Equality Impact Assessment/Equality Analysis

Part 1 - Description of the policy and its relevance to equality

Name of Project	Housing Strategy
Trigger for EQIA	The Equality Impact Assessment (EQIA) is being undertaken in light of the drafting of a new Housing Strategy for the London Borough of Bexley. The EQIA aims to identify, address and monitor any differential or adverse impacts on any specific equalities groups.
Brief description of the project including: • its purpose and aims • main stakeholders (i.e. beneficiaries, service	The Housing Strategy is a strategic analysis of the current and projected housing situation in the London Borough of Bexley and the measures that need to be addressed in the context of the housing crisis in London and the housing issues facing residents.
users, staff)	The Strategy highlights the importance of working in partnership, particularly with Registered providers, to assist the Council in meeting its housing challenge. It references the context for the housing challenge including demographic change, the economic situation and implications of the pandemic. It recognises the acute challenge of increasing numbers of households in temporary accommodation and the importance of effective prevention measures to try and prevent homelessness in the first place. Supply is also an area of concern, particularly supply of affordable housing to meet our identified housing need not only the need for affordable rent but affordable options for first time buyers. The increasing elderly population will need to be planned for effectively in the context of the high financial and social cost of placing residents in residential care. But we also need to ensure the availability of a range of suitable and affordable tenure choices that help them live independent lives for as long as possible whilst also enabling best use of the housing stock. The strategy also looks closely at the needs of vulnerable residents where we have a duty of care including those of our Care Leavers. We also know the Private Rented Sector (PRS) is becoming increasingly important and affordability and standards are a key issues for our residents. Whilst the Strategy is unlikely to change fundamentally over the course of its life, national policy changes and funding opportunities will require flexibility and we will respond. We will put in place a 5-year Delivery Plan with our partners which will be reported on and refreshed annually. With a Delivery Plan formulated that will be based around the four key themes of the Strategy which are: 1. Working with Partners
	2. Council's Policies

	3. Council's Data and Performance 4. Resident Offer The key stakeholders and beneficiaries include: Bexley residents, the London Borough of Bexley, The Greater London Authority, BexleyCo, Developers and Housing Associations
Equality Relevance	Highly Relevant to Equality
Previous EQIAs	No
Summary of actions from previous EIQA(s) and update on delivery	NA

Part 2 - Evidence collected

Evidence used to make assessment

There is national, regional and local evidence available which shows that people with certain protected characteristics can face barriers to Housing.

The 2011 Census (ward profiles available on the council website), and the 2014 ONS mid-year estimates and equality related evidence from Bexley's Joint Strategic Needs Assessment (JSNA) have been used in this assessment.

The London Borough of Bexley Strategic Housing Market Assessment (SHMA) 2020 which identifies the scale and mix of housing in the Borough and unmet need was also used as a significant piece of evidence to make this assessment. The content and structure of the SHMA comprised: a major Household Survey in 2018 which was completed by 3,408 households (representing an 11% response rate from the sample surveyed), an online survey of stakeholders, engagement with people requiring supported housing, interviews with supported housing, adult social care and older person professionals; interviews with estate and letting agents, and a review of existing (secondary) data.

The SHMA identified a number of core elements that were used in the London Borough of Bexley Housing Strategy. It recognised a number of core principles such as that house prices in Bexley remain lower than those for London as a whole, that the minimum housing need figure is 959 dwellings (subject to cap under the standard methodology) each year over the period 2020-2030 and identifies that a total of 13,631 existing households are in housing need.

The London Borough of Bexley has an estimated population of 245,655 as of 2019¹. This has increased from 231,997 in 2011 (Census) and is predicted to increase to over 300,000 by 2050. Natural change (births and deaths) accounts for the largest rise in population (over 1,000 people each year), whilst international migration also accounts for over 500 people each year.

Comparatively² Bexley is ranked as the 8th least deprived borough in London, with there being no neighbourhoods that are currently within the most deprived 10% of the country. Conversely, the borough actually has 14 neighbourhoods in the top 10% (least deprived) in the United Kingdom, however there does exist pockets of deprivation which require consideration. There is a clear strip of deprivation across the north of the borough, and a patch at the south. Furthermore, to a lesser extent there are two patches of deprivation in the East (East Wickham ward) and the west (Crayford ward).

