

## Appendix 2

### London Borough of Hackney Equality Impact Assessment Form

The Equality Impact Assessment Form is a public document which the Council uses to demonstrate that it has complied with the Equality Duty when making and implementing decisions which affect the way the Council works.

The form collates and summarises information which has been used to inform the planning and decision making process.

**All the information needed in this form should have already been considered and should be included in the documentation supporting the decision or initiative, e.g. the delegate powers report, saving template, business case etc.**

Equality Impact Assessments are public documents: remember to use at least 12 point Arial font and plain English.

The form must be reviewed and agreed by the relevant Assistant Director, who is responsible for ensuring it is made publicly available and is in line with guidance. Guidance on completing this form is available on the intranet.

<http://staffroom.hackney.gov.uk/equalities-based-planning-and-decision-making>

#### **Title of this Equality Impact Assessment:**

Local Lettings Policy for Woodberry Down Estate

#### **Purpose of this Equality Impact Assessment:**

To assess the impact of the policy change that extends the split household policy to out of phase tenants in the Local Lettings Policy for Woodberry Down Estate.

#### **Officer Responsible: *(to be completed by the report author)***

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<b>Directorate:</b> Neighbourhoods and Housing	<b>Department/Division:</b> Regeneration and Capital Programme Delivery - Climate, Homes and Economy

**Director:** James Goddard

**Date:** 17/02/2022

**Comment :** When the Local Lettings Policies are in place, the EqIA will be kept under review.

## **PLEASE ANSWER THE FOLLOWING QUESTIONS:**

In completing this impact assessment, you should where possible, refer to the main documentation related to this decision rather than trying to draft this assessment in isolation. Please also refer to the attached guidance.

### **STEP 1: DEFINING THE ISSUE**

#### **1. Summarise why you are having to make a new decision**

One of the key priorities of the Council is to regenerate housing estates in the borough. This involves the demolition and re-building of the whole estate or selected blocks and often requires rehousing tenants from their homes within a set timescale.

The Local Lettings Policies ensure fairness, consistency and transparency of the lettings process on regeneration estates. They set out the rules guiding the assessment and rehousing of tenants as well as the letting of new homes in order to decide who to offer housing and how offers are made.

The current Local Lettings Policies, agreed by the Council in November 2011, include a policy on 'in phase' split households. This gives the opportunity to adult children who have lived continuously in the home for 10 years or longer to move to a home of their own that meets their housing needs. A policy change is proposed for Woodberry Down to extend the opportunity for split household moves to adult children of 'out-of-phase' tenants.

Concerns about housing affordability and the social inclusion of existing residents emerged in the 2015/16 'Hackney: a place for everyone' consultation. The proposed policy for Woodberry Down helps local people to benefit from, and makes them feel more included in, Hackney's regeneration and economic growth process and will help to keep communities together at a time of social change and regeneration in their local area.

A quota of such moves for the Woodberry Down Estate would be made available each year. However, this means that, each year, a number of void properties available in the borough may be allocated to 'out of phase' adult children in Woodberry Down, thus reducing the availability of void properties that can be allocated to applicants on the Housing Register.

To assess the equalities impact of the policy that extends the split household policy to 'out of phase' adult children in the Local Lettings Policy for Woodberry Down, an Equality Impact Assessment (EqIA) is required. In particular, this EqIA assesses whether there are any equalities implications in respect of protected characteristics arising from the re-housing of an annual quota of 'out-of-phase' adult children into void properties that would have otherwise been allocated to applicants on the Housing Register.

This is particularly important considering the unprecedented housing crisis that Hackney is facing. In recent years, demand for social housing has been rising rapidly while supply has been decreasing thus extending the average time that applicants spend on the waiting list. Only 409 lets were made available in council and housing association homes in 2019/20 and 640 lets in 2018/19, compared to 1,132 in 2017/18, and 1,229 in 2016/17.

#### **2. Who are the main people that will be affected? Consider staff, residents, and other**

The main people that would be affected by the policy change are:

1. tenants on the Woodberry Down Estate, in particular 'out of phase' adult children over 18 who have lived continuously in the home for 10 years or longer,
2. applicants on the Housing Register with a significant need for housing.

