

Equality analysis template

Housing Allocations scheme 2020

Section 1: Equality analysis details

Proposed policy/decision/business plan to which this equality analysis relates		Housing Allocations Scheme			
Equality analysis author		Ricky Bellot			
Strategic Director:		Michael Scorer - Strategic Director of Housing and Modernisation Services			
Department		Housing and Modernisation Services	Division		Customer Experience
Period analysis undertaken		6 September 2014 to 23 November 2020			
Date of review (if applicable)		30 th November 2021			
Sign-off		Position		Date	

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

1.1 Brief description of policy/decision/business plan

Background

The demand for secure affordable housing in Southwark far outweighs the supply. In order to maximise the supply of affordable housing in Southwark the Council works closely with a number of Private Registered Providers, they are also known as Housing Associations to build new affordable accommodation. In addition to this, the council has a commitment to build new affordable housing to meet the needs of the local community. The Private Registered Providers have joined a common housing register and Allocation Scheme where all void properties except those exempt within the Scheme are allocated. The council is committed to offering choice to all applicants seeking housing and has sought to achieve this by introducing a Choice Based Lettings Scheme during 2006.

The council is required by UK law to pay due regard to advancing equality, fostering good relations and eliminating discrimination for people sharing certain protected characteristics, as set out in the Public Sector Equalities Duty (2011) (under section 149 of the Equalities Act 2010). The council carries out Equalities Analysis of its plans, decisions and programmes to consider the potential impact (positive and negative) of proposals on the key 'protected characteristics' in the Equality Act 2010 and on Human Rights.

The general equality duty does not specify how public authorities should analyse the effect of their existing and new policies and practices on equality, but doing so is an important part of complying with the general equality duty.

'Equality Analysis' is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The primary concern is to identify any discriminatory or negative consequences for a particular group or sector of the community.

This equalities analysis report supports the implementation of the amendments to Southwark's Housing Allocations Scheme draft 18, November 2020.

Legislation

Southwark Council is required under section 167 of the Housing Act 1996 to produce a Housing Allocation Scheme. The requirements of the policy are set out in Part VI Housing Act 1996 (as amended by the Homelessness Act 2002 and Localism Act 2011), Homeless Reduction Act 2017, giving reasonable preference to those applicants defined by the 1996 Act.

The Department for Communities and Local Government has published a new code of guidance, 'Allocation of Accommodation: guidance for local housing authorities in England' which has been considered as part of this Equality Analysis.

The Guidance, which came into force on 29th June 2012, sets out the new freedoms in the Localism Act, which are intended to allow councils to better manage their housing registers, to promote mobility for existing social tenants, to encourage work and mobility, and to tailor their allocation priorities to meet local needs and local circumstances.

The Government expects that social homes should go to people who genuinely need

them, such as hard working families and those who are looking to adopt or foster a child in need of a stable family; and to ensure that Armed Service families get the priority for social housing they deserve.

The changes in the council's Allocations Scheme have to be looked at in the context of the wider series of changes to the way councils generally manage the use of their limited housing resources. As well as the changes in the revised Allocations Scheme, other changes in the law are encouraging councils to tackle homelessness through the introduction of the Homelessness Reduction Act 2017.

The review has also been carried out against the background of central Government's package of welfare reforms, austerity the remodelling of the provision of new affordable housing and the COVID19 pandemic. The impact of welfare reform has had a large impact on people in Southwark, and elsewhere, and has resulted in an increase in the number of local residents presenting as homeless, and seeking to join the housing register in order to access better and more affordable housing. The council has seen a 51% increase in homeless applications in the 2020/2021 financial year. The COVID19 pandemic has increased unemployment in Southwark since the 23 March 2020 up to the date of this report from 22,000 to 44,000.

Existing allocations scheme

Prior to 2005 the council allocated properties to people on the waiting list using points based framework, with transparency in this work being low. Consequently, it was paramount before the introduction of the Choice Based Lettings scheme to ensure that officers did not indirectly discriminate against any particular groups and there was as such monitoring of the lettings outcomes in common with practices in other authorities. However following the introduction of Choice Based Lettings, the emphasis shifted to ensure that different groups (now described as sharing common protected characteristics) understand how to exercise choice and are assisted, when required, to do so. Since the introduction of the new Housing Allocations scheme in September 2014, the council has become even more transparent with the allocation of affordable housing in Southwark, with improved equality analysis monitoring data available to the council, customers and the wider community. The council produces regular information on the Choice Based Lettings scheme web site on the allocation of all affordable housing in Southwark.

The council is satisfied that in operating the Housing Allocations scheme between the 6th September 2014 to the 1st November 2020, much has been done to address equality issues. The Housing Allocations scheme was developed after full consultation with the key stakeholders and their views influenced the current scheme. Procedures are in place to ensure that the service is compliant with the necessary legislation and codes of guidance.