The³ employment rate of those living in the London Borough of Bexley has traditionally been higher than that of London, and often higher than Great Britain as a whole. By September 2017 the percentage of those in employment in the borough was 74.7% and over 40% of working residents,

³ ONS Population and Labour Force Survey

¹ GLA Population Projections – Central trend 2018-based population projections (published 2020)

² Indices of Multiple Deprivation (2019)

work in a job requiring high skills. Earnings of Bexley workers fall below their London counterparts, but remain similar to neighbouring Borough workers. The more financially insecure households are mainly found in the North of the Borough with some pockets elsewhere, whilst households described as 'Affluent Achievers' are mainly found in the south of the borough.

The following sources have proved useful as sources of evidence that have guided the assessment:

- London Borough of Bexley Strategic Housing Market Assessment (2020)
- SHMA Household Survey (2018)
- 2011 Census
- 2019 VOA
- CACI Paycheck
- The ONS mid-2018 population estimates
- Indices of Multiple Deprivation (2019)
- ONS Population and Labour Force Survey
- GLA Population Projections Central trend 2018-based population projections (published 2020)

Protected	Evidence
Characteristic	
Age	Almost 250,000 ⁴ people reside in Bexley, of which children and young people (people under the age of 25) account for almost a third of the population, whilst older people (aged 65 and over) account for a sixth.
	However, it is recognised that Bexley has an ageing population with over 34,000 people forecasted to be aged 75+ by 2050, compared to 20,000 in 2019, equating for a 70% increase. ⁵ Furthermore, projections up to 2050 show an ageing population; over 65s will make up 21% of the population. The younger population will also increase, but to a much smaller extent. ⁶
	According to the SHMA, the number of people across the Borough of Bexley aged 65 or over is projected to increase from 40,400 in 2016 to 56,500 by 2036 (39.9% increase). Bexley has the third highest rate of people aged 65 and over in London (17% of Bexley's total population), and those aged 85 and over make up 2% of the total population. The population of Bexley is also ageing faster than the rest of London – there was a 10% increase in the population aged over 65 years from 2003-2012. By 2030, there is predicted to be a 32% increase in people aged over 65. The largest percentage change will be in the "oldest" older people – a 25% increase in those aged 90 and over by 2020, and a 95% increase by 2030.
	The SHMA also highlights that the higher populations of older people living alone are found in the south of the Borough, in particular the south east.

⁴ GLA Population Projections – Central trend 2018-based population projections (published 2020)

⁵ GLA Population Projections – Central trend 2018-based population projections (published 2020)

⁶ GLA Population Projections – Central trend 2018-based population projections (published 2020)

However, over a quarter of older people residents registered on the housing register live in Erith, north of the Borough.

SHMA analysis of the age profile reveals that Bexley has experienced a net inflow in all younger (0-44) age groups (except 15-19 which is likely to be associated with the student population migrating out of Bexley for higher education) and return flows are experienced across the 20-24 and 25-29 age groups (Figure 3.7). Net outflows are recorded in 45+ age groups, likely linked to the out-migration flows to the South East region.

Disability

According to the 2011 Census 16.0% of the Bexley population have a long-term health problem or disability where their day-to-day activities are limited.

The 2018 Household Survey indicates that 5.4% of households live in properties that have been adapted or purpose built for those with an illness/disability.

Evidence from the SHMA states that there are currently 3,561 adults aged 18-64 with a learning disability in Bexley. The figures are expected to rise to 3,635 over the next three years. It is estimated that there are 850 older people aged 65 plus with a learning disability in Bexley. This figure is forecasted to increase to 884 older people by 2021. There are also currently 673 people on the learning disabilities register, of which 45 are identified as having complex health needs. The SHMA also identifies that there are currently 51 clients with a learning disability that live at home and are cared for by parents over the age of 65 years.

It is estimated that there are currently 1,423 adults aged 18-64 with Autistic Spectrum Disorders in Bexley. In the longer term by 2021 this number is forecast to rise to 1,452.

