

Equality Impact and Needs Analysis – Housing Allocations Annual Lettings Plan 2024/25

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.
- They 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.
- They 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.
- They review policies or decisions, for example, if the make-up of service users changes, as the general equality duty is a continuing duty.
- They 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.
- They 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 the 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 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 with divisional/departmental/service business plans. These will be placed on the website for public view under the council's Publications Scheme. All Cabinet reports will also publish related

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).

Whilst the equality analysis is being considered, Southwark Council recommends considering implications arising from socio-economic disadvantage, as socio-economic inequalities have a strong influence on the environment we live and work in. As a major provider of services to Southwark residents, the council has a policy commitment to reduce socio-economic inequalities and this is reflected in its values and aims. For this reason, the council recommends considering impacts/needs arising from socio-economic disadvantage in all equality analyses, not forgetting to include identified potential mitigating actions. **The Council has adopted the Socio-Economic Duty as part of its overall equality, diversity and inclusion policy commitments in the Southwark Equality Framework.** This requires us to ensure we do not make any conditions worse for those experiencing socio-economic disadvantage through our policies and practices.

Section 1: Equality impact and needs analysis details

Proposed policy/decision/business plan to which this equality analysis relates		Annual Lettings Plan			
Equality analysis author		Ricky Bellot Programme Manager			
Strategic Director:		David Quirke-Thornton			
Department		Housing	Division	Resident Services	
Period analysis undertaken		Jan 2024			
Date of review (if applicable)		April 2025			
Sign-off	Cheryl Russell	Position	Director of Resident Services	Date	28 February 2024

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

1.1 Brief description of policy/decision/business plan

The council is seeking to introduce an annual lettings plan (ALP) for the financial year 2024/25. This plan will set out how the council will allocate properties that become available for let within the financial year.

This will include properties that become available from council stock and those of other providers the council has nomination rights.

The annual lettings plan takes into consideration the changing demand and the impact this has had on allocations over the years alongside pressures placed on the council to provide homes.

Demand for homelessness assistance has remained high and this has led to an increasing number of households in temporary accommodation. This combined with a lack of available and suitable accommodation in the private sector has meant that the number of households Southwark has placed in temporary accommodation has tripled since 2010.

The proposed annual lettings plan for 2024/25 allocates more properties to homeless households than any other priority group to discharge duty and in doing so reducing the number of households in temporary accommodation.

Policy changes

Provision is made in the Council's existing allocation scheme (2013) for the publication of an Annual Lettings Plan (Paragraph 3.13) that "will set annual targets for property types across priority bands".

No Annual lettings plans have been introduced since the current allocation scheme went live in 2013.

The existing policy permits the ability to make direct offers to homeless households who the council owe a full duty to provide permanent accommodation. The development of the annual lettings plan will require the use of this ability in order to meet the set out targets within the ALP.

The proposed annual lettings plan does not seek to make any policy changes, however the council is currently in the process of a review of the scheme and is aiming to agree a new policy in the autumn of 2024.

Legal background

Section 159(1) of the housing Act 1996 requires a local authority to comply with Part 6 of the Act, (sections 159 to 174) in allocation housing accommodation. Section 159 (7) provides that "subject to provisions of this Part, a local housing authority may allocate housing accommodation in such a manner as they consider appropriate." Section 169 provides that, when exercising their functions, under part 6 of the Act, as amended my 2002 Homelessness Act, local housing authorities "shall have regard to such guidance as may be given by the Secretary of state" when carrying out their role in allocating housing.

In compliance with section 166A of the 1996 Act, Southwark has an Allocations scheme 2013 for determining priorities which sets out the procedure to be followed when allocating housing accommodation.

The scheme must also give 'reasonable preference' to certain groups of people. This includes

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(amongst other categories) people who are homeless.

Subject to certain limited exceptions, a housing authority must allocate its housing in accordance with its allocation scheme.

