

Equalities Impact Assessment

Camden Council

What is an Equality Impact Assessment?

An Equality Impact Assessment (“EIA”) is a way of analysing a proposed organisational policy or decision to assess its effect on people with protected characteristics covered by the Equality Act 2010*. To meet the Council’s statutory duty the EIA should also address issues of advancing opportunities and fostering good relations between different groups in the community.

Name of proposed decision/policy being reviewed:

Overcrowding Strategy for a Family Friendly Camden 2023-2028

Section 1 - WHAT IS BEING ANALYSED?

Question 1: What is changing and why?

If the issue is going for decision, e.g. at Cabinet meeting, what are the decision makers being asked to decide? If you are reviewing a policy what are its main aims? How will these changes affect people?

Proposed Overcrowding Strategy - 2023-2028

As of 28 September 2022, about 7 in 10 households in the Camden housing register (4,891 applicants) have been awarded any of the three levels of overcrowding points according to severity level. Specifically, 35% (2,491) have been awarded 50 points. This award is given if a household must use every possible room in a property as a bedroom. Typically this means that the living room becomes a bedroom too. 30% (2,086) have been awarded 100 points which is the standard award for overcrowding given if a household (even after converting the living room) has one less bedroom than they have been assessed as requiring. 6% (386) have been awarded 250 points for the most severe overcrowding (SOC), which means the assessed bed need is at least two bedrooms more than the number of rooms the property. Families with children living in studio flats also receive severe overcrowding points.

40% of Council homes are studios or 1-bed flats while most demand on our housing register is for 2 and 3 beds, with a shortage of larger properties for those who are severely overcrowded. Having genuinely affordable social homes which are good quality with suitable spaces including bedrooms and bed spaces, is fundamental to our children's health, well-being, education and development and we want to give every child the best start in life.

The report is requesting Cabinet to agree an Overcrowding Strategy and proposed delivery from 2023-2028 comprising of the Family Friendly Purchase Housing Programme (FFPP) and Housing Support.

The FFHPP will enable the Council to increase its family friendly social homes using a combination of purchasing former Right to Buy (ex-Council) properties by recycling Council assets to buy, refurbish or convert family homes through the sale of small and unsuitable properties, and the sale of council freeholds in all leaseholder buildings.

The Housing Support offer will enable the Council to provide a more relational approach to overcrowded residents who are waiting for family friendly homes by having conversations to understand resident needs and proposals, establish a regular feedback loop where engaged residents can have a role in supporting service development and advice. Neighbourhood Housing Officer led casework support will have increased focus on supporting under-occupiers to downsize and work with residents to develop local neighbourhood plans mapping resources to relieve overcrowding.

These two complimentary approaches of purchasing more family sized homes and supporting those who are waiting, contributes to our We Make Camden aspirations by increasing the supply of family friendly homes and prioritises dependent children on the social housing

register so they 'have a place to call home.' The 2 programmes are set out below:

Family Friendly Purchase Programme

The aim of the Family Friendly Purchase Programme is to buy back former Right to Buy family friendly homes in borough to increase the number of bedrooms and bedspaces so that more overcrowded families on the housing register can be accommodated in Council homes. This will be funded through the receipts from unsuitable properties.

What estimated numbers of social housing properties are proposed to be sold and purchased? In scope are only the properties from general needs social housing. This does not include Sheltered Housing or Temporary Accommodation.

- Initially sell 15 high-cost voids and unsuitable properties already on hold in Year 1 only
- Sell 10 high-cost voids and 33 unsuitable one beds and studio flats in Years 2-5, with the exception of: ground floor properties; wheelchair accessible properties; properties that can be extended/converted to family friendly; if in a block of flats 1st, 2nd and 3rd floor properties with lift access, large 1-bedroom flats that can be converted into 2 beds or could accommodate small family households e.g. adult and small child where applicant does not have sufficient points to bid for a 2 bed.
- Sell 10 last tenanted units of any bed size in Year 1 and an additional 10 units in Years 2-5, so that Camden can sell the freehold for all leaseholder occupied properties. This absolves Camden from its costly structural, maintenance, management and freeholder responsibilities. Leaseholders will be given the opportunity to make a claim and buy the freehold themselves within statutory time periods.
- Sell 12 Camden freeholds for all leaseholder occupied properties in Years 1-5.