According to the Department of Health, there were 25 partially sighted and 35 blind residents in Bexley in 2014. In addition, there were 50 blind people with additional needs (15 physical disability, 10 deaf with speech and 20 hard of hearing). There were also 60 partially sighted people with additional needs (30 physical disability and 20 hard of hearing). A total of 180 residents receive Disability Living Allowance due to blindness.

According to the Department of Health, there were 1,365 people registered as deaf or hard of hearing in Bexley in 2010 (latest available data).

The SHMA used the Projecting Adult Needs and Service Information System (PANSI) to predict that the number of residents in the Borough with dementia is to increase by around 1,660 over the period to 2035 and those with early onset dementia to increase by 45 over the same period.

Sex

As of the 2011 Census, the population of the London Borough of Bexley is made up of 52% female and 48% male. This is still reflected in the 2014 ONS mid-year estimate for the male/female ratio of the borough population.

	Considering the employment rate of residents ⁷ , by gender, we can see that men living in Bexley have a higher rate than London and Great Britain whereas women are more in line with Great Britain but still above London for the last five years.
Gender reassignment	No evidence available for gender reassignment.
Pregnancy & Maternity	No evidence available; however, there are approximately 3,000 live births each year and around 2,000 deaths each year ⁸ . These have remained reasonably stable over time with a steady increase in births. This has led to a natural increase in population.
Race	Bexley is becoming more diverse. In the 2011 Census, the Black and minority ethnic population accounted for 18%, this is estimated to rise to 30% of the population by 2045. Populations of some ethnic groups (Black, Asian and Mixed) are predicted to more than double from the Census to 2050.
	Whilst internal (domestic) migration has been volatile in recent years, international migration accounts for 500 people each year. The 2011 Census shows the top three countries of birth of those born outside of the United Kingdom as Nigeria, India and Ireland. Ethnic groups are not distributed evenly throughout the borough, with the wards in the north of Bexley having the highest proportions of people from BAME groups.
	The ethnic minority employment rate is as high as white counterparts in the London Borough of Bexley ¹⁰ , this is something that is not reflected in London as a whole.
	The 2018 Household Survey indicates that 80.7% of Household Reference People describe themselves as White British and 19.3% describe themselves as having other ethnicities. Of these, 6.3% are Black/African/Caribbean/Black British, 3.7% are Asian/Asian British, 3.2% are White Central/Eastern European, 0.9% White Irish, 0.2% White Gypsy/Traveller and 3.3% are White Other. A further 1.1% have a mixed ethnicity and 0.7% are other ethnic groups.
	The SHMA's analysis of ethnicity across the ward areas shows some variations. Above-average proportions identified as White British in Blendon & Penhill ward (90.9%), Blackfen & Lamorbey (89.6%) and West Heath (88.3%). Compared with the Borough average of 6.3%, higher proportions identified as Black/African/Caribbean/Black British in Thamesmead East ward (30.6%) and Slade Green & Northend ward (15.1%). In Erith a high of 6.8% identified as Asian/Asian British, compared with the Borough-wide average of 3.7%. This based on the 2018 Household Survey.

⁷ Nomis Official Labour Market Statistics

⁸ GLA Population Projections – Central trend 2018-based population projections (published 2020)

 ⁹ GLA Population Projections – Central trend 2017-based population projections (published 2019)
 ¹⁰ ONS Population and Labour Force Survey

	The Household survey also details the following information relating to BAME households: Around 58.0% are owner occupiers, 24.8% rent privately and 17.2% live in affordable housing (social rented or intermediate tenures); and 27.9% BAME households were in some form of housing need (compared with 13.9% of all households), with key needs factors being overcrowding (47.9% of households in need) and 19.2% sharing facilities with other households.
	There are three main gypsy sites in the borough; these are located in the wards of Erith, Crayford, and Sidcup. There are no known new age travellers, organised groups of travelling show people or circus people travelling together based in the borough.
Religion & Belief	For the Bexley population in the 2011 Census, 62% are Christian, 2% are Sikh, 2% Hindu, 2% Muslim and 1% Buddhist. 31% either stated no religion or did not state an answer.
	Two key statistics emerging are that 24% people said they had no religion and 7% chose not to state their religion
Civil Partnerships & Marriage	0.1% of the Bexley population are in a civil partnership (same sex marriage was introduced after the 2011 Census). According to the Office for National Statistics 152 people entered into a Civil Partnership in the London Borough of Bexley since records began in 2006 up to 2017.
Sexual Orientation	This information is not available at borough level.