There are also several other acts that also must be considered as part of the development of the Housing allocations scheme and the development of an annual lettings plan. This are listed below:

- Housing Act 1985
- Housing Act 1996
- Housing & Regeneration Act 2008
- Equality Act 2010
- Immigration Act 2014
- Data Protection Act 2018
- Tenancy Standard of the Regulator of Social Housing

Details of the annual lettings plan:

	Rehousing category	Bedsit	1 bed	2 bed	3 bed	4 bed +	Total	%
Band 1	Accessible housing	0	26	26	17	6	75	4.0%
	Landlord Transfers	3	19	20	10	5	57	3.0%
	Regeneration	6	38	40	20	9	113	6.0%
	Management discretion	0	3	3	2	1	9	0.5%
	Stat OC	0	19	23	10	5	57	3.0%
	SS nominations Families	0	1	1	1	0	4	0.2%
	Under Occupiers	0	29	26	14	6	75	4.0%
					Total Band 1	390		
Band 2	Ex armed forces	0	0	0	0	0	0	0.0%
	Good Tenant	0	3	3	1	1	8	0.4%
	Homeless households in PRS	1	6	7	3	2	19	1.0%
	Independent living	0	1	1	1	0	4	0.2%
	Insanitary conditions	0	0	0	0	0	0	0.0%
	Severe medical	8	56	58	30	13	166	8.8%
	MAPPA recommendations	0	1	1	0	0	2	0.1%
	Move on from supported accommodation	3	18	18	10	4	53	2.8%
	Care leavers	75	0	0	0	0	75	4.0%
					Total Band 2	327		
Band 3	Accepted Homeless	0	263	303	157	69	792	42.0%
	Moderate medical	6	38	40	20	9	113	6.0%
	Moderate OC	9	64	66	34	15	189	10.0%
					Total Band 3	1094		
Band 4	Sheltered cases	0	75	0	0	0	75	4.0%
					Total Band 4	75		
Total							1886	100.0%

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Notably the council will be making 42% of social allocations to homeless households in TA which will be through a combination of restricted bidding and direct offers. This comes at the same time the council will see the benefit of the delivery of a significant number of new build homes coming available in 2024. Other priority groups (i.e. overcrowded, welfare needs, etc.) will be able to continue to access social housing through the bidding process.

After a year it is anticipated the percentage of lets to homeless will revert back to the averages of previous years and the council will operate other initiatives to provide temporary/permanent accommodation to resident in the private sector.

Section 3: Overview of service users and key stakeholders consulted

2. Service users and stakeholders	
Key users of the department or service	The development of the annual lettings plan will have a direct impact on the households registered on the councils housing register. At the time of developing this analysis, the council recorded 17,715 households listed on the housing register. It is also noted that the allocation of homes will also have an impact on the wider community when developing mixed and balanced communities.
Key stakeholders were/are involved in this policy/decision/business plan	Internal councils staff

Section 4: Pre-implementation equality impact and needs 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, including improvement actions to promote equality and tackle inequalities. An equality analysis also presents as an opportunity to improve services to meet diverse needs, promote equality, tackle inequalities and promote good community relations. It is not just about addressing negative impacts.

The columns include societal issues (discrimination, exclusion, needs etc.) and socio-economic issues (levels of poverty, employment, income). 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 socio-economic issues are given special consideration, as it is the council’s intention to reduce socio-economic inequalities in the borough. Key is also the link between protected characteristics and socio-economic disadvantage, including experiences of multiple disadvantage.

Socio-economic disadvantage may arise from a range of factors, including:

- poverty
- health
- education
- limited social mobility
- housing
- a lack of expectations
- discrimination
- multiple disadvantage

The public sector equality duty (PSED) requires us to find out about and give due consideration to the needs of different protected characteristics in relation to the three parts of the duty:

1. Eliminating discrimination, harassment and victimisation
2. Advancing equality of opportunity, including finding out about and meeting diverse needs of our local communities, addressing disadvantage and barriers to equal access; enabling all voices to be heard in our engagement and consultation undertaken; increasing the participation of under represented groups
3. Fostering good community relations; promoting good relations; to be a borough where all feel welcome, included, valued, safe and respected.

