

Equality Impact Assessment (“EIA”)

Financial Year and Quarter	2018/2019 - Quarter 3 Last update: 23 December 2018
Name of policy	Local Lettings Plan for Lancaster West Estate and Bramley House (“the LLP”)
(1) Summary of policy / decision	<ol style="list-style-type: none"> 1. The Council recognises that residents of the Lancaster West Estate and Bramley House (“the LLP Area”) were amongst those most deeply and closely affected by the tragedy at Grenfell Tower. As part of its commitment to doing what it can to help residents in their recovery, both individually and as a community, the Council has committed to an ambitious and resident-led refurbishment of the LLP Area. As part of that commitment, the Council wishes to ensure that: <ol style="list-style-type: none"> a. Residents from the LLP Area who need to move to a more suitable home, but wish to remain in the Area as part of the community, are able to do so; and b. All Council homes within the LLP Area which become vacant and available for letting will be offered first to existing residents from the Area. 2. The following residents will qualify under the LLP (“qualifying residents”): <ol style="list-style-type: none"> a. They must have been living within the LLP Area at the time of the fire at Grenfell Tower; <u>and</u> b. They must: <ol style="list-style-type: none"> i. Hold a secure tenancy, living at home; or ii. Hold a secure tenancy, but are living away from home and would like to return home, but cannot do so as their home is very unsuitable; or iii. Have been given a home to rent within the LLP Area by the Council which is not a secure tenancy (i.e. they are accommodated pursuant to the Council’s homelessness duties); or

	<p>iv. They are household members of Council tenants (as defined by the LLP) who live with the tenant as their main and principal home, either (a) within a property which is overcrowded and the family needs a four-bedroom property or larger <u>or</u> (b) the property has three or more bedrooms, the tenant is willing to downsize and the household member is rehoused to their own studio or one-bedroom property under the LLP; <u>and</u></p> <p>c. They must meet the criteria for at least one of the priority categories identified within the LLP.</p> <p>3. The LLP falls within the Council’s Housing Allocation Scheme (February 2017 revision). The LLP provides its highest priority to residents who would (in any event) qualify for rehousing under the Allocation Scheme. They include residents with exceptional or urgent housing needs, high medical needs, those at serious risk of harm and under-occupiers, amongst others.</p> <p>4. A number of additional priority categories are also granted by the LLP to help resolve housing need within the LLP Area and to help residents who might not normally qualify under the main Allocation Scheme. They include tenants and household members with (lower) medical needs, who are overcrowded, or who wish to move closer to family.</p> <p>5. Qualifying residents may be awarded points for more than one category, subject to certain exceptions set out within the LLP. Households may combine medical points awarded to more than one member.</p> <p>6. All residents given new homes under the LLP will be granted a periodic (lifetime) secure tenancy.</p> <p>7. If an available property within the LLP Area is not let to a qualifying resident within a reasonable period of time, it will then be made available to the other residents on the Housing Register. The Council reserves the right to offer accessible homes first to residents who need them.</p> <p>8. The LLP will run for two years following implementation, and will be reviewed no later than 18 months from implementation.</p> <p>The LLP should be considered alongside the Grenfell and Wider Grenfell Rehousing Policies, and the “<i>Decision relating to future housing options and support for secure tenants of the Walkways, Treadgold House and Bramley House in temporary accommodation</i>” (“the Decision”).</p>
(2) Consultation	