## **STEP 2: ANALYSING THE ISSUES**

### **3. What information and consultation have you used to inform your decision making?**

To assess the impact of the policy change, the protected characteristics of applicants on the Housing Register with a significant need for housing are compared to the protected characteristics of tenants and their children in Woodberry Down.

The following data sources were used to inform the assessment:

- Woodberry Down Housing Needs survey (phases 4-8, 2021<sup>1</sup>).
- Council records, Housing Register (2020)

There is no requirement for statutory consultation in relation to updating or adding to Local Lettings Policies. Through the process of developing the LLP, however, officers have engaged with:

- officers from relevant council services,
- Woodberry Down Community Organisation

Once the LLP is in place, their impact will be monitored recording the key characteristics of each letting (e.g. priority band, case type, ethnicity) and ongoing engagement will take place with tenants.

## **Equality Impacts**

### **4. Identifying the impacts**

#### **Woodberry Down Estate** (phases 4 to 8)

##### **Age**

Data collected shows that approximately 31% of main tenants are aged 55-64. This is the highest represented age group, followed by age groups 45-54 (25.3%) and 65-74 (17%). 9.2% of main tenants are aged 35-44, the same percentage are aged 75-84. 4.4% are aged 85+. The least represented age group is 25-34 (3.9%).

With regards to children, 12.9% are aged 0-9, 24.4% are aged 10-20, and 62.7% are aged 21 and over.

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<sup>1</sup> Figures and statistics were extracted from responses received on and prior to 8 February 2022.

## **Gender**

Women make up the majority of the tenants (67.2%).

52.9% of children on the estate are female. Amongst children within households that would consider for their adult members to be rehoused separately, 55% of the children are female.

## **Ethnicity / Race**

Just over one third (35.3%) of the tenants are Black/Black British. This is the most represented ethnic group, with the next most significant ethnic groups being White or White British (24.9%) and Turkish (21%). The least represented group in the estate is the Mixed/Multiple background (1.3%). The Other ethnic group represents 9.2%. The Asian/Asian British represents 8.3%.

Information on the ethnicity of children is not available but analysing the information on the ethnicity of the main tenant of households that expressed the wish for their children to be rehoused separately, 35.9% are Black/Black British, 26.9% are Turkish, 23.1% are White/White British, 7.7% represent the Other ethnic group, and 6.4% are Asian/Asian British. There are no households where the main tenant is from a Mixed/Multiple ethnic background.

## **Disability**

66.4% of tenants declared that they, or a member of their household, have a health condition.

Almost one third (31.9%) of main tenants declared that they, or a member of their household, registered as disabled.

With regards to households that would consider for their adult members to be rehoused separately, 74.6% declared that they, or a member of their household, have a health condition. 39.7% declared that they, or a member of their household, are registered as disabled.

## **Carers**

29.7% of tenants on the estate receive care for their day-to-day needs. Of this 29.7%, 92.6% receive care from family or friends. 3.5% provide day-to-day care for neighbouring residents on the estate.

No information is available on religion/faith, sexual orientation, gender reassignment and identity, or pregnancy and maternity.

## **Housing Register** (applicants with a significant need for housing<sup>2</sup>)

### **Age**

Data shows that approximately 33.4% of applicants are aged 26-35. This is the highest represented age group, followed by age group 36-45 (27.4%). The least represented age

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<sup>2</sup> Urgent, priority/homeless bands of the system in force until September 2021, approximating band B in the system introduced in October 2021.

groups are people over 65, in particular 3.7% of applicants are aged 65-74, 1.8% are aged 75-84, and 1.2% are aged over 85%.

## **Gender**

Women make up the majority of the applicants in the three high priority bands (70.5%).

It is worth noting here that data collected since 2018 shows an increase in the number of homelessness approaches from single males in Hackney (37.1% in 2018/19, 47.8% in 2020/21).

## **Ethnicity / Race**

Almost one third (32.1%) of the applicants did not provide information on their ethnicity ('not recorded/refused/unknown').

