

Equality Impact Assessment – the process for analysing the effects on equality

EQUALITY IMPACT ASSESSMENT (EqIA)

SECTION 1: SUMMARY OF EQUALITY IMPACT ASSESSMENT (EqIA)

1.1	Details of the Policy, Strategy, Function, Project or Activity
	<p>Title of EqIA: Proposal to change the use of Tonbridge House retirement housing scheme to general needs housing</p> <p>Date of EqIA: 21 November 2013</p> <p>State whether EqIA is on a policy, strategy, function, project or activity or a combination: Project</p> <p>Indicate whether it is a 'new' or an 'existing' policy, strategy, function, project or activity:</p> <p><input type="checkbox"/> New</p> <p><input checked="" type="checkbox"/> Existing</p>
1.2	Details of the person responsible for the EqIA
	<p>Full Name: Leonard Asamoah</p> <p>Position: Head of Housing Solutions</p> <p>Department: DASHH</p> <p>Telephone number: 62384</p>

1.3 What is the aim and objective of the policy, strategy, function, project or activity?

Introduction:

- 1.3.1 The council is currently experiencing a serious homelessness problem as a result of an increase in demand at the same time as a reduction in housing supply available to the council. A range of factors has contributed to this. The economic downturn has meant that many households are struggling to manage financially and finding the private sector increasingly unaffordable. An increase in the London population, not matched by the growth in the housing stock, has served to force up house prices and private rents as a result of supply and demand imbalances. Private landlords now have more options open to them and the attractiveness of letting to low income or benefit-dependent households (whether directly or via schemes run by the council or housing associations) has diminished, partly because there are more better-off households now looking to rent, and partly because of changes to the housing benefit system (limiting eligible rents to 30% of the local housing allowance rates, the benefit cap and the impending introduction of direct payments to tenants being the main ones). The social housing stock in Croydon is, as a proportion of the total stock, fairly small compared with other London boroughs. As a result, the council relies heavily on private rented housing for accommodation for homeless households and so is suffering disproportionately from the buoyancy in this sector and the falling interest amongst private landlords of letting to our nominees.
- 1.3.2 As a result, increasing numbers of homeless families are being housed in bed and breakfast hotels. This position is not sustainable. Accommodation with shared facilities is not suitable for families with or expecting children for anything but very short periods. Local authorities can only place families in B&B hotels for a maximum of six weeks according to the Homelessness (Suitability of Accommodation) (England) Order 2003. Exceeding this period means that the council is at risk of legal challenge by way of judicial reviews. And there are also financial implications: the average daily cost per family is £10.11 not all of which is covered by housing benefit so the council has to make up the shortfall. A range of measures has reduced the number of households exceeding the six week limit in shared accommodation from 197 at end of September 2012 to zero in September 2013. However, there remain pressures of demand and it is expected that these will continue for the foreseeable future. Whilst not exceeding the six-week limit, 229 homeless households are nevertheless living for socially unacceptable periods in shared accommodation experiencing cramped conditions unsuitable for children; and, overall, 2362 families are placed in temporary accommodation.
- 1.3.3 At the same time, because the expectations and aspirations of many older people have changed and because there are many initiatives now which make it easier for people to stay put in their own homes, some retirement housing blocks have become difficult to let as evidenced by the number of people flats are offered to before someone accepts. Where people have expressed an interest in retirement housing, the main requirement is for ground floor housing, in a quiet neighbourhood close to shops; high-rise schemes in particular do not therefore meet people's preferences. The average wait for retirement housing between April and September 2013 was 5 months as opposed to 10 months for a 1 bedroom general needs property. For family housing, the wait

can be even longer.

1.3.4 Amongst the measures looked at to help alleviate the housing shortage for homeless families, therefore, was the proposal to convert a retirement scheme to general needs accommodation. An appraisal of 11 retirement schemes (all high-rise blocks) was undertaken in order to identify the most suitable scheme which would have the least impact on existing and future older tenants. A range of factors was considered: the number of units in each scheme, the availability of alternative accommodation nearby, the number of adapted properties, age profile of existing tenants and the dependency levels of scheme residents. From a final shortlist of four blocks, Tonbridge House was considered to be the third most suitable after Gillett Road and Garnet Road. Although Garnet Road ranked second in the shortlist, it is not considered to be suitable for a change of use because it is the twin block of Gillett Road. The use of Gillett Road has now changed to general needs temporary housing, any vacancies at Garnet Road have been ring fenced so that tenants at Gillett Road who wish to relocate have the option of moving only a short distance into the neighboring block to minimize disruption.

1.3.5 A consultation with residents at Tonbridge House retirement scheme started on Wednesday 2 October 2013 and ended on Monday 1 November 2013. The purpose of the consultation was to seek the views of the residents of Tonbridge House on the proposal and options presented and fulfil the Council's obligation to comply with its obligation under Section 105 of the Housing Act 1985 which applies to secure tenancies. Under this legislation, landlords are obliged to make arrangements to carry out consultation with tenants on matters of housing management.

