

# .SSA EQUALITY IMPACT AND NEEDS ANALYSIS

<b>Directorate</b>	<b>Housing and Regeneration</b>
<b>Service Area</b>	<b>Housing Delivery and Development</b>
<b>Service/policy/function being assessed</b>	<b>Intermediate Housing Policy and Marketing</b>
<b>Which borough (s) does the service/policy apply to</b>	<b>Richmond</b>
<b>Staff involved</b>	<b>Housing Delivery &amp; Development Team</b>
<b>Date approved by Directorate Equality Group (if applicable)</b>	<b>N/A</b>
<b>Date approved by Policy and Review Manager</b>	29.09.2017
<b>Date submitted to Directors' Board</b>	

## SUMMARY

The changes we are making to the existing Intermediate Housing policy for LBR are quite minor, these are:

- Increasing the household income cap for eligible households.
- Supporting the new London Living Rent (LLR) product introduced by the GLA to the Borough in line with local requirements.
- Supporting RPs in developing innovative forms of housing at a lower cost for Intermediate Housing.
- Expanding one of the priority tiers for Intermediate Household eligibility to include households which are overcrowded.
- Where Intermediate Rent Stock arises (properties rented up to 80% of market rate), the same affordability criteria for Shared Ownership Housing is applied.

Nevertheless; the policy will have some positive effects on groups with protected characteristics. The changes will continue to support the financial viability of schemes in the borough. This will allow the schemes to continue to cater to groups with protected characteristics as when it was initially introduced. In addition:

- Innovative new forms of housing using modular construction will benefit younger age brackets.
- The expansion of tier three to identify overcrowded households will help lone single parents (particularly) mothers facing these circumstances.
- Through research undertaken and by constructing new forms of collecting information on groups protected characteristics accessing intermediate housing in the Borough, we can ensure Registered Providers (RPs) target marketing at groups which have been shown to be under representative in home ownership, both locally and nationally.

## 1. Background

Intermediate housing – the most common form in the Borough being shared ownership - provides home ownership opportunities for residents who cannot afford to buy on the open market. The Council wishes to ensure that intermediate housing (such as shared ownership) is marketed by Registered Providers (RPs) to Richmond residents in a comprehensive and strategic manner that reflects the priorities of the Council. The marketing statement therefore provides guidelines for RPs to follow when promoting their schemes.

The Intermediate Housing Policy was introduced in 2012 and was updated in 2015. As per Housing & Regeneration Department practice, it is reviewed every few years. As part of this review we are making a number of changes to the existing policy:

**- We will be changing the household income cap for 2/3 of eligible households in the borough from £45,000 to £47,000.**

In setting the cap, the Council has to address and balance two objectives: the need to ensure that intermediate housing is affordable to a range of household incomes in the Borough, and the ability of registered providers to optimise income to support intermediate housing delivery in the Borough. Without sufficient return it is not be viable for Registered Providers to continue developing low cost market housing in the Borough. This cap increase was calculated using a number of statistical techniques based on the formulas used to calculate intermediate housing scheme viability and real data from existing schemes. Including household incomes and property prices.

**- The GLA have introduced a new Affordable Housing Product called London Living Rent (LLR). Whilst the Council are overall supportive of the product, it has raised some objections. As a result we will be introducing it to the borough in Line with Intermediate Housing Policy guidelines.**

Whilst the Council are supportive of the product as a way of households gaining the opportunity to access low cost home ownership, it has raised objections on the overall Policy. The objections cover the fact that households are forced to leave rented accommodation for an exclusive three month period prior to cascading wider to Pan London nomination if their financial circumstances are such that they cannot afford to convert from rented housing into shared ownership. Also the Council have advised the GLA that these properties should be marketed locally.

**- Expanding the Priority three tier of applicants to include those who live in overcrowded housing and cannot afford appropriate housing in the locality.** This is part of our overall plan to simplify the priority cascade to make the allocation process simpler for applicants, RPs and the Council alike.