Among those who revealed their ethnicity on the application, 30.6% are White. This is the most represented ethnic group, with the next most significant ethnic group being Black/African/Caribbean/Black British (24.6%). Approximately 5.9% are from an Asian or Asian British background. The least represented group is Mixed/Multiple Ethnic Groups (1.9%). 4.9% are from an 'other ethnic group background'.

In Hackney, according to the 2011 Census, the largest ethnic group is the White group (54.7%), the second largest is Black/Black British (23.1%), the third largest is Asian/Asian British (10.5%), followed by Mixed Ethnic Groups (6.4%), and Other Ethnic Groups (5.3%). The Other ethnic group increased by 222% between 2001 and 2011. In terms of single ethnic groups, White British is the largest one (36.2%), followed by the Other White group (16.2%) and Black African group (11.4%). Despite being the single largest ethnic group, the White British group has decreased (-1%) between 2001 and 2011. The White Other population instead grew considerably (+60%). One of the most significant causes behind the increase in the White Other group is likely to be the accession of Eastern European countries in 2004 and resultant immigration from these countries, in particular Poland.<sup>3</sup>

The Other ethnic background increased not only within the White broader ethnic group but also within all other broader ethnic groups: Black Other (+101%), Asian Other (308%), Mixed Other (+122%). A reason for the increase in mixed ethnicities may be increased diversity and multiculturalism in the borough since the 2001 Census.<sup>4</sup>

## **Religion**

Although no information is available on religious belief, according to the 2011 Census in Hackney Christianity is the leading belief (38.6%), followed by residents with no religion (28.2%), Muslims (14.1%), Jewish (6.3%) and lastly Buddhists, Sikhs, Hindus and residents of other religions which together make up approximately 3% of the borough's population. Almost 10% of Hackney's residents did not state their religion on their Census form.<sup>5</sup>

In terms of 2001-2011 trends, the Christian population decreased, passing from 46.6% to 38.6% of the total population. The proportion of residents with no religion increased, passing from 19% to 28.2%. This mirrors a local, regional and national trend towards multiculturalism. The Jewish, Muslim and Buddhist communities saw modest increases.<sup>6</sup>

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<sup>3</sup> Census 2011: Ethnicity, Identity, Language and Religion in Hackney, May 2013

<sup>4</sup> Ibid

<sup>5</sup> Ibid

<sup>6</sup> Ibid

## Disability

10% of applicants need housing with a type of medical classification, ranging from A-B to F. Within this medical classification range, 1.2% would require a wheelchair standard property, while 3.7% could be housed on any floor and would not require any adaptation to the property.

Analysing data of applicants in Band B of the banding system introduced in October 2021, 4.4% of the Band B applications included a medical need. 23.8% of applicants in Band B need a 1 bedroom flat, out of these applications 5.9% include a medical need. 48.2% of applicants in Band B need a 2 bedroom flat, out of these applications 2.2% include a medical need.

No information is available on sexual orientation, gender reassignment and identity, pregnancy and maternity, and carers.

Comparing data from Woodberry Down Estate to data from the Housing Register it emerges that:

- The majority of the Woodberry Down Estate tenants are middle aged/older people, the most represented age group being 55-64 (31%). The majority of the Housing Register applicants are young (approximately 69.8% are aged 18-45).
- In both Woodberry Down (main tenants and children within households that would consider for their adult members to be rehoused separately) and the Housing Register, there is a higher proportion of women than men.
- In both Woodberry Down Estate and the Housing Register, the highest represented ethnicities are White and Black/Black British, while the least represented ethnic group is the Mixed ethnic group. On the basis of the data available, Woodberry Down Estate has a somewhat higher proportion of Black or Black British representation. Woodberry Down also has a high representation of the Turkish population.

Information on ethnicity provided by the main tenant of households that would consider for their adult members to be rehoused separately shows that the most represented groups Black/Black British, Turkish, and White/White British. While the least represented groups are Other, Asian/Asian British. The Mixed/Multiple ethnic background is not represented within this category.

- With regards to disability, the Woodberry Down Estate dataset and Housing Register dataset are not easily comparable, but Woodberry Down Estate has a high percentage of residents that declared a health condition and a quite significant percentage of residents registered as disabled.