SECTION 2: SCOPING THE ASSESSMENT

2.1 What information is currently available about the different protected groups that the policy, strategy, function, project or activity is likely to effect? (for examples see guidance)

There is a range of information available about the different protected groups likely to be affected by our plans to increase the supply of emergency accommodation for homeless families in Croydon and this is as follows:

2.1.2 Ethnicity: South Norwood Ward profile – (source: www.croydonobservatory.org)

Tonbridge House is located in South Norwood and data from the Croydon Observatory shows that 44% of the population are from a 'Minority Ethnic' background, which includes White Irish, White Other, Black, Asian, Mixed and Chinese and Other ethnic groups and 35% of those are from a 'Black and Minority Ethnic' (BME) background, which includes Black, Asian, Mixed and Chinese and Other ethnic groups

The ward population is very ethnically diverse. The 2001 census data showed that:

- 22% Black, African, Caribbean, Black British
- 7% Asian or Asian British
- 5% Mixed/Multiple ethnic groups
- 1% Other or Chinese
- 56% White
- 9% White Irish/other

Information from the Office of National Statistics 2001 Census shows that, the Black British community make up over half of the Minority Ethnic population in South Norwood which is well above the Croydon average and overall, Caribbean and African groups make up a much larger proportion of the population than in other wards in Croydon.

Table 1. Ethnicity	Total cases	Ethnicity of cases (%)	Ethnicity of head of family	Ethnicity of head of household (%)
Asian	10	3.1	8	3.0
Bangladesh	4	1.2	4	1.5
Black African	65	19.9	55	20.9
Black Caribbean	71	21.7	61	23.2
Black Other	17	5.2	14	5.3

Chinese	2	0.6	2	0.8
Indian	3	0.9	3	1.1
Irish	2	0.6	2	0.8
Mixed White Asian	4	1.2	3	1.1
Mixed White Black African	3	0.9	3	1.1
Mixed White Black Caribbean	14	4.3	14	5.3
Other Mixed	5	1.5	4	1.5
Other	6	1.8	3	1.1
Pakistani	5	1.5	5	1.9
White	61	18.7	45	17.1
White Other	17	5.2	17	6.5
Not Known	38	11.6	20	7.6
Total	327	100.0	263	100.0

2.1.3. Table 1 below shows the ethnic breakdown of all cases occupying emergency accommodation as at October 2012. The table shows that black African and black Caribbean families are over represented in emergency accommodation.

Ethnicity Profile of Existing Occupants as September 2013		
Asian or Asian British		
Black, African, Caribbean, Black British		
Mixed/Multiple ethnic groups		
Other		
White		
TOTAL RESPONSES		

Age:

In October 2013, there were 600 single older people and older couples households on the housing register. In addition, there were 250 single older people and 60 pensioner couples who were existing social tenants total, 9% of people on the housing register are older people.

Date of birth records are held for 100% of the tenants at Tonbridge House and Table 2 overleaf shows their age composition as at September 2013.

Table 2. Age Profile Of Occupants as at September 2013						
	Total number of tenants in occupation	Under 55	Under 65	65 - 74	75 - 84	85+
Tonbridge House retirement scheme	37	3% (1)	16% (6)	35% (13)	41% (15)	5% (2)

Gender:

Gender records are held for 100 per cent of the occupants at Tonbridge House. As at September 2013, the distribution of male and female occupants at Tonbridge House was just about equal as illustrated in Table 3 below.

Table 3: Gender Profile of Existing Occupants as at September 2013			
	Total number of tenants in occupation	Male	Female
Tonbridge House Retirement scheme	37	68% (25)	32% (12)

The table 4 on the below shows that compared to other priority need categories, women are over represented among single parent families in emergency accommodation. Of the 779 homeless households with children in emergency accommodation as at October 2012, 673 were female households which include a pregnant woman and/or dependent children.

Table 4: Households accepted with the full housing duty in 2012/13
by household type and gender

Household Composition/Priority Need Category	Numbers	Male	Female
Couple + 1 child	53	24	20
Couple + 2 children	57	26	31
Couple + 3 children	45	20	25
Couple (pregnant)	11	3	8
Single parent + 1 child	272	21	251
Single + 2 children	155	10	145
Single + 3 children	94	2	92
Single (pregnant)	92	N/A	92
Totals	779	106	673

As show in table 5, which is also on the next page, the composition of homeless households accepted with the full housing duty in 2012/13 by household type and gender and reflects this trend, in that it shows that women are disproportionately represented among lone parent households with dependent children i.e. 87%.

Table 5. Ccomposition of homeless households accepted with the full housing duty in 2010/11						
Couple with dependent children	Lone parent with dependent children		One person households		All other household groups	Total
	Male applicant	Female applicant	Male applicant	Female applicant		
166 (%)	33 (4%)	580 (64%)	74 (8%)	36 (4%)	23 (2%)	912

Disability

In 2012/13 6 people were accepted as homeless and in priority need because of a physical disability, and 34 because of a mental health problem. People who were vulnerable as a result of a physical disability or a mental illness or disability accounted for 1% of all acceptances.

2.2 What are your information gaps? For example service user data, or employment data on a particular protected group. What steps are you/have you taken to fill them as part of this assessment?

During the public consultation, people responding were asked to provide information about the protected characteristics and given the option to complete an equalities monitoring form. The results are provided in 2.3 below.

Information is collected about households applying as homeless but not specifically about religion and sexuality households.

2.3 Who have you engaged with (staff, service users, community groups etc)?

Describe the methods of engagement you used

What are the issues arising from the engagement?

What are the outcomes of this engagement?

What engagement did not or could not take place?