**- The Council will be working closely with RPs to investigate more innovative approaches to providing intermediate rented housing to increase affordable housing delivery.** As an example of this, one of the Council's preferred housing association

partners, Richmond Housing Partnership (RHP), has for the past two years been working with modular manufacturers to design and produce modular housing aimed at providing low cost rented accommodation for single and couple working households. This is also known as modern methods of construction (MMC) housing.

- **Where Intermediate Rent Stock arises (properties rented up to 80% of market rate), the same affordability criteria for Shared Ownership Housing is applied.** Richmond Borough Council currently has very little Intermediate Rent Stock, so this is not projected to have a major effect either way. Where this stock does come onto the market, the criteria will cater to low income groups as specified for Shared Ownership housing.

## 2. Analysis of need and impact

Protected group	Findings																														
Age	<p><b><u>Census 2011 (LBRuT Population Distribution):</u></b></p> <table border="1"> <thead> <tr> <th>Age</th> <th>Percent</th> </tr> </thead> <tbody> <tr> <td>0-20</td> <td>24%</td> </tr> <tr> <td>21-30</td> <td>12%</td> </tr> <tr> <td>31-40</td> <td>18%</td> </tr> <tr> <td>41-50</td> <td>16%</td> </tr> <tr> <td>51-60</td> <td>11%</td> </tr> <tr> <td>61+</td> <td>17%</td> </tr> </tbody> </table> <p><b><u>Latest Shared Ownership (SO)/Intermediate Housing register data:</u></b></p> <table border="1"> <thead> <tr> <th>Age Bracket</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>0-20</td> <td>1</td> </tr> <tr> <td>21-30</td> <td>24</td> </tr> <tr> <td>31-40</td> <td>36</td> </tr> <tr> <td>41-50</td> <td>25</td> </tr> <tr> <td>51-60</td> <td>10</td> </tr> <tr> <td>61+</td> <td>5</td> </tr> <tr> <td>Total</td> <td>100</td> </tr> </tbody> </table> <p>The census data indicates that there is a fairly uniform distribution</p>	Age	Percent	0-20	24%	21-30	12%	31-40	18%	41-50	16%	51-60	11%	61+	17%	Age Bracket	%	0-20	1	21-30	24	31-40	36	41-50	25	51-60	10	61+	5	Total	100
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of age across the borough.

In the previous Eina for this policy, data showed that in Richmond upon Thames only 13% of household reference persons (the person identified to best respond to the Census return) aged under 24 were owner occupiers, increasing to 36% of those aged 25-34 and 63% of those aged 35 to 49.

Ultimately the intermediate housing policy does attempt to make some headway against existing unevenness, but there are issues in access to home ownership (which intermediate housing policy aims to address).

Nationally, owner occupation is associated with an older age profile compared to private renting and social housing. This is because to access owner occupation a household requires a stable income source and a deposit for a mortgage. Younger households may need time to save a deposit or if they are at the beginning of their careers may prefer the flexibility of private renting so they can easily move jobs. (ONS, 2016)<sup>i</sup>

Extreme affordability issues facing the London housing market and subsequent requirements for larger deposits also put owner occupation beyond the reach of younger households. Data from the Halifax building society highlights the average age of a first time buyer in London is 32 years of age<sup>ii</sup>.

From the data it appears that the Intermediate Housing Policy offer by LBRuT is making some headway against existing age inequalities in home ownership with large amounts in the 21-30 and 31-40 age bracket. However more progress could be made with the 21-30 age bracket.

**Disability**

**Census 2011**

People Permanently Sick or Disabled in LBR(2011)	People Permanently Sick or Disabled in LBR (% of all aged 16-74 (2011))
2,802	2.03%

Data on Disability on the LBR Shared Ownership register is currently not collected. On the LBR general housing waiting list around .5% of those on the list are listed as part of the Physical Disability queue (i.e. waiting for wheelchair/other-adapted housing).

