

Equality Analysis

Directorate: Community Wellbeing Service Area: Housing Strategy & Policy	Lead Officer: Marta Imig Date completed: 28 March 2022
Service / Function / Policy / Procedure to be assessed: Housing Allocations Policy 2022	
Is this: New / Proposed <input checked="" type="checkbox"/> Existing/Review <input type="checkbox"/> Changing <input type="checkbox"/>	Review date: The Housing Allocations Policy will be reviewed at least every 5 years or where suitable, sooner. The equality analysis will need reviewing in parallel with any changes made to the policy.

Part A – Initial Equality Analysis to determine if a full Equality Analysis is required.

What are the aims and objectives/purpose of this service, function, policy or procedure?

Every local authority must have a housing allocations scheme to determine housing priorities, and a procedure to be followed when allocating accommodation. The policy aims to meet this duty by ensuring that social housing in the borough is allocated fairly and objectively, having regard to any legislative requirements, regulations or Codes of Guidance issued by Department for Levelling Up, Housing and Communities, and homelessness and tenancy strategies. In exercising their functions under Part 6 of the Housing Act 1996, local authorities must have due regard to statutory guidance issued by the Secretary of State. This includes ensuring that reasonable preference is given to specific groups of people including people who are owed a duty under the Housing Act/Homelessness Reduction Act, people who occupy unsanitary or overcrowded housing or living in unsatisfactory housing conditions, people who need to move on medical or welfare grounds relating to disability, or people who need to move to a particular area to avoid hardship.

Aims of the service are highlighted within the policy as:

- To operate a lettings policy based on housing need; which is simple, easy to understand, transparent, open and fair.
- To ensure that every application is dealt with fairly and consistently.
- To give adequate priority to people who fall within the Government’s “Reasonable Preference” categories.
- To provide timely information, advice and assistance and make the best use of the powers and resources available to assist people to solve their housing problems in a way more suited to their needs.
- To ensure that applicants have ready access to information on their prospects of housing.
- To give adequate priority to homeless people whilst maintaining a balance between the needs of the homeless and other applicants in housing need.
- To give most applicants choice where practicable to express choice and preferences about where they want to live whilst having regard to the availability of housing resources and the high demand for housing.
- To give adequate priority to residents in housing need who are in low income employment, and who have served in the Armed Forces, whilst maintaining a balance to all other applicants.

In addition to the above, this policy has been designed to make best use of the housing stock in the borough to ensure that:

- It enables the delivery of more affordable homes
- Promotes independence and wellbeing
- Prevents homelessness and rough sleeping.

Please indicate its relevance to any of the equality duties (below) by selecting Yes or No?

	Yes	No
Eliminating unlawful discrimination, victimisation and harassment	✓	
	✓	

Advancing equality of opportunity		
Fostering good community relations	✓	

If not relevant to any of the three equality duties and this is agreed by your Head of Service, the Equality Analysis is now complete - please send a copy to **NAMED OFFICER**. **If relevant**, a Full Equality Analysis will need to be undertaken (PART B below).

PART B: Full Equality Analysis

Step 1 – Identifying outcomes and delivery mechanisms (in relation to what you are assessing)

<p>What outcomes are sought and for whom?</p>	<p>The main outcome of the policy is to ensure that social housing in the borough is allocated fairly and objectively, having regard to any legislative requirements, regulations or Government Codes of Guidance.</p> <p>Affected groups will include (not exhaustive):</p> <ul style="list-style-type: none"> • All adults (and associated dependants) who live or work in the borough; • Those who are unable to access the housing market locally due to high property prices and increasing rents; • Those who are homeless or at risk of homelessness, including rough sleepers; • Partners involved in the delivery of affordable housing, such as Registered Providers, developers, health and social care providers;
<p>Are there any associated policies, functions, services or procedures?</p>	<p>Corporate Plan Health & Wellbeing Strategy Local Plan Economic Development Strategy Asset Management Plan Housing Act 1996 (as amended by various) Housing Strategy Homelessness and Rough Sleeping Strategy</p>
<p>If partners (including external partners) are involved in delivering the service, who are they?</p>	<p>Whilst registered providers have a role in delivering some elements of the policy, the overall policy and its implementation is the responsibility of Spelthorne Borough Council.</p>

Step 2 – What does the information you have collected, or that you have available, tell you?