2.3.1 A consultation with tenants at Tonbridge House retirement scheme started on Wednesday 2 October 2013 and ended on Friday 1 November 2013. Tenants were consulted on the three options presented below.

2.3.2 Options presented:

Option 1: Keep Tonbridge House as retirement accommodation and other retirement housing blocks as retirement housing (in other words do nothing)

Option 2: (preferred option): Change the use of Tonbridge House retirement housing scheme to general needs housing classification

Option 3: Change the use of another retirement housing block to general needs housing classification

2.3.3 How the consultation was carried out

The consultation exercise was designed with the input of an experienced team of officers within the council and internal and external legal advisors. The following methods were used to consult with the tenants:

- To publicise the meeting, letters were sent to all the existing tenants at Tonbridge House inviting them and their families and/or carers to attend one of two briefing sessions. Both meetings took place on 2 October 2013 and were facilitated by the DASHH Resident Involvement Team.
- A full consultation pack was posted directly to all tenants at Tonbridge House. These documents are provided as Appendix 3.
- In recognition of the potential needs of the client group being consulted and to maximise the number of questionnaires returned, officers from the resident involvement team visited Tonbridge House in October 2013. Three visits were made to the block on different days and times. 'We called' slips were left where there was no response to encourage people to get in touch if they need help or further guidance on how to complete the questionnaire.
- The consultation ran from 2 October until 1 November 2013.

2.3.4 The number of consultation responses

22 out of a possible 37 households returned the questionnaire; this equates to a response rate of 59%. However, not all respondents answered all of the questions and therefore there are variations in the total number of responses shown in each table.

2.3.5 Responses to the equalities questionnaire

Respondents were given the option of completing an equalities monitoring form at the end of the questionnaire. The responses are shown below:

Age	All tenants as at Sept 2013	Response %	Number of responses
Under 55	3% (1)	0%	0
55-65	16% (6)	14%	3
65 - 74	35% (13)	41%	9
75 - 84	41% (15)	41%	9
85+	5% (2)	4%	1
TOTAL RESPONSES			22 out of 22

Gender	Response %	Number of responses
Male	73%	16
Female	27%	6
Male & Female (2 person household)	0%	0
TOTAL RESPONSES		22 out of 22

Disability	Response %	Number of responses
No	30%	6
Limited a lot	65%	14
Do not wish to say	5%	1
TOTAL RESPONSES		21 out of 22

Religion	Response %	Number of responses
Christian	57%	8
Hindu	7%	1
Sikh	0%	0
Muslim	0%	0
Other	0%	0
No faith/religion	36%	5
Do not wish to say	0%	0
TOTAL RESPONSES		14 out of 22

2.3.6 Demographic data

The next table demographic profile of respondents in Tonbridge House (as presented in below).

	Which of these describes your ethnic background? Tonbridge House Road tenants only - aggregated totals	
Croydon residents only – aggregated totals	Number of responses	Response %
Asian or Asian British	3	17%
Black, African, Caribbean, Black British	7	39%
Mixed/Multiple ethnic groups	0	0%
Other	1	5%
White	7	39%
White Irish/other	0	0%

TOTAL RESPONSES	18 out of 22	100%
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2.3.7 Summary of responses to the options presented

Overall, the survey results indicate an overwhelming preference to maintain the status quo, with 76% of respondents indicating that they fully disagree that the use of Tonbridge House should be changed. The key results for each option are shown below.

Option 1: Keep Tonbridge House as retirement accommodation and other retirement housing block as retirement housing (in other words do nothing)

- 19 out of 22 respondents put forward their views. Virtually all the comments were in support of keeping Tonbridge House and other retirement housing as is (unchanged). Only one respondent said that they didn't mind.

Option 2: Change the use of Tonbridge House retirement housing scheme to general needs housing classification (preferred option):

- 90% of said that they would prefer to stay, the other 10% of respondents said that they would prefer to move to alternative accommodation.
- 76% of respondents fully disagree that the use of Tonbridge House should be changed. 19% partially agreed and another 5% neither agreed nor disagreed with the proposed change.
- 79% of respondents that answered the question said that children with families moving into the block whilst they were still living there would have a negative impact on them. 21% of respondents said that it would have no impact.

Age	All tenants as at Sept 2013	Respondents %	Number of tenants
Under 55	3% (1)	0%	0
55-65	16% (6)	14%	3
65 - 74	35% (13)	41%	9
75 - 84	41% (15)	41%	9
84+	5% (2)	4%	1
TOTAL RESPONSES			22

Disability	Response %	Number of responses
No	28%	6
Limited a lot	67%	14
Do not wish to say	5%	1
TOTAL RESPONSES		21 out of 22

Gender	Response %	Number of responses
Male	73%	16
Female	27%	6
Male & Female (2 person household)	0%	0
TOTAL RESPONSES		22 out of 22

Option 3: Change the use of another retirement housing block to general needs housing classification

- 10% of respondents said that they didn't know which of the other retirement housing blocks should have its use changed to general needs temporary accommodation.
- 90% said that none of the retirement blocks should have their use changed.