On a national level, research by Aspire (2014)<sup>iii</sup> found that around 24,000 wheelchair users in England are waiting for appropriate social or affordable housing. When matched with freedom of information responses on wheelchair accessible properties allocated to wheelchair users, they calculated that it would take 6 years to meet current demand if allocation rates continue at the current rate. Hemingway (2011)<sup>iv</sup> highlights the sheer range of barriers which face disabled people when trying to access appropriate housing. This can include difficulties viewing properties or even accessing estate agents, there may be lack of accessible information and disabled people may face attitudinal barriers from estate agents regarding their disability. Clearly, barriers exist to people with disabilities with respect to accessing suitable housing. Whilst there is no data on Shared Ownership housing on this aspect, it is clear from the general waiting list that more progress could be made.

**Gender (sex)**

**Census 2011, Gender (Sex) distribution in LBR**

Male	Female
49% (91,149)	51% (95,849)

**Single parent households in LBR**

Lone Parent Households 2011 Census		
Single Parent H/Hold Male	365	0.46%
Single Parent H/Hold Female	3,503	4.40%
Total Richmond Households	79,800	100%

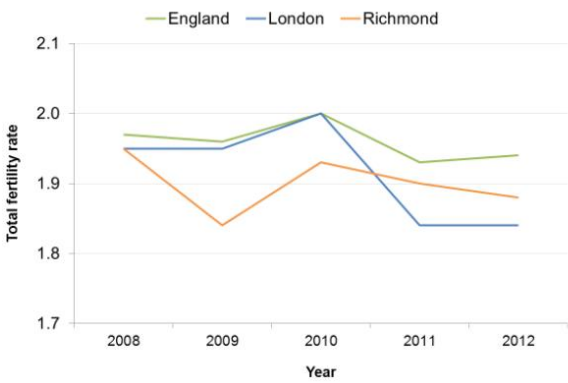
This data shows that whilst the gender (sex) distribution in LBRuT is fairly balanced, of all the single parent households, women slightly outnumber men.

**Richmond Shared Ownership Register**

Gender (sex) with/without children	%
Female with children	20.2381
Female without children	25
Male with children	4.761905
Male without children	22.61905
Joint with children	17.85714
Joint without children	9.52381