The PSED is now also further reinforced in the two additional Fairer Future For All values: that we will

- Always work to make Southwark more equal and just
- Stand against all forms of discrimination and racism

Age - 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).

Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.

Potential Socio-Economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)

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<p>Data from the housing register shows the majority of main applicant residents on the housing register falls within the age bracket of 36-55 (49%). This is followed by residents in the age range of 26-35 (32%).</p> <p>Younger people leaving the care are already accommodated in the policy to receive priority band 2 for a move. Additionally they are able to access bedsit accommodation which will meet their housing need. The ALP does not see to amend this priority or allocation. It is anticipated that this priority category will continue to receive the same amount of lets through the ALP.</p> <p>The reduction of households in temporary accommodation through the introduction of the ALP in 2024/25 will have a positive impact to children. This is following research conducted which has shown the negative impact to children residing in temporary accommodation due to the insecure nature of this accommodation and potential disruption to education.</p> <p>Older persons over the age of 56 can access older person dwellings and sheltered accommodation. There is generally a lower take up of the available properties, therefore the ALP will not have an impact on this as these properties will still be restricted to households who fall under this category.</p> <p>Older persons may be less likely to engage with the bidding process and this maybe a reason as to why there is limited take up on these restricted properties.</p>	<p>57% of parents report that their children's health has been harmed by being in temporary accommodation. 47% reported that their children have had to move school as well as 52% reporting that their children have missed days of school due to the disruption of temporary accommodation (Shelter, 2023)</p> <p>1 in 4 parents of children who are in temporary accommodation say their children are often unhappy or depresses as a result of their living situation. (Shelter, 2022).</p> <p>Living in temporary accommodation affects children's attendance to school as well as 45% arriving late, tired or hungry. (Shelter, 2022)</p> <p>Male life expectancy is 79.6 years compared to 79.4 years in England. Female life expectancy is 84.1 years compared to 83.1 years in England.</p>
<p>Equality information on which above analysis is based</p>	<p>Socio-Economic data on which above analysis is based</p>
<p>JSNA, Annual Report 2023, Southwark Public Health</p> <p>Age profile of statutorily homeless households (Derived from HCLIC data).</p> <p>ONS Census 2021 data</p> <p>A review of Ofcom's research on digital exclusion among adults in the UK, 2022</p> <p>Housing register Data Review, Feb 2024</p> <p>Shelter's Growing Up Homeless Research, 2022</p> <p>Shelter, Not a Home, Temporary Accommodation, 2022</p>	<p>Shelter 2022 - https://blog.shelter.org.uk/2022/12/not-a-home-temporary-accommodation/</p> <p>Shelter 2023 – Still Living in Limbo, Why the Use of Temporary Accommodation Must End.</p>
<p>Mitigating and/or improvement actions to be taken</p>	

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<p>Supporting information will be provided to residents in order to explain the bidding process and their eligibility. The council is currently exploring an IT upgrade system and a revision to the full housing allocations policy.</p>	
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<p>Disability - 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.</p> <p>Please note that under the PSED due regard includes:</p> <p>Giving due consideration in all relevant areas to "the steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities." This also includes the need to understand and focus on different needs/impacts arising from different disabilities.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</p>	<p>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</p>
<p>The allocation of accessible housing is restricted to a specific assessment which will confirm if a household requires such a specialist property. As at the 1 Feb 2024, the housing register data confirmed there is 1.6% (289) of households requiring an adapted accessible property. Those that are in temporary accommodation is a further smaller amount, where only 18 households are listed.</p> <p>The ALP will not alter access to such properties for households requiring such accommodation. The households who are in TA.</p> <p>Housing register data shows that that over 60% of the households registered on the housing register has left the question blank or preferred not to state. Therefore it is likely that this area does not reflect the full status of disabilities within the borough who are listed on the housing register.</p> <p>Statistics in the Census 2021 shows that Southwark has 17.6% of people reporting da disability under the equality Act. This has increased from 14.6% of the population in 2011.</p> <p>The presentations of homeless households with mental health issues has increased within recent years. Accommodating households in temporary accommodation for long periods could have a detrimental impact on mental and physical health. The introduction of the ALP which will include greater lets to homeless households will help households with</p>	<p>Residents with significant health needs can experience the greatest socio-economic disadvantage. Further development of mental health illnesses from living in deprived areas can occur.</p>