	<p>In August 2018 two independently facilitated workshops were held with residents of the LLP Area to discuss proposals for a local letting scheme. The Council subsequently met with the respective Residents Associations of Lancaster West and Bramley House to discuss the draft LLP, before launching a four-week public consultation ending on 30 November 2018. A paper copy of the draft LLP and a short survey were sent to all households within the LLP Area. A letter with an electronic link to the draft LLP and survey was sent to all households on the Housing Register. Details of the draft LLP were also posted on the Grenfell Support website.</p> <p>The Council received 72 responses to the survey from residents and housing applicants and received written comments from local advice agencies.</p> <p>A Consultation Report and Appendices have been prepared with an analysis of the survey. They indicate that the large majority of respondents are in favour of the creation of a Local Lettings Plan: 80.6%.</p> <p>The consultation documents were also presented to the Grenfell Recovery Scrutiny Committee.</p>
<p>(3) Who does this policy affect?</p>	<p>The LLP will directly affect all those who are “qualifying residents” as outlined above.</p> <p>At present over 120 households living on the Estate and in Bramley House are registered on the Housing Register with a priority for rehousing under the main Allocation Scheme; therefore the number who will qualify for the LLP will be far in excess of this number.</p> <p>Qualifying residents will include those from Barandon Walk, Hurstway Walk, Testerton Walk, Bramley House and Treadgold House. Under the Wider Grenfell Rehousing Policy, residents from these blocks who wish to be rehoused are awarded 900 points and thus hold a high priority status on the Housing Register (“Category B priority”). Residents awarded Wider Grenfell Priority cannot utilise these points within the LLP.</p> <p>The LLP will not apply to (a) leaseholders, (b) residents privately renting or subletting flats within the LLP Area, or (c) households who have moved to the LLP Area after the date of the fire.</p> <p>In practice, the LLP will not apply to former residents of Grenfell Tower and Grenfell Walk (“Category A priority”). Under the Grenfell Rehousing Policy, these households hold the highest priority in the Borough and benefit from an enhanced rehousing procedure. However under the LLP, the Council retains</p>

	<p>discretion to offer homes which become vacant within the LLP Area to Category A households before any other qualifying residents.</p> <p>The Council also recognises that, by prioritising qualifying local residents for vacant homes within the LLP Area, the LLP may indirectly impact other households on the Housing Register who will no longer enjoy priority access to these homes. Therefore this EIA considers the anticipated equalities impact of the LLP on households qualifying through the main Housing Allocation Scheme. As of 19 December 2018, there were 3,204 applications to the Housing Register (3,338 including residents who have been awarded Wider Grenfell Rehousing Priority (WGRP)).</p>
<p>(4) Sources of data</p>	<p>The Appendix to this EIA summarises available equality and diversity (“E&D”) data regarding the protected characteristics of lead and joint tenants of the LLP Area. By way of comparison it also provides a breakdown of protected characteristics amongst tenants who hold Category A and Category B priority.</p> <p>This data has been extracted from E&D information voluntarily provided by tenants when signing up to their tenancy agreements, and from a tenancy profiling exercise carried out by the TMO in 2016-17. Tenants’ response rates varied, particularly in respect of questions about certain protected characteristics such as sexual orientation. In addition, the data does not capture the E&D characteristics of all other members of tenants’ households. However it provides an overview of the types of persons who hold tenancies within the LLP Area and thus may become “qualifying residents” under the LLP.</p> <p>In preparing the draft LLP and this EIA, the Council has also considered the data underlying, and the findings of, its four recent EIAs:</p> <ol style="list-style-type: none"> 1. Revisions to the Housing Allocation Scheme, February 2017 2. Grenfell Rehousing Policy, November 2017 3. Wider Grenfell Rehousing Policy, February 2018 4. Decision relating to future housing options and support for secure tenants of the Walkways, Treadgold House and Bramley House in temporary accommodation, October 2018.

	<p>Particular attention has been given to Appendices 1-8 prepared in respect of the ‘Decision EIA’ of October 2018. They analyse the protected characteristics of (a) all applicants on the Housing Register as of 29 July 2018, and (b) all households registered for Category B priority as of that date. It is acknowledged that the Category B data does not capture all of the households within the LLP Area, and to some extent this information will now have been eroded by the passage of time. Nonetheless the Appendices provide a broad, detailed and recent overview of the types of households who live in the area <u>and</u> on the Register, who will be affected by the LLP and therefore can be considered representative.</p> <p>Appendix 8 contains the result of a ‘door knocking’ / ‘getting to know you’ exercise carried out within the LLP Area by the Lancaster West Neighbourhood Office in the summer of 2018. Residents who participated did so voluntarily. The exercise profiled a total of 840 residents, up to 9 July 2018. However, the response rates and quality of the data varied widely. For example, while the majority of respondents (80%) agreed to disclose their ethnicity, only 20% were willing to disclose their sexual orientation. In addition, the survey did not consider all protected characteristics within the meaning of the Equality Act.</p> <p>To supplement the above data, the EIA also draws upon the following data:</p> <ul style="list-style-type: none"> • 2011 Census data • RBKC Housing Management records • RBKC Housing Register data • Grenfell Care and Support data • RBKC Housing Benefit data • Office of National Statistics • RBKC Temporary Accommodation Procurement Strategy 2017 to 2019.
<p>(5) Headlines from existing data</p>	<p>Approximately half of households likely to be affected by the LLP include children under the age of 18. In July 2018, 50.65% of all households on the Housing Register included children, and 51.47% of households which qualified for Wider Grenfell Priority (i.e. a subset of the LLP Area).</p> <p>Data also shows that a significant proportion of <i>tenants</i> (as opposed to <i>residents</i>) of the Lancaster West Estate are aged 65+: 31.17%. This suggests that many of the tenants who will be ‘qualifying residents’ under the LLP are older. As a result there may be higher than average numbers of residents downsizing to smaller homes, but also higher numbers requiring accessible accommodation.</p>