What evidence/data already exists about the service and its users? (in terms of its impact on the 'equality strands', i.e. race, disability, gender, gender identity, age, religion or belief, sexual orientation, maternity/pregnancy, marriage/civil partnership and other socially excluded communities or groups) and **what does the data tell you?** e.g. are there any significant gaps?

General Spelthorne context

Almost half of Surrey's 20 most deprived super output areas are in Spelthorne. Three are in the ward of Stanwell North, two in Ashford North and Stanwell South and one in each of Ashford East and Sunbury Common. Spelthorne has the highest number of lone parent families and the highest level of child poverty in Surrey; it also has the highest under-18 conception rate in the county. That said, residents are largely healthy, with life expectancy for both males and females slightly above the national average.

Although the number of VAT and/or PAYE-registered business has fallen slightly over the past four years, Spelthorne has a low rate of unemployment: 1.4% of those economically active aged 16 to 64, compared to the South East (2.2%) and UK as a whole (3.5%). Heathrow Airport is a significant local employer, with 8.3% of Spelthorne's working population employed there. Significantly, 21.5% of those in work in Stanwell North are in low level employment compared to an average of 11.6% in Surrey. Average wages are slightly above regional averages at £630 per week for full-time employees.

Whilst house prices remain well above the national average, most residents are owner-occupiers (73%), followed by private rented (13%) and social rented (12%).

Gender / gender identity

Census data from 2011 shows that 50.5% of residents in Spelthorne were female, with the remaining 49.5% being male. There is no data known to be held in relation of other gender identities.

Source: ONS Census, 2011 - neighbourhood statistics for residents aged 16 to 74

A White Paper published in December 2018 (Help shape our future: the 2021 Census of population and housing in England and Wales) sets out the Office for National Statistics' (ONS) recommendations for what the census should contain and how it should operate. The White Paper recommends that the census in 2021 includes a question about gender identity, asking respondents whether their gender is the same as the sex they were registered as at birth. The question will be separate from the question about sex (i.e., whether the respondent is male or female), which will be phrased in the same way as previous years. There is currently no official data about the size of the transgender population (the word 'transgender' is used here to describe people whose gender identity does not match the sex they were assigned at birth). The Government Equalities Office (GEO) has said that there may be 200,000 to 500,000 transgender people in the UK, but stresses that we don't know the true population because of the lack of robust data. The ONS has identified user need for official estimates in order to support policy-making and monitor equality duties.

Source: <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/CBP-8531>

Age

Spelthorne has a slightly lower population of under-30s (34%) compared to the rest of the country (37%), and a slightly higher population of 30-69 year olds (42%) compared with the UK average of (40%), The number of 70+ is 23%, which is broadly in line with the rest of the UK (24%).

Source: <https://commonslibrary.parliament.uk/local-data/constituency-statistics-population-by-age/>

Ethnicity

The ethnic make-up of Spelthorne is largely in line with the UK average, although we have more residents who identify as Asian and fewer residents who identify as Black than the national average.

