

## Appendix 8.5 12 Site Regeneration General Needs and Sheltered Equality Impact Assessments

# EQUALITY IMPACT ASSESSMENT

## 12 HRA Site Regeneration Programme General Needs

<b>Title:</b>	12 HRA Site Regeneration Programme			
<b>Service impacted by proposal</b>	Housing Services			
<b>Date Created</b>	14/12/17	<b>Review Date:</b>	14/12/2020	<b>Version:</b> 1
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## SECTION 1: AIMS AND IMPLEMENTATION OF THE 12 SITE REGENERATION PROGRAMME

### Background

The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity between those with 'protected characteristics' and those without them
- Fostering good relations between those with 'protected characteristics' and those without them.

The Council also has a 'Specific Duty' to publish information about people affected by our policies and practices and decisions. This Equality Impact Assessment provides evidence for meeting the Council's commitment to equality social cohesion and the responsibilities outlined above.

Where relevant within the programme If negotiation of the acquisition of land by private treaty fails the Council will have to consider the use of compulsory acquisition powers. If they are necessary, the Council should be satisfied that there is a compelling case in the public interest and that there is sufficient justification for interfering with human rights of those with an interest in the land affected. In this respect the Human Rights Act 1998 incorporates certain provisions of the European Convention on Human Rights, namely:

- a) Article 1 – the right of everyone to peaceful enjoyment of possessions. No one can be deprived of possessions except in the public interest and subject to the relevant national and international laws.
- b) Article 8 – private and family life, home and correspondence. No public authority can interfere with these rights except if it is in accordance with the law and is necessary in the interests of national security, public safety or the economic well-being of a country.
- c) Article 14 – the right to enjoy rights and freedoms in the Convention free from discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, or national or social origin.

In the case of each of these articles, the Council should be conscious of the need to strike a balance between the rights of the individual and the interests of the public. The Council may decide that, in the light of the significant public benefit which would arise from the proposed development, the use of compulsory purchase powers is necessary and proportionate taking into account the availability of compensation. In particular, the Council may consider that the CPO would not constitute any unlawful interference with individual property rights.

### Identifying the aims of the proposal

The overall objective of the 12 Site Regeneration Programme is to broaden and enhance the range, quality and quantity of housing across all tenures for existing and new residents, whilst also supporting the provision of facilities and services necessary to support growing communities.

The Council has established objectives for the regeneration project that are set out below:

- To contribute to meeting the wider housing needs of Havering through the regeneration and transformation of the Council's existing stock for predominantly residential use.
- To provide a choice of good quality housing for people at all stages of life, increasing tenure diversity through affordable rent, shared ownership, private rent, market sale and extra care sheltered housing.
- To deliver high quality residential led development that is commercially viable and generates receipts for cross subsidy to ensure the programme is sustainable.
- To achieve development returns, income and/or a range of secure revenue streams for the Council through re-provision of all Housing Revenue Account (HRA) stock lost through redevelopment with new HRA stock matching the existing tenure.
- Where viability permits, the developments should also aim to deliver additional HRA rented units to the level of existing stock on sites previously purchased under the Right to Buy scheme.
- Where viability permits, the developments should also aim to deliver additional affordable housing being up to 30% of all additional units above existing all tenure stock levels, thereby achieving over 40% affordable housing across the 12 sites. This additional affordable housing target tenure split to be equal numbers of HRA rented and shared ownership dwellings.
- Help mitigate the homelessness pressures in the General Fund by providing increased affordable housing numbers.
- Improve the viability within the Asset Management Strategy by reducing the cost of maintaining existing poor viability buildings.
- Land is expected to remain in Council ownership except any freehold properties built for outright sale.

Where tenants and leaseholders wish to move back to a site, and there is suitable accommodation to meet their needs, they will be able to do so.

## Why does the Council need to undertake an Equalities Impact Assessment?

The 12 Site Regeneration Programme is intended to benefit residents of all ages and backgrounds, regardless of any disabilities, impairments or socio-economic status. This Equalities Impact Assessment (EIA) considers the affects that this regeneration programme could have on households living in general needs properties owned or managed by the Council and seeks to identify and mitigate disproportionate disadvantage that may arise for Council tenants that identify with any of the protected groups recognised by equality legislation.

This EIA recognises that residents affected by the Regeneration Programme all have legitimate needs and expectations. As such, general principles apply across all affected groups, and include:

- Keeping residents fully informed about issues that affect them
- Giving them the opportunity to express their views and that these are taken into account
- Providing appropriate support, including advice, assistance and financial compensation.

In recognition of the particular needs of older people living in sheltered housing, a specific Sheltered Accommodation EIA has been developed in order to consider in detail the specific needs of sheltered residents and how the Council's Regeneration proposals are tailored to address them.

The aim of the Programme is to maximise the number of units on existing HRA sites that present regeneration opportunities. The focus of the new build units will be to meet the needs and aspirations of Havering residents in the form of affordable and supported housing, low cost home ownership and homes for open market sale. This will sustain the balance of the HRA business plan over the next 30 years to allow us to continue to provide Housing and associated services to our residents.

Due to the scale and longevity of the regeneration programme, an EIA is required to assess the impact that the programme activities will have on residents in and around the regeneration sites.

In the short term the disruption caused by the programme will have a negative impact on households. To mitigate this, the Council will provide a comprehensive package of rehousing assistance and support to minimise the disturbance experienced by residents including compensation which will be detailed in the Council's Local Lettings Plan. There will be an enhanced package of assistance available for all residents including help with removals, disconnection and reconnection of services etc. Throughout the moving process and wherever possible, the Council will minimise the number of times that people need to move (with the majority of tenants only having to move once). More vulnerable residents will be prioritised for one move only.

The Council recognises that the Regeneration Programme will impact those living in the affected sheltered housing schemes. Therefore,

in addition to the comprehensive meetings with directly affected residents we are holding a series of public meetings with people living near the sites in order to provide information and answer any concerns they may have. More details on how we plan to communicate with stakeholders can be found in the Regeneration Consultation and Communication Strategy.

The temporary adverse effects of the 12 Site Regeneration Programme will be outweighed by the widespread betterment associated with housing regeneration such as new, energy efficient homes in a better designed environment. By definition residents that identify with a protected characteristic are more likely to be housed in social housing, as identified by the Allocation Policy. Thus many of those negatively impacted by the Regeneration process, plus many more, will be positively impacted in the long term.

More widely, future work will be carried out across the Council and other organisations to ensure that any impacts on schools, GP surgeries and public transport are properly assessed and dealt with.

#### **Who are the stakeholders affected by this proposal?**

The Regeneration Programme will affect the residents and property owners on all 12 regeneration site areas, namely;

1. Royal Jubilee Court
2. Brunswick Court
3. Dell Court
4. Delderfield House
5. Queen Street
6. Solar, Serena, Sunrise
7. Waterloo Estate
8. Maygreen Crescent and Park Lane
9. Oldchurch Gardens
10. Chippenham, Farnham and Hilldene
11. Napier and New Plymouth House
12. Delta Court TMO

Within these sites, the following resident groups are affected:

- Council general needs tenants
- Council tenants in sheltered accommodation
- Home owners (Residential leaseholders, Non-residential leaseholders and Freeholders)

➤ Private tenants

The programme also affects other stakeholders such as:

- Families and carers of residents
- Existing housing register applicants
- The wider residential community in the Borough
- Havering Council Officers(staff in charge of operations) including Councillors and members of the Council
- Housing Associations and affordable housing providers and other partner agencies
- Businesses or community services next to or surrounding an site regeneration area
- Other public services such as the emergency services, education services, transport services etc.

### How does the Regeneration Programme meet the Council's current priorities?

In January 2017, Havering launched its new vision for the Borough – Making a Greater London. The proposals to redevelop the Council's key sites in Havering addresses three of the Council's objectives:

1. **Communities making Havering** - supporting families and communities to look after themselves and each other, with a particular emphasis on our most vulnerable residents. The regeneration of sites that no longer meet the best standards of design and layout will enhance a sense of community safety and well-being. In addition, the Local Lettings Plan maximises individual choice for affected residents in terms of their re-housing options, including moving vulnerable groups together wherever practicable.
2. **Places making Havering** – delivering high quality homes which will improve the health and well-being of our residents. The Regeneration programme not only means that existing affected residents will have access to better quality accommodation in future but the redevelopment of sites will produce additional homes which will be available to more people, helping to solve the shortage of good quality affordable housing in the Borough.
3. **Opportunities making Havering** – the Council are committed to providing first-class business opportunities by supporting the commercial development of companies within the Borough; to ensure sustainable economic growth that generates local wealth and opportunities, high-quality skills and careers. The procurement of a joint venture partner to deliver the 12 Site Regeneration Programme will require a commitment from any potential investment partner to add social value their offering. This will include an undertaking that they will provide employment, skills and training opportunities for local people. In addition, there is a clear link between having a safe, modern home in the context of well-designed residential sites with greater educational achievement and access to better jobs.