2.3.8 High level analysis of tenant concerns/issues arising from the consultation

Listed below are the 11 key themes which were identified from the analysis of the comments made by tenants about the proposal:

- Facilities and services: laundry, car park, garages and potential damage to these facilities
- Anti-social behaviour: noise nuisance and unknown visitors to the block
- Personal health: perceived effect on the respondents health, potential effect on existing illnesses
- Personal safety: fear and anxiety, concerns about intimidation and personal safety
- Hazards: Building not suitable for children
- The building: one bedroom flats and over crowding
- Life style differences: incompatibility of mixing younger and older people in block

- Illegal activity: drugs on premises, drug use, theft
- Maintenance: maintenance of building, cleaning and tidiness of the block
- General upheaval: moving away from Tonbridge House to alternative accommodation, loss of support network, cost of moving.
- Local facilities: proximity to local shops, proximity to transport, near to buses and bus stops, GP surgery and religious temple.

SECTION 3: ANALYSING YOUR EQUALITY INFORMATION

3.1 From the information you have gathered (including information gathered to fill existing gaps) and the engagement you have undertaken how are each protected group affected (positively or negatively, or not affected at all)? What changes could be made to the policy, strategy, function, project or activity to mitigate a negative impact?				
Age				
	Positive Impact	Negative Impact	None	Assessment of impact on protected groups
0–18 years	Yes			<p>Age</p> <p>In 2010/11, 216 young people under 25 years were accepted as homeless and in priority need (37 per cent of total homeless households accepted)</p> <p>The overall impact of replacing bed and breakfast accommodation on younger people would be positive as the proposal would increase the supply of cost effective Council owed self-contained temporary accommodation for families with children. This would have a significant positive impact on the wellbeing of babies and young children.</p> <p>As at November 2013, the housing data base showed that only one of the occupants at Tonbridge House was under the age of 55. At the time of the consultation, one of the tenants who responded was under the age of 55.</p> <p>The overall impact of the proposal to change the use of Tonbridge House is negative. By virtue of the fact that the age criteria for sheltered housing are age 55 and over, the proposal to change the classification of Tonbridge House will have a negative impact on the older people currently living at the block.</p> <p>Various themes have been identified in response to the proposal that younger people with children could be housed in the block alongside older people. For each theme, at least one example of the concerns raised has been provided and these are shown in italics.</p>
19-54	Yes			
55-65		Yes		

Facilities and services (6 comments)

The responses suggest issues around being able to access the laundry facilities as well as misuse of car park and the garages by couples and families making it more difficult for older residents to access them.

“As before see answers to Q2 - the laundry facilities the women with children have to use it more often. Would cause a lot of problems with them taking over this facility.”

Anti-social behaviour (12 comments)

The second biggest concern expressed relates to antisocial behaviour particularly the belief that there will be an increase in noise levels in the block thus undermining the quiet enjoyment of their home. A small number of people also expressed concern about increased numbers of people that are unknown to existing residents visiting the block and the increased risk of theft vandalism and drug abuse.

“We feel that this change would increase the noise level. Problems with vandalism, loud music, drug abuse, disturbances and graffiti concerns.”

Personal health (4 comments)

Respondents expressed concern about the potential impact that any change of use could have on their health particularly those who already have some degree of pre-existing ill health or are frail due to age.

“You cannot mix elderly infirm people with young families. It adds stress to the elderly and unsuitable environment for children”

“Most of residents who live in sheltered accommodation are people of an advanced age who enjoy the peace and quietness of these housing blocks. We feel that disturbing this set up can damage the health of most of the residents”.

“Leave us well enough alone. Is a bad idea to do this at the expense of old sick and vulnerable people. Give us a break we deserve it!!!!.”

Personal safety (4 comments)

Many respondents expressed concern about older people mixing with younger people in that they feel that their safety would be compromised and they would feel intimidated if children and younger people were also living at Tonbridge House.

“No security for elderly tenants. The totally wrong environment in which to raise children. We have intercom entry and FOB keys. Can you imagine how may FOBS you issue are going to fall into the wrong hands! Your families are not going to be given use of our laundry room. That will cause confrontation between them and the elderly tenants. To quote the health condition of just 3 of our present tenants. we have a 69 year old who is blind, diabetic and has Parkinson’s disease. An 86 year old lady with brittle bone disease and an 83 year old with severe heart problems. Their battery operated mobility vehicles have to be recharged on the landings. How long before they get stolen?”

Hazards (7 comments)

Many respondents expressed concerns about the suitability of the building for children. Residents are concerns about the windows, electric cookers and the building having no play areas for children.

“These buildings are not suitable for young children or people. Stoves are all electric which would be disaster waiting to happen. (be warned) there are no play areas for children except the corridors and turning the lifts into train doors no go - bad foresight.”

The building (2 comments)

Respondents expressed concern about the properties having only one bedroom, overcrowding and therefore its suitability of its use for families.

“Most, if not all, accommodation in Tonbridge House is one bedroom, most suitable for retired singles or couples, and NOT suitable for family dwelling.”

Lifestyle differences (11 comments)

Incompatibility of mixing younger and older people in block

“Old people life will be no good with homeless family with children, it will be noisy, loud music it will be no quiet in this flat.”

“A lot of problems because we are older people, it would be disadvantage for the younger couples especially for babies. Walls not thick babies will be crying.”

“It should remain an old people retirement home not mixed young people with old people. I disagree I wanted peace and quiet it should not be used to house homeless family with children.”

General upheaval (17 comments)

The main concern was expressed about moving away from Tonbridge House to alternative accommodation, loss of support network their and the cost of moving.