Ethnic group	Spelthorne		Region	UK
	Number	%	%	%
White	83,455	87.3%	90.7%	87.2%
Mixed	2,382	2.5%	1.9%	2.0%
Asian	7,295	7.6%	5.2%	6.9%
Black	1,545	1.6%	1.6%	3.0%
Other	921	1.0%	0.6%	0.9%
Total	95,598	100.0%	100.0%	100.0%

Source: <https://commonslibrary.parliament.uk/home-affairs/communities/demography/constituency-statistics-ethnicity/>

Disability

As of July 2019 there were around 2,020 PIP claimants in Spelthorne constituency. In comparison, there was an average of 2,500 claimants per constituency across the South East. Within Spelthorne, psychiatric disorders were the most common reason for claiming PIP. They accounted for 37% of awards, compared to 36% in Great Britain. 'Psychiatric disorders' include anxiety and depression, learning disabilities and autism. The second most common reason for awards was musculoskeletal disease (general), which accounted for 17% of awards within the constituency and 21% in Great Britain. Musculoskeletal disease (general) includes osteoarthritis, inflammatory arthritis and chronic pain syndromes.

Source:

<http://data.parliament.uk/resources/constituencystatistics/personal%20independence%20payment/PIP%20claimants%20in%20Spelthorne.pdf>

Religion

Residents of Spelthorne predominately identify themselves as either Christian or having no religion. There is a smaller Muslim population compared with the national average, but a larger Hindu and Sikh population.

	Constituency		Region	UK
	Number	%	%	%
Has religion	67,392	70.5%	65.0%	66.7%
of which				

Christian	60,954	63.8%	59.8%	58.8%
Muslim	1,808	1.9%	2.3%	4.5%
Hindu	2,332	2.4%	1.1%	1.4%
Buddhist	420	0.4%	0.5%	0.4%
Jewish	206	0.2%	0.2%	0.4%
Sikh	1,325	1.4%	0.6%	0.7%
Other	347	0.4%	0.5%	0.4%
No religion	21,511	22.5%	27.7%	26.1%
Not stated	6,695	7.0%	7.4%	7.2%

Source: <https://commonslibrary.parliament.uk/home-affairs/communities/constituency-data-religion/>

Sexual orientation

There is no accurate dataset which can be used to reflect solely Spelthorne. The White Paper recommends asking a new question about sexual orientation. The ONS has identified a user need for better data on sexual orientation – particularly for small areas – to inform policy-making and service provision, as well as monitoring equality duties. The ONS has previously used the Annual Population Survey (APS) to estimate the size of the lesbian, gay and bisexual (LGB) population in the UK. According to these estimates, just over 1 million people identified as LGB in 2016 (around 2% of the population). However, the sample population used in the APS isn't big enough to provide robust estimates of the LGB population in smaller areas.

Source: <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/CBP-8531>

Marriage / Civil Partnership

More people in Spelthorne are married compared to the rest of England and Wales, and fewer people identify as single.

Marital Status	Spelthorne		England and Wales	
All usual residents aged 16+	78,089		45,496,780	
Single (never married or never registered a same-sex civil partnership)	24,562	31%	15,730,275	35%
Married	38,984	50%	21,196,684	47%
In a registered same-sex civil partnership	153	0%	104,942	0%
Separated (but still legally married or still legally in a same-sex civil partnership)	2,042	3%	1,195,882	3%
Divorced or formerly in a same-sex civil partnership which is now legally dissolved	6,870	9%	4,099,330	9%
Widowed or surviving partner from a same-sex civil partnership	5,478	7%	3,169,667	7%

Has there been any consultation with, or input from, customers / service users or other stakeholders? If so, with whom, how were they consulted and what did they say? If you haven't consulted yet and are intending to do so, please list which specific groups or communities you are going to consult with and when.

TBC

Are there any complaints, compliments, satisfaction surveys or customer feedback that could help inform this assessment? If yes, what do these tell you?

TBC

Step 3 – Identifying the negative impact.

a. Is there any negative impact on individuals or groups in the community?

Barriers:

What are the potential or known barriers/impacts for the different 'equality strands' set out below? Consider:

- **Where** you provide your service, e.g. the facilities/premises;
- **Who** provides it, e.g. are staff trained and representative of the local population/users?
- **How** it is provided, e.g. do people come to you or do you go to them? Do any rules or requirements prevent certain people accessing the service?
- **When** it is provided, e.g. opening hours?
- **What** is provided, e.g. does the service meet everyone's needs? How do you know?