**Which equality objective(s) are relevant to this proposal**

- Understanding the needs of Havering's diverse community
- Improving life chances for all, particularly for the most vulnerable members of the community
- Removing barriers to accessing the Council
- Promoting community relations and civic pride

**Are there any current strategies/policies that are relevant to this Proposal?**

- Homelessness Act 2002
- Housing Act 1985
- Housing Act 1996
- Housing Act 2004
- Housing and Regeneration Act 2008
- Human Rights Act 1998
- Land Compensation Act 1973
- Planning and Compulsory Purchase Act 2004
- Town and Country Planning Act 1990
- Draft London Housing Strategy 2017
- Regeneration Local Lettings Plan
- Regeneration Decant Policy and Possessions Procedure

**Implementation of the Regeneration Programme**

The Regeneration Programme will be led by the Housing Regeneration Board. All project documentation can be found at [https://www.havering.gov.uk/homepage/78/building\\_hew\\_homes\\_for\\_havering](https://www.havering.gov.uk/homepage/78/building_hew_homes_for_havering)

## SECTION 2

Does this proposal have any relevance to the following protected characteristics		Internal relevant to staff or working practices	External relevant to service delivery or provision
1	Age	No	Positive
2	Disability	No	Positive
3	Sex (gender)	No	Neutral
4	Sexual Orientation	No	Neutral
5	Gender reassignment	No	Neutral
6	Pregnancy and maternity	No	Positive
7	Marriage and Civil Partnership	No	Neutral
8	Religion and Belief	No	Positive
9	Ethnicity	No	Neutral
10	Socio Economic factors	No	Positive
11	Health	No	Positive



## SECTION 3

### CONSIDERATION OF DATA AND RESEARCH

#### Quantitative and qualitative data that informed the impact assessment includes:

- Housing diversity report
- JSNA (Joint Strategic Needs Assessment)
- Housing Regeneration Consultation data outcomes
- Mid-year population estimates 2015; Office of National Statistics (ONS)
- Census 2011, Office for National Statistics (ONS); Produced by Public Health Intelligence
- OHMS Housing Services in-house data system
- Housing Register data

#### How will you communicate the regeneration proposal to staff and service users?

One of the Council's key commitments is to ensure that there is 'on-going consultation' with residents. There is a clear communication plan to facilitate resident awareness and involvement throughout the lifetime of the programme. The Council is committed to regular, open and honest communication regarding the regeneration proposals throughout the redevelopment period. This is further explained in the Programme's Consultation and Communication Strategy.

The consultation process for each site has so far consisted of collating feedback through a range of communication channels:

1. Regular briefings and consultation meeting sessions held on each regeneration site.
2. Dedicated newsletter sent to residents on each site with regular updates on the regeneration proposals along with FAQs and answers.
3. One to one sessions with residents to discuss housing needs and decant requirements.
4. Dedicated web page set up for General Needs housing developments with each scheme having its own web page accessed at [www.havering.gov.uk/HousingRegeneration](http://www.havering.gov.uk/HousingRegeneration)
5. Regular editions of At the Heart magazine, available on line and in printed format where required, including special dedicated editions.
6. Briefings held for Housing Services staff, Economic development and Regulatory Services.
7. Positive press coverage in Romford Recorder and Havering Yellow Advertiser with feedback mechanisms.
8. Updates posted on social media, including Facebook and Twitter.

A dedicated Housing Regeneration Project Team has also been set up within the Council's Housing Service to work with residents on a case by case basis to ensure that accommodation and support needs are addressed. They will be working across the Council in collaboration with other council services and teams to do so.

The Regeneration Board, with senior management representation across the service, will address all cases that require escalation.

**Gaps in information:**

There is no information available to determine the impact of the programme on businesses that are either owned by or cater for the needs of BME or residents belonging to other protected characteristic groups in Havering.

**Action needed:**

Full consultation will be carried out with businesses impacted by the regeneration proposals, including the public house on the Waterloo Estate and the shops located below the flats on the Chippenham, Farnham and Hilldene Estate. This will include working with the businesses to identify and mitigate any negative impacts BME, disabled, older people or any other groups with protected characteristics.

## SECTION 4

### ASSESSMENT OF IMPACT

This EIA will consider the effect of the Regeneration Programme on tenants who occupy our general needs properties affected by the Regeneration Programme. In consideration for the concessions and service adjust required to accommodate to the needs of our residents in sheltered accommodation, the Council has created a separate EIA, HRA 12 Site Regeneration Programme –Sheltered Accommodation/Extra Care provision.

#### Ethnicity

The Housing diversity report indicates that 63% of all tenants currently residing in one of the affected general needs regeneration properties is White British, this compares to the overall demographic of Havering of white British residents as making up 83% of the population of Havering (source JSNA). 4% of affected tenants have not disclosed (or it remains unknown) as to their ethnicity.

33% of all residents disclosed an ethnic origin other than White British, with the highest represented ethnic group among affected tenants being from Black African origin at 9%. The combined percentage of 33% of all affected tenants being of an ethnic origin other than White British is slightly above the figure established from Havering 's 2011 Census Population, which found that the BME percentage of the total population of the borough to be at 17%.

In the short term, there is a potential for the Programme to disproportionately impact BME residents, for example, if they are required to relocate far away from shops and/or community venues that cater specifically to their cultural needs, or if these facilities are earmarked for demolition.

In the long term, however, any disadvantages will be mitigated by regeneration because the programme will create more opportunities for commerce and enterprise throughout in the borough. New communities will support new businesses thus creating more employment opportunities, accessible to local residents.

The Council will ensure that the nature of the proposals are understood by BME households and that they receive adequate support through the re-housing process which will be monitored as the project progresses, to ensure that suitable support is being provided. This will include implementing the Council's translation/interpreting guidelines in the event of households needing further support. Owner occupiers and businesses impacted by the programme will also have access to this support.

## Gender

The Housing Services Diversity report indicates that a total of 65% of all affected tenants are female compared to 35% of males. This gender split is higher than the overall proportion of women in Havering's tenanted population and Havering's overarching borough trends. The Regeneration Programme will therefore disproportionately affect women.

The 2016 Families and Households ONS report demonstrates that a lone mother heads 90% of lone parent households. Single parent households may struggle to cope with the requirement to move home more than two parent households. Moving home can be demanding and involves organising removals, connections and disconnections, forwarding mail, and furnishing a new home. While some of these costs are reimbursed by the Council via Disturbance Payments and other financial compensations, households will experience other drawbacks from the decant process such as having to find a new doctor, dentist and school for any children.

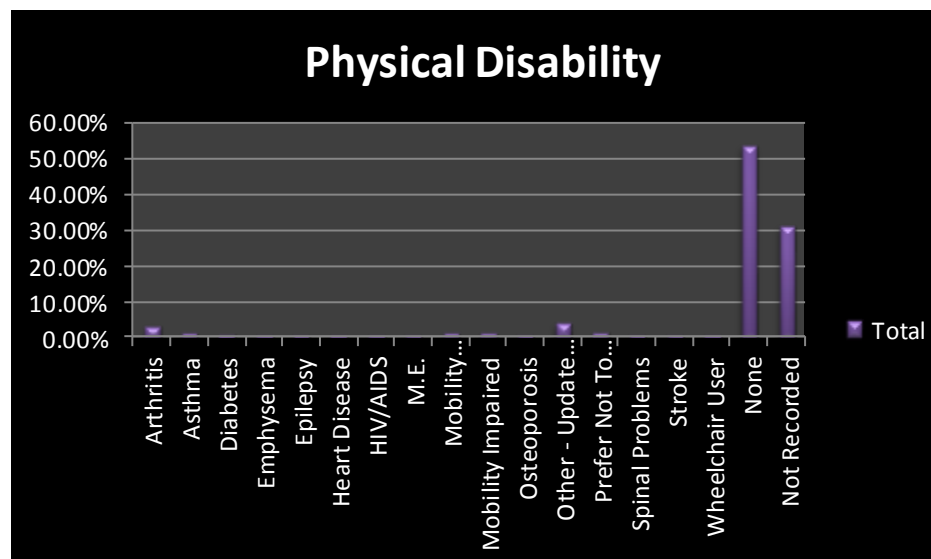
The Regeneration Decant Policy and Possession Procedure which supports the programme will ensure that any vulnerable tenants and residents are supported through the programme by assisting them to find suitable accommodation and locating amenities close to their new home. The support offered to residents during the decant process will mitigate the disruption caused by having to move home.