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mental health issues to return to the borough into secure accommodation.	
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
Housing register data Feb 2024	JSNA report 2023 Census 2021
Mitigating and/or improvement actions to be taken	
<p>Accessible housing will be allocated via the choice based lettings bidding system as already indicated within the main allocations scheme.</p> <p>The service will assess the housing need of households based on the need before any are taken out.</p> <p>The lack of data within this area is from the collection of data historically. Our IT systems and application forms did not collect the relevant information. This has since been updated so all new applications include this up to date information.</p> <p>The council will seek to improve data within this area to enable greater assessment relating to disabilities data.</p>	

<p>Gender reassignment: - The process of transitioning from one gender to another.</p> <p>Gender Identity: Gender identity is the personal sense of one's own gender. Gender identity can correlate with a person's assigned sex or can differ from it.</p>	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)
<p>The Housing register has very little data relating to the gender identity. The data taken from the snapshot of the housing register shows that less than 1% indicates the main applicant identifies as a different identity of that at birth.</p> <p>The 2021 Census asked residents the optional question relating to gender identity.</p> <p>Southwark is ranked the 5th highest local authority in England for trans or non-binary identity. This also recorded over 3,200 residents reporting a gender identity different than that at birth. Therefore the numbers on the housing register is likely to be under estimates.</p>	

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<p>The council has not identified any negative impacts to this group of residents as a result of the introduction of an ALP.</p>	
<p>Equality information on which above analysis is based.</p>	<p>Socio-economic data on which above analysis is based</p>
<p>Housing Register data Feb 2024</p> <p>JSNA report 2023</p> <p>Census 2021</p>	
<p>Mitigating and/or improvement actions to be taken</p>	
<p>The lack of data within this area is from the collection of data historically. Our IT systems and application forms did not collect the relevant information. This has since been updated so all new applications include this up to date information.</p> <p>The council will seek to improve data within this area to enable greater assessment relating to equalities data.</p> <p>The council is committed to ensuring residents from the LGBTQ + community are able to access services and therefore the council will continue to promote equality and engage with the third sector in order to address any inequality issues.</p>	

<p>Marriage and civil partnership – 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 couples. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples and must be treated the same as married couples on a wide range of legal matters. (Only to be considered in respect to the need to eliminate discrimination.)</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan</p>	<p>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</p>
<p>Our data shows that there are very little residents whom approach our service whom are married or have a civil partnership. Our current snapshot of data shows there are only 11% of households married or in a civil partnership compared to 47% listing they are single.</p> <p>A joint income household will likely be able to have more disposable income. Therefore more potential to access housing in the private market. Lone parents are disproportionately affected by homelessness compared to their share of the population so are more likely to be affected by the policies.</p>	

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<p>The council has not identified any negative impacts relating to residents who are married or in a civil partnership.</p>	
<p>Equality information on which above analysis is based</p>	<p>Socio-economic data on which above analysis is based</p>
<p>Housing register data February 2014</p>	
<p>Mitigating or improvement actions to be taken</p>	
<p>The lack of data within this area is from the collection of data historically. Our IT systems and application forms did not collect the relevant information. This has since been updated so all new applications include this up to date information.</p> <p>The council will seek to improve data within this area to enable greater assessment relating to equalities data.</p>	

