

## Equalities Analysis Assessment

|               |                      |                    |                                                     |
|---------------|----------------------|--------------------|-----------------------------------------------------|
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| <b>Date</b>   | <b>15/08/2022</b>    | <b>Service</b>     | <b>Housing Partnerships and Service Improvement</b> |

### 1. The project or decision that this assessment is being undertaken for: Accommodation Procurement Strategy 2022 - 25

- 1.1. The Supreme Court judgment in the case of Nzolameso v Westminster City Council required local authorities to have “a policy for procuring sufficient units of temporary accommodation secondly, each local authority should have and keep up to date, a policy for allocating those units to individual homeless households.”
- 1.2. The Accommodation Procurement Strategy (Appendix 1) was developed and approved in 2015 to demonstrate Lewisham’s approach to procuring sufficient units of temporary accommodation following the Supreme Court decision in Nzolameso v Westminster City Council. The council’s Accommodation Procurement Strategy has been updated to reflect the current pressures of demand and supply for temporary accommodation which the Council is facing.
- 1.3. The strategy provides an action plan for meeting demand and sets out procurement activities that will be followed to source properties, both for temporary accommodation and for private rented sector offers.

### 2. The protected characteristics or other equalities factors potentially impacted by this decision

|                                                        |                                                         |                                                             |                                                                    |                                |
|--------------------------------------------------------|---------------------------------------------------------|-------------------------------------------------------------|--------------------------------------------------------------------|--------------------------------|
| <input checked="" type="checkbox"/> Age                | <input checked="" type="checkbox"/> Race                | <input checked="" type="checkbox"/> Maternity and pregnancy | <input checked="" type="checkbox"/> Marriage and civil partnership | <input type="checkbox"/> Other |
| <input checked="" type="checkbox"/> Gender             | <input checked="" type="checkbox"/> Gender reassignment | <input checked="" type="checkbox"/> Disability              |                                                                    |                                |
| <input checked="" type="checkbox"/> Religion or belief | <input checked="" type="checkbox"/> Carer status        | <input checked="" type="checkbox"/> Sexual orientation      |                                                                    |                                |

The strategy provides an action plan for meeting demand and sets out procurement activities that will be followed to sourcing properties, both for temporary accommodation and for private rented sector offers. This report outlines the Lewisham picture, summarises the key elements of the strategy and the rationale behind the proposed strategy.

The policy aims to provide enough housing for homeless households to meet demand. It aims to contain temporary accommodation costs by ensuring that supply is affordable to the council. The policy also aims to ensure that housing, for both temporary accommodation and for private rented offers, is affordable to low income households and within benefit levels, so it is sustainable in the longer term. This means that some properties procured will be outside London. The policy also aims to ensure that locations where properties are procured are suitable for homeless households.

We believe the proposed strategy could have an impact on many protected characteristics and, in particular, on:

- Age;
- Religion;
- Ethnicity;
- Disability;
- Gender;
- Carer status;
- Maternity and Pregnancy

### 3. The evidence to support the analysis

The key data used for this assessment is the service-user profile – i.e. those applying for housing support and currently accommodated in temporary accommodation. Much of this information is provided as part of a housing application and has been sourced from the in-house system.

Applicants, however, are not required to enter data on protected characteristics in their service-user profile. Therefore the council has limited data on the protected characteristics of applicants, so we are unable to provide a detailed assessment of the impact, or forecast the impact with a significant degree of confidence.

It should be noted that the housing service has recently implemented a new integrated housing system. In time, and with a re-registration process proposed as part of the policy review, our data quality should improve over time.

### Sources

Analysis has been undertaken into the profile of homelessness applications from April 2019 – July 2022. This was done by filtering the list of applicants for either those who made a homeless application or for whom a new duty was applied during the period. Where key data is not available from homelessness applications this has been taken from the profile of housing register applicants. Where data is not available this has been clearly stated.

## 4. The analysis

### Age

| Homelessness applications Age Range | %           |
|-------------------------------------|-------------|
| Less than 18                        | 1%          |
| 18-25                               | 23%         |
| 26-35                               | 28%         |
| 36-40                               | 12%         |
| 41-50                               | 18%         |
| 51-60                               | 12%         |
| More than 60                        | 5%          |
| <b>Total</b>                        | <b>100%</b> |

- The most represented age bracket in homelessness applications is 26-35.

