

## **APPENDIX C**

### **Intermediate rent housing list**

### **Equalities Impact Assessment**

**August 2020**

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## Guidance notes

### Things to remember:

Under the Public Sector Equality Duty (PSED) public authorities are required to have due regard to the aims of the general equality duty when making decisions and when setting policies. Understanding the affect of the council's policies and practices on people with different protected characteristics is an important part of complying with the general equality duty. Under the PSED the council must ensure that:

- Decision-makers are aware of the general equality duty's requirements.
- The general equality duty is complied with before and at the time a particular policy is under consideration and when a decision is taken.
- We consciously consider the need to do the things set out in the aims of the general equality duty as an integral part of the decision-making process.
- We have sufficient information to understand the effects of the policy, or the way a function is carried out, on the aims set out in the general equality duty.
- We review policies or decisions, for example, if the make-up of service users changes, as the general equality duty is a continuing duty.
- We take responsibility for complying with the general equality duty in relation to all their relevant functions. Responsibility cannot be delegated to external organisations that are carrying out public functions on their behalf.
- We consciously consider the need to do the things set out in the aims of the general equality duty not only when a policy is developed and decided upon, but when it is being implemented.

Best practice guidance from the Equality and Human Rights Commission recommends that public bodies:

- Consider all the [protected characteristics](#) and all aims of the general equality duty (apart from in relation to marriage and civil partnership, where only the discrimination aim applies).
- Use equality analysis to inform policy as it develops to avoid unnecessary additional activity.
- Focus on understanding the effects of a policy on equality and any actions needed as a result, not the production of a document.
- Consider how the time and effort involved should relate to the importance of the policy to equality.
- Think about steps to advance equality and good relations as well as eliminate discrimination.
- Use good evidence. Where it isn't available, take steps to gather it (where practical and proportionate).
- Use insights from engagement with employees, service users and others who can help provide evidence for equality analysis.

Equality analysis should be referenced in community impact statements in Council reports. Community impact statements are a corporate requirement in all reports to the following meetings: the cabinet, individual decision makers, scrutiny, regulatory

committees and community councils. Community impact statements enable decision makers to identify more easily how a decision might affect different communities in Southwark and to consider any implications for equality and diversity.

The public will be able to view and scrutinise any equality analysis undertaken. Equality analysis should therefore be written in a clear and transparent way using plain English. Equality analysis may be published under the council's publishing of equality information, or be present within divisional/departmental/service business plans. These will be placed on the website for public view under the council's Publications Scheme.

Equality analysis should be reviewed after a sensible period of time to see if business needs have changed and/or if the effects that were expected have occurred. If not then you will need to consider amending your policy accordingly. This does not mean repeating the equality analysis, but using the experience gained through implementation to check the findings and to make any necessary adjustments.

Engagement with the community is recommended as part of the development of equality analysis. The council's Community Engagement Division and critical friend, the Forum for Equality and Human Rights in Southwark can assist with this (see section below on community engagement and [www.southwarkadvice.org.uk](http://www.southwarkadvice.org.uk)).

Whilst the equality analysis is being considered, Southwark Council recommends considering health and wellbeing implications, as health and health inequalities are strongly influenced by the environment we live and work in. As a major provider of services to Southwark residents, the council has a legal duty to reduce health inequalities and this is reflected in its values and aims. For this reason, the council recommends considering health and wellbeing impacts in all equality analyses, not forgetting to include identified potential mitigating actions.