At the time the EqIA was written there were on the Housing Register (band B) 64 applicants/households with a medical need, in need of a 1 bedroom.

Overall, there are similarities in terms of ethnicity and gender between Woodberry Down tenants (phases 4-8) and Housing Register applicants with a significant need for housing. In terms of disability, from the data analysed it seems that a considerable percentage of Woodberry Down households have a health condition and/or are registered as disabled. It

is also important to note that recent housing register figures show that 64 households in Band B on the Housing Register, with a medical need, are in need of a 1 bedroom flat (the type of flat most likely to be allocated to adult children).

#### **4 (a) What positive impact could there be overall, on different equality groups, and on cohesion and good relations?**

##### **(i) Keeping communities together - Existing residents' inclusion**

Extending the split household policy to adult children of 'out of phase' tenants in the Woodberry Down Estate responds to concerns about housing affordability in the borough and existing residents' social inclusion emerged in the 2015/16 - 'Hackney: a place for everyone' consultation.

From the consultation with Hackney's residents that informed the Community Strategy 2018-2028 it emerged that people who had children were worried that children would not be able to afford to live in Hackney when they are older.

The split household policy within the Local Lettings Policy for Woodberry Down would have particularly positive impacts for adult children who have lived continuously in the home for 10 years or longer as they have the opportunity of moving to a new home of their own that meets their housing needs, with the perspective of a secure tenancy within the estate where they grew up. This would contribute to avoiding the displacement of young generations out of the borough, a high proportion of whom are from culturally and ethnically diverse communities. This is particularly important in Hackney where the cost of buying or privately renting a home has risen more sharply than in other boroughs.

##### **(ii) Keeping communities together - Intergenerational community cohesion**

Extending the split household policy to 'out of phase' adult children fosters social cohesion and strengthens intergenerational community links. It would not only benefit 'out of phase' adult children but would also have a broader positive impact on residents on the estate.

Social links between the older and younger generations would be maintained and reinforced. This is particularly important considering that, according to the data analysed, tenants on the estate tend to be middle aged/older people so they could benefit additionally from having their younger generation living locally.

#### **4 (b) What negative impact could there be overall, on different equality groups, and on cohesion and good relations?**

Where you identify potential negative impacts, you must explain how these are justified and/or what actions will be taken to eliminate or mitigate them. These actions should be included in the action plan.

The potentially negative impacts of extending the split household moves policy to adult children of 'out of phase' tenants in Woodberry Down are identified below. The action plan in section 6 describes the actions that will be taken to eliminate or mitigate them.

As of 8 February 2022, 34% of households who responded to the survey would consider for their adult members to be rehoused separately. The number of households with adult

children (or children that will turn 18 in the coming years and may become eligible for a split household move in the remaining phases of the regeneration) in Woodberry Down is higher and may result in a higher demand for split household moves than the demand collected in the survey. Demand for split household moves in phases 4 to 8 is likely to be significant.

As split household moves for adult children would result in a net loss of lettings available to applicants on the housing register, applicants (including applicants with medical needs, particularly those in need of a one bedroom property - the type of flat most likely to be allocated to adult children) may have to spend additional time on the housing register and, if homeless, in temporary accommodation. This would result in the Council having to procure and provide additional temporary accommodation with consequent cost implications.

To mitigate the impacts described above, the number of moves made available to adult children in future phases of the regeneration scheme would be monitored and agreed annually.

In addition to the above, although the Black/Black British, Turkish and White/White British, ethnic backgrounds seems to be well represented amongst households on Woodberry Down that would consider for their adult members to be rehoused separately, nobody is from a Mixed/Multiple ethnic background (as of 8 February 2022) and a low percentage are from the Other and Asian backgrounds. Low representation of Other and Mixed/Multiple ethnic groups in the estate does not seem to reflect the increasing multiculturalism of the borough.