“Happy and secure where I am, total cost of spent here is £5,000 when I moved in, on carpets, wardrobes, painting /decorating. At my age I have no desire to uproot myself and why should I? It would cause much disruption and inconvenient.”

“Can’t afford to move can’t be far from my children.”

Local facilities (1 comment)

Proximity to local shops, proximity to transport, near to buses and bus stops, GP surgery

“When you are old with health problems you lack mobility. You need close proximity to public transport, a post office, your regular bank, your local health centre and a library. I have all of that here. Anyway you have already stated that none of us will be moved, so why ask this question? we are human beings, not Cattle!!!! ”

	Positive Impact	Negative Impact	None	Assessment of impact on protected groups
Learning disability			None specifically identified	Disability The overall impact of the proposal to change the use of Tonbridge House is negative.
Physical disability		Yes		67% of respondents at Tonbridge House said that their activities were limited a lot due to health problems or disability and generally cited multiple health problems rather than a single illness.
Mental health		Yes		A number of comments made that specifically relate to their disability and how they think that the proposed change of use would impact on them. These comments are detailed below in italics.
Deaf or hard of hearing		Yes		<i>“No security for elderly tenants. The totally wrong environment in which to raise children. We have intercom entry and FOB keys. Can you imagine how may FOBS you issue are going to fall into the wrong hands! Your families are not going to be given use of our laundry room. That will cause confrontation between them and the elderly tenants. To quote the health condition of just 3 of our present tenants. We have a 69 year old who is blind, diabetic and has Parkinson’s disease. An 86 year old lady with brittle bone disease and an 83 year old with severe heart problems. Their battery operated mobility vehicles have to be recharged on the landings. How long before they get stolen?”</i>
Visually impaired		Yes		<i>“The Elderly who live in these flats would not be able to adapt to younger people as their neighbours. They need a lot of peace and quiet as most of us have some form illness and younger people like to enjoy their way of life which could be loud music, rowdy visitors, at all hours not forgetting drink and drugs and vandalism which could lead to our car parks and garages being misused. I myself have needs and feel a lot safer knowing Careline is here to help”</i>
Other, incl carers		Yes		<i>“Most of residents who live in sheltered accommodation are people of an advanced age who enjoy the peace and quietness of these housing blocks. We feel that disturbing this set up can damage the health of most of the</i>

				<p><i>residents.”</i></p> <p><i>“Leave us well enough alone. Is a bad idea to do this at the expense of old sick and vulnerable people. Give us a break we deserve it!!!!”</i></p> <p><i>“I do not want the worry and stress of other families here.”</i></p> <p><i>“There are and always have been retired people living in this block with health problems. I feel this is unfair to these older people as many of them, like myself have lived here for many years and do not want to start moving at their time of life. Having families with children moving in would make them feel at RISK and fearful of this situation, which would have an impact on the deterioration of their health. I totally oppose this option, as the older people in this 'Block' were originally placed here to feel safe and secure.”</i></p> <p><i>“When you are old with health problems you lack mobility. You need close proximity to public transport, a post office, your regular bank, your local health centre and a library. I have all of that here. Anyway you have already stated that none of us will be moved, so why ask this question? we are human beings, not Cattle!!!! “</i></p> <p><i>“Children knocking on my door and bothering me. Mess made by families, noise. I recently had a stroke and I am worried.”</i></p> <p><i>“Do not want to move out due to ill health. (See letter attached) don't want it to change”</i></p> <p><i>“I am happy here than anywhere else as of my ill health”</i></p>
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Gender/Sex

	Positive Impact	Negative Impact	None	<p><u>Gender</u> The outcome of the project will affect all existing tenants at Tonbridge House</p>
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Female	Yes			irrespective of their gender. Although 73% and 27% of respondents were male and female respectively.
Male			None specifically identified	However, changing the use of Tonbridge House would benefit women as women with dependent children are over represented amongst homeless households and will therefore benefit from the new scheme.
Gender reassignment			None specifically identified	<p><u>Homeless households</u> As shown in 2.3.1.families accepted by the council for a full rehousing duty are most likely to be headed by female lone parents with children, as well as being far more likely to be from the BME community.</p> <p>Additionally, in October 2013 of the 321 households in emergency accommodation 250 were households which include a pregnant woman and/or dependent children.</p>
Race/Ethnicity				
	Positive Impact	Negative Impact	None	Assessment of impact on protected groups
Asian	Yes	Yes		The outcome of the project will have both a positive and negative impact on BME groups.
Black	Yes	Yes		<u>Negative impact</u> The BME community would appear to be over-represented at Tonbridge House. The category selected by 61% who answered the ethnicity question felt into a BME group. 39% described themselves as white.
Mixed	Yes			67% of the existing tenants at Tonbridge House are from BME communities and therefore there will be a disproportionate impact on this group.
Other, such as Travelers	Yes	Yes		<u>Positive impact</u>

White	Yes	yes		<p>In 2010/11 60 per cent of homeless households accepted by the council with the full homelessness duty were from BME communities.</p> <p>In addition, black African and black Caribbean families are over represented in emergency accommodation as illustrated in 2.1.3.</p>
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Religious/Faith Groups