The objectives of the council's Allocation Scheme 2013 were to:

- Offer as much choice as possible to customers.
- Offer customers information and advice to enable them to make informed choices about their housing options.
- Create an easy to understand, fair and transparent system.
- House those in priority need as determined by the law.

- Help prevent homelessness.
- Make the most effective use of the local housing stock.
- Respond to the circumstances of vulnerable individuals by joint working with other agencies.
- Ensure equality of opportunity in accessing the housing register and in the allocation of properties.
- Promote sustainable tenancies and communities by acknowledging the support needs where appropriate
- Support the principles of social inclusion, community cohesion and aim to meet customer expectations.
- Recognise residents who make a contribution to the local community
- Encourage residents to access employment and training

The desired outcomes of the policy were -

To let vacant properties through the Choice Based Lettings Scheme, within target times, in accordance with the Allocations Scheme 2013.

To make all allocations fair, equitably and without any discrimination based on race, gender, gender reassignment, marriage and civil partnerships, pregnancy sexual orientation, ethnic origin, nationality, religion, age disability or illness. Therefore, the contents of this equality analysis allow the council to comply with the Equality Act 2010.

A key principle of the Housing Allocations scheme is to help develop community cohesion and employment

The Housing Allocations scheme proposes the criteria that will enable people to register on the Housing Register and be prioritised for social housing based on their individual circumstances and housing need. Consequently those registering for housing are likely to be the most economically disadvantaged and therefore contain an over representation of households in the protected groups including the elderly, families with children, single parent families, those with disabilities and households from ethnic minorities.

Operation of the Housing Allocations scheme 6 September 2014 23 November 2020

The council has a large number of residents registered on its housing register and we need to make sure we're allocating social housing in a way that is fair. In doing so, the housing allocations scheme aims to create mixed and stable communities.

The council amended the local connection rules in light of the significant demand for affordable housing in Southwark, the changes introduced by other council's across London in terms of local connection, and the flexibilities contained within the Localism Act.

Those in employment and in housing need were also be prioritised in the allocation of housing. However, it is the housing need that determines the priority Band status awarded not the employment status of the household.

The rules on the level of rent arrears permissible to those bidding for properties are being

made more flexible to allow a greater degree of flexibility in the management of the housing stock.

Rules were introduced regarding the suspension of bidding rights for applicants/ tenants who refuse 3 offers or who have failed to attend a viewing appointment.

Additional priority to customers who adopt or foster care for children, has also been very successful, with increased numbers of foster care households and households who adopt being re-housed compared to the previous housing allocations scheme.

Rules governing the allocation of social housing are in the main, set by the government through primary legislation. Prior to recent changes in legislation, Southwark Council and other local authorities were restricted when it came to setting rules about who was eligible to join a housing register and how it prioritised between applicants once they were put on the register.

The on line Housing Register housing application form introduced has proved popular with customers, and this analysis identified no relevant issues from the introduction of the on line housing application form. In addition to this since the introduction of the on line housing application form by Southwark Council central Government introduced the Universal Credit framework in Southwark and this framework requires 100% of customers to engage with all benefit claims on line.

Positive special measures and steps were introduced to support those without access to the Internet, and those who have difficulties using Information Technology, and customer feedback of these special measures has proved popular with customers accessing the Housing solutions service. Therefore, the council is very experienced in assisting disadvantaged groups in using the Choice Based Lettings scheme, the on line housing applications and the on line changes in circumstances document.

Consequently, there were no known issues, discrimination, unconscious bias, or unintended consequences arising from the introduction of the Housing Allocations scheme in the period 6 September 2014 to the 1 November 2020.

In the council's view these policy changes did not affect groups differently, but there are wider strategic issues that need to be addressed in relation to rebalancing communities further, for example by reducing inequality and poverty over the long term by encouraging employment, training, educational attainment and building hope within our communities and not fear.

Proposed changes

- It is recommended that the residential period be used as a criterion for priority and be five years and with the exception of Key Workers working in Southwark, armed forces personnel or applicants who have a work related right to move or other exceptional reason all applicants will be required to live in Southwark for five consecutive years to be prioritised within bands 1-3.
- It is recommended residents whom move away as part of a decant program, are able to move back to the new development once completed.
- It is recommended a percentage of all allocations of all new build properties go to existing tenants in the local area. This process will be drawn up in full consultation with tenants, residents and the approved cabinet member for Housing and

Modernisation.