What will change? Reduction in numbers of smaller sized social housing stock (studios and 1 bed) and increase in numbers of larger family friendly social housing stock (2 bed, 3 bed, 4 bed +). In addition, unsuitable or low social housing value units which will include one bed/studio flats hence reducing the social housing stock for single vulnerable adults/couples and smaller family households e.g. adult and small child who don't have sufficient points to bid for a 2 bed. Families who are severely overcrowded will benefit as larger properties will be bought using the funding from smaller property sales.

A quarterly reporting system will be developed to monitor how the sales of properties meet the objectives related to the purchase of new properties and how the new properties are ultimately allocated to residents with severe overcrowding needs.

Under Occupying Housing Support

The Housing Needs Team will continue funding for 2 dedicated posts 'Under Occupying Older Tenants Advisors' who provide advice and support to council tenants over the age of 60 years to downsize. In the last 3 years the number of downsizing moves has been 94 (2019/20), 53 (20/21), lower due to Covid-19 and 81 (21/22). The Neighbourhood Housing Officers (NHOs) will begin annual tenancy visits and provide holistic support to residents. NHOs will use these visits to begin a conversation with under occupiers of all ages about downsizing or mutual exchange. Downsizing moves will be closely monitored on a quarterly basis to evaluate success including equality data. Resident views will determine interventions the approach is developed, and these proposals are identified and agreed, an *updated Equalities Impact Assessment will be submitted for this programme.*

Question 2: Do those from protected groups benefit or will they experience specific and disproportionate impacts? Will there be any direct or indirect discrimination?

Gather relevant equality data and information to show who will be affected by this decision and how. Set this out below. Include the results of any consultation or engagement. If you have identified any information gaps set out what these are.

Family Friendly Housing Purchase Programme

There are two types of housing impact related to this proposal that will be analysed in relation to EIA protected categories: reduction in numbers of smaller-sized social housing stock (studios and 1-beds) and increase in numbers of larger family-friendly social housing stock (2 bed, 3 bed, 4 bed +). Data as of 27 September 2022.

Age

81% of applicants (n=302) who are couples or singles over age 65 on the housing register need 1-bed properties. Meanwhile, 94% of applicants with 250 severe overcrowding points currently on the register are families with multiple children needing 2+ bed properties. These 688 children in severe overcrowding conditions comprise 8% of all children on the register.

Disability

Camden housing captures data on mobility-related disability and only 3% applicants with 250 severe overcrowding points (n=8) have also demonstrated mobility needs. The distribution of wheelchair users and applicants with mobility needs is even across all property bed sizes.

Marriage/Civil Partnership

Lone applicants (i.e., single parents) with children including those with non-dependent adults comprise 30% of the register but 62% of those with severe overcrowding points. Couples with children including those with non-dependent adults comprise 30% of the register but 38% of those with severe overcrowding points. Single applicants comprise 28% of the register but 0% of those awarded severe overcrowding points.

Pregnancy/Maternity

Families with pregnant women or women in maternity (n=214) make up 3% of the housing register, but they make up 15% of the severe overcrowding applicants (n=56). None of these applicants have 0 and 1-bed needs.

Race

There are 3,773 BME applicants in the housing register or 54% of the register. 251 BME applicants are severely overcrowded, or 65% of those severely overcrowded, thus indicating an overrepresentation of BME applicants among those with severely overcrowding points.

There are 2,240 or 32% White including White Other applications on the housing register, of these 99 or 26% white applicants have severe overcrowding points. After the white ethnic group (n=2,240, 32%) on the housing register Bangladeshi (n=1,117, 16%), Black and African of all groups (n=1,127, 16%), and Somali (n=393, 6%) are the next three largest ethnic groups.

White applicants (n=716) and applicants who did not disclose ethnicity (n=431) with 0- and 1-bed need comprise more than 50% of smaller-sized property needs in the register.