	Positive Impact	Negative Impact	None	Assessment of impact on protected groups
Buddhist			None	<p><u>Religion/faith groups</u></p> <p>1 respondent at Tonbridge House indicated that they are of the Hindu faith and 8 Christians.</p>
Christian		Yes		
Jewish			None	
No religion/faith			None	
Other			None	
Sik			None	
Muslim			None	
Hindu			None	

Sexual Orientation

	Positive Impact	Negative Impact	None	Assessment of impact on protected groups
Heterosexual			None	<u>Sexual orientation</u>

Lesbian			specifically identified	None specifically identified from the information available.
Gay				
Bisexual				
Pregnancy and maternity				
	Positive Impact	Negative Impact	None	Assessment of impact on protected groups
Pregnancy and maternity	Yes			<u>Pregnancy and maternity</u> The project will have a positive impact by increasing the supply of suitable emergency accommodation for families with/or expecting children and reduce the likelihood of pregnant women being housed in bed & breakfast accommodation for more than 6 weeks.
Marriage and civil partnership				
	Positive Impact		None	Assessment of impact on protected groups
Marriage/civil partnership			None specifically identified	None specifically identified.
3.2	Could any changes be made to the objective or the actions to eliminate or mitigate the impact?			
	10% of respondents said that they would prefer to move to alternative accommodation (see 2.3.7) if option 2 was chosen. Should the decision be made to change the use of Tonbridge House (option 2) existing Tonbridge House tenants could be given the option to relocate to alternative accommodation using previous refurbishment projects (Kuala Gardens) a model, of good practice and examples of successful re-settlement of older people, some very elderly. <u>Health and wellbeing (age & disability)</u>			

Negative impacts have been identified in relation to age & disability and resultant health and wellbeing of tenants.

Based on experience gleaned from previous major works projects, and the information gathered it is recognised that some tenants may have specific support needs as a result of age related physical or mental frailty, health infirmity, disability or other life circumstances and may be considered vulnerable. As such, some may require practical help and assistance with rehousing. The Council would provide dedicated staff to support the tenants and ensure a high level of customer care and these activities should minimize any negative impact on the health and wellbeing.

To mitigate the impact of the proposed change, a sensitive approach to managing the relocation of tenants will be required to safeguard the health and wellbeing of all tenants. In recognition of this need, steps that will be taken:-

- Individual consultation meetings to establish and understand individual's needs;
- Recruitment of a Project Assistant to ensure the required level of staffing resources is available to provide practical support and assistance for relocating tenants.
- Wherever possible, involve family and/or carers in the relocation process from the consultation stage through to actual relocation.
- On site advice surgery as necessary to provide accessible support and visibility of project team during early stages of relocation process;
- Once their preferences have been identified and needs assessment have been carried out, suitable properties will be identified and tenants who wish to relocate will be given a high priority.
- Completion of pre and post move check list to ensure consistency of service;
- Pre move visits, support and/or a visit to the tenant on the day of the move;
- Assist tenants to establish catchment area of existing healthcare providers ie GP survey;
- Involvement/liaison with family/friends and/or existing care providers;
- Provision of needs assessment by qualified social worker;
- Identifying accommodation that is suitable and in close proximity to Tonbridge House. In recognition of this, for the past few weeks, void properties at Garnet Road, Laxton Court and Sevenoaks House have been held pending the outcome of the decision making process to ensure a ready supply of alternative accommodation. Both of these blocks are in close proximity to Tonbridge House; Sevenoaks House being its neighboring block and occupying the same site and would cause the minimum disruption to their contact with family, friends, support networks and community connections. Moreover, there is a good supply of alternative retirement housing schemes within the area albeit not as close as Sevenoaks House.

Relocation and resettlement of tenants (age, disability, race, religion)

- With input from social services, provide tenants with good information about the location of other retirement housing schemes so that they have a clear understanding of their proximity to Tonbridge House.

- Assistance to complete necessary documentation;
- Provision of interpretation /translation services as necessary;
- Tenants who choose to relocate at Tonbridge House will be given a high priority on the transfer register;
- Use of professional removals services from a contractor on the Councils existing framework with experience of working with vulnerable clients and that are able to tailor their service to meet the needs of the client groups affected. In addition, contractors selected from the Councils framework will have been assessed for as part of the procurement process as well as compliance with regard to equalities requirement.
- The removals contractor will be required to work in a careful manner sympathetic to tenants needs for example, flexibility where a female tenant may feel uncomfortable being alone with a male operative working in the property.
- Advice on other areas which tenants might want to move to. i.e. Religion, Cultural
- We are aware that during Ramadan, the timing of visits or moves will have to be considered. Project members are aware that there are some members of the community who are more conservative than others and that we have a duty to be sensitive and respectful of various cultural/religious requests and rituals. e.g. respecting the prayer times for Muslims
- In all situations we recognise the need to liaise with our tenants to negotiate convenient times for moving whilst balancing this with not hindering the lettings/void period.
- Packing and unpacking
- Assistance with change of address activities and relocation of mail, contacting utility companies etc
- Disconnection and reconnection of appliances such as washing machines and cookers, telephones;
- Provision of transport as required for viewing properties;
- Where tenants have existing adaptations, properties will be sought which have similar fixtures. Alternatively, these will be refitted in the new property or if this is not feasible replicated, subject to an assessment by an occupational therapist

Facilities and services

Concern has been expressed about access to the existing communal facilities and service at Tonbridge House specifically access to the laundry room, lifts and communal lounge. To minimize the impact any negative impact on existing tenants, the Council will, in consultation with tenants, assess the feasibility of a number of options including:

- Look at the potential to increase the number of washing machines and dryers available if these facilities were to be accessible to homeless families as well as older residents
- Restricting access to existing tenants only with the access restricted to Monday to Friday 09.00 – 17.00.
- Assess the viability of gifting washing machines to existing tenants who choose to remain at Tonbridge House.
- If the use of Tonbridge House were to change, access to the warden call system would remain unchanged.