- It is recommended removal of priority stars except for those residents whom undertake work on the LBS estates and Housing associations estates.
- It is recommended the creation of a new band 4 category to include all households whom do not meet the local connection criteria but are in a housing need.
- It is recommended the removal of band demotion upon the refusal of 3 offers of accommodation.
- It is recommended that the removal of applicants from the Housing Register who have not submitted a bid for accommodation in the previous 12 months will take place to ensure the Housing Register reflects true and current housing needs.
- It is recommended that additional priority will be awarded to people leaving the Armed Forces in housing need. These applicants will be placed in Band 1.
- It is recommended that homeless people may be re-housed into the Private Rented Sector rather than a Social Housing tenancy to allow the council to discharge its homeless duty. The operation of this section of the Housing Allocations scheme will comply with the Homelessness (Suitability of Accommodation) (England) order 2012 SI No 2601.
- It is recommended that the council will produce an Annual Lettings Plan; this will set annual targets for property types across all priority needs bands, and ensure applicants in the highest priority needs groups are re-housed as soon as possible through active support from the council. This lettings plan will also highlight the reason for the households being accommodated, the percentage of lettings to each property type and the number of properties used as temporary accommodation.
- It is recommended that the council promotes Low Cost Homeownership schemes, Mutual Exchanges and private rented options to all applicants on the housing register to attempt to meet the households housing needs and aspirations.
- It is recommended the council conducts financial appraisals of all applicants to promote the most appropriate housing solution for each household.
- It is recommended that people who are statutory overcrowded who lack 2 or more bedrooms will be awarded priority Band 1. As at the 8th November 2020, this would mean that 29 households.
- The new priority Band 3 criteria for overcrowded households will include those family households whom are currently residing within another household's address.
- It is recommended that Band 2 priority status will be awarded to homeless households whom the council would have a duty to house, but who have accepted private rented accommodation under prevention and relief duties. They are homeless applicants who accept a property in the private sector through Sections 148 and 149 Localism Act
- It is recommended that applicants who would otherwise be in bands 1-3 but who lack a local connection with the authority should be placed into the new priority Band 4.
- It is recommended that the family dwelling category should be removed meaning all

types of households can bid for houses. Previously only applicants with a child under the age of 16 could apply for houses.

- It is recommended that the good tenant priority category is removed. This means 21 household applications will need to be re assessed. This removal would promote the council's commitment for equality of opportunity and ensure only a households housing needs are assessed as part of the housing application process.
- It is recommended greater flexibility is provided to the Strategic Director of Housing and Modernisation relating to decisions and management of the Housing Allocations scheme.
- It is recommended the changes introduced by the Homelessness Reduction Act 2017 are now placed within the Housing Allocations scheme to ensure the new Housing Allocations scheme is compatible with this Act.
- It is recommended Right to Move applicants are awarded priority Band three status
- It is recommended that Key Workers also access the Intermediate accommodation being provided by Southwark Council and Housing Association partners. This accommodation provision falls outside of the remit of this Housing Allocations scheme.
- It is recommended priority Band two status is awarded to applicants nominated by Adult Social Services/Children's Services, for example:
 - Southwark Care Leavers (Former Relevant children) as defined by the Children (Leaving Care) Act 2000, for example:
 - Care leavers
 - A need to move due to child protection issues
 - Fostering carers for the Council where there is a need to move to a larger home in order to accommodate a looked after child
 - Adoption arrangements the Council where there is a need to move to a larger home in order to accommodate a looked after child
 - Adult Social Services customers who would otherwise be in priority Band 3 or 4.(eligible under the Care Act 2014 / Mental Health Act 1983/2007)
- It is recommended Band 2 priority status for applicants fleeing domestic violence and abuse.

Relevant data, research and consultation

This Equality Analysis looks at the changes implemented since the introduction of the Housing Allocations scheme on the 6th September 2014 through to and including the 23rd November 2020 period, and to assess the impact of these changes to applicants/households within the protected characteristic groups listed in section 4 below.

The Equality Analysis was carried out along with a full review of the allocation scheme data. This included a complete breakdown by all protected characteristics of the Housing Register. The council historically did not have comprehensive data on the number of people on the Housing Register, who were in employment, but this has now changed since the introduction of the Housing Allocations scheme in September 2014 and this data is

now available to the council.

In addition to the breakdown of residents listed on the housing register, the key data from the choice based lettings allocations has also been reviewed examining each of the protracted characters. The council produces regular information on the Choice Based Lettings scheme web site on the allocation of all affordable housing in Southwark.

The council's equality monitoring data has improved by 100% since the introduction of the existing housing allocations scheme with all nine of the protected characteristics now report on through this report.

In completing the Equality Analysis, the key data from the Census 2011 was also reviewed in order to understand the demographic of the borough. It must be noted the next Census is scheduled to be completed in 2021.

Inherent prejudice amongst staff could lead to inequality in the treatment of customers. In order to mitigate against this risk, customers are encouraged to feedback comments through satisfaction surveys and open questioning about the service provided.

However, the satisfaction surveys need to be more sophisticated in terms of monitoring by the respective equalities characteristics which is not done at present. It is however, a requirement that all staff have to attend mandatory equality training.

Customers are always encouraged to report complaints of service provision to the Council.

Southwark Council's Housing Solutions service undertakes annual equality training and this training has been provided by the Housing Diversity Network, Shelter, the Chartered institute of Housing, Stonewall housing and the Albert Kennedy Trust.