## Section 1: Equality analysis details

|                                                                                       |                                |
|---------------------------------------------------------------------------------------|--------------------------------|
| <b>Proposed policy/decision/business plan to which this equality analysis relates</b> | Intermediate rent housing list |
|---------------------------------------------------------------------------------------|--------------------------------|

|                                   |                                              |                 |                               |
|-----------------------------------|----------------------------------------------|-----------------|-------------------------------|
| <b>Equality analysis author</b>   | Robert Weallans, Housing Strategy Manager    |                 |                               |
| <b>Strategic Director:</b>        | Paul Langford, Director of Resident Services |                 |                               |
| <b>Department</b>                 | Housing and Modernisation                    | <b>Division</b> | Strategy and Business Support |
| <b>Period analysis undertaken</b> | August 2020                                  |                 |                               |
| <b>Date of review (if</b>         | A year following implementation of the list  |                 |                               |

|                    |             |                 |                                       |             |     |
|--------------------|-------------|-----------------|---------------------------------------|-------------|-----|
| <b>applicable)</b> |             |                 |                                       |             |     |
| <b>Sign-off</b>    | Perry Singh | <b>Position</b> | Strategy and Business Support Manager | <b>Date</b> | TBC |

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## Section 2: Brief description of policy/decision/business plan

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### 1.1 Brief description of policy/decision/business plan

In the New Southwark Plan (NSP) the council has proposed a new policy P4 which will provide an option for developers to meet the affordable housing requirement on a purpose built private rented development of over 100 units through a new product called private affordable rent. The NSP proposed that these would be split by properties at social rent and London Living rent levels. These would be private rent units but at significantly discounted market rents. It states the the “discounted market rent homes must be allocated to households on Southwark’s Intermediate Rent Housing List.”

The Mayor of London is also encouraging a supply of London Living Rent homes and providing grant to assist in the delivery of these. There is an expectation that households would use the lower rent to help save for a deposit to buy, either the current property or an alternative property. The council is proposing that these would initially be prioritised to those on Southwark’s intermediate housing rent list.

In response the council has developed proposals for this intermediate rent housing list and consulted on these between July and November 2018.

Following changes to the New Southwark Plan proposal in January 2019 the council is proposing the following eligibility criteria to join the list

#### Eligibility Criteria

- Residence in the borough or a key worker working in the borough
- A household with a household income of less than £60,000
- A household with a minimum earned income of £26,000
- To be not an existing homeowner unless the current property is unsuitable (overcrowded/disabled access/unaffordable) and the household is unable to buy in the private market.
- That nobody in the household has been guilty of unacceptable behaviour serious enough to make the applicant unsuitable to be an intermediate rent tenant
- That the main applicant is aged 18 or over
- The household can be formed of 2 or more unrelated households (sharers)

#### Prioritisation

The council is proposing the following groups should receive a priority star

- Proposed priority groups
- Keyworkers
- Armed Forces personnel (serving and former)
- Victims of domestic violence/abuse
- Carers

- Families undertaking fostering or adoption where a larger home is needed

### Section 3: Overview of service users and key stakeholders consulted

| 2. Service users and stakeholders                                               |                                                                                                                                                                        |
|---------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Key users of the department or service</b>                                   | Members of the public; Key worker organisations (NHS, Fire Service, Police, Council etc) Developers; Local Authorities; Housing Associations; Greater London Authority |
| <b>Key stakeholders were/are involved in this policy/decision/business plan</b> | Members of the public; Key worker organisations (NHS, Fire Service, Police, Council etc) Developers; Local Authorities; Housing Associations; Greater London Authority |

### Section 4: Pre-implementation equality analysis

This section considers the potential impacts (positive and negative) on groups with 'protected characteristics', the equality information on which this analysis is based and any mitigating actions to be taken.

The first column on the left is for societal and economic issues (discrimination, higher poverty levels) and the second column on the right for health issues, physical and mental. As the two aspects are heavily interrelated it may not be practical to fill out both columns on all protected characteristics. The aim is, however, to ensure that health is given special consideration, as it is the council's declared intention to reduce health inequalities in the borough. The Public Health Team can assist with research and data.