	<p>Data strongly indicates that women will be disproportionately impacted (positively and/or negatively) by the LLP. Women make up almost 63% of tenants of the Lancaster West Estate, and almost 68% of applicants on the Housing Register.</p> <p>Single women are particularly likely to be head of households with dependent children: 32.25% of Category B households and 34% of Housing Register applicants respectively, as of July 2018.</p> <p>The Council has collected data on race and ethnicity for 80% of the residents of the Walkways, Treadgold House and Bramley House, and 70% of residents on the Housing Register. This data suggests that there is very considerable diversity both within the LLP Area and on the Housing Register, but no significant variation between the two.</p> <p>Similarly, data suggests that there is very considerable diversity of religious belief amongst the residents of the Lancaster West Estate.</p> <p>Regarding disability, the data is not conclusive on the number of disabled persons. However 22.8% of Wider Grenfell Rehousing Policy households have reported medical conditions which might (though not necessarily must) be considered disabilities. This compares to almost 14% of Wider Grenfell Rehousing Policy households who have been assessed as requiring some form of accessible accommodation.</p> <p>Amongst Housing Register applicants, 19.6% reported medical conditions which might (though not must) amount to disability, and 11.37% were assessed as requiring some form of accessible accommodation.</p>
<p>(6) Summary of concerns about the decision</p>	<ol style="list-style-type: none"> 1. The LLP only applies to residents who were already living within the LLP Area on 14 June 2017, i.e. the date of the fire at Grenfell Tower. It will not apply to residents who have moved to, or been placed in, accommodation within the LLP Area since that date. It will not assist other applicants who have become homeless since that date, even if they have an urgent need for housing. This may include some 'split households', where residents from the LLP Area left their homes and are now accommodated under Part VII of the Housing Act 1996: these persons will not qualify under the LLP because they were not tenants (rather, they formerly lived with qualifying residents). 2. The LLP reserves highest priority (100 points+) for qualifying residents who would have received the same level of points under the Housing Allocation Scheme in any event. Non-LLP applicants with an equivalent level of housing need will thus receive an equal level of priority under the

	<p>Allocation Scheme. However, vacant homes within the LLP Area will be made available first to the <i>qualifying resident</i> with highest housing need (rather than to the <i>applicant</i> with the highest need). Therefore homes may be allocated to qualifying residents with lower housing need than 'ordinary' applicants on the Housing Register. For example, a qualifying resident with 900 points could be allocated a vacant home within the LLP Area ahead of an 'ordinary' applicant with 1,900 points.</p> <ol style="list-style-type: none"> 3. The LLP also provides a number of additional priority categories which do not apply under the main Scheme, albeit only for residents with the lowest levels of housing need (5-80 points). In this way the LLP prioritises residents from the LLP Area above 'ordinary' applicants on the Register, who have an equivalent level of housing need but are not awarded additional points on that basis (e.g. 5 points to move closer to family). 4. Qualifying residents will enjoy other enhancements under the LLP which will not apply to 'ordinary' applicants on the Housing Register. Other applicants are thus treated less favourably: <ol style="list-style-type: none"> a. All qualifying residents allocated a new home under the LLP will receive a (lifetime) secure periodic tenancy. Any qualifying resident who has not previously held a lifetime secure tenancy will thus be given a more secure form of tenure than other applicants on the Housing Register. This provision will principally benefit existing tenants who were granted their tenancies after 5 January 2014, and residents accommodated within the LLP Area pursuant to the Council's homelessness duties. Normally they (and all other applicants allocated homes for the first time) would receive a one-year introductory tenancy followed by a 5-year fixed term tenancy, which is reviewed upon expiry. The majority of such tenancies are renewed, but they may be terminated at that point if there is cause, within the Council's Tenancy Policy, to do so. b. Under the LLP, qualifying residents who are single adults may be allocated either a studio or a 1-bedroom apartment. Under the Housing Allocation Scheme, single adults on the Housing Register are normally assessed as eligible only for studio apartments. Some single qualifying residents will therefore be allocated larger properties than 'ordinary' single applicants.
<p>(7) Justification for the policy and mitigation to address concerns</p>	<ol style="list-style-type: none"> 1. The LLP will apply only to a small proportion of the Council's total housing stock. The LLP Area contains 627 rented homes, compared to over 6850 homes in the total Council housing stock (excluding homes owned by leaseholders, which are not available for allocation.)