During the 6th September 2014 to the 23rd November 2020 period that this Equality Analysis relates to the Housing Allocations scheme and the Housing Solutions service obtained the following equality accreditations:

- The Albert Kennedy Trust for work with the Lesbian, Gay, Bi-Sexual and Transgender customers
- The Housing Diversity Network – equality and diversity certificate
- The Chartered Institute of Housing
- Mindful Employer
- Positive About Disabilities
- Stonewall for work with the lesbian, Gay and Bi-Sexual customers

Section 3: Overview of service users and key stakeholders consulted

2. Service users and stakeholders

Key users of the department or service	As at the 1 November 2020, 14, 141 households were registered on the Housing Register. The service also works in partnership with community organisation, and customer representative support agencies.
Key stakeholders were/are involved in this policy/decision/business plan	All Housing Association partners, Citizens Advice Bureau, community organisations, local residents, Adult and Children's Services, and customers.

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.

This assessment is intended to inform elected members, customers, communities and partner agencies about the impacts the changes to the Allocations Scheme had during the 6th September 2014 to the 23rd November 2020 period, and the impact on those in the nine protected characteristic groups in this period. It has been drawn up using a broad range of data and research available to officers about those on the Housing Register and those presently living in council accommodation. In addition to the legislation and case law governing allocations, consideration has been given to the government guidance on the allocation of housing, the Equality Act 2010 and recent case law on the operation of Section 149 of that act.

Overall, the Southwark Allocations Scheme has many provisions in place to meet the needs of particular households in the protected groups (disabled people; the elderly; people with support needs), and we have provisions to exercise discretion in exceptional circumstances. Officers will continue to monitor the effects of any changes to the Allocations Scheme to assess the impacts of these changes on an on-going basis.

It remains critical that the revised Allocations and Choice Based Lettings Scheme aims to ensure that all residents are fairly and equally treated irrespective of race, gender, disability, sexual orientation, age, religion or belief or any other characteristic, including pregnancy and maternity, gender reassignment and socio- economic factors.

The code of practice on racial equality in housing specifically sets out the following areas of potential discrimination and disadvantage in the lettings and choice based lettings process. Most of these could apply equally to the other groups with protected characteristics:

- Information about services.
- Access.
- Elimination of discriminatory practices in Lettings and quality of offers.
- Nomination arrangements.
- Assessment of housing applicants.
- Type of property.
- Advice services.

This Equality Analysis has highlighted the need to continue to maintain improved monitoring systems and to make use of them to refine allocation policies and practice. The council will need to enhance its monitoring systems further to provide a comprehensive framework capable of monitoring the specific outcomes of the new Housing Allocation Scheme that is planned for 2021.

Future changes to Southwark Council's Housing Allocations scheme are likely to have differential impacts on those with protected characteristics, and it is of the greatest importance regular Equality Analysis take place in the future.

It is planned that there will be no adverse impacts on people having protected characteristics, following the outcome of this Equality Analysis.

However, we recognise the potential adverse impact on all applicants and the steps we have taken to mitigate these or to monitor actual trends in allocations are set out below.

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

Children

As at the 23 November 2020, the housing register comprises of 7,026 households with children aged between 0-18.

The continuation of the priority bandings based on the level of overcrowding will enable the 3,246 households on the housing register including children the ability to be able to access social housing properties through the bidding process. Under the previous allocations scheme the level of overcrowding permitted 1,748 residents to move from overcrowding accommodation through the bidding process.

The Scheme aims to reduce the number of families with children residing in overcrowding circumstances through the promotion of suitable accommodation in the private sector. Households whom successfully move will be permitted the ability to remain on the housing register and can continue to bid for accommodation. This will enable children of school age the ability to move into suitable accommodation and enhance the ability for greater educational attainment.

Children could potentially be initially be negatively impacted if they are moved outside of the area into the private sector outside of the borough. This is a result of the disruption of changing school, moving away from support networks and other familiar facilities.

Older persons

Sheltered Housing continues to be available for customer above pension credit age, and it is easier to obtain Older Persons Dwellings and Sheltered Accommodation for elderly people in Southwark compared to General Need accommodation for all other households.

The removal of the additional priority through the working status will ensure there is no possibility for older persons to potentially be indirectly restricted from an allocation through as a result of retirement.

There are only 173 households who have applied for alternative accommodation in to sheltered accommodation and this represents 1.22% of all customers on the Housing Register. Consequently. 520 allocations have been made to households requiring sheltered accommodation.

There is potential for older persons to be digitally excluded from the online bidding process.

There appear to be no further specific issues relating to age as a result of the proposed changes to the allocations scheme.

Equality information on which above analysis is based

The Housing Register consists of 14,141 households and the information relating to the age of all 14,141 households has been considered during the Equality Analysis.