| <b>Age</b> - Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).                                                                                                                                                                            |                                                                                                                                                                                                                                                                                              |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b>                                                                                                                                                                                                                                            | <b>Potential health impacts (positive and negative)</b>                                                                                                                                                                                                                                      |
| The only age restriction that is being proposed is that the main applicant is 18 or over. The proposal should provide a more affordable option than renting in the private sector for those on lower incomes. Given the high average market prices in Southwark, these households could be from across the age spectrum in Southwark. | The proposal in P4 of the NSP offers greater security and stability for tenants for a minimum of 3 years which would have positive health impacts (both mentally in terms of reduced stress and physically in terms of establishing roots into health and wellbeing services and activities. |
| Potentially prioritising key workers could provide a barrier to those of an age who are likely to be retired. However the council believes prioritising key workers is a legitimate policy aim to ensure the high quality functioning of public services which has benefits across all age groups.                                    | The proposal to prioritise keyworkers and in particular nurses, doctors and other clinical staff should help tackle recruitment issues and improve these health services to benefit all                                                                                                      |

|                                                                                                                                                                                               |                                                     |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|
|                                                                                                                                                                                               | age groups.                                         |
| <b>Equality information on which above analysis is based</b>                                                                                                                                  | <b>Health data on which above analysis is based</b> |
| None at this stage – equalities data will be collected at various points of the implementation of the list, registry, lettings etc to help determine if there are any unforeseen age impacts. |                                                     |
| <b>Mitigating actions to be taken</b>                                                                                                                                                         |                                                     |
| No mitigating actions are required.                                                                                                                                                           |                                                     |



| <b>Disability</b> - A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <b>Potential health impacts (positive and negative)</b>                                                                                                                                                                                                                                                                  |
| <p>The proposed eligibility criteria allows an existing home owner to be eligible if their home is unsuitable due to issues around accessibility and where the household is unable to buy in the private market. This may have a positive impact if the properties built are more accessible (units which include lifts etc).</p> <p>The proposal to prioritise carers may also have a positive impact. This would help provide an option for those who are currently struggling in the private rented sector. Some carer households might struggle to meet the minimum income thresholds but this has been proposed based on what is realistic to afford a London Living Rent unit in the cheapest areas of the borough. Those on lower incomes would be better suited to social rented housing.</p> <p>There is a potential negative impact of prioritising groups such as key workers if people with disabilities are likely to be under represented in these categories. However the council believes prioritising key workers is a legitimate policy aim to ensure the high quality functioning of public services which has benefits across society.</p> <p>We will need to consider how we make sure information about the intermediate rent scheme is provided in a variety of formats and capable of being read by screen readers to prevent potential barriers.</p> | <p>There are potential mental health benefits of providing more long term tenancies, these may help prevent some mental health issues developing. There will also be health benefits if there is better provision of public services, particularly in the health sector, through stronger recruitment and retention.</p> |
| <b>Equality information on which above analysis is based</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>Health data on which above analysis is based</b>                                                                                                                                                                                                                                                                      |
| <p>We do not have data in relation to disabilities of any of the preference groups listed. We will include equalities profiling of any registrations, lettings etc to help us monitor this going forward.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                          |
| <b>Mitigating actions to be taken</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                          |
| <p>To ensure information about the intermediate rent housing list is provided in different formats to ensure it as accessible as possible.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                          |

| <b>Gender reassignment</b> - The process of transitioning from one gender to another.                                                                                                                                        |                                                                                                                                |
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| <b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b>                                                                                                                                   | <b>Potential health impacts (positive and negative)</b>                                                                        |
| The council is not aware of any evidence which suggests there would be any particular impact in relation to gender assignment.                                                                                               | The council is not aware of any evidence which suggests there would be any particular impact in relation to gender assignment. |
| <b>Equality information on which above analysis is based.</b>                                                                                                                                                                | <b>Health data on which above analysis is based</b>                                                                            |
| None at this stage – equalities data will be collected at various points of the implementation of the list, registry, lettings etc to help determine if there are any unforeseen impacts in relation to gender reassignment. |                                                                                                                                |
| <b>Mitigating actions to be taken</b>                                                                                                                                                                                        |                                                                                                                                |
| No mitigating actions are required.                                                                                                                                                                                          |                                                                                                                                |