Lettings to the Lancaster West Estate and to Bramley House represent, on average, 5.5% of the Council's total annual lettings of social housing, and 13.8% of annual lettings of Council rental properties.

2. The Wider Grenfell Rehousing Policy and the Decision are designed to encourage and facilitate residents from within the LLP Area who do not feel able to return to their homes following their fire to relinquish their properties and move to new accommodation. These policies focus in particular on freeing up homes which are currently unoccupied so they can be allocated to other households. The Council anticipates that there will be a significant turnover amongst homes in the Area in the first months of the LLP. For example as of 14 October 2018, at least 47 households from the Walkways, Treadgold House and Bramley House had registered their intention not to return home and wanted to move to new accommodation.
3. The LLP is designed to help tenants and families who are living in unsuitable homes move to a more suitable home while remaining in the community and close to their existing support networks as this will help to support their longer term recovery.
4. A number of themed concerns were raised within public consultation on the draft LLP, particularly by the three local advice agencies. Some of those concerns are addressed within this EIA, and the Council's formal response to these concerns, including mitigation, is provided in the Executive Decision Report **Local Lettings Plan For The Lancaster West Estate And Bramley House** (reference 05333/18/K/A)
5. Against that background, the LLP aims to ensure that every home relinquished within the LLP Area is allocated to a qualifying local resident. However it also ensures that whenever a local resident is rehoused, another property is freed up elsewhere, thereby creating a chain of further lets. It is anticipated that this process will lead to 'churn' amongst homes within the LLP Area and also amongst the rest of the stock. This effect would help to advance equality of opportunity and foster good relations amongst all groups in the community. This will be achieved in four ways:
 - a. Qualifying residents who would otherwise have bid for accommodation across the whole of the Borough will not now need to do so, thereby freeing up other homes for allocation to 'ordinary' applicants via the Housing Register.

- b. The additional points categories granted to qualifying residents under the LLP (5-80 points) will assist more households to move, thereby freeing up additional properties for letting.
 - c. Under the LLP, any homes which are not allocated to qualifying residents within a reasonable period of time will be made available to let to residents on the Housing Register.
 - d. Many applicants on the Housing Register are existing Council tenants who need to move to suitable accommodation. As they are rehoused - either through the LLP or Housing Register - further properties will become available for letting and the 'chain' of lets will continue.
6. The LLP will only benefit residents from the area *who have an assessed housing need*. Under the LLP, residents with the highest priority (100+ points) would in any event benefit from an equivalent level of priority under the Allocation Scheme.
7. Where two qualifying residents are awarded equal points under the LLP, priority will be given to the household with the greatest length of residence within the LLP Area. This provision equates with the "Priority Date" system used within the Housing Allocation Scheme (para. 5.3) and the Grenfell and Wider Grenfell Rehousing Policies. The Council anticipates that the LLP mitigates against the possibility of qualifying residents with different levels of housing needs being awarded the same number of points, due to the availability of the additional priority categories under the LLP and because multiple points awards are permitted. However it is acknowledged that this element of the LLP will need careful monitoring following implementation.
8. Residents will pay the rent applicable to their new home. This will not be capped at the rent paid for their previous home. The same policy applies to all other residents transferring homes under the Housing Allocation Scheme, Wider Grenfell Rehousing Policy and the Decision (an exception is made only for Category A residents from Grenfell Tower and Grenfell Walk).
9. The Housing Allocation Scheme will continue to apply to all other applicants on the Housing Register and to the majority of vacant properties within the Council's stock, ensuring that reasonable preference is still given to all applicants who qualify under the Scheme. All vacant homes within the LLP Area which are not allocated to qualifying residents within a reasonable period will be made available via the Housing Register in the usual manner.