From our analysis work during the 6th September 2014 to the 23rd November 2020, there has been no negative impact of the Housing Allocations scheme on any age group and it remains the case that people above the pension credit age find it much easier to access affordable housing in Southwark, and the Housing Register for people seeking Sheltered Housing is significantly smaller than the demographic profile of Southwark.

Mitigating actions to be taken

Southwark employs officers in the Housing Solutions service to assist older and vulnerable customers to bid for example those with limited access to bid through the internet or limited IT skills. The council also employs officers to support all customers with specific re-housing plans for moving into Sheltered Housing, downsizing to smaller accommodation, mutual exchanges, and support with bidding for alternative accommodation.

Prior to the Covid 19 pandemic, the council also permitted customer access to the council offices to enable website access to the bidding scheme.

There is the potential for the elderly to be disadvantaged in a Choice Based Lettings system. The Housing Solutions service and support agencies such as Age UK, the CAB and local support groups provide significant support to ensure this does not happen.

Households including children whom are given an Assured Shorthold Tenancy through the homelessness duties will be provided with a resettlement service. This placed into the private rented sector are given support plans to ensure they are able to access the relevant services and support to enable successful sustainment of their tenancy. This is reviewed on a regular basis to ensure continued support is provided.

The Housing allocations scheme also promotes the welfare of children in care the ability to ensure cases identified by children's social services are awarded priority band 2 to enable an urgent move.

The allocation of general needs housing has reduced significantly in Southwark over the period of this equality analysis. However, the allocation of Sheltered Housing has remained stable and hence the shorter timescale for households above pension credit age have to wait to be re-housed compared to other age groups.

The council also partner with external charities and organization such as the Citizen Advice Bureau in order to assist digitally excluded older residents to make an application and access the Homesearch bidding scheme on a weekly basis.

The impacts of the Welfare Reforms have largely impacted on people who are not of pension credit age. However, no negative trends have been identified through this Analysis on 16 to 35 years of age group in terms of people on the Housing Register, being re-housed into alternative affordable housing. However, national, local and regional research has identified the difficulties this group now faces accessing private rented accommodation due to the introduction of the Welfare Reforms.

The introduction of the Annual Lettings plan can enable the flexibility to target specific groups, which could include overcrowded households with children.

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.

Possible impacts (positive and negative) of proposed policy/decision/business plan

There is potential for people with disabilities to be disadvantaged within the process, particularly those with mental illness.

This includes the potential to be excluded from the ability to submit an online application or to engage with the weekly digital bidding process.

Disabled people are more than twice as likely to be unemployed as non-disabled people, therefore the removal of the additional priority through the employment status will enable the ability to eliminate the possibility of any indirect disadvantages to achieving a successful allocation.

Records show that as of the 23rd November 2020, 195 or 1.54% of customers on the Housing Register needed properties that have had adaptations or the customer has other forms of disability to allow them to improve the quality of life.

It must be recognised however, that specially adapted properties are not in short supply in Southwark and waiting for this type of accommodation is significantly reduced compared to general needs accommodation. Details of all those which have been adapted are recorded on the iworld database and properties that have had major adaptations are advertised as available for applicants who have and meet this need.

Residents with care needs can also access the accommodation through the allocations scheme and are specifically included as a qualification criteria. The housing allocations scheme also permits exceptional circumstances to be considered and therefore discretion can be applied for households whom have specific medical needs that can only be met within the borough.

There are no specific issues from the proposed changes which are felt could discriminate or disadvantage people with a disability other than general matters detailed elsewhere in this report, specifically the significant reduction in the availability of affordable housing in Southwark.

Equality information on which above analysis is based

The evidence on employment rates for disabled and non disabled people is based on the Labour Force Survey, 2016.

Records indicate that that as the 23rd November 2020, 219 or 1.93% of customers on the Housing Register needed properties that have had adaptations or require to transfer due to related disability issues to allow them to improve the quality of life. Floating Support is available for customers who have Mental Health and may require to remain in the existing accommodation or transfer to alternative accommodation.

Mitigating actions to be taken

Significant steps are taken both to support applicants in making their initial application and subsequently in making their bids so as to ensure they suffer no disadvantage.

Southwark's Housing Allocations scheme actively promotes the needs of disabled groups by being designed to ensure that applicants with mobility needs and mental health and housing needs are prioritised for accommodation that is suitable for their needs, and customers with Mental Health concerns are offered a customer focused support service through the Housing Allocations scheme and once re-housed into alternative accommodation through the provision of Floating Support.

A review of the online housing application form and the assessment of the housing application forms are audited and reviewed on a regular basis. We have also worked with tenants groups to change the format of the application to include greater detail within the application form.

Southwark Council through its planning policies has developed significant numbers of properties for people with physical disabilities in the Owner Occupied and Affordable Housing Sectors, and the waiting time to be re-housed and the numbers of the households on the Housing Register is significantly below the need for general need accommodation.

This positive action has resulted in considerable equality gains for people with disabilities in Southwark, and the demand for this accommodation has reduced significantly over the period of this Equality Analysis.