As explained above, on page 5 (“Ethnicity/Race”), the Other ethnic group alone and the Other ethnic background within broader ethnic groups (White, Black, Asian, Mixed) have grown considerably in Hackney in recent years. This is likely to be due in part to recent immigration, such as in the case of people moving to Hackney from Eastern European countries following the 2004 enlargement of the EU. Recent migrants (particularly those who spent less than 10 years in the UK) are less likely to be represented in the social rented sector and more likely to be represented in the private rented sector<sup>7</sup>. Ethnic groups who have grown in the borough in recent years are less likely to be represented on regeneration estates, such as Woodberry Down, and likely to be more represented in private rented housing thus making them more likely to be at risk of illegal evictions, poor housing conditions, unstable tenancies and high rents.

Extending the split household moves to ‘out of phase’ adult children in Woodberry Down would not contribute to increasing the representation of recent migrants and their ethnic groups on regeneration estates and may delay access of recent migrants to social housing, while they may have to spend more time in the private sector housing, such as Houses in Multiple Occupation (HMOs).

The impact above is mitigated by the Council’s ongoing work around: providing advice on housing options to prevent homelessness and help find settled housing; and making rent in Hackney fairer, by working with landlords to create a more professional rented sector, supporting private sector tenants, challenging rogue landlords, tackling those who fail to provide a good, safe home to their tenants.

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<sup>7</sup> The Migration Observatory at the University of Oxford, Migrants and Housing in the UK: Experiences and Impacts, Figure 3: Housing Accommodation: Recent Arrivals vs. Longer-Term Residents, 2018, October 2019



### **STEP 3: REACHING YOUR DECISION**

#### **5. Describe the recommended decision**

The recommended decision is to adopt the Local Lettings Policy for Woodberry Down.

This would help adult children access social housing that meets their needs within the estate and would broadly benefit residents, especially older generations who may benefit additionally from the assistance and support that adult children could provide living locally.

## STEP 4 DELIVERY – MAXIMISING BENEFITS AND MANAGING RISKS

### 6. Equality and Cohesion Action Planning

Please list specific actions which set out how you will address equality and cohesion issues identified by this assessment. For example,

- Steps/ actions you will take to enhance positive impacts identified in section 4 (a)
- Steps/ actions you will take to mitigate against the negative impacts identified in section 4 (b)
- Steps/ actions you will take to improve information and evidence about a specific client group, e.g. at a service level and/or at a Council level by informing the policy team ([equalityanddiveristy@hackney.gov.uk](mailto:equalityanddiveristy@hackney.gov.uk)).

All actions should have been identified already and should be included in any action plan connected to the supporting documentation, such as the delegate powers report, saving template or business case.

The potential negative impacts are listed in the action plan below, together the actions that will be taken to mitigate them.

No	Objective	Actions	Outcomes highlighting how these will be monitored	Timescale s/ Milestones	Lead Officer
1	Mitigate potential negative impact - Extending the split household policy to 'out of phase' adult children could result in additional time spent by applicants on the housing register, including applicants with medical needs	Limit the demand for split households moves to an annual quota of moves available to 'out of phase' adult children	The number of moves made available to adult children in future phases of regeneration would be agreed annually by Regeneration and Benefits and Housing Needs	Annually	Head of Housing Strategy and Policy / Head of Benefits and Housing Needs
2	Mitigate potential negative impact - Extending the split household policy to 'out of phase' adult children could result in additional costs for the Council to provide additional temporary accommodation	As above	As above	As above	As above

3	Mitigate potential negative impact - Extending the split household policy to 'out of phase' adult children could result in delaying access to social housing of groups traditionally less represented in social housing and regeneration estates such as Woodberry Down	As above Provide advice on housing options  Keep working to make the private rented sector better and fairer as per the Hackney Better Renting Campaign	As above Provide advice on housing options to prevent homelessness and help find settled housing  Monitor property licensing schemes; campaign for better renting	As above Ongoing  Ongoing	As above Head of Benefits and Housing Needs  Head of Private Sector Housing
4					
5					

#### Remember

- Assistant Directors are responsible for ensuring agreed Equality Impact Assessments are published.
- Equality Impact Assessments are public documents: remember to use at least 12 point Arial font and plain English.
- Make sure that no individuals (staff or residents) can be identified from the data