The right to return also has a positive impact on all residents affected by the Programme as it gives them the choice to return to newly built accommodation that meets their needs. This outcome for residents helps to achieve the Council's vision to make a greater London by providing residents with quality places to live.

## Disability

Rehousing can be a disruptive process especially for households with a member that has a disability. 70% of general needs tenants currently living on a regeneration site have identified themselves as disabled. Homes may already have been adapted to their needs, and there may be considerable changes to the layout of the home, kitchen bathroom, entrance, parking arrangements and the environment to suit their needs and requirements. Households may have developed local support links with family, friends and neighbours, which have the potential to be broken by a forced move.

To mitigate these issues, the Council provides dedicated Housing support service on an individual case-by-case basis. Officers will ensure future homes are suitable and meet the identified housing need, providing adaptations where necessary. Officers will work closely with the Occupational Therapy team to ensure decant or regenerated homes are fit for purpose. Direct offers will take into account medical circumstances and allow for extra floor space and lifts, where appropriate.

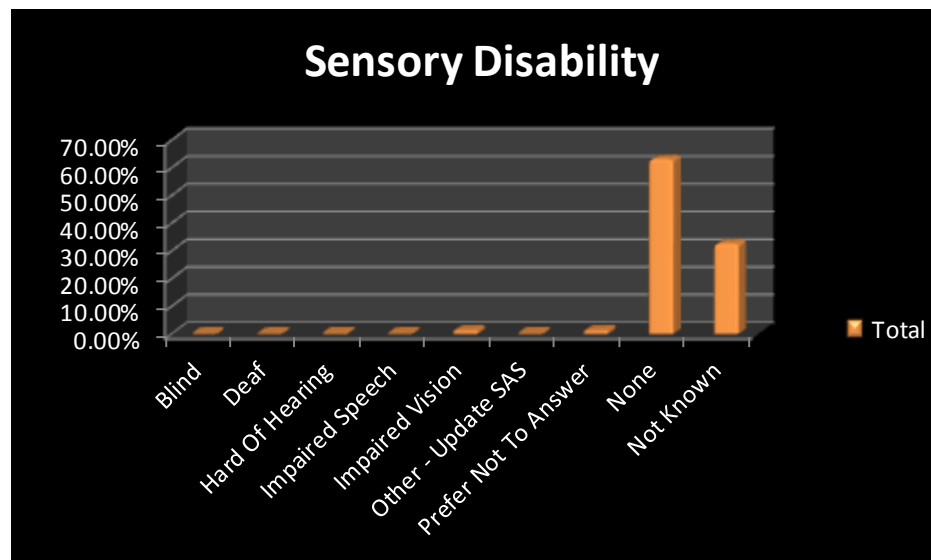


Source: Housing Services Diversity Report (December 2017)

As demonstrated in the diagram above, around 16% of tenants affected by the Regeneration Programme have a mobility difficulty that is more than the borough average. A further 53% have declared that they do not have a physical disability.

To mitigate any adverse impact caused during the decant process of the Regeneration Programme, the Council will support all vulnerable residents, including those with physical or sensory disabilities. This will include “matching” vulnerable tenants to appropriate properties that meet their specific needs and providing assistance to help with the moving process.

By delivering new homes that can be easily adapted and creating community hubs on some of the regeneration sites, in the long term the project will also offer residents a better quality of life and allow them to live independently for longer.



Source: Housing Services Diversity Report (December 2017)

As indicated in the diagram, the number of people who have declared they have a sensory impairment or disability is low (4%). A further 63% of residents have affirmed that do not have any type of sensory disability. Efforts are being made to allow residents who may be impacted by the programme to declare the extent and nature of their disability to support any rehousing needs. This is being addressed through confidential individual meetings with the Housing Regeneration Officer responsible for each site and provisions have been put in place to assist those residents who require additional assistance.

The Regeneration programme overall will have a positive impact on disabled residents living in Havering as all new homes will meet the Lifetime Homes standard, which will make new homes more accessible than the existing homes which are being replaced. This will allow residents to stay in their own homes for longer, reduce the need for home adaptations and give greater choice to disabled people who cannot live independently due to lack of suitable housing in our housing stock.

## Age

In terms of general needs properties, the largest percentage age group of residents affected overall by the Regeneration Scheme is the 35 to 44 year old age group, representing 26% of all affected tenants. This is followed by tenants in the 25 to 34 years (25%) and 45 to 54 years age(25%) respectively. Combined with tenants aged 18-24 years of age (representing 4% of affected residents), the total number of working age tenants is 89%, indicating that working age residents will be affected most by the Regeneration Programme.

When rehousing these tenants during the decant process, it is important that where possible, they are relocated to an area that gives them ample access to public transport to allow them to remain in employment. Many working age households will also contain children, so it is vital where possible to ensure that these tenants are placed near infrastructure which supports their families, schools, hospitals, GP's and community services.

While the Council will attempt to rehouse households in the most appropriate location, we know that there is not sufficient availability within our council stock in order to accommodate every household wishing to remain in proximity of their current accommodation and the support networks and infrastructure they are accustomed to. We recognise that the current private sector rental market is also compressed, with market rents at an all-time high.

To reduce this negative impact, officers will assess the Housing needs of all affected tenants and will match where possible tenants needs against available stock. Where possible, development of individual sites within the Regeneration Programme will be phased to facilitate the development of different parts of the site at different times. This will allow greater flexibility when moving residents.

Tenants aged 55 to 64 years represent 11% of those affected by the regeneration scheme. Assuming that most tenants over the age of 65 years old are no longer working, and by combining all remaining pension age groups together, it can be assumed that 11% of all affected tenants will be in general needs accommodation and of pension age.

While the Regeneration Process can be an uncertain time for all residents involved, the Council recognises that older people can be particularly anxious or concerned about the prospect of moving home. Given some older residents in general needs housing can feel more isolated or lacking support than sheltered housing tenants, the Council will ensure appropriate advice guidance and practical support are available to all older residents living in general needs properties affected by the regeneration programme.

The Programme has been planned with the needs of an ageing population in mind and the new communities will include properties designed to suit the needs of an ageing population and common age-related health conditions. The increase of sheltered and extra care properties will assist the most vulnerable, which shows that the project has a positive impact on all ages. The programme also strongly focuses on tenancy sustainment and work in partnership with many support agencies to enable our residents to remain in their properties for longer.

## Religion/Belief

Currently there are no plans to demolish any places of worship on the 12 Site Regeneration Programme .

The Regeneration Programme may affect residents that practice their religion by demolishing their place of worship or moving residents away from there.

The Council are committed to working with residents and groups whose religious practices could be negatively impacted by the Regeneration Programme. As part of the detailed design process of individual homes and properties we would seek to be sensitive to the individual needs of households on religious/belief grounds.

The Local Lettings Plan (LLP) undertakes that the Council will offer the maximum choice possible in terms of re-housing options, and the preference to be or remain near a place of worship or religious community will be fully considered in matching residents to a potential new home.

## Pregnancy and maternity

There is little evidence available to effectively assess the impact of the Regeneration programme across this protected characteristic. Pregnancy and maternity information is taken initially at the point of application to join the Housing Register and considered again when a resident makes a bid on a property, once accepted on to the Housing Register.

During the course of the Regeneration Programme, as and when tenants are decanted, our officers will take into consideration any pregnancy and maternity information that will impact on the housing needs of the tenant and their households. If the composition of a household changes or is expected to change, the main tenant is required to inform the Council as soon as reasonably possible. Evidence will be required to support any change to a household's composition.

The Council understand the possible need to provide additional support for pregnant women. Whether additional support is needed will be identified as part of the individual meetings with residents and addressed in line with the undertakings in the Local Lettings Plan; customised support will be provided as required.

The Council is committed to helping those who may find the process of moving particularly challenging where a protected characteristic is involved.

Regeneration is designed to improve the quality of homes in the local environment and the Programme will provide improved family-friendly homes for local residents.



## Marriage and Civil Partnership

There is no evidence available to suggest that people who are married or in a civil partnership will be particularly adversely affected by the Regeneration Programme proposals.

## Sexual orientation

There is little or no evidence to suggest that there is an adverse impact on protected characteristic groups as a result of the Regeneration Programme. The most recent Diversity report for general needs tenants affected by the Regeneration Programme does not provide an indication of diverse sexual orientation. We recognise that there is a potential deficit in the self-declaration of tenants who identify themselves as from the LGBT community. This may be attributable to tenants often being reluctant to disclose this information.