Southwark Council's Housing Solutions service employs two officers to specifically support people with disabilities to access affordable housing through the Choice Based Lettings scheme and one separate officer to support people with disabilities to move through a mutual exchange or downsizing to smaller accommodation.

Positive equality action has taken place in this area of our work; with an over supply of accommodation for this client group being available in Southwark compared to General Needs accommodation.

1,059 households have self identified as having a disability, however 7,465 (53%) households have not provided data on this area. Therefore there is a significant proportion of our residents on the housing register whom have not been determined as having a disability. The service will aim to gather greater information in this area and have reviewed the forms to enable this to be updated through annual reviews.

The introduction of the Annual Lettings plan can enable the flexibility to target specific groups, which could include households with disabilities.

There is no evidence of inequality taking place as a result of the Housing Allocations scheme for customers with disabilities following the Equality Analysis over the 6th September 2014 to the 23rd Nov 2020 period.

Gender reassignment - The process of transitioning from one gender to another.

Possible impacts (positive and negative) of proposed policy/decision/business plan

Transgender customers may be particularly at risk of housing crisis and homelessness arising from transphobic reaction by family, neighbours and members of the local community. This may make it difficult to undertake formal voluntary work.

There are no specific issues from the proposed changes which are felt could discriminate or

disadvantage residents whom have undergone gender reassignment other than general matters detailed elsewhere in this report, and the significant reduction in the availability of affordable in Southwark.

Equality information on which above analysis is based.

Housing register statistical data review 23 Nov 2020.

Unfortunately, there is little equality data in this area collected by the service to analyse, as the customers have decided not to record this information onto the customers housing application or change of circumstances form.

It must also be stated the relevant question was made mandatory from 2017 however the set responses also includes the ability not to specify.

Mitigating actions to be taken

Applicants made homeless through a hate crime would be placed in to the reasonable preference groups for re-housing and therefore achieve the provision of alternative accommodation.

However, gender re-assignment alone would not have any bearing on the ability to access social housing.

Southwark Council is in a position to collect this data, and is promoting this equality work with customers of the service.

There is no evidence of inequality taking place as a result of the Housing Allocations scheme for customers identified as gender reassignment customers following the Equality Analysis over the 6th September 2014 to the 23rd November 2020 period.

The housing solutions service has entered into a partnership with Stonewall Housing dedicated to provide support and advice to residents from the LGBTQ community. This will aim to promote the services and ensure any resident whom has gone through gender reassignment do not face any barriers to access social housing through the allocations scheme.

Marriage and civil partnership - Marriage is defined as a 'union between a man and a woman'. Same-sex couples can have their relationships legally recognised as 'civil partnerships'. Civil partners 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.**

Possible impacts (positive and negative) of proposed policy/decision/business plan

A joint income household will likely be able to have more disposable income. Therefore future proposed income assessments will take this into consideration when determining if a household can qualify to join the Housing register.

The increase in unemployment in the borough may result in an increase in families remaining in overcrowded conditions.

There are no specific issues from the proposed changes which are felt could discriminate or disadvantage married couples or those in civil partnerships other than general matters detailed elsewhere in this report, and the significant reduction in the availability of affordable in

Southwark.
Equality information on which above analysis is based
Statistical review of the 14,141 households on the housing register, and customers re-housed during the 6 th September 2014 to the 23 rd November 2020 period.
Mitigating actions to be taken
<p>There is no evidence of inequality taking place as a result of the Housing Allocations scheme for customers identified as married and civil partnership customers following the Equality data review over the 6th September 2014 to the 23rd November 2020 period.</p> <p>The proposed changes to the scheme also do not seem to have any information to suggest households within this category will be affected as a result.</p> <p>This area will continue to be monitored on a yearly basis to ensure there are no un-intended consequences from the introduction of the new Housing Allocations scheme.</p> <p>This information is now collected by the service and is available to analyse and the results of this analysis appear in appendix 1 to this report.</p> <p>Unfortunately, there is a high under-representation of customers sharing this equality information (43%) when the customers complete the housing application to join the housing register or to submit a change of circumstances forms.</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.
Possible impacts (positive and negative) of proposed policy/decision/business plan
<p>Under the existing scheme, 77% of women whom responded to confirm pregnancy went on to be placed in a priority band.</p> <p>There appear to be no specific issues relating to pregnancy and maternity within the provision of service or from the new Housing Allocations scheme.</p>
Equality information on which above analysis is based
Statistical review of the 14,141 households on the housing register, and customers re-housed during the 6 th September 2014 to the 23 rd November 2020 period, and evidenced in the appendix to this report.
Mitigating actions to be taken

It is of course a disappointment to pregnant applicants that their case can only be awarded priority after the birth of a child but the position taken by the Council to award priority after birth is reasonable given the demand on family sized accommodation and this will also comply with the Welfare Reform Act 2012.