### Ethnicity

| Homelessness applications Ethnicity                     | %     |
|---------------------------------------------------------|-------|
| Black/ African/Caribbean/Black British: Caribbean       | 24.3% |
| Black/ African/Caribbean/Black British: African         | 22.8% |
| White: English/Welsh/Scottish/Northern Irish/British    | 21.3% |
| Don't know / refused                                    | 7.1%  |
| Any other White background                              | 6.5%  |
| Any other ethnic group                                  | 4.8%  |
| Mixed/Multiple ethnic groups: White and Black Caribbean | 3.1%  |
| Any other Asian background                              | 2.4%  |
| Any other Black/African/Caribbean background            | 1.7%  |
| Any other Mixed/Multiple ethnic background              | 1.5%  |
| Mixed/Multiple ethnic groups: White and Black African   | 1.2%  |
| Other ethnic group: Arab                                | 0.8%  |
| Asian/Asian British: Indian                             | 0.6%  |
| Asian/Asian British: Pakistani                          | 0.5%  |
| Asian/Asian British: Chinese                            | 0.4%  |
| Asian/Asian British: Bangladeshi                        | 0.3%  |
| White: Irish                                            | 0.3%  |
| Mixed/Multiple ethnic groups: White and Asian           | 0.3%  |
| White: Gypsy or Irish Traveller                         | 0.1%  |

|                    |                |
|--------------------|----------------|
| <b>Grand Total</b> | <b>100.00%</b> |
|--------------------|----------------|

- We hold high quality data about the ethnicity of residents who make an application of homelessness, as this is collected by officers from the applicants.
- This shows that over half of homeless households have been from Black, Asian and Minority Ethnic households.

### Maternity

- **3.69%** of the lead tenants were known to be pregnant at the time of the most recent change in their application status.

### Gender

- **55.7%** of applicants were female, **44.2%** male, and **0.1%** transgender.
- This ratio is much more even than that observed for temporary accommodation, which skews heavily female. This is most likely because there are more single women with dependent children owed a long term homelessness duty (as dependent children is indicative of a priority need).

### Gender identity

- There is no data available for gender identity within homeless applicants.

### Disability

| Primary Disability Declared in Homelessness Applicants | Count |
|--------------------------------------------------------|-------|
| Physical impairment or mobility issues                 | 110   |
| Mental Health Condition                                | 93    |
| Long standing illness or health problem                | 46    |
| Blind or serious visual impairment                     | 16    |
| General Learning Disability                            | 14    |
| Deaf or serious hearing impairment                     | 13    |
| Specific Learning Disability                           | 13    |

- This data field was highly incomplete for homelessness applications, so meaningful analysis is not possible.
- 7% of applicants on the housing register have declared a disability.
- As at August 2022, there were 8 households in temporary accommodation awaiting accessible housing.

### Religion

| Religion           | %              |
|--------------------|----------------|
| Christian          | 49.6%          |
| No religion        | 32.4%          |
| Muslim             | 13.6%          |
| Other religion     | 2.3%           |
| Hindu              | 1.5%           |
| Buddhist           | 0.3%           |
| Jewish             | 0.3%           |
| <b>Grand Total</b> | <b>100.00%</b> |

- This data field was highly incomplete for homelessness applications, so meaningful analysis is not possible.
- Of the 663 remaining individuals who have disclosed a religion, almost a half have identified as Christian. The next most prevalent declaration is 'no religion', followed by Muslim. This data field was highly incomplete for homelessness applications, so meaningful analysis is not possible.

### Carer status

- There is no data for carers within the housing register or homelessness applications.

### Sexual orientation

| How would you define your sexual orientation? | Percentage |
|-----------------------------------------------|------------|
| Heterosexual / Straight                       | 95.3%      |
| Gay / Lesbian                                 | 2.5%       |
| Other sexual orientation                      | 1.7%       |
| Bisexual                                      | 0.5%       |

- Of those who have disclosed their sexual orientation, 95% have identified as straight / heterosexual.
- Less than 5% have identified as gay, lesbian, bisexual or other.