Any issues brought to our attention will be dealt with sensitively on a case by case basis. Housing Services does encourage tenants to declare any issues in terms of harassment, hate crime or domestic abuse which could impact on where we place tenant on a temporary or permanent decant basis. We recognise that this is an elective process on the part of the tenant and Housing Services will respect the confidence given to our officers when a tenant discloses this information to us.

In the interim, officers supporting tenants should consider specific questions relating to the tenants sexual orientation and how this might link to their housing options.

As part of our continued commitment to increasing awareness of all diversity and cultural needs, we provide ongoing training for staff, taking on good anti-discrimination practice. This serves to ensure that residents are placed in a sensitively appropriate setting which meets their needs.

## Gender reassignment

There is insufficient data available to identify whether tenants that identify as a gender different to that they were born, will be disproportionately affected by the Regeneration Programme, however we do not envisage that there will be any disproportionate negative impact on this group.

In instances where tenants have advised us that they are undergoing gender transitioning, the Council will work with them to find suitable accommodation that provides access to relevant support networks. This can be fully considered as part of the confidential discussions with individual residents on their rehousing options. The Council is committed to meeting affected residents' needs and preferences wherever practicable.

## Health Impact

The 12 Site Regeneration Programme will enable positive health benefits. The housing developments will facilitate neighbourliness and inclusive communities which encourage residents to be more physically and socially active.

Studies show that friendship, good social relations and strong supportive networks improve physical and mental health at home, at work, and in the community. For example, cohesive neighbourhoods, those that provide social support, trust and sense of community, can have a positive impact on children's and young people's health and wellbeing, including mental health. Good relationships in the home, school, and neighbourhood play a part in ensuring that young people can develop social competence and contribute to cohesive societies.

The development of the Community Hubs will be especially positive for the wellbeing of older residents. For older people, social cohesion and a sense of belonging, gives rise to trust, reciprocity and social bonding. This will lead to stronger relationships between neighbours, greater social participation and a larger support network. This consequently reduces the negative impact of social isolation on the older generation.

## Socio Economic Factors

Where applicable these have been highlighted within the assessment for each protected characteristic. In addition, the Council recognises the importance of maintaining social support networks which are often based on locality (neighbours, friends and family).

The Local Lettings Plan's (LLP) commitment to residents is that re-housing offers will be based on choice, given the re-housing options available.

The aim will also be to move groups of vulnerable residents together where practicable, in order to maintain social networks and a sense of community. It is of course worth highlighting that residents can opt to return to the property location /area once the site has been regenerated, thus mitigating any long-term social impacts.

A Mosaic demographic profile of the residents on the regeneration sites which provides a socioeconomic analysis and concludes that generally, those living on the regeneration sites have an income below the Havering average, peaking at £30,000. The Council recognises that many of our residents are on full or partial housing benefit or on low incomes. However, rent levels for new properties will be set at the appropriate level, according to Council policy and formula at the time. Service charges will be based on the level of service given at the scheme. The Council is not in a position to cap rents or service charges for the new properties, but will provide advice and support where residents are having difficulty paying their rent. This could include signposting to specialist debt advice agencies where appropriate.

The LLP sets out the offer to Council tenants, including home loss and disturbance payments, as well as other reasonable expenses. Havering recognises the increasing pressures on household budgets and the need to make homes as affordable as possible for new and existing residents. In order to achieve this, those existing residents returning to new homes will continue to pay a social rent, which is set significantly lower than market rent level. New residents will pay a rent equivalent to 80% of market rent.

Given recent tragic events around fire safety in London council blocks, Havering will seek to ensure that all the regenerated sites adhere to the highest standards of fire safety and other health and safety standards, including compliance with current and future regulation. This will apply across all sites and tenure types, so whatever the person’s economic status, it will not make them any less secure in their homes than anyone else.

## Section 4: Measures to mitigate adverse impact

In this section you should list the specific actions that you have earlier set out as to how you will address any negative equality impacts you have identified in this assessment.

Protected characteristic	Identified Matter	Action taken to mitigate impact*	Outcomes and monitoring**	Timescale	Lead
All	Incomplete and/or inaccurate data to assess the impact of the proposals on the protected characteristics	<ul style="list-style-type: none"> <li>• Equalities Data collection exercise required</li> <li>• Council tenants on the affected sites</li> <li>• Freeholders and leaseholders</li> <li>• Business (especially SMEs)</li> </ul>	Standardised monitoring guidance and related forms	Ongoing	Corporate Diversity Advisor Property & Land Services Manager
All	A comprehensive assessment of positive and negative impact of the Regeneration Programme	<ul style="list-style-type: none"> <li>• Completion of General Needs and Sheltered Housing EIAs</li> <li>• Completion of individual site EIAs</li> </ul>	Effective assessment of the impacts of the Regeneration programme on the residents of Havering.	Ongoing	Corporate Diversity Advisor Housing Strategy & Policy Team Manager

All	Fair and equal service delivery	<ul style="list-style-type: none"> <li>Requirement that all council staff have completed Equalities training</li> <li>Inclusive Policy for the JVLLP</li> <li>Fair to All policy</li> <li>Sign-up to LBH Community Cohesion Strategy and E&amp;D</li> </ul>	Standardised monitoring guidance and related forms	Ongoing	ALL
All	Insufficient consultation	<ul style="list-style-type: none"> <li>Identify specific community groups to encourage engagement with the council</li> <li>Ensure complete log of consultation as and when completed</li> </ul>	Standardised monitoring guidance and related forms	Ongoing	Community Engagement Team Manager
All	Disruption caused by Regeneration and Decant Process	<ul style="list-style-type: none"> <li>Continuous engagement with tenants</li> <li>Disturbance and homeloss payments</li> <li>Disconnection and reconnection services</li> <li>Moving services</li> <li>Housing advice for non- secure and non-council tenants</li> <li>Satisfaction surveys to monitor success of the decant process</li> </ul>	Standardised monitoring guidance and related forms	Ongoing	Rehousing Team Manager
All	Increased Housing supply to create homes that are fit for purpose and inclusive communities	<ul style="list-style-type: none"> <li>To be monitored through the planning process - LBH Infrastructure and Local Plan will specify additional infrastructures required to support the developments</li> <li>Designs to uphold the principles of the London housing design Guide</li> </ul>	Monitoring through planning process	Ongoing	JVLLP Planning
All	Tenants decanted away from support networks	<ul style="list-style-type: none"> <li>Regeneration decant reassessment to assess individual needs and support requirements</li> <li>Liaise with residents and support workers where appropriate to find best solution for residents</li> </ul>	Continued open dialogue with residents. Monitored through Satisfaction Surveys	Ongoing	Rehousing Team Manager
Age	Live-in Leaseholders and freeholders are unable to purchase new housing on the open market	<ul style="list-style-type: none"> <li>Negotiation period commencing December 2016</li> <li>Independent valuation resource</li> <li>Council purchasing private properties at OMV +10%</li> </ul>	To be discussed with Legal services to evaluate options and develop a standardised approach	Ongoing	12 Site Regeneration Project Board

All	Increased housing costs in new properties – decanted or new build	<ul style="list-style-type: none"> <li>Referral and assistance accessing Housing benefit to LHA rate</li> </ul>	Standardised monitoring	Ongoing	12 Site Regeneration Project Board
All	New Communities on the Sites – social cohesion initiative	<ul style="list-style-type: none"> <li>Social Value and Community Engagement work</li> <li>To create structures that enable residents to participate in the betterment of the new communities</li> </ul>	Cohesive designs and strategies as part of the redevelopment programme	Ongoing	JVLLP; Corporate Diversity Advisor ; Property & Land Services Manager

## SECTION 5: Monitoring and Review

The Housing Regeneration Board is responsible for reviewing this EIA, with expert guidance and advice from the Council’s Corporate Diversity Advisor. This EIA will be reviewed on an annual basis.

It is recognised that the scale and longevity of the Programme means that the potential impacts on residents will change as the project continues. In addition, it will only be possible to analyse the actual effect on different groups once the regeneration is underway and residents make their choices.

The monthly Board meetings provide an opportunity to highlight and review any trends or emerging changes. If and when feedback or data indicate that a review may be required, it will be a decision made by the Regeneration Programme Board. The Board will also oversee the delivery of existing or future actions on the Action Plan, to ensure that there is effective mitigation of any negative impacts on residents as the Programme is continues to be delivered.