10. The Council has a discretion to mitigate the impact of the LLP in cases where it would have a negative effect on applicants with significant housing needs, for example in a scenario where an 'ordinary' applicant has higher need than a qualifying resident. The LLP reserves discretion for the Council to first offer vacant homes within the LLP Area to the following applicants:
 - a. Category A households from Grenfell Tower or Grenfell Walk;
 - b. If it is an accessible property which is not required or chosen by a qualifying resident who needs that type of accommodation, a person from the Housing Register who needs it;
 - c. Applicants on the Housing Register assessed as having exceptional need, emergency medical priority or serious risk of harm; or
 - d. Council tenants who require an urgent decant or transfer from their existing home.
11. For applicants who do not meet the minimum residence criteria (i.e. having lived in the Borough for 3+ years, and/or having lived in the LLP Area on 14 June 2017), the Council has a discretion to admit applicants to the Register in exceptional circumstances: Housing Allocation Scheme para. 1.8. This may provide important mitigation when housing applications are received from:
 - a. Persons fleeing domestic or other forms of violence (who are more likely to be women);
 - b. Persons granted asylum (who are more likely to come from a BAME background); or
 - c. Irish Travellers and Gypsies, who are less able to meet residence criteria as a consequence of their traditional way of life.
12. Under the Housing Allocation Scheme (para. 4.18) the Council has an exceptional discretion to award 10 'locality hardship' points when satisfied that a household would suffer hardship unless rehoused in a particular area of the Borough. These points may be awarded to any household who does not meet the criteria of the LLP but can show a genuine connection with the LLP Area.
13. The Housing Allocation Scheme (para. 4.14) provides 50 additional points to applicants who are in paid work for at least 16 hours per week. These points are not available under the LLP because

they do not prioritise applicants based on their housing need. Also, the objective of that priority – to support economic growth and reduce social polarisation in the Borough – is less relevant to existing tenants who already live within the Borough’s social housing, particularly those recovering from the fire. These points remain available to applicants on the Housing Register.

14. The Council’s experience is that adults under-occupying their homes are less likely to downsize if they are only eligible to move to a studio rather than one-bedroom flat. The extended eligibility for one-bedroom flats provided by the LLP is intended to incentivise qualifying residents to downsize, thereby freeing up additional homes for letting. For ‘ordinary’ applicants, there is a discretion to permit bidding for larger properties in certain exceptional circumstances: Housing Allocation Scheme para. 6.3. Amongst other issues this discretion expressly caters for those with additional care needs, who are more likely to include persons with disabilities and older residents.
15. As to the other enhancements provided under the LLP:
 - a. Given the trauma and losses which local residents have suffered following the fire, the Council believes it is right that those with an assessed housing need are helped to find suitable new homes and are given a degree of permanence within the community.
 - b. The enhancements are time-limited as the policy will initially run for two years. Thus the LLP aims to encourage residents to reach a decision on their future housing needs within a reasonable period of time.
 - c. This will assist the recovery of the area and the Council’s planning for the future of its housing stock.
16. The LLP will not apply to (a) leaseholders or (b) residents renting private or housing association properties within the LLP Area, even if they were resident at the time of the fire. Although the Council recognises that these residents have also been deeply impacted by the fire, it does not believe it would be proportionate to include them within the LLP at this time. Firstly the Council does not owe statutory duties toward these households, unless they have been assessed as homeless under Part VII of the Housing Act 1996 or qualify for an allocation of housing under the Housing Allocation Scheme. Secondly, allocation of vacant homes within the LLP Area to these households would not release another property for letting within the Area and would not contribute to the ‘chain’ effect. This would negatively impact other applicants on the Housing Register.