Part 3 (optional) - Consultation and engagement - Views of consultees

Summary of consultation / engagement with service users/interested parties likely to be affected by the policy

The Covid-19 outbreak in early 2020 has meant that the draft Housing Strategy 2020-2025 consultation has been carried out within the restrictions imposed as a result of the pandemic. As such, key engagement has been in an online survey format posted on the London Borough of Bexley website as a means of securing the view of Bexley residents on the Council's strategy for the future of housing in the borough. The link to this has also been sent to relevant stakeholders, business forums, voluntary sector, community groups and partnership forums and been open for engagement for a two-and-a-half-month period. This engagement has been supplemented by other communication activities to raise awareness of the survey including; promotional articles, creation of an Easy-read strategy, press release and the creation of a profile-raising email banner. The link to the survey has also been made available across the Council's digital and social media platforms.

Pre-draft Housing Strategy consultation (Pre-July 2020):

- LB Bexley commissioned a <u>Strategic Housing</u> <u>Market Assessment (SHMA)</u>, an assessment of the borough that considers the affordable housing needs of households, the aspirations/ expectations of those households moving in the market, and the need for particular types of dwelling by age or disability.
- Arc4 conducted a <u>Household Survey (2018)</u> as part of the SHMA. Such a study included online survey of stakeholders, engagement with people requiring supported housing including the Commissioners for each of the Service Areas, interviews with estate and letting agents; and a review of existing data. The Household Survey was completed by 3,408 households, representing an 11% response rate from the sampled survey.
- A programme of community and stakeholder engagement events have been employed throughout the drafting of the Housing Strategy. In February 2019 The Housing Strategy and Enabling team engaged with stakeholders in a series of supported housing workshops (these concerned Mental health, Older Persons, Physical Disabilities and Learning Disabilities).

The Post-draft Housing Strategy engagement methodology included (Post-July 2020):

 Online Survey Monkey – posted on London Borough of Bexley's Housing Strategy webpage for a two and half month period (ending on 30th Sept 2020). This received 293 responses.

- Promotional article in Bexley Magazine
- Press release
- Social media activity on Twitter and Facebook
- Engagement with amenity groups
- Dispersal of printed copies at libraries
- Use of email banners to raise awareness
- Internal Leader's Blog to Bexley Staff
- RP meetings to discuss commitment to the strategy
- Development of an Easy-read version of the Strategy
- Inclusion in 'Bexley Together' email newsletter to Community Leaders

Target audiences:

- London Borough of Bexley residents
- Local Stakeholders: LB Bexley service areas, Councillors, Bexley Clinical Commissioning Group
- Housing Associations (incl. Peabody, London & Quadrant, Orbit, Hexagon, Moat, Hyde, Golding Homes)
- Private Developers
- Greater London Authority (GLA)

Input to policy by client group/service users/interested parties

The policy has been developed and engagement has taken place with a wide array of stakeholders. As part of information gathering a number of focus groups/workshops were held for specialist client groups to take part in to help inform/shape the draft Housing Strategy.

During the development of the Housing Strategy a variety of stakeholders, including; as the Greater London Authority, LB Bexley Partner Housing Associations, Developers, Bexley Clinical Commissioning Group and other relevant Council Departments have been consulted on the strategy and feedback has been considered and incorporated where appropriate.

Local residents have additionally been consulted through means of a public survey made available to them via SurveyMonkey and actively promoted by the Council through a number of channels of communication: Bexley Magazine, Press release, Leader's Blog, social media etc.

Details of contact with traditionally hard to reach/hear groups

As part of the research process prior to and during the writing of the Strategy, the Housing Strategy team were involved with a series of consultations with traditionally hard to reach groups, specifically those that require Specialist Housing.

Consultation was focussed on engagement with these different groups through various means to gain a greater understanding on the housing difficulties faced by such groups. Interaction included:

- A series of Specialist Housing Group engagement workshops held with industry experts including: Older People, Mental health, Learning Disability, Physical Disability (Feb 2019)
- Attendance at two Learning Disability workshops which included residents living with such disabilities (Summer 2018)
- Attendance at Mental Health Housing Strategy Consultation focus group (Autumn 2018)

As well as the Strategy being fully accessible in accordance with the Government's stringent accessibility standards, one of the resultant products of such contact was the creation of an Easy-Read Housing Strategy used to help those with learning difficulties more easily digest the Strategy and its contents.