# EQUALITY IMPACT ASSESSMENT

## 12 HRA Site Regeneration Programme Sheltered Accommodation/Extra Care provision

<b>Title:</b>	12 HRA Site Regeneration Programme – Sheltered Accommodation/Extra Care provision			
<b>Service impacted by proposal</b>	Housing Services			
<b>Date Created</b>	14/12/17	<b>Review Date:</b>	14/12/2020	<b>Version:</b> 1
<b>Author:</b>	Una Bedford – Housing Strategy & Policy Officer			

<b>Person completing EIA:</b>	
<b>Signed:</b> Una Bedford – Housing Strategy & Policy Officer	<b>Date:</b> 14/12/17
<b>Person supervising EIA:</b>	
<b>Signed:</b> Neil Stubbings – Programme Director of Regeneration	<b>Date:</b> 22/12/17

### SECTION 1: AIMS AND IMPLEMENTATION OF THE 12 SITE REGENERATION PROGRAMME

## Background

The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity between those with 'protected characteristics' and those without them
- Fostering good relations between those with 'protected characteristics' and those without them.

The Council also has a 'Specific Duty' to publish information about people affected by our policies and practices and decisions. This Equality Impact Assessment provides evidence for meeting the Council's commitment to equality social cohesion and the responsibilities outlined above.

Where relevant within the programme If negotiation of the acquisition of land by private treaty fails the Council will have to consider the use of compulsory acquisition powers. If they are necessary, the Council should be satisfied that there is a compelling case in the public interest and that there is sufficient justification for interfering with human rights of those with an interest in the land affected. In this respect the Human Rights Act 1998 incorporates certain provisions of the European Convention on Human Rights, namely:

- d) Article 1 – the right of everyone to peaceful enjoyment of possessions. No one can be deprived of possessions except in the public interest and subject to the relevant national and international laws.
- e) Article 8 – private and family life, home and correspondence. No public authority can interfere with these rights except if it is in accordance with the law and is necessary in the interests of national security, public safety or the economic well-being of a country.
- f) Article 14 – the right to enjoy rights and freedoms in the Convention free from discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, or national or social origin.

In the case of each of these articles, the Council should be conscious of the need to strike a balance between the rights of the individual and the interests of the public. The Council may decide that, in the light of the significant public benefit which would arise from the proposed development, the use of compulsory purchase powers is necessary and proportionate taking into account the availability of compensation. In particular, the Council may consider that the CPO would not constitute any unlawful interference with individual property rights.

## Identifying the aims of the Programme

The overall objective of the 12 Site Regeneration Programme is to broaden and enhance the range, quality and quantity of housing across all tenures for existing and new residents, whilst also supporting the provision of facilities and services necessary to support growing communities.

The Council has established objectives for the regeneration project that are set out below:

- To contribute to meeting the wider housing needs of Havering through the regeneration and transformation of the Council's existing stock for predominantly residential use.
- To provide a choice of good quality housing for people at all stages of life, increasing tenure diversity through affordable rent, shared ownership, private rent, market sale and extra care sheltered housing.
- To deliver high quality residential led development that is commercially viable and generates receipts for cross subsidy to ensure the programme is sustainable.
- To achieve development returns, income and/or a range of secure revenue streams for the Council through re-provision of all Housing Revenue Account (HRA) stock lost through redevelopment with new HRA stock matching the existing tenure.
- Where viability permits, the developments should also aim to deliver additional HRA rented units to the level of existing stock on sites previously purchased under the Right to Buy scheme.
- Where viability permits, the developments should also aim to deliver additional affordable housing being up to 30% of all additional units above existing all tenure stock levels, thereby achieving over 40% affordable housing across the 12 sites. This additional affordable housing target tenure split to be equal numbers of HRA rented and shared ownership dwellings.
- Help mitigate the homelessness pressures in the General Fund by providing increased affordable housing numbers.
- Improve the viability within the Asset Management Strategy by reducing the cost of maintaining existing poor viability buildings.
- Land is expected to remain in Council ownership except any freehold properties built for outright sale.

Where tenants and leaseholders wish to move back to a site, and there is suitable accommodation to meet their needs, they will be able to do so.



### **Why does the Council need to undertake an Equalities Impact Assessment?**

The 12 Site Regeneration Programme is intended to benefit residents of all ages and backgrounds, regardless of any disabilities, impairments or socio-economic status. This Equalities Impact Assessment (EIA) considers the affects that this regeneration programme could have on households living in sheltered accommodation properties owned or managed by the Council and seeks to identify and mitigate disproportionate disadvantage that may arise for Council tenants that identify with any of the protected groups recognised by equality legislation. The Council, recognises that residents living in sheltered housing have specific needs that do not always correlate to those living in general needs properties.

This EIA recognises that residents affected by the Regeneration Programme all have legitimate needs and expectations. As such, general principles apply across all affected groups, and include:

- Keeping residents fully informed about issues that affect them
- Giving them the opportunity to express their views and that these are taken into account
- Providing appropriate support, including advice, assistance and financial compensation.

Regeneration is an economically viable opportunity to bring current sheltered housing schemes up to modern day requirements and expectations. With many units within the Council's sheltered housing schemes' left vacant and therefore not attracting a rental income, regeneration will mitigate the adverse impact on the Housing Revenue Account (HRA) at a time of increasing financial pressure.

The Council runs approximately 800 units across 19 housing schemes for older persons housing, with the vast majority being the Council's own sheltered housing accommodation. Following the Older Person's Housing Review in 2016, the Council's sheltered housing accommodation was deemed no longer fit for purpose. Specifically, the review conveyed:

- a projected surplus of Affordable sheltered schemes within the borough and deficit in sheltered/retirement housing for lease and sale;
- a deficit of enhanced and extra care housing of all tenures; and
- a recommendation to develop additional extra care and /or Retirement Village Schemes

The Regeneration Programme seeks to address the Older Person's Housing Review and will deliver sheltered and extra care housing which reduces isolation and supports and promotes independence, health and well-being. Investment in the right type of sheltered housing will also provide the Council with a sustainable way to provide support for older people.

### **The Proposed Regeneration of Older Persons' Housing**

<b><i>Sheltered Scheme</i></b>	<b><i>Proposal</i></b>
Delderfield House	To build 30 new mixed tenure general needs homes.
Maygreen Crescent/Park Lane	This site is part of the 200 new mixed tenure homes proposed for the Maygreen Crescent and Park Lane Estate
Queen Street	This site is part of the 1,100 new mixed tenure homes on the Waterloo Estate.
Dell Court, Ravenscourt Grove	The proposal is to rebuild the Dell Court block, providing up to 40 flats for older persons over the age of 55 years and re-providing some communal facilities for the remaining sheltered accommodation. The flats will be targeted at persons over the age of 55 currently under occupying family sized council housing in a similar way to the various bungalow developments. These new units would not be classed as sheltered.
Ravenscourt, Ravenscourt Grove	To be retained
Brunswick Court	It is proposed that this site will be demolished and redeveloped into a new sheltered housing scheme with 50 new units which will include extra care sheltered housing with dementia provision.
Royal Jubilee Court	To replace the current provision with an Older Persons' village which will include new sheltered housing, extra care sheltered housing and some dementia care sheltered housing accommodation. There will also be some low cost home ownership and sheltered housing for sale on the site. The proposal is to build 150 new mixed tenure homes as an Older Persons' village.
Solar, Serena and Sunrise Courts	To develop new sheltered housing, extra care sheltered housing and some dementia care sheltered accommodation, creating 150 new mixed tenure homes developed as an older persons' village. There will be some low cost home ownership, sheltered housing and some dementia care sheltered housing within the new village.
<p><i>*All other Council-owned sheltered schemes are outside of the scope of this EIA</i></p>	
<p>Due to the scale and longevity of the regeneration programme, an EIA is required to assess the impact that the programme activities will have on residents in and around the sheltered schemes.</p> <p>In the short term the disruption caused by the programme will have a negative impact on households. To mitigate this, the Council will</p>	

provide a comprehensive package of rehousing assistance and support to minimise the disturbance experienced by residents including compensation which will be detailed in the Council's Local Lettings Plan. There will be an enhanced package of assistance available for all residents including help with removals, disconnection and reconnection of services etc. Throughout the moving process and wherever possible, the Council will minimise the number of times that people need to move (with the majority of tenants only having to move once). More vulnerable residents will be prioritised for one move only.

The Council recognises that the Regeneration Programme will impact those living in the affected sheltered housing schemes. Therefore, in addition to the comprehensive meetings with directly affected residents we are holding a series of public meetings with people living near the sites in order to provide information and answer any concerns they may have. More details on how we plan to communicate with stakeholders can be found in the Regeneration Consultation and Communication Strategy.

The temporary adverse effects of the 12 Site Regeneration Programme will be outweighed by the widespread betterment associated with housing regeneration such as new, energy efficient homes in a better designed environment.