	<p>17. Similarly, the LLP does not presently recognise ‘split households’ as identified in Section 6(1). Although these are local residents who were also impacted by the fire, they too cannot release another property for letting. The LLP mitigates for these residents by granting additional priority to households who are overcrowded and are willing to ‘split’ into different homes.</p> <p>18. Existing tenants have options beyond the LLP to move home if they wish, including mutual exchange. The Council is currently considering the adoption of a new management transfer policy.</p> <p>19. The LLP will be reviewed no later than 18 months from the beginning of implementation, in particular with a view to monitoring how the LLP has affected the position of ‘ordinary’ applicants on the Housing Register. The Council will also continue to collect E&D data from qualifying residents and applicants on the Housing Register, to identify and address any unforeseen negative impact on any particular protected groups.</p> <p>20. All applicants (via the Allocation Scheme and LLP) are given a suitability assessment to assess their and their household’s particular housing needs. Applicants from the Walkways, Treadgold House and Bramley House (a subset of qualifying residents) are being offered individualised and sensitive support in making decisions about their future housing, in accordance with the Decision.</p>
<p>(8) EIA Analysis</p>	<p>Existing evidence does not demonstrate a negative (or positive) impact upon the following characteristics:</p> <ul style="list-style-type: none"> a. Gender reassignment b. Marriage and Civil Partnership c. Religion/belief (including non-belief) d. Sexual Orientation <p>Age</p> <p>The Council believes that the LLP will provide particular benefits for households with children and older households from within the LLP Area:</p> <ul style="list-style-type: none"> 1. Households with children and older residents are likely to benefit disproportionately from the LLP, because they are more likely to qualify for some of the principle priority categories provided within the LLP (i.e. overcrowding, downsizing and medical needs).

2. The LLP provides additional priority categories for residents who lack one bedroom in their current home or those who wish to move closer to family. These categories may be more likely to benefit residents with children, whose households are growing and who would benefit from access to family support networks.
3. The LLP provides additional priority categories for household members of tenants who lack one or more bedrooms, who would need a four-bedroom house, but who are willing to be rehoused into their own property. This may be more likely to benefit older tenants whose children are grown.
4. The Council's Temporary Accommodation Placement Policy prioritises households who have children with special educational needs (which may include disabled children), child protection plans or 'high social needs linked into local support services' for placement into temporary accommodation located within the Borough. Therefore households which include the most vulnerable children are more likely to have been placed in the LLP Area pursuant to the Council's homelessness duties and therefore to qualify under the LLP. The LLP recognises these families as qualifying residents.
5. Households in temporary accommodation ("TA") are particularly likely to include dependent children: households with children make up a significant proportion of all duty accepted households annually. All applicants leaving temporary accommodation are awarded 100 points (both under the Allocation Scheme and LLP). However in practice, qualifying residents leaving TA may be allocated accommodation more quickly than 'ordinary' applicants leaving TA because there may be less competition for vacant homes within the LLP Area than generally.

Regarding households with children and older residents on the Housing Register, as explained above (Section 7.3) it is not thought that the LLP will increase waiting times or reduce supply. However the Council acknowledges that the Borough's housing supply generally remains under strain with significant waiting times. This is due to the impact of the fire and the overall shortage of affordable accommodation in the area.

It is acknowledged that households waiting for larger accommodation (2+ bedrooms) and accessible accommodation continue to experience the longest waiting times and therefore suffer greatest disadvantage, because these properties are in high demand and short supply. It is also acknowledged that households requiring accessible accommodation are more likely to include applicants who are older

and/or disabled. Those requiring larger homes are more likely to include dependent children and female heads of household.

However the limited supply at present of larger properties and accessible properties in the LLP Area is likely to mean that the opportunities for larger families on the Housing Register, and those who require accessible accommodation, will not be significantly restricted.

It is acknowledged that these aspects of the LLP will require careful monitoring and review as the policy is implemented.

Disability

To meet the definition of “disability” provided by s. 6 of the Equality Act 2010, persons must (a) have a physical or mental impairment, and (b) the impairment must have a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. Alcohol and drug addiction (without some other impairment) are excluded from the definition of “disability”.

The fact that a household has priority due to their medical status or requires accessible accommodation does not necessarily mean that members are disabled within the meaning of the Act. Nor can it be assumed that all persons who report a physical or mental health condition are sufficiently impaired so as to meet the statutory definition.

Conversely, there are likely to be residents who would be considered “disabled” notwithstanding that they do not need adapted accommodation or have not qualified for medical priority points. It is also possible that applicants with medical conditions have not disclosed those details in their application or within suitability assessments.

Persons with disabilities will include children (for example, a child who is experiencing trauma as a result of the Grenfell Tower tragedy). This is considered an issue of disability rather than age for the purposes of the EIA.

Given the impact of the tragedy and in light of existing data, the Council takes the view that the percentage of disabled persons from the LLP Area is likely to be higher than the general incidence in the population.