| <b>Marriage and civil partnership</b> – In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couple. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favorably than married couples and must be treated the same as married couples on a wide range of legal matters. <b>(Only to be considered in respect to the need to eliminate discrimination.)</b>                                                                                                                                                                                                                                                   |                                                         |
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| <b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>Potential health impacts (positive and negative)</b> |
| <p>The council is not aware of any evidence which suggests there would be any particular impact in relation to marriage and civil partnership.</p> <p>We are not proposing any eligibility criteria or prioritisation which relates to marriage or civil partnership.</p> <p>The make up of the household could have a bearing on the likely income of the household. For example a single parent may be more likely to struggle to meet the proposed £26k household income threshold, and a couple may be more likely to have a combined income of over £60k. However the Council believes the needs of those on incomes of below £26K are better met through social/affordable rent and incomes of over £60k could be met through shared ownership or the private housing market</p> | None                                                    |

| Equality information on which above analysis is based                                                                                                                                                                                    | Health data on which above analysis is based |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|
| None at this stage – equalities data will be collected at various points of the implementation of the list, registry, lettings etc to help determine if there are any unforeseen impacts in relation to marriage and civil partnerships. |                                              |
| Mitigating actions to be taken                                                                                                                                                                                                           |                                              |
| No mitigating actions are required.                                                                                                                                                                                                      |                                              |

**Pregnancy and maternity** - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

| Potential impacts (positive and negative) of proposed policy/decision/business plan                                                                                                                                  | Potential health impacts (positive and negative)                                                                                                                                                                                                                                                                                                                                       |
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| The council is not aware of any evidence which suggests there would be any particular impact in relation to pregnancy and maternity. If somebody was on maternity leave, they would still be counted as a keyworker. | <p>The council is not aware of any evidence which suggests there would be any particular health impact in relation to pregnancy and maternity.</p> <p>Potentially the prioritisation of key workers could help in addressing any recruitment issues in the health sector such as with nurses, midwives etc which could have a positive health impact in relationship to pregnancy.</p> |

| Equality information on which above analysis is based                                                                                                                                                                            | Health data on which above analysis is based |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|
| None at this stage – equalities data will be collected at various points of the implementation of the list, registry, lettings etc to help determine if there are any unforeseen impacts in relation to pregnancy and maternity. |                                              |
| Mitigating actions to be taken                                                                                                                                                                                                   |                                              |
| No mitigating actions are required.                                                                                                                                                                                              |                                              |

**Race** - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others

| Potential impacts (positive and negative) of proposed policy/decision/business plan                                                                                                                                                                             | Potential health impacts (positive and negative) |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| The council is not aware of any evidence which suggests there would be any particular impact in relation to race. There could potentially be impacts if any group was overrepresented or under represented in the priority categories, but the council does not |                                                  |

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| have any evidence to suggest this is the case.                                                                                                                                                                |                                                     |
| <b>Equality information on which above analysis is based</b>                                                                                                                                                  | <b>Health data on which above analysis is based</b> |
| None at this stage – equalities data will be collected at various points of the implementation of the list, registry, lettings etc to help determine if there are any unforeseen impacts in relation to race. |                                                     |
| <b>Mitigating actions to be taken</b>                                                                                                                                                                         |                                                     |
| No mitigating actions are required.                                                                                                                                                                           |                                                     |

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| <b>Religion and belief</b> - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.                                  |                                                         |
| <b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b>                                                                                                                                                                                                                                   | <b>Potential health impacts (positive and negative)</b> |
| The council is not aware of any evidence which suggests there would be any particular impact in relation to religion and belief. There could potentially be impacts if any group was overrepresented or underrepresented in the priority categories, but the council does not have any evidence to suggest this is the case. | None                                                    |
| <b>Equality information on which above analysis is based</b>                                                                                                                                                                                                                                                                 | <b>Health data on which above analysis is based</b>     |
| None at this stage – equalities data will be collected at various points of the implementation of the list, registry, lettings etc to help determine if there are any unforeseen impacts in relation to religion and belief.                                                                                                 |                                                         |
| <b>Mitigating actions to be taken</b>                                                                                                                                                                                                                                                                                        |                                                         |
| No mitigating actions are required.                                                                                                                                                                                                                                                                                          |                                                         |