#### **Who are the stakeholders affected by this proposal?**

The programme will affect residents at the following sheltered housing schemes:

1. Brunswick Court sheltered housing scheme
2. Delderfield House sheltered housing scheme
3. Queen Street sheltered housing scheme
4. Maygreen Crescent and Park Lane sheltered housing scheme
5. Solar, Serena & Sunrise sheltered housing scheme
6. Dell Court sheltered housing scheme
7. Royal Jubilee Court sheltered housing scheme

Within these sites, the following resident groups are affected:

- Council general needs tenants
- Home owners (Residential leaseholders, Non-residential leaseholders and Freeholders)
- Private tenants

The programme also affects other stakeholders such as:

- Families and carers of residents
- Existing housing register applicants seeking sheltered housing
- The wider residential community in the borough
- Havering Council Officers (staff in charge of operations) including Councillors and members of the Council
- Housing Associations and affordable housing providers and other partner agencies
- Businesses or community services next to or surrounding a site regeneration

### **How does the regeneration of sheltered housing meet the Council's current priorities?**

In January 2017, Havering launched its new vision for the Borough 'Havering– Making a Greater London'. The proposals to redevelop the Council's sheltered accommodation and extra care provision for older people addresses three of the Council's objectives:

1. **Communities making Havering** - supporting families and communities to look after themselves and each other, with a particular emphasis on our most vulnerable residents. The redevelopment of our sheltered accommodation and extra care scheme allows Housing Services to trial and implement a range of solutions which can tackle social isolation and improve well-being among our more vulnerable residents. Redesigning our older person accommodation provision within the Borough and piloting/rolling out community hubs will reduce social isolation for our older residents of all tenure types
2. **Places making Havering** – delivering high quality homes which will improve the health and well-being of our residents. Aside from the redevelopment of our more unsuitable sheltered schemes, improvements will be made to those sheltered blocks that will remain and we will be investing in our existing general needs council stock.
3. **Opportunities making Havering** – the Council are committed to providing first-class business opportunities by supporting the commercial development of companies within the Borough; to ensure sustainable economic growth that generates local wealth and opportunities, high-quality skills and careers. The procurement of a joint venture partner to deliver the 12 Site Regeneration programme will require a commitment from any potential investment partner to add social value their offering. This will include an undertaking that they will provide employment, skills and training opportunities for local people.

One of the key principles resulting from the 2015 review of older persons' housing in Havering is that all schemes for older residents must be modern, safe and accessible. This will also improve cost efficiency and facilitate greater choice and control for service users. The regeneration of sheltered housing makes a positive contribution to our obligations and duties under the Care Act 2014; to prevent, reduce or delay the need for care and support for all local people.

### **Which equality objective(s) are relevant to this proposal**

- Understanding the needs of Havering's diverse community
- Improving life chances for all, particularly for the most vulnerable members of the community
- Removing barriers to accessing the Council
- Promoting community relations and civic pride

**Are there any current strategies/policies that are relevant to this Proposal?**

- Homelessness Act 2002
- Housing Act 1985
- Housing Act 1996
- Housing Act 2004
- Housing and Regeneration Act 2008
- Human Rights Act 1998
- Land Compensation Act 1973
- Planning and Compulsory Purchase Act 2004
- Town and Country Planning Act 1990
- Draft London Housing Strategy 2017
- Regeneration Local Lettings Plan
- Regeneration Decant Policy and Possessions Procedure

**Implementation of the Regeneration of Older Persons Housing**

The Regeneration Programme will seek to address the recommendations and proposals arising from the Older Persons' Housing Review. The programme will be led by the Housing Regeneration Board. All project documentation can be found at [https://www.havering.gov.uk/homepage/78/building\\_hew\\_homes\\_for\\_havering](https://www.havering.gov.uk/homepage/78/building_hew_homes_for_havering)

## SECTION 2

Does this proposal have any relevance to the following protected characteristics		Internal relevant to staff or working practices	External relevant to service delivery or provision
1	Age	No	Positive
2	Disability	No	Positive
3	Sex (gender)	No	Neutral
4	Sexual Orientation	No	Neutral
5	Gender reassignment	No	Neutral
6	Pregnancy and maternity	No	Positive
7	Marriage and Civil Partnership	No	Neutral
8	Religion and Belief	No	Positive
9	Ethnicity	No	Neutral
10	Socio Economic factors	No	Positive
11	Health	No	Positive

## SECTION 3 CONSIDERATION OF DATA AND RESEARCH

### Quantitative and qualitative data available that informed the impact assessment

- Housing diversity report December 2017
- JSNA (Joint Strategic Needs Assessment)
- Housing Regeneration Consultation data outcomes
- Mid-year population estimates 2015; Office of National Statistics (ONS)
- Census 2011, Office for National Statistics (ONS); Produced by Public Health Intelligence
- OHMS Housing Services in-house data system
- Housing Register data

Sources of useful information

Suggested sources include:

- Service user monitoring data that your service collects

- Havering Data Intelligence Hub
- London Datastore
- Office for National Statistics (ONS)

### **How will you communicate the regeneration proposal to staff and service users?**

One of the Council's key commitments is to ensure that there is 'on-going consultation' with residents. There is a clear communication plan to facilitate resident awareness and involvement throughout the lifetime of the programme. The Council is committed to regular, open and honest communication regarding the regeneration proposals throughout the redevelopment period. This is further explained in the Programme's Consultation and Communication Strategy.

The consultation process for each site has so far consisted of collating feedback through a range of communication channels:

1. Regular briefings and consultation meeting sessions held on each regeneration site.
2. Dedicated newsletter sent to residents on each site with regular updates on the regeneration proposals along with FAQs and answers.
3. One to one sessions with residents to discuss housing needs and decant requirements.
4. Dedicated web page set up for General Needs housing developments with each scheme having its own web page accessed at [www.havering.gov.uk/HousingRegeneration](http://www.havering.gov.uk/HousingRegeneration)
5. Regular editions of At the Heart magazine, available on line and in printed format where required, including special dedicated editions.
6. Briefings held for Housing Services staff, Economic development and Regulatory Services.
7. Positive press coverage in Romford Recorder and Havering Yellow Advertiser with feedback mechanisms.
8. Updates posted on social media, including Facebook and Twitter.

A dedicated Housing Regeneration Project Team has also been set up within the Council's Housing Service to work with residents on a case by case basis to ensure that accommodation and support needs are addressed. They will be working across the Council in collaboration with other council services and teams to do so. The Regeneration Board, with senior management representation across the service, will address all cases that require escalation.

### **Gaps in information**

There is no information available to quantify the LGBT service users in sheltered accommodation. The proposal will have a neutral impact on this group.

### **Action needed**

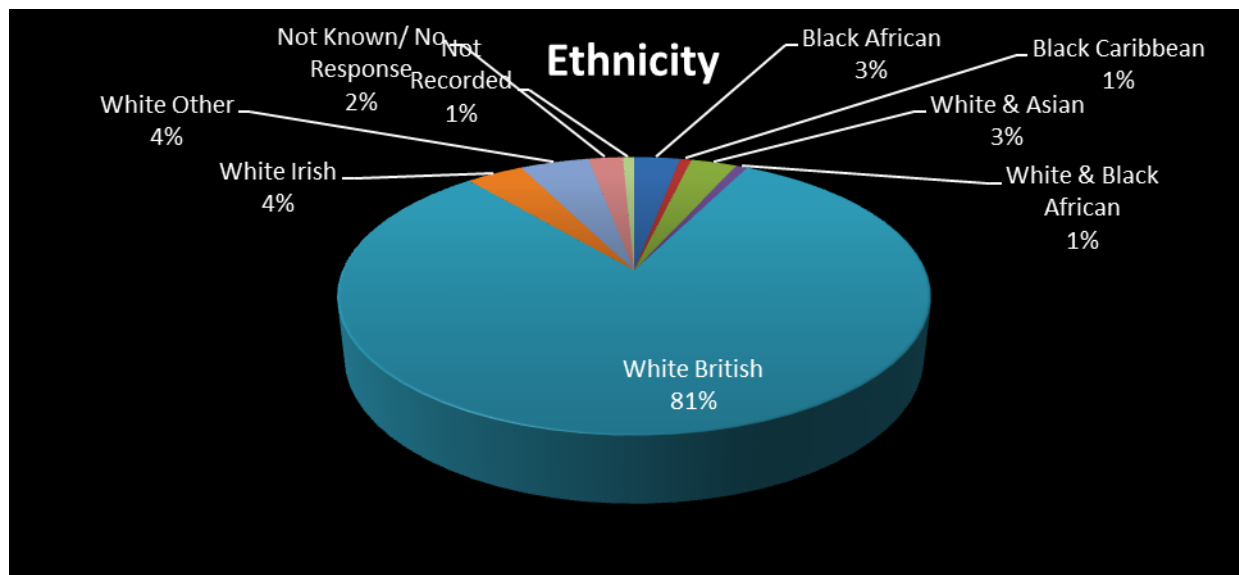
Residents have been continuously consulted with and the Council will continue to do so in order to identify and mitigate any disproportionate adverse impact to groups with protected characteristics that has resulted from the regeneration proposals.