The Council believes that the LLP makes reasonable adjustments for, and advances equality of opportunity for, persons with disabilities from the LLP Area as follows:

1. Disabled persons are more likely to have complex housing needs and to receive support from carers, medical professionals and others within the community. The LLP addresses this issue by (a) helping qualifying residents to be rehoused close to their existing support network; and (b) providing that accessible properties within the LLP Area is offered first to qualifying residents who need this type of accommodation.
2. Tenants who might find it most difficult to make decisions about their housing (i.e. including the decision whether or not to apply for rehousing) may include persons with disabilities, particularly persons experiencing mental health difficulties, whether those have arisen as a result of the events of the Grenfell Tower tragedy or otherwise. However the Council believes that the LLP provides, initially at least, a reasonable period of time (2 years) in which residents can make this choice. Residents will also continue to be provided with individualised and sensitive support in making their choice.
3. 'Moving closer to family' points available under the LLP may be particularly important for persons with care and support needs.
4. Provision of 'lifetime' secure tenancies rather than one-year introductory tenancies or five-year fixed term tenancies will provide additional security of tenure for residents. This may provide additional reassurance for disabled persons, particular those with mental health difficulties.
5. The Council's Temporary Accommodation Placement Policy prioritises persons with significant, or severe and enduring, health conditions and care needs for placement into temporary accommodation located within the Borough. Persons with disabilities, including children, are therefore more likely to have been placed in the LLP Area pursuant to the Council's homelessness duties, and therefore to qualify under the LLP. Persons with disabilities may also be disproportionately represented within the cohort of tenants who are currently living away from home and wish to return, but cannot as their property is unsuitable for their needs. The LLP recognises these households as qualifying residents.

However existing evidence also demonstrates that there might be negative impacts upon persons with disabilities, particularly 'ordinary' applicants on the Housing Register. The potential adverse impacts are summarised as follows.

1. Tenants with physical disabilities may wish to return to their existing home within the LLP Area, but are unable to do so as their secure tenancy is not suitable given their physical and / or mobility requirements. Alternatively, Residents may not feel able to return to their homes due to their experiences during and after the fire.
2. As rents in residents' new homes will not be capped at the level paid in their old home, there may be concerns about affordability for tenants who move to larger properties. This includes any resident allocated an extra bedroom in order to cater for care or support needs.
3. 'Ordinary' applicants with disabilities may, to some extent, suffer a 'knock on' effect of added delay, because accessible accommodation which becomes vacant within the LLP Area will be offered first to qualifying residents (even if ordinary residents have equal or – potentially – higher housing need). Accessible accommodation is in short supply and high demand, with long waiting times for all applicants across the Borough. As outlined above, it is possible that accessible accommodation may be in higher than average demand under the LLP due to the age profile of local residents.

The following mitigation may help to address the potential adverse impacts upon disabled persons:

1. Where an accessible property is allocated to a qualifying resident instead of to an 'ordinary' applicant, in most cases the qualifying resident will in any event have had an equivalent level of assessed housing need / points award.
2. Any accessible accommodation which is not needed by qualifying residents will next be offered to applicants from the Housing Register with a need for this type of accommodation. They will thus take precedence above any qualifying resident who has higher points but no mobility issues.
3. Under both the LLP and Housing Allocation Scheme (para. 4.19), qualifying residents / applicants may combine multiple points awards for medical needs of different members of their household.

4. The limited supply at present of larger properties and accessible properties in the LLP Area is likely to mean that the opportunities for those who require accessible accommodation may not be significantly restricted.
5. It is anticipated that the planned investment and refurbishment programme within the LLP Area will improve accessibility across the stock in general. This may help to meet the anticipated high demand for these properties amongst all applicants for housing in the Borough.
6. All applicants are offered suitability assessments to identify their housing needs. Suitability assessments take account of disabilities, receipt of medical, social and health care and informal caring arrangements, employment, training and education. No applicant should be required to accept an offer of accommodation which is not affordable. The Council can also advise on income maximisation, checks to ensure a resident is in receipt of all benefits to which they are entitled.
7. Tenants have the right to review offers of social housing.
8. Tenants can be offered advice and assistance from the Council's Adult Social Care and / or Housing Occupational Therapists with regard to minor or major adaptations that might make their existing or new home suitable. Residents with mobility problems are accompanied to offers of permanent homes by a Housing Occupational Therapist who can advise on suitability and appropriate minor adaptations.
9. Property requirements for residents with mobility needs are also assessed in accordance with the Pan-London Accessible Housing Register (AHR) guidance. This guidance is also used to categorise properties with accessible features. The AHR guidance recommends the provision (included within both the Allocation Scheme and LLP) that vacant accessible permanent properties are first offered to households who need them, even if other applicants have higher housing needs.