### Income

- By definition, all applicants on the housing register are on low incomes and / or in receipt of housing benefit or Universal Credit.

## 5. Impact summary

### Age

Priority for housing is generally through having dependent children, and there are therefore a higher proportion of younger households in receipt of temporary accommodation. Children can potentially be negatively affected if they need to move outside of Lewisham and London. This is due to the potential requirement to start new schools, which can be disruptive particularly if they are at key exam stages. Although the council will, wherever possible, seek to acquire affordable accommodation within Lewisham and in neighbouring boroughs, this is becoming increasingly difficult, due to the lack of properties within LHA affordable levels. Overall, the impact is neutral as the council operates a Location Priority Policy (LPP), which sets out how it will prioritise who it places in or outside of Lewisham. Under this policy, some children and families will be prioritised for in borough/adjacent borough accommodation,

### Disability

In general adapted accommodation is scarce and the council faces significant challenges in procuring properties that are suitable for people with disabilities. As such, implementing the strategy may allow those without a disability to move into suitable accommodation more quickly than those with a disability.

Overall, the impact is neutral as the council has adopted a number of policies that seek to mitigate the impact on certain households, including:

The council operates a Private Rented Sector Offer policy which sets out who it will offer private rented accommodation to, and who is exempt from such offers, including:

- Where a household requires adaptations to meet health and disability related needs which it is not reasonably practicable to achieve in private rented sector accommodation.
- Where a household is unable to manage a tenancy in the private rented sector without a substantial level of tenancy related support. This may include some disabled households who wouldn't be able to manage a private rented tenancy (for example, those who may have care and support needs or a mental health condition which prevents them from managing a tenancy)

The council is implementing a new banding structure under its Housing Allocations Policy, which sets out how it will prioritise housing register applicants for social housing. Implementing the banding structure may allow those with a disability to move more quickly within the "medical high" rehousing reason, which will be placed within Band Two.

The council also operates a Location Priority Policy (LPP), which sets out how it will prioritise who it places in or outside of Lewisham. Under this policy, some disabled applicants will be prioritised for in borough/adjacent borough accommodation, including:

- Disabled applicants receiving treatment for a physical or mental health condition from a specialist hospital unit which cannot be transferred to another NHS service or they are at a critical point in their treatment, will also qualify for 'In-borough' priority. Disabled applicants may also be able to show other circumstances which demonstrate an exceptional and compelling need which cannot be met outside of the London Borough of Lewisham.

### **Gender**

There are a higher proportion of women amongst service users – this is explained by the higher proportion of families with single mothers and the fact that children are a key consideration for local authorities in providing accommodation, and the high proportion of female victims of domestic abuse. Single female parents are disproportionately affected by homelessness and the benefit cap compared to their share of the population. Single mothers can potentially be negatively affected as additional stock from procurement that is affordable for those affected by the benefit cap will likely be further afield.

### **Pregnancy and maternity**

Overall, the impact is neutral as it continues existing practises, which are transparent, consistent and clearly defined. Women who are on maternity leave from employment and meet the required criteria are prioritised for placements close to the London Borough of Lewisham.

### **Ethnicity**

A greater proportion of homeless decisions are made for ethnic minorities and therefore the strategy will have a disproportionate effect on ethnic minority households. There may be fewer cultural facilities for some ethnic groups in locations outside London, although this would very much depend on the area where the offer was made. Overall, in assessing the amended strategy the impact is neutral as it continues existing practises, which are transparent, consistent and clearly defined.

### **Religion**

Insufficient monitoring customer engagement and feedback means that it is not be possible at this time to properly evaluate with any certainty what impact the service has and whether some customers may be disadvantaged through their specific religion. However, there may be fewer places of worship or cultural facilities for some religious groups in locations outside London, although this would very much depend on the area where the offer was made. Overall, the impact is neutral as it continues existing practises, which are transparent, consistent and clearly defined.

### **Carer Status**

Overall, the impact is neutral as it continues existing practises, which are transparent, consistent and clearly defined. For applicants have a longstanding arrangement to provide essential care to another person or people in the London Borough of Lewisham who is not part of their household and where placement in another local authority would disrupt be of detriment to this arrangement. They will also qualify for 'In-borough' priority.