<p>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.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</p>	<p>Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)</p>
<p>Pregnant women are more likely to approach as homeless and be placed on the housing register. Which is reflected within the data.</p> <p>The data on the wider housing register needs may not be fully recorded. This is due to the requirement for residents to provide updates on their circumstances to indicate they are pregnant. In many instances, residents will update their application at the point where the child has been born.</p> <p>The introduction of the ALP is not anticipated to have a negative impact on this group of individual.</p> <p>It is however likely that residents from this group will be</p>	<p>The majority of households living in TA are families with children, and over 50% of these are lone mother led. (Shelter 2023)</p> <p>99% of midwives reported seeing mothers who were homeless, 66% felt the numbers were higher than ever before (Centre Point, 2020)</p> <p>Access to appropriate healthcare can be a challenge when living in TA with 4 in 10 reporting TA made it harder to access services. (Groundswell)</p>

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<p>positively impacted as the increased number of households who are placed in TA due to homelessness issues will be able to be moved into permanent accommodation.</p>	
<p>Equality information on which above analysis is based</p>	<p>Socio-economic data on which above analysis is based</p>
<p>Housing Register data Feb 2024</p>	
<p>Mitigating and/or improvement actions to be taken</p>	
<p>Greater tracking in this area is required as well as updating residents of the requirement to update any change of circumstances relating to pregnancy.</p>	

<p>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</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</p>	<p>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</p>
<p>Data from the 2021 Census shows that 51% of people living in Southwark have a White Ethnic background compared to 81% nationally. The largest ethnic group other than white is 'Black, Black British, Caribbean or African' with 25%. Compared to other London Borough to only 14% and then 4% nationally. The data also provided data on the households from Hispanic or Latin America recording 9,200 people. The diversity in Southwark is much greater among children and young people in the borough.</p> <p>Housing register data shows that over 43% of applicants registered on the housing register are for Black Caribbean or African background.</p> <p>Additionally when we examine the ethnicity of households placed in TA, this shows that there's equally a greater over representation of households from black and Hispanic backgrounds residing in temporary accommodation compared to the borough averages.</p> <p>The ALP will impact households from ethnic minority backgrounds positively as it will increase the number of</p>	<p>Whilst a placement in TA will be subject to suitability assessments to enable residents the ability to move, there will still be an impact to households.</p> <p>The over representation of children from ethnic backgrounds residing in TA will have the education impacted due to the instability of the accommodation. In many instances the travel to the TA can impact the ability to attend school or be productive when in school.</p> <p>Maintaining employment is also more of a challenge when in instable TA.</p> <p>Accessing healthcare will still be accessible in TA however the changeover may cause disruption to care.</p> <p>The increased number of lets to homeless households will enable to residents to be rehoused permanently</p>

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lets for households in these groups. Unfortunately there is also 10% of residents on the housing register who did not provide ethnicity data.	and reduce any further impact to households based on the instability of accommodation.
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
Housing register data February 2024	
Mitigating and/or improvement actions to be taken	
The lack of data within this area is from the collection of data historically. Our IT systems and application forms did not collect the relevant information. This has since been updated so all new applications include this up to date information. The council will seek to improve data within this area to enable greater assessment relating to equalities data.	

Religion and belief - 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.	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
Data from the housing register shows over 60% of residents on the housing register has refused or have not provided information relating to their religion and belief. This is followed by Christian faith (20%) and then Islamic faith (7%). It is likely the percentage representing faith on the housing register is higher, however this is not available based on the information currently available. Southwark being a multicultural borough has many places of worship across the borough. This will enable residents to practice their faith. There is no information to suggest the introduction of an ALP will impact the ability for residents to access services to practice faith.	

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Equality information on which above analysis is based	Socio-economic data on which above analysis is based
Housing register data as at the Census data JSNA Annual Report 2023	
Mitigating and/or improvement actions to be taken	
The lack of data within this area is from the collection of data historically. Our IT systems and application forms did not collect the relevant information. This has since been updated so all new applications include this up to date information. The council will seek to improve data within this area to enable greater assessment relating to equalities data.	