On the shared ownership register women (with or without

	<p>children) take the largest proportion of the register. However it should be kept in mind that according to the ONS (2014)<sup>v</sup> 91% of lone parents with dependent children were women. The implication is that lone parent households are disproportionately more likely to affect women than men. This implies that there needs to be a policy offer for this.</p>														
<p><b>Gender reassignment</b></p>	<p><b><u>Joint Strategic Needs Assessment 2014</u></b></p> <p>The number of people presenting to health services and Gender Identity Clinics for gender dysphoria is growing rapidly – an estimated 15-20% increase per annum. This is thought to be due to a number of factors including increased public awareness and knowledge, NHS provision of services, legislative changes, mutual support within the growing Transgender community and more respectful press coverage. Using the 2009 Gender Identity Research and Education Society (GIREs) incidence estimate and predicted growth, incidences in 2013 of presenting would be roughly 6 per 100,000 aged 15 and over per year.</p> <p>Assuming uniform distribution of individuals geographically, there may be between 16 and 39 people with gender dysphoria in Richmond Borough, and the potential for 12 presentations for treatment in 2013 in those over 15 years old.</p> <p>There is little information on gender reassignment amongst those using homelessness services in Richmond, or on the Shared Ownership register either. We need to look at ways in which we can capture this information with regards to Intermediate Housing units moving forward.</p>														
<p><b>Marriage and civil partnership</b></p>	<p><b><u>Census 2011</u></b></p> <table border="1" data-bbox="624 1541 1134 1912"> <thead> <tr> <th colspan="2">Marriage and Civil Partnerships in Richmond upon Thames</th> </tr> <tr> <th>Status</th> <th>Percentage of Population</th> </tr> </thead> <tbody> <tr> <td>Single</td> <td>37%</td> </tr> <tr> <td>Married</td> <td>48%</td> </tr> <tr> <td>Divorced</td> <td>8%</td> </tr> <tr> <td>Separated</td> <td>2%</td> </tr> <tr> <td>Widowed</td> <td>5%</td> </tr> </tbody> </table> <p>In addition to the information above, 665 residents (0.44% of those eligible) responded as being in a registered same sex civil</p>	Marriage and Civil Partnerships in Richmond upon Thames		Status	Percentage of Population	Single	37%	Married	48%	Divorced	8%	Separated	2%	Widowed	5%
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	<p>partnership.</p> <p>There is no data on the shared ownership register on marriage/civil partnership status or the Richmond general housing register.</p> <p>However, according to research by Shelter (2014)<sup>vi</sup> of the types of household analyse in their report, they concluded that in over 85% of Local Authority Area, less than one in ten available properties are affordable to a single person on average wages. As LBRuT has particularly high house prices relative to London and the Borough this is something we need to be aware of. Policy should take this into account when catering to the needs of single potential-homeowners.</p>																								
<p><b>Pregnancy and maternity</b></p>	<p><b><u>ONS birth summary statistics</u></b></p> <p>In 2012, there were 2,916 live births to women living in Richmond. The live birth rate was 72 per 1,000 women aged 15-44 years in the borough which is predicted to remain fairly stable over the next ten years.</p> <p>However, Fertility rates in Richmond appear to have been declining. (JSNA)<sup>vii</sup></p>  <table border="1"> <caption>Total fertility rate data (approximate values from graph)</caption> <thead> <tr> <th>Year</th> <th>England</th> <th>London</th> <th>Richmond</th> </tr> </thead> <tbody> <tr> <td>2008</td> <td>1.97</td> <td>1.95</td> <td>1.95</td> </tr> <tr> <td>2009</td> <td>1.96</td> <td>1.95</td> <td>1.84</td> </tr> <tr> <td>2010</td> <td>2.00</td> <td>2.00</td> <td>1.93</td> </tr> <tr> <td>2011</td> <td>1.93</td> <td>1.84</td> <td>1.90</td> </tr> <tr> <td>2012</td> <td>1.94</td> <td>1.84</td> <td>1.88</td> </tr> </tbody> </table> <p>The previous EINA found that the CAB national website outlines housing issues where due to pregnancy and maternity applicants may face discrimination; in the private rented sector e.g. landlord asking a person to leave when they find out the tenant is pregnant; or when buying e.g. estate agent not selling to a person because they are pregnant.</p> <p>So whilst the impact of housing on pregnant women <i>may</i> be declining over time in the Borough, it is important there is a Housing-related policy offer nonetheless.</p>	Year	England	London	Richmond	2008	1.97	1.95	1.95	2009	1.96	1.95	1.84	2010	2.00	2.00	1.93	2011	1.93	1.84	1.90	2012	1.94	1.84	1.88
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**Race/ethnicity****Census 2011**

	<b>Richmond upon Thames</b>	<b>England</b>	<b>London</b>
<b>White</b>	86%	86%	60%
<b>Black</b>	2%	3%	13%
<b>Asian</b>	7%	8%	18%
<b>Mixed</b>	4%	2%	5%
<b>Other</b>	2%	1%	3%

**Shared Ownership Register**

<b>Row Labels</b>	<b>%</b>
1_ White	67
2_ Mixed_multiple_Ethnic_groups	5
3_ Asian_or_Asian_British	10
4_ Black_African_Caribbean_or_Black_British	4
5_ Other_Ethnic_Group	1
6_ Refused_to_disclose	6
7_ Not_Asked	8
(blank)	0
Grand Total	100

The shared ownership register has a higher proportion of non-white ethnic groups relative to the census data for Richmond as a whole.