## SECTION 3 ASSESSMENT OF IMPACT

The following data and analysis relates to residents living in sheltered/extra care schemes for older people that are affected by the Regeneration proposals

### Ethnicity

Diversity data of current residents indicates that the predominant ethnic group among residents within the affected sheltered and extra care schemes identified themselves as white British, making up currently 81% of residents. The next highest represented group among the sheltered and extra care schemes are the White Irish and the White other groups (respectively at 4% each), followed by the Black African and White Asian at 3% each. The other ethnic groups made up 1% or less respectively of the ethnic make-up of the affected sheltered schemes. This is reflective of the diversity currently across the Borough.



**Source: Housing Services Diversity Report (December 2017)**

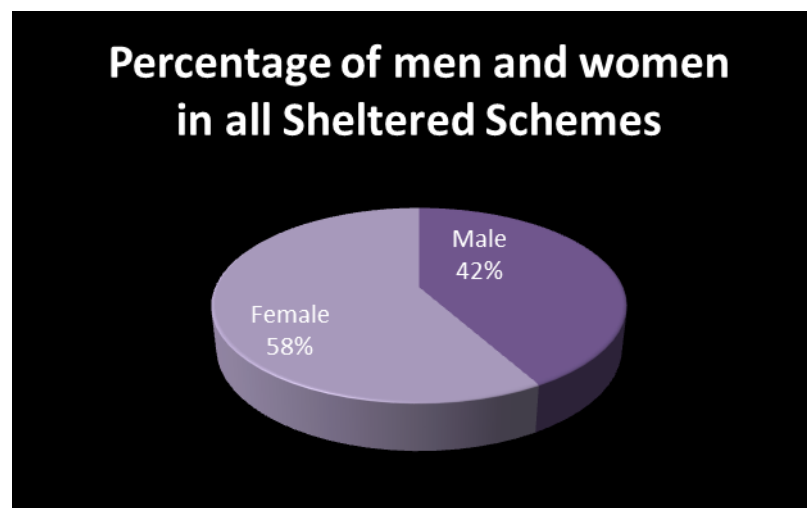
There is no evidence to suggest that the proposals to redevelop the sheltered and extra care schemes will produce discriminatory effects on any protected characteristic within this strand. From the data collated from Housing Services Online Management System



(OHMS), only 2 out of 134 residents (just over 1%), in all affected sheltered and extra care schemes require a language interpreter as a requested service adjustment. This will be monitored throughout the consultation process. All residents will receive care and support during the redevelopment programmes in a culturally appropriate manner. Support plans and daily activities remain person centred and are inclusive of meeting all ethnic diversity needs.

## Gender

Females represent a greater proportion of service users in all the affected sheltered schemes (58% female to 42% male residents). The general trend may reflect that women live longer in Havering. As age increases, the ratio of women to men in the older population of Havering increases. The life expectancy at age 65 years in Havering is 18.9 years for males and 21.6 years for females (Life expectancy at birth, 2001-2003 to 2012-2015; Office for National Statistics (ONS); Produced by Public Health Intelligence)



**Source: Housing Services Diversity Report (December 2017)**

The gender split among residents in Havering's sheltered accommodation and extra care schemes is weighted towards women. Women will therefore be more affected by the programme than men. All residents will be supported individually throughout the programme, to mitigate this.

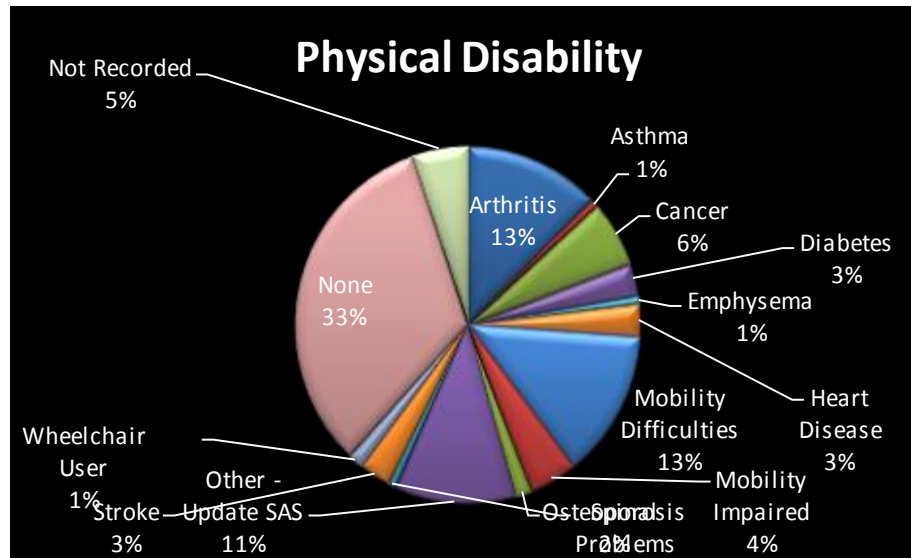
<b>Age Group</b>	<b>Male</b>	<b>Female</b>
55-59	7,779	7,647
60-64	6,248	6,602
65-69	6,423	7,049
70-74	4,460	5,377
75-79	3,654	4,892
80-84	2,791	4,209
85-89	1,608	2,946
90+	687	1763

**Source: Mid-year population estimates 2015; Office of National Statistics (ONS)**

## **Disability**

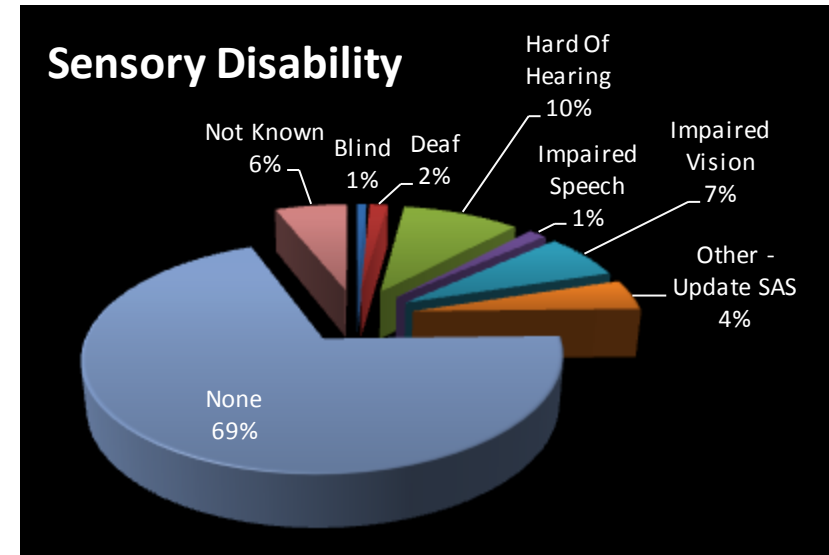
The proposed redevelopment of our older persons' housing will aim to meet the needs of those with a disability and ensure that accommodation is suitable and meets their needs, and that the regenerated schemes deliver modern, safe amenities in line with current design standards for disabled living. 95% of those currently living in sheltered accommodation have identified themselves as being disabled.

Moving existing tenants from their current homes will be disruptive to them, their families and carers. Some residents with close local and family ties and friendship groups in their current homes may find it upsetting to move. A full assessment will be carried out for each resident before they move. These assessments will be based on good practice guidelines on closing sheltered schemes and settling people into new accommodation. Residents will also have access to independent advocacy support which will provide tenants with support and reassurance they need.



Source: Housing Services Diversity Report (December 2017)

62% of all residents in the affected Sheltered Schemes have a condition which will impact on their mobility



Source: Housing Services Diversity Report (December 2017)

25% of the residents in all affected Sheltered Schemes have a declared sensory disability.

The redevelopment of the affected schemes is about making a positive change and redesigning our sheltered housing offering. The redevelopment of these facilities will greatly improve the quality of our service provision. During this transformation process, the Council will ensure that the care needs of existing tenants will be met.

The Council will ensure that reasonable adjustments are made throughout this process. We will identify the needs and requirements of tenants during one to one meetings and support them in sourcing alternative accommodation, (should we need to decant tenants during the development), and assist them where it is necessary for them to choose new accommodation within our sheltered housing offering. We will help prepare tenants for a move or making a move to alternative accommodation. All residents' next of kin will be involved in supporting residents to help them decide the best solution for each resident.