## **6. Mitigation**

This Equalities Analysis Assessment recognises that the implementation of the policy will have a greater impact on specific groups because they have a higher representation within the overall service user profile. The impact on these groups will be mitigated by the individual assessment carried out on each case which will allow for any relevant factors to be considered in the allocation of housing. Further mitigating considerations or actions to be taken include:

## **Age**

The council operates a Location Priority Policy (LPP), which sets out how it will prioritise who it places in or outside of Lewisham. Under this policy, some children and families will be prioritised for in borough/adjacent borough accommodation, including:

- Children in all exam years at school
- Children subject to a Child Protection Plan in the London Borough of Lewisham which cannot be transferred to another local authority without causing serious detriment to a child's welfare.
- Children subject to an Education Health and Care Plan (EHCP) or a Statement of Special Educational Needs in the London Borough of Lewisham which cannot be transferred to another local authority without causing serious detriment to the child's welfare.

## **Disability**

The council operates a Private Rented Sector Offer policy which sets out who it will offer private rented accommodation to, and who is exempt from such offers, including:

- Where a household requires adaptations to meet health and disability related needs which it is not reasonably practicable to achieve in private rented sector accommodation.
- Where a household is unable to manage a tenancy in the private rented sector without a substantial level of tenancy related support. This may include some disabled households who wouldn't be able to manage a private rented tenancy (for example, those who may have care and support needs or a mental health condition which prevents them from managing a tenancy)

The council is implementing a new banding structure under its Housing Allocations Policy, which sets out how it will prioritise housing register applicants for social housing. Implementing the banding structure may allow those with a disability to move more quickly within the "medical high" rehousing reason, which will be placed within Band Two.

The council also operates a Location Priority Policy (LPP), which sets out how it will prioritise who it places in or outside of Lewisham. Under this policy, some disabled applicants will be prioritised for in borough/adjacent borough accommodation, including:

- Disabled applicants receiving treatment for a physical or mental health condition from a specialist hospital unit which cannot be transferred to another NHS service or they are at a critical point in their treatment, will also qualify for 'In-borough' priority. Disabled applicants may also be able to show other circumstances which demonstrate an exceptional and compelling need which cannot be met outside of the London Borough of Lewisham.

## **Gender**

Where households are affected by the benefit cap, the council will work with partners to refer households into employment support and benefit advice.

The council has implemented the Domestic Abuse Bill. During the homelessness application, information is collected which ensures that a suitable offer of accommodation can be made. The council will ensure suitability assessments are completed to ensure victims of domestic abuse are removed from areas of risk.

## **Religion**

During the homelessness application, information is collected which ensures that a suitable offer of accommodation can be made. Religious beliefs can be taken into account by reviewing the suitability of accommodation and its proximity to relevant places of worship

## **Carer Status**

The council operates a Location Priority Policy (LPP), which sets out how it will prioritise who it places in or outside of Lewisham. Under this policy, some carers, and people being cared for, will be prioritised for in borough/adjacent borough accommodation.

## 7. Service user journey that this decision or project impacts

If you think you may become homeless, you should contact the Council for advice at the earliest opportunity. The earlier you contact us the more chance we have of helping you to avoid becoming homeless.

If you want to join the housing list you can do this by referring to our information on the website [www.lewisham.gov.uk](http://www.lewisham.gov.uk)

For advice about your housing options, please contact the **Allocations and Lettings Service** on 020 8314 7007 or [LewishamFindYourHomeApplications@lewisham.gov.uk](mailto:LewishamFindYourHomeApplications@lewisham.gov.uk).

If you are vulnerable (for example you are elderly, have learning or other disability, or do not have the ability to read English or another language) we can assist you in accessing housing and bidding for properties. The **Homeseach Support Officer**, based in the Allocations and Lettings Service, assists applicants to engage with the choice based lettings system and can assist clients with bidding. Please contact the Allocations and Lettings Service for further information on 020 8314 7007 or [LewishamFindYourHomeApplications@lewisham.gov.uk](mailto:LewishamFindYourHomeApplications@lewisham.gov.uk).

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|-----------------------------------------|--|
| <b>Signature of<br/>Head of Service</b> |  |
|-----------------------------------------|--|

For further information please see the full [Corporate Equality Policy](#).