Sex - A man or a woman.	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)
Housing register data has shown that the housing register consists of 65% of the applicants on the housing register listed their sex as female. This is representative across all priority bands and therefore the ALP would not disproportionately provided allocations to a specific gender. Women also disproportionally represent the majority of the main applicants residing in temporary accommodation. However when we look at the housing need on property size, male applicants make up closer to 50% of applicants requiring a 1 bedroom property. Women are likely to be single parents and this is represented within the data. Women are also represent the majority of households	

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<p>who have been victims of domestic abuse and have been accommodated in TA.</p> <p>The introduction of the ALP will help households in TA and therefore a positive impact on women who are disproportionately represented within the Homeless priority category.</p>	
<p>Equality information on which above analysis is based</p>	<p>Socio-economic data on which above analysis is based</p>
<p>Housing register data as at the 1 February 2024.</p> <p>Census data</p> <p>JSNA Annual Report 2023</p>	
<p>Mitigating and/or improvement actions to be taken</p>	
<p>Data will be monitored. The service also provides support and assessment of households in TA. This will help to identify if male residents require any additional support.</p>	

<p>Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</p>	<p>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</p>
<p>Housing register data shows that that over 60% of the households registered on the housing register has left the question blank or preferred not to state.</p> <p>Following this the next main household member has advised they are heterosexual, at 38%.</p> <p>Residents from the LGBTQ community represents less than 2% of the data. This is out of sync with this census data therefore it is likely that there are more households from the LGBTQ community included within the housing register.</p> <p>With the introduction of the ALP, there is no identified negative or positive impacts relating to sexual orientation. However it is understood that individuals from the LGBTQ+ community also experience</p>	

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discrimination and homophobia when accessing services,	
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
Housing register data February 2024 JSNA Annual Report 2023	
Mitigating and/or improvement actions to be taken	
<p>The lack of data within this area is from the collection of data historically. Our IT systems and application forms did not collect the relevant information. This has since been updated so all new applications include this up to date information.</p> <p>The council will seek to improve data within this area to enable greater assessment relating to equalities data.</p> <p>The council is committed to ensuring residents from the LGBTQ + community are able to access services and therefore the council will continue to promote equality and engage with the third sector in order to address any inequality issues.</p>	

<p>Human Rights</p> <p>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</p>
Potential impacts (positive and negative) of proposed policy/decision/business plan
Information on which above analysis is based
Mitigating and/or improvement actions to be taken

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Conclusions

Summarise main findings and conclusions of the overall equality impact and needs analysis for this area:

The lasting impact of the COVID-19 pandemic and the on-going cost of living crisis continues to exacerbate the housing needs of residents. The increased number of properties that will come available in 2024/25 will provide an opportunity for the council to address the negative experience too many people experience. Overall the EINA has identified the Annual Lettings Plan will have a positive impact to residents who experience inequalities, namely ethnic minority grounds, people with mental health issues and children placed in TA.

There are a number of residents who have protected characteristics where the main allocations scheme already provides priority, and therefore the ALP will not have an impact on these groups. This includes households who require an adapted property or older persons who can access sheltered or older persons accommodation.

There will be groups on the register who could also benefit from the additional properties, however the mitigating actions will include greater information relating to renting in the private sector and engagement through prevention mechanism to help resolve their housing need.

Overall the EINA has not found any grounds that would conclude the implementation of the ALP will have a significant negative impact on households on the Housing register.

Section 5: Further equality actions and objectives

5. Further actions

Based on the initial analysis above, please detail the key mitigating and/or improvement actions to promote equality and tackle inequalities; and any areas identified as requiring more detailed analysis.

Appendix 3

Number	Description of issue	Action	Timeframe
1			
2			
3			
4			
5			
6			
7			

5. Equality and socio-economic objectives (for business plans)

Based on the initial analysis above, please detail any of the equality objectives outlined above that you will set for your division/department/service. Under the objective and measure column please state whether this objective is an existing objective or a suggested addition to the Council Plan.

Objective and measure	Lead officer	Current performance (baseline)	Targets	
			Year 1	Year 2

6. Review of implementation of the equality objectives and actions

Appendix 3

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Implementation Equality Impact and Needs Analysis