Research from the House of Commons library<sup>viii</sup> found that – nationally – home ownership is more common amongst White, Indian or Pakistani backgrounds compared to other ethnic groups. Additionally, between 2001 and 2016 the rate of ownership *fell* across all ethnic groups, but was most pronounced amongst non-white ethnic groups.

As the previous Eina identified, whilst reasons for home ownership are complex, historic access and discrimination can play a part. Therefore, an intermediate housing policy would need to take account of this.



<b>Religion and belief, including non belief</b>	<p><b>Census 2011</b></p> <table border="1" data-bbox="624 501 1134 913"> <thead> <tr> <th>Religion/Belief</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Christian</td> <td>55%</td> </tr> <tr> <td>Buddhist</td> <td>1%</td> </tr> <tr> <td>Hindu</td> <td>2%</td> </tr> <tr> <td>Jewish</td> <td>1%</td> </tr> <tr> <td>Muslim</td> <td>3%</td> </tr> <tr> <td>Sikh</td> <td>1%</td> </tr> <tr> <td>Other Religion</td> <td>0%</td> </tr> <tr> <td>No Religion</td> <td>28%</td> </tr> <tr> <td>No Religion Stated</td> <td>8%</td> </tr> </tbody> </table> <p>The previous Eina found that most religious groups in Richmond upon Thames have high levels of home ownership, with owner occupation being the majority tenure, ranging from 79% of Jewish residents to 53% of Buddhist residents. The only religious group with very low levels of owner occupation and where there may be an increased need for intermediate housing is for Muslims residents.</p> <p><b>Owner occupation and Muslim residents in Richmond;</b>  Muslim residents in Richmond have low levels of owner occupation with just over 39% of Muslim Household Reference Persons owning their own homes. This is slightly higher than the Greater London average, with 30% of Muslim Household Reference Person’s being owner occupiers.</p> <p><b>National and Regional information around low levels of owner occupation for Muslims</b>  Understanding low levels of owner occupation amongst Muslim residents is complex. Across the UK high levels of housing need facing the Muslim community has led to a high proportion accessing the social rented sector<sup>ix</sup>. We would want to work with RPs to ensure Intermediate Housing can ameliorate this where possible through positive marketing techniques.</p>	Religion/Belief	%	Christian	55%	Buddhist	1%	Hindu	2%	Jewish	1%	Muslim	3%	Sikh	1%	Other Religion	0%	No Religion	28%	No Religion Stated	8%
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<p><b>Sexual orientation</b></p>	<p>The 2011 census did not have a specific question regarding sexual orientation. Neither the housing register nor the shared ownership register captures this information either.</p> <p>National research captures some of the barriers faced by LGBT people when accessing housing. Sullivan (2014)<sup>x</sup> covers the need for acceptance and safe spaces for LGBT seniors which may be unavailable in open market housing. Durso et al (2012)<sup>xi</sup>, (Urig 2014)<sup>xii</sup>, and Hills et al (2010)<sup>xiii</sup> cover the range of inequalities and barriers which face LGBT people when accessing housing. Stonewall (2017)<sup>xiv</sup> uncovered that one in ten LGBT people who were looking for a house or flat to rent or buy in the last year were discriminated against because of their sexual orientation and/or gender identity. In addition black, Asian and minority ethnic LGBT people (24 per cent) were discriminated against in the past year when looking for a new home. These barriers are substantial and need an appropriate policy response.</p>
<p><b>Across groups i.e older LGBT service users or bme young men</b></p>	<p>Looking at the different age brackets, there is an interesting distribution of single men/women/joint with children.</p> <ul style="list-style-type: none"> <li>- 'Female with children' appears frequently in the earlier age brackets: 21-30, 31-40, 41-50.</li> <li>- 'male with children' appears in: 31-40, 41 -50.</li> </ul> <p>This implies a higher demand for intermediate housing for women with children than men with children, but crucially, across <i>all</i> age groups.</p> <p>With respect to age and gender, the category 'sole female' applicant dominates across all age brackets with the exception of 61+. Sole Male applicant reaches the highest frequency in the 31-40 bracket.</p> <p>The implication of this data could be as follows. The policy offer (if being marketed appropriately) is correctly targeting women with children, especially as research has shown this group is overrepresented in lone parent households. With respect to age and gender, women are again highly represented, but we may be missing out on older men who could benefit from the policy.</p>

