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Equality Impact Assessment (EqIA)

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Job title: Housing Strategy Manager

Which Corporate Director or Assistant Director is responsible for this proposal: Darren Levy (Director of Housing)

Director (approver) email: Darren.Levy@newham.gov.uk

Title of proposal you are assessing: Noele Gordon House LLP

Type of activity being assessed: A new policy

Please describe the aims and outcomes of the proposal being assessed: The LLP concerns the allocation of new affordable rent homes for over 55s in Noele Gordon House, to which the Council is able to nominate persons to be secure tenants. Through this LLP, the Council will manage these nominations and prioritise lettings to existing Council tenants who are downsizing from a Council property. It will also afford priority to wheelchair users.

A key element of this LLP is that the new housing provision at Noele Gordon House is used to increase the availability of homes with two or more bedrooms for households on the housing register and in temporary accommodation.

The planned implementation date of the proposal (if known): 07/05/2024

What corporate priority does this fall under?: Homes for our residents

Which of the following does the proposal affect? : Residents

Is a specific geographical area, neighbourhood or ward affected by this proposal?: Yes

Which of the following does it affect?: East Ham Central

Will this proposal affect any of the protected characteristics groups listed below more than other groups?: Age, Disability, Health and well-being, Race and ethnicity

Are there gaps in information that make it difficult to form an opinion on how your proposal might affect people from protected characteristic groups?: Yes

Will the proposal impact how a service or council function is delivered, maintained or accessed?: Yes

Does the proposal involve a significant commitment or withdrawal of resources (over £500,000)?: No

Does this proposal affect a statutory service?: Yes

needFullEqIA: yes

Have you collected any evidence (including data or research findings) on affected groups?: Yes

Provide a summary of your findings from data collection and evidence, including a description of the sources of information used: The Local Lettings Policy for Noele Gordon House has equalities implications because it limits access to the new properties on the basis of a protected characteristic, age, and prioritises applications on the basis of other characteristics, namely disability status (protected) and whether or not they are an existing Council tenant (not protected).

These groups are prioritised in order to achieve the following objectives:

1. Provide a pioneering new housing offer for over 55s that provides an opportunity for independent living with the assurance of a telecare system and twice-weekly on-site support;
2. Maximise the number of lettings in Noele Gordon House to existing Council tenants who are downsizing from their current accommodation;
3. Enable households who require a wheelchair accessible property to secure a property that meets their needs; and
4. Help to increase the amount of high quality affordable accommodation available for households on the housing register.

Because the aim is to let the properties to existing tenants as a first priority, the intended outcome is that general needs properties would become available which could be let to households on the housing register. This widens the pool of potential beneficiaries.

The Census 2021 data has been the key source of evidence for this EqIA.

Have you carried out any consultation or engagement with affected groups?: No

Provide a summary of why you do not need to carry out any consultation activities: No formal consultation has been carried out because the decision to apply for a property in Noele Gordon House is entirely voluntary. Moreover, the decision to prioritise downsizers has already been agreed at an earlier stage (Cabinet Paper) and is a key part of the rationale for the scheme. Therefore it was considered that a consultation would not be appropriate.

Upload supporting documents (e.g. full consultation write-up):

What impact will this proposal have on people of different ages?: Positive

Please explain how you came to this conclusion: The scheme is only open to households aged 55 and over so the LLP may present a disadvantage for households aged less than 55. However what this scheme seeks to mitigate is negative impacts on this group when occupying general needs housing, for example stairs, plus has mental health benefits for this group who are disproportionately likely to experience loneliness. 1.4 million older people in the UK are often lonely and this can have negative health impacts as well as taking a toll emotionally (Age UK).

Although it may appear that the LLP disadvantages younger age groups, by encouraging downsizing, the aim is to free up general needs housing for households on the housing register who may be from younger age groups, so it has wider benefits for other age groups.

What impact will this proposal have on people with different disabilities?: Positive

Please explain how you came to this conclusion: People with disabilities, namely those requiring a wheelchair accessible property, are a key beneficiary of the Local Lettings Policy. People who need a wheelchair accessible property who are downsizing from a Council property have the highest priority, and wheelchair users on the housing register have the third-highest level of priority. Because the availability of wheelchair-accessible properties is limited, this presents an opportunity for this group to be housed in a property that suits their needs.