It is accepted that these aspects of the LLP will require careful monitoring and review.

Race/ethnicity

The Council has made considerable progress in gathering data on the race and ethnicity of its residents and housing applicants, following the identification of gaps in this evidence in previous EIAs. The Council has now gathered race/ethnicity data on 83.6% of Category B households and a large number of the residents of Lancaster West.

The data confirms that there is considerable ethnic and racial diversity amongst both residents of the LLP Area and the general pool of applicants on the Housing Register. A significant proportion of both applicants and qualifying residents will identify as BAME or of mixed race: at least 45.19% of applicants on the Housing Register and 52.48% in Lancaster West (i.e. Black, Asian, mixed race and 'other')

As both the Allocation Scheme and LLP prioritise and allocate housing according to an applicant's relative housing need, it is not thought that there are any identifiable barriers for rehousing on the grounds of race or ethnicity.

The considerable diversity amongst both qualifying residents and 'ordinary' applicants suggests that persons from racial or ethnic minorities will be likely to benefit from the LLP, and from any net increase in lettings as a result of 'churn'.

However it is acknowledged that the residence criteria within the LLP and Housing Allocation Scheme mean that certain groups are less likely to qualify than others. Two of these groups are more likely to be defined by reference to their ethnic or racial background, which may be closely linked to the reasons they cannot meet residence criteria. They are:

- a. Applicants recently granted asylum / refugee status, and
- b. Irish Travellers and Gypsies who have not been resident within the Borough on a long-term basis by reason of their traditional way of life.

These applicants would however be in the same position as any other household who has become homeless or entered onto the Housing Register since June 2017, who do not benefit from the LLP.

As noted above (Section 7.7 and 7.8) the Council has discretion to admit applicants to the Register even where they do not meet minimum residence criteria, and to award additional 'locality hardship' points

where an applicant can demonstrate that they have a close connection to a particular area and would suffer hardship if not rehoused within that part of the Borough. It is thought that this discretion will mitigate the impact of the LLP on any households from these groups who do not qualify by reason of their race or ethnicity.

However it is also acknowledged that the LLP will need to be carefully monitored and reviewed in order to determine whether there are any unforeseen or indirect adverse impacts linked to race or ethnicity.

Sex

It is acknowledged that women are likely to be heavily impacted by the LLP (positively and/or negatively) because they feature disproportionately amongst all groups who reside in or apply for social housing. Single women with children are particularly likely to be affected, as data suggests they make up a significant proportion of households on the Housing Register and within the LLP Area (approximately 32-34%).

The prevalence of women amongst applicants and residents suggests that many women will benefit from the LLP, and from any net increase in lettings as a result of 'churn'.

At the same time, it is acknowledged that there may be negative impacts for women. In particular:

1. The concerns identified within Section 6 of this EIA are most likely, statistically, to negatively affect women. Relevant mitigation in respect of those concerns is set out in Section 7.
2. The residence criteria implicit within the Allocation Scheme and LLP are likely to adversely impact victims of violence who have fled their homes in another district, who are significantly more likely to be women. Important mitigation features have been built into the Scheme and LLP which may be used to address the position of these households:
 - a. There is a discretion to waive residence criteria in order to admit applicants onto the Register in exceptional circumstances;
 - b. Those assessed at serious risk of harm or with urgent needs will be awarded a high priority status under the Housing Allocation Scheme;

	<p>c. The Council retains discretion to allocate vacant properties outside the LLP to households with the highest priority status on the Housing Register, when required to address their urgent housing needs.</p> <p>Nonetheless it is accepted that the LLP will also require careful and considered monitoring in order to determine how it impacts women in the LLP Area and the Housing Register, so that any adverse impacts may be identified and addressed.</p>
Lead Officer	Rob Shaw – Housing Policy Manager
Senior Officer sign-off	Maxine Holdsworth – Director of Housing Needs and Supply
Lead Equality Officer	Angela Chaudhry - Equalities and Diversity Officer