The Housing Strategy was also included in the 'Bexley Together' email newsletter to Community Leaders. This was sent to 2,011 people on the mailing list as a means of encouraging those from a spectrum of different community groups to link in with the Council and feed in their views on the draft Housing Strategy.

Part 4 - Analysis of evidence and description of impact

(a) Aim 1 of the PSED – the duty to eliminate discrimination $% \left(1\right) =\left(1\right) \left(1\right)$

Characteristic	Actual or likely impacts (negative/positive/no impact) and justification	Actions to be taken to mitigate potential negative impacts
Age	The Housing Strategy priorities and Delivery Plan will help in addressing the needs of vulnerable people will have a positive impact on all age groups.	The Housing Strategy team through the subsequent delivery plan will look to continue to monitor the borough's housing situation and how residents of all ages are affected.
	The objective to promote wider housing options may benefit older people, particularly under-occupiers and those requiring additional support. Currently there is no affordable Extra Care offer in the Borough and a number of sheltered housing sites are tired and increasingly unpopular. The focus on increasing the supply of extra care housing will have a positive impact on older people with care and support needs. The Housing Strategy will look to help younger people, many of whom will be on a lower income/ have less savings to be able to afford housing costs. The creation of new homes and particularly of affordable and intermediate homes – will benefit this group.	The strategy and associated delivery plan will have a horizon-scanning focus with the aim of tracking, reviewing and better understanding the housing needs of residents. Therefore, the strategy and subsequent delivery plan are themselves intended as means of mitigating potential negative impacts. Whilst there continues to be significant pressures arising from an increase in the numbers of care leavers and the associated demand for safe and 'homely' one bed properties with appropriate support. This will be mitigated by the LB Bexley Leaving Care team – who will continue to work closely with housing services colleagues to properly assess young people and their ability to fully manage a tenancy, providing the appropriate level of support to achieve this and to sustain their tenancy.
	Young people may also benefit from homelessness prevention measures – particularly those to whom we have a statutory duty such as Care Leavers where we will help prepare young adults to live independently. This includes staying with their previous foster carers (known as Staying Put), accessing their own tenancy, preparing for a tenancy in the private sector or semi-independent accommodation with support provided.	
Disability	The Housing Strategy priorities and Delivery Plan will help in addressing	The strategy and associated delivery plan will have a horizon-scanning focus

	the needs of vulnerable people and will have a positive impact on people with disabilities. The availability of appropriate accommodation and support is fundamental to meeting the needs of people with specialist housing needs.	with the aim of tracking, reviewing and better understanding the housing needs of residents. Therefore, the strategy and subsequent delivery plan are themselves intended as means of mitigating potential negative impacts.
	Bexley's Growth Strategy ambition is to ensure new homes are high quality, attractive and accessible, designed to meet residents' needs now and as their needs change over time as well as enhancing the character of an area.	
	All new homes will be designed in accordance with the London Plan which includes a number of policies which promote accessible, adaptable and attractive homes and neighbourhoods that stand the test of time.	
	There is currently an over reliance on often high cost residential placements, a number of which are out of borough – this will look to be mitigated by the availability of a wider range of accommodation locally in which people could be supported more.	
Sex	It is not considered that this proposal will impact disproportionately on one sex more than the other	N/A
Gender reassignment	The England/Wales Census and Scottish Census have not asked if people identify as transgender. The charity GIRES estimated in their Home Office funded study in 2009 the number of transgender people in the UK to be between 300,000 and 500,000. Although Gender Reassignment is a protected characteristic under equalities legislation, there is insufficient data and no evidence that the proposal will have a negative impact on any	N/A