Data gap(s)	How will this be addressed?
There is no shared ownership register data on Disability, Gender reassignment, Marriage & civil Partnership, Pregnancy & maternity or religion.	We will work to build an online form – or other appropriate data collection method - in conjunction with the HIAS and the RPs to ensure we can capture this data where possible.

### 3. Impact

Protected group	Positive	Negative
<b>Age</b>	The council will be working closely with RPs to develop innovative forms of modular, low cost housing. This will also open up opportunities to younger age groups who will benefit most from this strategy.	In section two it was identified that younger residents appear to be more highly represented in Shared Ownership applications compared to the population of LBR as a whole. This is congruent with research that shows that owner occupation is more favourable to older age groups nationally. It is possible that the policy changes this Eina refers to could have a negative impact on younger age groups as higher (older) income groups <i>could</i> take places of lower (younger) income groups. However, if the income cap was not raised, there is a risk that future schemes <i>would not be financially viable</i> . This would have a far greater, negative impact on younger residents as there would be fewer units overall.
<b>Disability</b>	<p>In section 2, there were issues identified facing individuals with disabilities when accessing housing at a national level. Additionally, there may be further issues at a local level as people with disabilities are under represented on the LBRuT housing register when compared to the population of LBRuT as a whole.</p> <p>The main way these disparities are addressed is</p>	

	<p>through the marketing statement which accompanies every policy change to intermediate Housing strategy in the Borough .The marketing clarifies the expectations the Council has with RPs. This includes highlighting specific requirements for marketing shared ownership wheelchair accessible units. It also includes requirements for the marketing of re-sales of wheelchair accessible units, so that units are not lost over the long term.</p> <p>Additionally, the marketing statement includes requirements for RPs to better market wheelchair accessible units including more joint working with local organisations to publicise opportunities, such as RAID.</p> <p>The minor policy changes enacted in this update will prove positive in continuing to support the financial viability of Intermediate housing schemes. Financial viability assessments by developers of intermediate housing often find it hard to justify wheelchair accessible/supported units on the basis if viability. By changing the cap, exploring MMC units and introducing LLR it will help support the financial viability of schemes, including contributing to units which support wheelchair/supported access for example.</p>	
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<p><b>Gender (sex)</b></p>	<p>Whilst the gender balance in Richmond is fairly even, there is a higher proportion of single female parents than single male parents. This is reflected in the Shared Ownership Housing register. Therefore, there is a need for a policy intervention that helps tackle these inequalities. One way in which this policy change will assist is by helping the council to identify applicants living in overcrowded housing. Where overcrowded housing is due to large numbers of children in the property, this policy would help to identify these households and contribute to providing them with suitable accommodation as a result.</p>	
<p><b>Gender reassignment</b></p>		<p>These policy changes will not have a significant impact either way on this protected group. There is insufficient data on this group to make a judgement. However by reviewing the equality data protection procedures, we can make more informed policy judgements in the future.</p>
<p><b>Marriage and civil partnership</b></p>	<p>Again, as there is not enough data on this characteristic, it is not easy to make a judgement. However as research shows it is much harder for single individuals to afford housing in the UK than couples. By ensuring the long term viability of these schemes and exploring innovative new products, we can reduce the cost of schemes, thus making them more affordable to those single people who may be on</p>	