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| <b>Sex</b> - A man or a woman.                                                                                                                                                                                                                                                                                                 |                                                         |
| <b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b>                                                                                                                                                                                                                                     | <b>Potential health impacts (positive and negative)</b> |
| There could be a potential impact where any gender is likely to be over or under represented in the priority groups. There may be some key worker groups where genders are likely to be over or under represented, however we don't have evidence that this would apply across the full range of keyworker job types proposed. | None                                                    |
| <b>Equality information on which above analysis is based</b>                                                                                                                                                                                                                                                                   | <b>Health data on which above analysis is based</b>     |
| None at this stage – equalities data will be collected at various points of the implementation of the list, registry, lettings etc to help determine if there are any unforeseen impacts in relation to gender.                                                                                                                |                                                         |
| <b>Mitigating actions to be taken</b>                                                                                                                                                                                                                                                                                          |                                                         |
| No mitigating actions are required.                                                                                                                                                                                                                                                                                            |                                                         |

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| <b>Sexual orientation</b> - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes                                                                                                |                                                         |
| <b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b>                                                                                                                                  | <b>Potential health impacts (positive and negative)</b> |
| The council is not aware of any evidence which suggests there would be any particular impact in relation to sexual orientation. This would have no role in assessing eligibility or priority.                               | None                                                    |
| <b>Equality information on which above analysis is based</b>                                                                                                                                                                | <b>Health data on which above analysis is based</b>     |
| None at this stage – equalities data will be collected at various points of the implementation of the list, registry, lettings etc to help determine if there are any unforeseen impacts in relation to sexual orientation. |                                                         |
| <b>Mitigating actions to be taken</b>                                                                                                                                                                                       |                                                         |
| No mitigating actions are required.                                                                                                                                                                                         |                                                         |

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| <b>Socio-economic disadvantage</b> – although the Equality Act 2010 does not include socio-economic status as one of the protected characteristics, Southwark Council recognises that this continues to be a major cause of inequality in the borough. Socio economic status is the measure of an area's, an individual's or families economic and social position in relation to others, based on income, education, health, living conditions and occupation.                                                                                                                                                                                        |                                                                                                                                                                                                                                                        |
| <b>Potential impacts (positive and negative) of proposed policy/decision/business plan</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>Potential health impacts (positive and negative)</b>                                                                                                                                                                                                |
| <p>The proposal for the intermediate rent is to help try and address socio-economic disadvantage. The proposal is about trying to provide a housing option for those who are unlikely to get social rented housing but struggling to afford rents in the private rented sector, and unable to afford shared ownership.</p> <p>The proposed £26k minimum income threshold is a barrier to those with lower incomes but this was based on what would be required to afford a London Living Rent equivalent rent in the cheaper areas of the borough. The needs of those on lower incomes would be better met through social rent or affordable rent.</p> | The provision of a lower London Living Rent to those on lower incomes of between £26k and £60k should result in these households having more disposable income to help pay for healthier food and to help pay for any health and wellbeing activities. |
| <b>Equality information on which above analysis is based</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>Health data on which above analysis is based</b>                                                                                                                                                                                                    |
| CACI household income data by 5k income bands.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                        |
| <b>Mitigating actions to be taken</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                        |

No mitigating actions are required.

### **Human Rights**

There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour, Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol

#### **Potential impacts (positive and negative) of proposed policy/decision/business plan**

The council does not believe there are any impacts in relation to human rights.

#### **Mitigating actions to be taken**

No mitigating actions are required.