Bangladeshi families (n=178) and Somali families (n=94) with 4- and 5-bed need comprise more than 50% of applications of these large property sizes followed by Black and white families. Furthermore, Bangladeshi and Somali children comprise 33% (n=230) of all children with severe overcrowding applications.

Sex

The main applicant’s sex (F/M) distribution for severe overcrowding is the same as in the general register, 65% female (n=4,529) and 35% male (n=2,381). There is an even split between female and male applicants with 0-1-bed needs, however, over 72-81% of applicants requesting 2-5-bed properties are female.

The Camden housing register collects data religion/belief, gender reassignment, and sexual orientation but with very low disclosure rates. Camden has not found documentation of consultations related to past overcrowding projects in the borough.

Please use the below grid to capture insight already received through consultation and engagement – to be completed as engagement progresses.

| | The groups below were contacted during the consultation | Say what the groups said | Say what the individuals said | Any key themes? |
|--------------------------------|---|--------------------------|-------------------------------|-----------------|
| Age | | | | |
| Disability | | | | |
| Gender reassignment | | | | |
| Marriage and civil partnership | | | | |
| Pregnancy and maternity | | | | |
| Race | | | | |
| Religion or belief | | | | |
| Sex/gender | | | | |
| Sexual orientation | | | | |

Question 3: Analysing the evidence outlined above, does the proposed decision have an impact (positive or adverse) on our duty to eliminate discrimination/harassment and victimisation, advance equality of opportunity or foster good relations between different groups in the community (those that share characteristics and those that do not)?

Family Friendly Housing Purchase Programme

While Bangladeshi, Black, and Somali ethnicities comprise 38% of the housing register, they make up 48% of applicants with severe overcrowding points. Severe overcrowding in Camden mostly impacts these BME families headed by couples and single parents. Bangladeshi, Black, and Somali women make up 31% or 121 of severely overcrowded main applicants. By acquiring larger-sized properties it is anticipated that more Black and minority ethnic women will be accommodated in right-sized family homes.

In doing so, Camden will be advancing equality of healthy development opportunities for the nearly 700 children on the housing register with documented severe overcrowding needs.

| Protected group | Summarise any possible negative impacts that have been identified for each protected group and the impact of this for the development of the activity | Summarise any positive impacts or potential opportunities to advance equality or foster good relations for each protected group |
|-----------------|---|---|
| Age | Applicants aged over 65 years would not be negatively impacted by the scheme. In addition, older adults in Camden are more likely to be under-occupiers who currently receive specialist casework services under the Housing Needs Group. | <p>The greatest beneficiaries of this project are the 688 children, or about 1 in 10 children on the register, living in severely overcrowded households. By relocating children into right-sized properties in purpose-built blocks, they will gain the personal space for healthy development and a community space for social engagement with peers and neighbours.</p> <p>Working-age adults are the other age group benefiting from new family-friendly homes where couples and single parents can have their own space to foster healthy relationships.</p> |
| Disability | Wheelchair users and other applicants requiring wheelchair | Wheelchair users and those with mobility needs are not |

| | | |
|--------------------------------|--|--|
| | accessibility or ground level properties will not be affected negatively by the scheme. | among those with severe overcrowding needs and will not directly benefit from this project. |
| Gender reassignment | N/A | N/A |
| Marriage and Civil Partnership | Singles and couples without children will only be minimally impacted by the scheme due to a small reduction in smaller-sized properties. | Couples and single parents with children comprise most overcrowded applicants and will greatly benefit from an increase in family-friendly housing stock that offers new opportunities to select their right-sized property. |
| Pregnancy and maternity | There are no negative impacts for this group. | Pregnant women and women in maternity in large families stand to gain from this project since growing families drive current overcrowding levels. |
| Race | All other ethnic groups will not be negatively impacted, in relative and absolute terms. | Bangladeshi, Black, Somali, and white families will receive the largest positive impact since they comprise most overcrowded applicants and will be given new opportunities to select their right-sized property. |
| Religion or belief | N/A | N/A |
| Sex | Male applicants will only be minimally impacted in a negative way compared to female applicants. | Female applicants with children comprise most overcrowded applicants on the housing register and will be given new opportunities to select their right-sized property. |
| Sexual orientation | N/A | N/A |

Question 4: If there is an adverse impact, can it be avoided?
If it can't be avoided, what are we doing to mitigate the impact?