Management of Tonbridge House (age, disability, race, religion)

Though separated into 11 themes, a high proportion of tenants have expressed concern about anti-social behavior of various forms and

the impact on their, health and wellbeing and personal safety. If option 2 was selected, any negative impact on health, wellbeing and personal safety by the following actions:

- The responsibility for day to day management of the block will be the duty of Croydon Landlord Services, including the neighborhood warden service could be initiated to address respondents concerns about safety and security of the block.
- CCTV is installed at Tonbridge House and should increase the tenants feeling of safety as well as providing a tool to address anti-social behavior.
- All lifts are inspected and maintained on a monthly basis and where breakdowns do occur a response is required within 2 hours and repairs are given a high priority and carried out as soon as possible. This will be reiterated to tenants to reassure them.
- Lifts are built to a specific standard and therefore the Council's technical officers do not envisage the change as having an impact on the functioning of the lifts. Again, this will be reiterated to tenants to reassure them.
- Families will be housed at Tonbridge House on a temporary basis. This would be by way of a license as opposed to a secure tenancy thus enabling the Council to deal with any breaches of the terms of the license swiftly and effectively.
- The terms of the license, and expectation of families, with regard to behavior, will be reinforced by the family liaison officer who provides support to families in temporary accommodation.

Financial assistance

- The tenants will not be entitled to a discretionary disturbance payment. However, an average of £4000 per household will be 'set aside' to meet all reasonable costs associate with moving to alternative accommodation as a result of the change of use.
- Although there is no entitlement, the criteria will be in line with the disturbance policy previously developed for another retirement housing project and assistance will be provided in accordance with the procedure and policy at **Appendix 4**.
- Where elderly tenants at Tonbridge House are temporary accommodation tenants, assistance will be limited to the provision of removal and disconnection and reconnection costs. We only have one tenant at Tonbridge House who fall into this category.

3.2	From the information you have gathered and the engagement you have undertaken describe how the policy, strategy, function, project or activity actively enables the council to meet its public duties to:	
Advance equality of opportunity between different groups of people by removing or minimizing disadvantages	<p>The project contributes to advancing equality of opportunity between different groups by meeting needs of homeless households with children by increasing the supply of suitable self contained emergency accommodation as an alternative to bed and breakfast accommodation.</p> <p>There is currently an imbalance between the supply and demand of smaller homes.</p>	
Advance equality of opportunity between different groups of people by taking steps to meet needs	<p>The project contributes to advancing equality of opportunity between different groups by meeting needs of homeless households with children by increasing the supply of suitable self contained emergency accommodation as an alternative to bed and breakfast accommodation.</p>	
Advance equality of opportunity between different groups of people by encouraging participation in public life	<p>Subject to further investigation and scoping, support services may be available on site by providing a range of surgeries providing convenient access to information and advice.</p> <p>Participation in public life can be difficult when people are living in short-term temporary housing with inadequate amenities. This proposal will help some homeless families make better base for themselves.</p>	
Eliminate discrimination	<p>The council is committed to eliminating discrimination.</p> <p>By meeting needs of groups disproportionately impacted by homelessness, the project could contribute to fostering good relations by providing accommodation that is more appropriate for family life reducing the stigma of homelessness.</p>	

Eliminate harassment	The council is committed to eliminating discrimination. Making better use of existing housing stock could provide safer spaces for more sections of the community especially young children.
Eliminate victimisation	The council is committed to eliminating discrimination. By meeting needs of groups disproportionately impacted by homelessness, the project could contribute to fostering good relations by providing accommodation that is more appropriate for family life reducing the stigma of homelessness.
Foster good relations between different groups and communities by tackling prejudice	By meeting needs of groups disproportionately impacted by homelessness, the project could contribute to fostering good relations by providing accommodation that is more appropriate for family life.
Foster good relations between different groups and communities by promoting understanding	The council is committed to promoting good relations between different groups and communities by promoting understanding by involving Croydon Landlord Services in the shaping of the project prior and developing management practices prior to implementation.

3.3 Having considered the potential or actual effect of the policy, strategy, function, project or activity on equality make an informed judgment about what should be done (more than one may apply)?