There is no evidence of inequality taking place as a result of the Housing Allocations scheme for customers identified as pregnant or on maternity leave following the Equality Analysis over the 6th September 2014 to the 1st November 2020 period.

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.

Possible impacts (positive and negative) of proposed policy/decision/business plan

Nationally there is widespread concern about the allocation of scarce public housing resources across many ethnic groups. This can be damaging to community perceptions of unfairness relating to the allocation of social housing.

Local Lettings policies have the potential to impact the housing options of disadvantage groups and much has been written nationally on this. Ethnic minority communities often choose to live in close proximity. Reasons include being close to family and other cultural spaces such as religious and retail facilities. Local Lettings schemes will therefore benefit those members of ethnic minority communities who wish to exercise their choice to remain within their communities.

Larger properties with three, four, five or six bedrooms are often a requirement of some racial groups and lack of availability could disadvantage some families.

Residents who do not qualify under the working household policy may be awarded Community Contributions awards. However, there are concerns that insufficient voluntary work and support exists in Southwark to allow some ethnic minority groups to engage in meaningful participation with organisations they feel are welcoming and inclusive to be able to effectively mitigate for this impact.

Poor quality information or language problems could impact negatively.

The five year residential qualification criteria will have a positive impact for local people meeting the criteria, but will mean new resident arrivals to Southwark and or the UK will not be able to access the Housing Register unless they are in a housing need.

Geographical distribution of different racial groups across the affordable housing stock is now monitored in an attempt to ensure that choice does not lead to segregation. However as the system is based on choice this can be a difficult area to confront.

The attached analysis shows there has been no discrimination, no unintended consequences or unintended bias with the allocations representative of those households whom are on the housing register.

Equality information on which above analysis is based

Analysis of the 14,141 households on the housing register, and customers re-housed during the 6th September 2014 to the 23rd November 2020 period, and evidenced in the appendix to this report.

- <https://raceequalityfoundation.org.uk/wp-content/uploads/2018/02/Housing-Briefing-23.pdf>
- <https://data.london.gov.uk/census/reports/>
- https://www.npi.org.uk/files/6614/7316/1332/Demography_and_deprivation_in_Southwark_and_Tower_Hamlets.pdf

- BME National. 2017. BME Housing Sector Offer. <https://bmenational.files.wordpress.com/2017/06/the-bme-housing-sector-offer.pdf>
- BME National and Human City Institute (HCI). 2015. Summary of research study exploring legacy of BME housing organisations. <http://www.housingdiversitynetwork.co.uk/wp-content/uploads/BME-National-and-HCI-Deep-roots-diverse-communities-dedicated-service-summary-Aug-2015.pdf>

Mitigating actions to be taken

The Housing Allocations scheme contains specific rules about eligibility that are enforced for all applicants.

Alongside this however, is the continuing need to encourage all applicants to complete the ethnic monitoring data to allow the Council to be better informed about the applicants it is providing services for. This is a compulsory field following the introduction of the new Housing Allocations scheme in 2021, and customers will have to complete this information to register on the housing register.

Customers made homeless through a hate crime would be placed within a reasonable preference priority band therefore achieve re-housing through the Housing Allocations scheme.

As far as can be determined all applicants, regardless of racial group are given access to the same information about lettings with translations being made available on request.

There is no evidence of inequality taking place as a result of the Housing Allocations scheme for customers identified though the customers race or ethnic origin following the Equality Analysis over the 1st September 2014 to the 23rd November 2020 period.

However, the percentage of customers who record the customer's race on the housing application remains very low, and this does affect the equality analysis work across all equality characteristics.

There is no evidence of discrimination, unintended consequences or unintended bias taking place since the introduction of the housing allocations scheme as evidenced from the attached appendix to this report.

A full review on of allocations based on ethnicity to will be completed by Southwark Public Health department in early 2021.

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.

Possible impacts (positive and negative) of proposed policy/decision/business plan

Whilst the detailed recording of allocations by people of different faith groups can pin point adverse trends in relation to individual faith groups, the information should be treated only as an issue for further investigation since much will depend on the respective priorities of applicants and the particular areas they are aspiring to.

Equality information on which above analysis is based

Statistical data of the 14,141 households on the housing register, and customers re-housed during the 6th September 2014 to the 23rd November 2020 period, and evidenced in the appendix to this report.

Mitigating actions to be taken

Please note that religion or belief alone would not have any bearing on the ability to access social housing.

There is no evidence of inequality taking place as a result of the Housing Allocations scheme for customers identified through the customers religion or beliefs following the Equality Analysis over the 6th September 2014 to the 23rd November 2020 period.

There is no evidence of discrimination, unintended consequences or unintended bias taking place since the introduction of the housing allocations scheme as evidenced from the attached appendix to this report.

Sex - A man or a woman.