	individual or group due to gender reassignment.	
Pregnancy & Maternity	It is not considered that this proposal will impact disproportionately on one sex more than the other. However, the Housing Strategy acknowledges the need for more family-sized housing, and in particular an increased number of affordable units of this type. This would have a largely positive impact on this characteristic group and provide greater options for housing.	The strategy and associated delivery plan will have a horizon-scanning focus with the aim of tracking, reviewing and better understanding the housing needs of residents. Therefore, the strategy and subsequent delivery plan are themselves intended as means of mitigating potential negative impacts.
Race	The Housing Strategy priorities of increasing the supply of affordable housing and meeting the needs of vulnerable people will have a positive impact on people from all ethnic groups. Any impacts, positive or negative, will impact BAME groups disproportionately due to the population profile in these wards. Thamesmead East and Erith, which show high proportions of BAME residents are areas expected to see greater change through growth. Growth in areas such as Thamesmead East and Erith with larger BAME populations, will provide positive change to the area – bringing in new and improved infrastructure and an update of the housing stock, which will be better connected and better suited to the needs of residents. In addition, such sustained growth in the area will also provide an increase in jobs in the area.	The strategy and associated delivery plan will have a horizon-scanning focus with the aim of tracking, reviewing and better understanding the housing needs of residents. Therefore, the strategy and subsequent delivery plan are themselves intended as means of mitigating potential negative impacts. The Council will regularly monitor the actions arising from the Housing Strategy Delivery Plan and track the borough's housing situation and impact on residents of all ethnicities. Any potential negative impacts to the heightened levels of growth in these regions must be mitigated through constant communication and consultation with residents living in the area to ensure that their voices are heard.
Religion & Belief	The Housing Strategy priorities of increasing the supply of affordable housing and meeting the needs of vulnerable people	N/A

	will have a positive impact on people from all religions.	
Civil Partnerships & Marriage ¹¹	There are no differential impacts identified for this equalities strand.	N/A
Sexual Orientation	There are no differential impacts identified for this equalities strand.	N/A

 $^{^{11}}$ Only applies to aim 1e of the PSED

(b) Aims 2 and 3 of the PSED – the duty to advance equality of opportunity & foster good relations

Protected Characteristic	How can this project be designed to advance equality of opportunity	How can this project be designed to foster good relations between groups
Age	All new homes will be designed in accordance with the London Plan which includes a number of policies which promote accessible, adaptable and attractive homes and neighbourhoods that stand the test of time. Housing affordability is a significant issue for many Bexley residents and is a significant barrier to greater equality. This Strategy is likely to have a positive impact on contributing to reducing inequalities with the ambition to increase the number and pace of delivery of new affordable homes to buy or rent. A mix of unit sizes and tenure will offer more choice to residents of all ages.	The creation of a strategy and delivery plan that takes account of a wide scope of housing need and demand seeks to create mixed and balanced communities that are well-connected and cater for all - is likely to lead to good relationships between groups. Well-designed, affordable, accessible housing offering a mix of unit sizes and tenure for all ages can contribute to good relations between all groups.
Disability	All new homes will be designed in accordance with the London Plan which includes a number of policies which promote accessible, adaptable and attractive homes and neighbourhoods that stand the test of time.	As above
	The Council has adopted the London Plan requirement that 90% of new homes are built to M4(2) accessible and adaptable homes standard and 10% meet the standard of M4(3) wheelchair adapted properties. It is also assumed that there will be ongoing adaptation of existing dwellings to support those with additional needs.	
Sex	There are no differential impacts identified for this equalities strand.	N/A
Gender reassignment	There are no differential impacts identified for this equalities strand.	As above

Pregnancy & Maternity	There are no differential impacts identified for this equalities strand.	As above
Race	There are no differential impacts identified for this equalities strand.	As above
Religion & Belief	There are no differential impacts identified for this equalities strand.	As above
Sexual Orientation	There are no differential impacts identified for this equalities strand.	As above

Part 5 - Completion and authorisation

Directorate & Service	CE, Strategic Planning and Growth	
Date EQIA completed	21.01.21	
Department completing EIQA	Housing Strategy & Enabling	
Describe how impact of policy will be monitored	Impact and delivery against actions will be monitored corporately and reported to Public Cabinet alongside the annual update on the Housing Strategy Delivery Plan.	
Department responsible for monitoring impact	Housing Strategy & Enabling	
Date EQIA is scheduled to be reviewed	1 year	
DD responsible for policy	Signature Date: 21.01.21	