	lower household incomes.	
<b>Pregnancy and maternity</b>		Whilst there is nothing directly on the policy changes which will directly impact on this group one way or another. When working with the RPs to develop innovative forms of housing , we can emphasise the importance of catering to different household compositions (for example. single mothers with young children)
<b>Race/ethnicity</b>	As stated in section 2, there are complex reasons for home ownership amongst different ethnic groups in the UK, these are related to historic access and discrimination reasons. The marketing statement (as in the original policy implementation) does and will include requests to RPs to undertake direct marketing to community groups/media for BME communities. By working to improve data collection on equalities with RPs we will be able to measure this more accurately and enact more targeted policy actions in the future.	
<b>Religion and belief, including non belief</b>	There are no changes to the policy which make a direct attempt at targeting certain groups by religious affiliation. What we will do is work with RPs to ensure that marketing also targets Muslim community groups to help reduce the low levels of home ownership amongst this groups. This is already included in the Marketing statement, but is something we can emphasise to RPs as a key finding which they	

	should take into consideration when undertaking marketing strategies.	
<b>Sexual orientation</b>	<p>There are no changes to the policy which make a direct attempt at targeting certain groups by sexual orientation. However by improving the data collection process we can ascertain better the potential inequalities for this protected characteristic w.r.t intermediate Housing.</p> <p>The Council will work with RPs to adopt the suggestions by Stonewall (2017) that Associations/RPs could take to improve access to (Intermediate and other) housing for LGBT groups. These are:</p> <ul style="list-style-type: none"> <li>- Make clear to all tenants that discriminatory treatment of other residents, including anti-LGBT behaviour, will not be tolerated.</li> <li>- Consult with local LGBT groups on how to make services inclusive and to encourage LGBT people to report discrimination from staff or other tenants.</li> <li>- Develop and display clear policies, procedures and staff training on LGBT inclusion.</li> </ul>	

#### 4. Actions

Put in this table actions you have identified that will be included in your strategy/policy and supporting action plan or mitigating actions you have identified that need to be undertaken.

Include how the impact of actions will be measured for example if you resolve to make a service more accessible for older residents say what your current baseline is and what target you want to achieve.

These actions will be tracked by the Policy and Review Team.

Action	Lead Officer	Deadline
Look at ways to Improve data collection on missing equalities/protected groups	Joseph Foster	April 2018
Emphasise to RPs working with Modern Methods of Construction the importance of catering to different household compositions (for example. single mothers with young children)	Joseph Foster	July 2018 (Housing Development requires large lead in times)
Emphasise to RPs the importance of making safe spaces for LGBT people based on the Stonewall suggestions above.	Joseph Foster	April 2018
Emphasise to RPs, where different groups by religious affiliation face additional barriers to Housing, to look at ways to direct marketing activities accordingly. As the marketing statement does with BME and other ethnic minority groups.	Joseph Foster	April 2018

### 5. Consultation. (optional section– as appropriate)

Where a significant change is proposed to a service or where a new policy/service/service specification is being developed it is best practice to consult on the draft findings of an ENIA in order to identify if any impact or need has been missed.

*N/a as changes not significant enough, but will be consulting with RPs on the above changes as part of Intermediate Policy changes.*

<sup>i</sup> <http://visual.ons.gov.uk/uk-perspectives-2016-housing-and-home-ownership-in-the-uk/>



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- ii Halifax, 2014 available at [www.lloydsbankinggroup.com/globalassets/documents/media/press-releases/halifax/2014/first-time-buyer-half-year-review-web-version-pdf](http://www.lloydsbankinggroup.com/globalassets/documents/media/press-releases/halifax/2014/first-time-buyer-half-year-review-web-version-pdf)
- iii Aspire, 2014, "Wheelchair Accessible Housing, waiting for appropriate housing in England", October, 2014, available at [https://www.housinglin.org.uk/\\_assets/Resources/Housing/Support\\_materials/accessiblehousing2014-aspire.pdf](https://www.housinglin.org.uk/_assets/Resources/Housing/Support_materials/accessiblehousing2014-aspire.pdf)
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