Outcome	Definition (more information is available in the guidance)	Judgment (Y/N)
Outcome 1: no major change	Your assessment demonstrates that the policy is robust and the evidence shows no potential for discrimination and that you have taken all appropriate opportunities to advance equality and foster good relations between groups.	No
Outcome 2: adjust the policy	This involves taking steps to remove barriers or to better advance equality and introducing measures to mitigate the potential effect.	Yes

Outcome 3: continue the policy	This means adopting your proposals, despite any adverse effect or missed opportunities to advance equality, provided you have satisfied yourself that it does not unlawfully discriminate.					Judgment (Y/N)
Outcome 4: stop and remove the policy	If there are adverse effects that are not justified and cannot be mitigated, you will want to consider stopping the policy altogether. If a policy shows unlawful discrimination it must be removed or changed.					No
3.4	Planning actions – please record all actions arising from the assessment, with clear targets, milestone and lines of responsibility.					Yes
Protected group¹	Action (SMART)	Judgment (Y/N)	Completion Date	Lead Officer	Lead Partner²	
r, d, a	Develop and agree support package to be provided	No	October 2013	Leonard Asamoah	N/A	
r, d, a	Invite and present relocation process and package to all tenants at Tonbridge House	Yes	October 2013	Leonard Asamoah	N/A	
r, d, a	Carry out needs assessments and individual consultation with tenants that would like to relocate to alternative accommodation	No	October 2013	Leonard Asamoah	N/A	

¹ Enter in this column which of the protected characteristics that the action encompasses: race/ethnicity (r), disability (d), age (a), sexual orientation (so), gender/sex (g), religion/belief (rb), gender reassignment (gr), marriage and civil partnerships (m), pregnancy and maternity (pm).

² If appropriate.

r, d, a	Engage services of a reputable removals company	No	October 2013	Leonard Asamoah	N/A
r, d, a	Recruitment of Project Assistant	All tenants able to make an informed choice about remaining or relocation to another scheme	October 2013	Leonard Asamoah	N/A
		Intended Outcome			
		Comprehensive relocation and support package			
		All tenants able to make an informed choice about remaining or relocation to another			

		scheme			
		Clear understanding of needs			
		Provision of high quality removal service			
		To provide resources required to support tenants who relocate to alternative accommodation			

3.5 Please indicate the risks and what will be done to address them? Risks may need to be recorded in your risk register.

Risk/ issues identified	Action required	Resource implications	Timescales	Lead Officer	Expected outcome	Progress
Fewer than the projected number of tenants chooses to relocate.	Provide clear and comprehensive information about relocation package and alternative accommodation available. Identify housing needs and preferences of the tenants and give high priority to meeting these	Predicted savings not achieved	By October 2013	Leonard Asamoah	Clarity & reassurance for tenants reassured tenants needs met	
Negative press	Regular progress updates to Communications team	Negative impact on Council's reputation	Ongoing	Leonard Asamoah		
The mitigating measures do not prevent the friction resulting from mixing different household types or do not deal with the fears felt on the part of the older residents	Work with tenant to get a precise understand what the issues are. Deal with issues under terms of tenancy or license.	Potential increase number of complaints. Input required form Landlord Services and/or neighborhood wardens	Ongoing	Landlord Services	Successful transition to general needs housing	

Changes to housing benefit rules regarding funding of concierge in that, current rules allow such cost to be covered by housing benefit as long as there is a clear rationale and justification for the provision of services of this type.	Keep abreast of revisions to welfare benefits	Restructure of rent payable	Ongoing	DMT	Ongoing	

SECTION 4: MONITORING AND REVIEW

4.1	Equality impact assessment is an ongoing process that does not end once a policy, strategy, function, project or activity has been agreed or implemented.	
Question	Response	
How will you measure the effects of the policy on equality?	Following resettlement Information will be collected on the protected group e.g. ethnicity, disability, gender, age etc.	

When will the policy be reviewed?	Following resettlement customer satisfaction surveys will be completed.
What type of equality information is needed for monitoring and how often will it be analysed?	Information will be collected on the protected group e.g. ethnicity, disability, gender, age etc. and will be undertaken annually or more frequently if practical.
How will stakeholders be engaged in the implementation, monitoring and review?	Via the resident association and officer attendance at the sheltered housing panel meetings, Divisional Management Team

5.1	Before sending the EqIA to be approved by the relevant director use the following checklist to ensure the process is completed. The completed initial EqIA should also be checked.	
	The EqIA clearly outlines the purpose of the policy, strategy, function, project or activity? (initial and full assessment template)	Yes
	The EqIA clearly outlines how the policy, strategy, function, project or activity relates to equalities and to the council's public duties? (initial and full assessment template)	Yes
	The EqIA clearly outlines the evidence available and the information gathered for the assessment? (full template only)	Yes
	The EqIA clearly outlines the community engagement undertaken for the assessment? (full template only)	Yes
	The EqIA clearly identifies the impact on each protected group based on the information available and how the policy, strategy, function, project or activity enables the council to meet its public duties? (full template only)	Yes
	Final judgement has been made based on the evidence available? (full template only)	Yes

The EqIA identifies SMART actions and identifies risks? (full template only)	Yes
The EqIA includes information on how the policy, strategy, function, project or activity will be monitored and reviewed? (full template only)	Yes

SECTION 6: DECISION MAKING AND PUBLICATION

6.1	I agree with the outcome of the above EqIA and actions arising, and have integrated the outcome into the policy decision	
Lead Officer		
Name	Leonard Asamoah, Head of Housing Solutions ext. 62384	
Signature		
Date		
Lead Director		
Name	Peter Brown, Director of Housing Needs and Strategy ext. 65474	
Signature		
Date		
Date sent to corporate equalities and cohesion team (data.equalities@croymdon.gov.uk)		
THIS SECTION TO BE COMPLETED BY THE CORPORATE EQUALITIES AND COHESION TEAM		
Publication Date (summary on website)		