Possible impacts (positive and negative) of proposed policy/decision/business plan

Sex is an issue in relation to economic status with women being adversely impacted. Research nationally suggests that women are more likely to be lone parents and equally experience lower levels of economic activity than men.

The removal of the additional priority will reduce the possibility of an unintended consequence of women being less able to move through the Homesearch bidding scheme.

Women are 8 times more likely to be a victim of domestic abuse. Therefore the inclusion of the domestic abuse priority category will enable survivors of domestic abuse to access priority and an allocation of accommodation through the policy.

Equality information on which above analysis is based

Analysis of the 14,141 households on the housing register, and customers re-housed during the 6th September 2014 to the 23rd November 2020 period, and evidenced in the appendix to this report.

Mitigating actions to be taken

Please note sex alone would not have any bearing on the ability to access social housing.

There is no evidence of inequality taking place as a result of the Housing Allocations scheme for customers identified through the customers sex following the Equality Analysis over the 6th September 2014 to the 23rd November 2020 period.

There is no evidence of discrimination, unintended consequences or unintended bias taking place since the introduction of the housing allocations scheme as evidenced from the attached appendix to this report.

<p>Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes</p>
<p>Possible impacts (positive and negative) of proposed policy/decision/business plan</p>
<p>It is acknowledged that data on resident's sexual orientation is unlikely to be accurate and on-going efforts should be made to encourage such information being given at the point of application.</p>
<p>Equality information on which above analysis is based</p>
<p>Analysis of the 14,141 households on the housing register, and customers re-housed during the 6th September 2014 to the 23rd November 2020 period, and evidenced in the appendix to this report.</p>
<p>Mitigating actions to be taken</p>
<p>There is no evidence of inequality taking place as a result of the Housing Allocations scheme for customers identified though the customers sexuality following the Equality Analysis over the 6th September 2014 to the 23rd November 2020 period.</p> <p>The Housing Solutions service has been accredited by the Albert Kennedy Trust, Stonewall, the Chartered Institute of Housing and the Housing Diversity Network for our work on sexuality. In addition to this annual training has taken place on sexuality for 100% of staff in the Housing Solutions service.</p> <p>Staff have been fully trained by Albert Kennedy Trust in 2016. Therefore, the service should be well placed to identify and deal with potential discrimination. The Housing Solutions staff have also received training from Stonewall housing.</p> <p>The housing Solutions service responsible for the administration of the Housing allocations scheme, has partnered with Stonewall housing. This will help to continually examine the practices of the policy ensuring residents from the LGBTQ community are represented. Ensuring there is access to households from this group to access the Homeseach bidding scheme. Stonewall will focus on advice and advocacy including viewings, applying for benefits, referring to other agencies for assistance. In addition to the above, Stonewall will focus upon wider community and outreach work.</p> <p>It is acknowledged there is a over representation of homeless approaches form the LGBTQ community and greater work must be completed to prevent homelessness.</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>
<p>Possible impacts (positive and negative) of proposed policy/decision/business plan</p>
<p>There is always the possibility in a personal service that people's freedom and opportunities are limited and hindered by prejudice, discrimination or arbitrary restraint.</p>

Information on which above analysis is based

Analysis of the 14,141 households on the housing register, and customers re-housed during the 6th September 2014 to the 23rd November 2020 period, and evidenced in the appendix to this report.

Mitigating actions to be taken

Human Rights considerations are now mainstreamed within the Housing Solutions service, and there is no evidence that individuals are being disadvantaged in terms of their human rights.

The service is designed to give support to all applicants in registering and making bids and it is an important aspect of the service that whilst protecting privacy, residents should not feel isolated or excluded from the process. They should be involved as much as possible in the way the service is designed and delivered and have full opportunity to express any views through satisfaction surveys and user panels etc. As the elderly and vulnerable are traditionally population groups missed from routine statistical monitoring surveys etc, it is important that support is given where appropriate to understand and complete documentation.

The contents of the Housing Allocations scheme does not impact on the Human Rights as defined by the Human Rights Act 1998, following the results of this Equality Analysis over the 6th September 2014 to the 23rd November 2020 period.

The Housing Allocations scheme does not impact on the rights of children as defined by the UN Convention on the Rights of the Child, following the results of this Equality Analysis over the 1st April 2014 to the 23rd November 2020 period..

There is no evidence of inequality taking place as a result of the Housing Allocations scheme for customers identified though the customers sexuality following the Equality Analysis over the 6th September 2014 to the 23rd November 2020 period..

Section 5: Further actions and objectives

5. Further actions

Based on the initial analysis above, please detail the key mitigating actions or the areas identified as requiring more detailed analysis.

Number	Description of issue	Action	Timeframe
1	Undertake an Equality Analysis on an annual basis	Undertake an Equality Analysis on an annual basis	1 st January. 2022.
2			
3			
4			
5			
6			
7			

5. Equality objectives (for business plans)

Based on the initial analysis above, please detail any equality objectives 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	
			2021/22	2021/22