* Some barriers are justified, e.g. for health or safety reasons, or might actually be designed to promote equality, e.g. single sex swimming/exercise sessions, or cannot be removed without excessive cost. If you believe any of the barriers identified to be justified then please indicate which they are and why.

Solutions:

What can be done to minimise or remove these barriers to make sure everyone has equal access to the service or to reduce adverse impact? Consider:

- Other arrangements that can be made to ensure people's diverse needs are met;

- How your actions might help to promote good relations between communities;
- How you might prevent any unintentional future discrimination.

Equality Themes	Barriers/Impacts identified	Solutions (ways in which you could mitigate the impact)
Age (including children, young people and older people)	Young people aged 16-17 cannot hold tenancies and so housing options are severely limited.	Young people aged 16-17 receive enhanced services via the Surrey Joint Protocol. They have access to specialist young peoples homelessness accommodation.
Disability (including carers)	Anecdotally we know that physically disabled people accessing settled accommodation in Spelthorne have much more limited options available to them due to potential property adaption requirements.	<p>When the level of need is identified for specific types of accommodation, such as disabled adapted, the Council's disposal protocol helps inform the acquisition delivery programme. This ensures that the Council maximises opportunities to support physically disabled people into affordable settled accommodation that meets their needs. Equally, those who may not have a physical disability but are instead impacted by severe anxiety, depression or poor mental health may have specific property requirements, such as, the need for homes on lower floor levels, sound proofing rooms or homes within a quieter part of the Borough. With a disposal protocol and property acquisition policy, the Council is able to secure dispersed affordable homes that will potentially meet with some of these more specialised needs.</p> <p>The Council has also recently reviewed the availability of accessible accommodation options for this affected group and are working with Knowle Green Estates on future developments to ensure future homes meet resident needs.</p> <p>The Council is responsible for administering Disabled Facility Grants. Where appropriate and households are allocated properties that do not</p>

		meet current needs relating to physical disabilities, Disabled Facility Grants or solutions under the principles of the Better Care Fund will be utilised to adapt properties
Gender (men and women)	Within the policy, sex is included within the calculation of assessing bedroom need. This is governed by the Governments guidance on calculating bedroom need for benefit entitlement purposes.	The policy aims to be inclusive as possible for people who identify as non-binary or gender fluid.
Race (including Gypsies & Travellers and Asylum Seekers)	Accommodation for people seeking asylum is the responsibility of the Home Office. Provision for pitches for gypsies and travelling showpeople are dealt with under the Local Plan.	N/A
Religion or belief (including people of no religion or belief)	No negative impacts have been identified.	N/A
Gender Re-assignment (those that are going through transition: male to female or female to male)	No negative impacts have been identified.	N/A
Pregnancy and Maternity	No negative impacts have been identified.	N/A
Sexual orientation (including gay, lesbian, bisexual and heterosexual)	No negative impacts have been identified.	N/A

Step 4 – Changes or mitigating actions proposed or adopted

Having undertaken the assessment are there any changes necessary to the existing service, policy, function or procedure? What changes or mitigating actions are proposed?

No changes required.

Step 5 – Monitoring

How are you going to monitor the existing service, function, policy or procedure ?

The Housing Allocations policy will be monitored by the Council's Strategic Housing Group who meet monthly, with any required changes to the policy being recommended to elected members (where required) as a result.

Part C - Action Plan

Barrier/s or improvement/s identified	Action Required	Lead Officer	Timescale
n/a	n/a	n/a	n/a

Equality Analysis approved by:

Group Head:	Date:
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Please send an electronic copy of the Equality Analysis to the Equality & Diversity Team and ensure the document is uploaded to the EA Register which will be available to the public:

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