Family Friendly Housing Purchase Programme

Selling 1-bed and studio properties using the receipts to buy larger family-friendly sized homes (2 bed+) will lead to a stock reduction in smaller-sized properties, but we anticipate minimal impact on non-overcrowded applicants. The properties sold will not be concentrated in any one ward and the decrease in housing stock of studios and 1-beds will be largely offset by smaller-sized properties that become available after overcrowded families relocate.

Though single, white, older, and male applicants, which often include those who are ex-offenders and those with a history of mental health/substance misuse conditions, are among the least likely to benefit from a decrease in studios and 1-beds, we anticipate minimal impact, given the low number of smaller homes being sold, equivalent to an estimated 2% of the total 1 bed/studio flat stock across the Borough. The equality impact assessment will be monitored and updated as the programme delivers.

Wheelchair accessible and ground level properties together with properties in purpose-built blocks of flats on the 1st, 2nd and 3rd floors that have lift access, will be retained and not be within scope of the disposal strategy, unless there is a high underlying property risk and high repair and maintenance costs. Where a property of this type is considered to have a high underlying risk and assessed for disposal, there will be a commitment to purchase another ground floor property to replace it. This will not reduce stock levels of properties for those with disabilities or mobility needs.

Neighbourhood Housing Officers will also seek ground floor or 1st floor accommodation for people who are over 60 years and interested in downsizing to reduce the need to move again in later years.

Housing Support

Through our engagement work with overcrowded tenants, we will be sensitive to their situation and acknowledge that there is a limited availability of right-sized homes. Additional training will be carried out ahead of approaching tenants to manage difficult conversations and not add additional trauma. Our Neighbourhood Housing Officers already have an ongoing relationship and extensive knowledge of our tenants. This approach is aimed to improve the support that can be provided towards residents to help improve their living conditions by actively seeking feedback. We will ensure that the residents that are contacted during the engagement work will be representative of the proportion of people who have severely overcrowded and standard overcrowded points.

Question 5: Could any part of the proposed activity discriminate unlawfully?
 Can we advance equality of opportunity via this decision/policy?
 Can we foster good relations via this decision/policy?

Family Friendly Housing Purchase Programme

While in Question 4 we demonstrated that selling properties will not discriminate unlawfully, in Question 5, we draw attention to the allocation system of the family-friendly properties acquired by the funding of sales from smaller sized and unsuitable properties.

As part of ongoing quarterly evaluation, we will monitor the housing allocation household data who come to live in the Family Friendly Purchase Programme properties to link property sales and purchases to their eventual housing allocations. We will track that severely overcrowded applicants are the primary beneficiaries and that no demographic sub-group is disfavoured in the allocation process. Through close monitoring, Camden can show evidence of how it has advanced equality of housing opportunity for large, overcrowded families without disadvantaging smaller families and singles.

Use this stage to record the outcome of the EIA. An EIA has four possible outcomes.

| Outcome of analysis | Description | Select as applicable |
|---|---|----------------------|
| Continue the activity | The EIA shows no potential for discrimination and all appropriate opportunities to advance equality and foster good relations have been taken. | |
| Change the activity | The EIA identified the need to make changes to the activity to ensure it does not discriminate and/ or that all appropriate opportunities to advance equality and /or foster good relations have been taken. These changes are included in the planning for improvement section of this form. | yes |
| Justify and continue the activity without changes | The EIA has identified discrimination and / or missed opportunities to advance equality and / or foster good relations but it is still reasonable to continue the activity. Outline the reasons for this and the information used to | |

| | | |
|---|--|--|
| | reach this decision in the box below. | |
| Stop the activity | The EIA shows unlawful discrimination. | |
| Comments (if required): Please see response to Question 4 - planning for improvement. | | |

EIA prepared by: Murylo Batista

Date: 4 October 2022

EIA checked by: Jaclyn Bello

Date: 11 October 2022

EIA approved by: Gavin Haynes

Date: 30 November 2022

Director of Property Management