What impact will this proposal have on people of different ethnic groups and nationalities?: Neutral

Please explain how you came to this conclusion: Newham's older age groups are more likely to identify as White than other age group. Approximately 39% of over 65s in Newham are White, compared with 32-36% of 16-64 year olds, and less than 20% of under 16s. This means that the LLP may benefit White groups more than others. However the longer-term effect of the scheme will benefit a broader range of ethnicities as the general needs homes will be available for households on the housing register which is broadly representative.

What impact will this proposal have on people of different gender identities than the gender they were assigned at birth or people seeking to undergo or have undergone gender reassignment surgery?: No impact

Please explain how you came to this conclusion: Gender identity is not a factor which is taken into account as part of the allocation of properties via the LLP. There is no data on the share of potential applicants who have a gender other than that they were assigned at birth so it is impossible to know whether there could be other impacts for this group.

What impact will this proposal have on people who are married or in a civil partnership?: No impact

Please explain how you came to this conclusion: Whether a household is married, or whether a single tenant or a couple has no impact on their likelihood of being allocated a property through the LLP.

What impact will this proposal have on people who are pregnant or undertaking maternity or paternity leave?: No impact

Please explain how you came to this conclusion: Pregnancy and maternity leave do not affect the likelihood of being allocated a property as a tenant is not treated differently on the basis of pregnancy (for example in bedroom allocation) until the child is born. Moreover the properties are for over 55s so pregnancy and maternity is not expected to be a relevant factor for applicants to the scheme.

What impact will this proposal have on people of different religious faiths or beliefs: Neutral

Please explain how you came to this conclusion: There is a difference in the religious identities of older age groups in Newham compared with the Borough as a whole. The biggest differences are between Christians, who make up 48% of over 50s but only 35% of the wider Newham population, and Muslims, who make up only 25% of over 50s but 35% of the wider Newham population.

As a result of these discrepancies, it may be the case that a greater number of Christians benefit from the new scheme as they are more likely to meet the age criteria. However we don't have reliable data on the religious make-up of Council tenants specifically, so this may differ.

As in the case of ethnicity, it is important to note that the former properties of downsizers moving into Noele Gordon House will be let to households on the housing register, and this group tends to be more representative of the Borough as a whole.

What impact will this proposal have on people of different sexual orientations?: No impact

Please explain how you came to this conclusion: Sexual identity is not a factor which is taken into account as part of the allocation of properties via the LLP. There is no data on the sexual orientation of potential applicants so it is impossible to know whether there could be other impacts for this group.

What impact will this proposal have on different sexes?: Neutral

Please explain how you came to this conclusion: As women are slightly overrepresented in older age groups (Census 2021) the scheme may disproportionately benefit women. However as this is simply the characteristic of this age group it is considered that no mitigation is required. Moreover this impact is likely to be cancelled out by the fact that it will benefit households on the housing register who are likely to be younger and with a more even split between genders.

What impact will this proposal have on people who are socio-economically disadvantaged?: Positive

Please explain how you came to this conclusion: Existing Council tenants downsizing into Noele Gordon House will be offered a rent that is no higher than their current rent. They will also benefit from incentive payments. Households moving into Noele Gordon House from the housing register will be offered London Affordable Rent which should be lower than rents in the private sector, benefitting those households. It is therefore expected that socio-economically disadvantaged people who are allocated the properties will see a net financial benefit. There is no impact on households who are socio-economically disadvantaged who are not allocated a property.

What impact will this proposal have on people with different levels of health and well-being?: Positive

Please explain how you came to this conclusion: As noted above, the scheme is likely to have positive health and wellbeing outcomes for over-55s moving into the scheme due to the telecare system, the on-site staff two days a week, and the reduced risk of loneliness.

Overall impact: Low

Please provide a summary of why you have rated your overall impact high/medium/low/no impact, and of mitigating action to be taken to reduce the disproportionate and undue impacts on the groups identified in your assessment above: The impacts on all affected groups with protected characteristics are either positive or neutral, so no mitigating impacts are required.

Frequency of review: 1 year

Next review date: 02/05/2025

Does this EqIA contain information which would prevent publication on the Council's website?: No