## Age

Residents in the Borough are living longer and the average age when people move into sheltered housing has steadily risen. A better range of choices is needed to enable people to live fulfilling lives into older age.

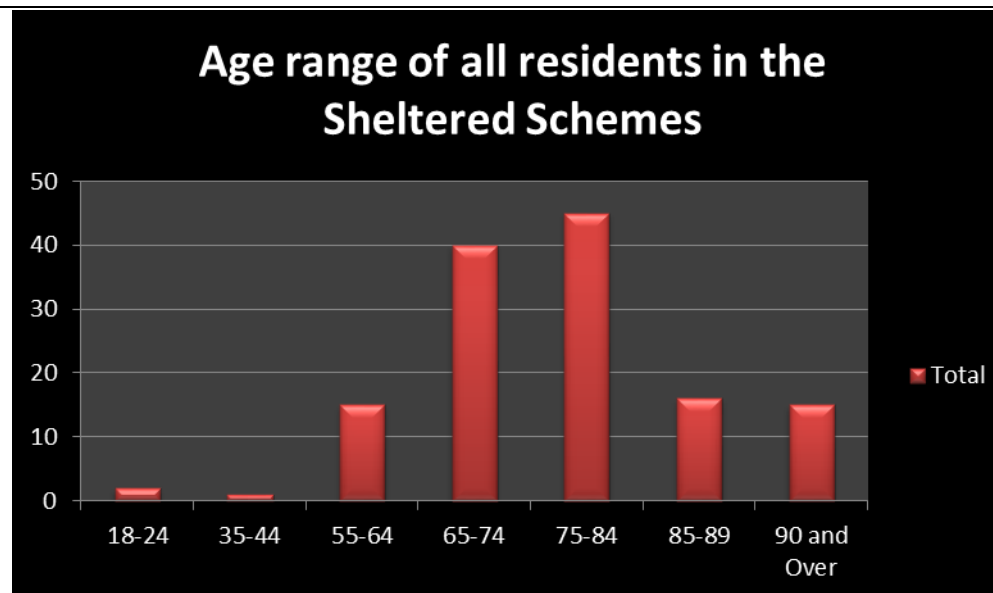
The size of the 65+ population is projected to grow significantly in Havering over the next 15 years, driven mainly by life expectancy. The projected increase is likely to increase demand for social care in the Borough.

### Projected percentage population change by age group since 2016, for 2021, 2026 and 2031

Age Group	2021	2026	2031
0-4	6%	8%	4%
5 –10	11%	16%	15%
11-17	13%	26%	29%
18-24	-5%	0	10%
25-64	5%	7%	5%
65-84	5%	16%	26%
85+	14%	26%	46%

### 2015 Round Strategic Housing Land Availability Assessment (SHLAA)-Based Projections; Greater London Authority (GLA); Produced by Public Health Intelligence

Many residents are keen to engage in a wide range of activities and wish to engage actively with their local community. The largest age groups represented within all the affected sheltered housing schemes are those residents aged 65 – 74 and 75 -84 groups



**Source: Housing Services Diversity Report (December 2017)**

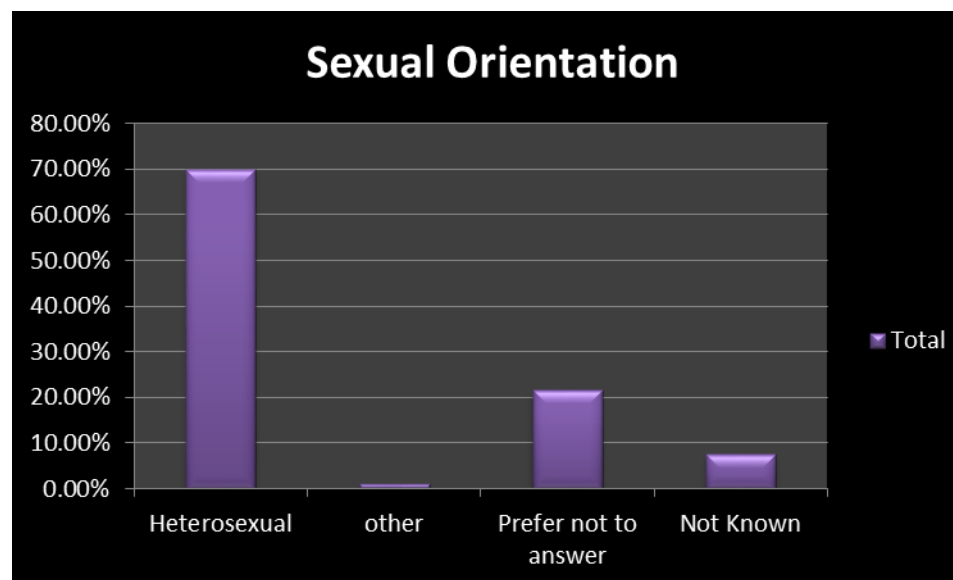
At present, there continues to be many older people remaining in general needs housing and living longer in that housing, meaning that the general needs housing stock is not being recycled for other families as quickly as it was in the past. The life expectancy for people living in Havering is 80.2 years (for males) and 83.9 years (for females) from birth. Life expectancy in Havering has been mostly higher than the average in England and has continued to increase over the last decade. This adds further pressure on the existing housing stock and compounds the shortage in the supply of general needs family housing available for younger households.

The redevelopment will provide older people with more choice and opportunities to maximise their independence within a supported housing scheme with care provided on site. This will enable people to retain independence while providing the appropriate level and type of support, enabling people to continue living their life in their own way having choice and control.

Given the correlation between ageing and a range of health conditions, it is worth emphasising that the regeneration project will provide improved & expanded housing options for older people by developing a range of models to include low-dependency accommodation and extra care housing.

## Sexual Orientation

There is little or no evidence to suggest that there is an adverse impact on protected characteristic groups as a result of the Regeneration Programme. The most recent Diversity report for sheltered accommodation tenants affected by the Regeneration Programme does not provide an indication of diverse sexual orientation. We recognise that there is a potential deficit in the self-declaration of tenants who identify themselves as from the LGBT community. This may be attributable to tenants often being reluctant to disclose this information.



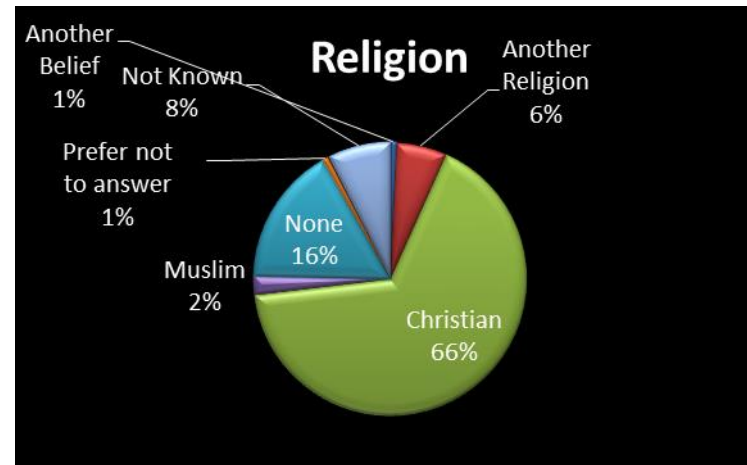
**Source: Housing Services Diversity Report (December 2017)**

Any issues brought to our attention will be dealt with sensitively on a case by case basis. Housing Services will encourage tenants to declare any issues in terms of harassment, hate crime or domestic abuse which could impact on where we place a tenant on a temporary or permanent decant basis. We recognise that this is an elective process on the part of the resident and Housing Services will respect the confidence given to our officers when a resident discloses this information to use.

In the interim, officers supporting residents should consider specific questions relating to the tenants sexual orientation and how this might link to their housing options. As part of our continued commitment to increasing awareness of all diversity and cultural needs, we provide ongoing training for staff, taking on good anti-discrimination practice. This serves to ensure that residents are placed in a sensitively in an appropriate setting which meets their needs.

## Religion/Belief

It is thought that the proposals, in the main, will not have any impact on residents based on their religion, faith or beliefs.



**Source: Housing Services Diversity Report (December 2017)**

The Regeneration Programme may affect residents that practice their religion by demolishing their place of worship or moving residents away from there. We are aware, that there may be residents within some of the sheltered housing schemes who may like to remain in the proximity of their current place of worship and may require closeness to culturally relevant shops and to their faith groups

As part of continued communication with our stakeholders, we will work with residents and local faith groups to ensure that these links remain in place. Importantly, consideration will be given to ensure that the provision of prayer facilities and understanding of other belief systems is promoted within our schemes.

## Gender reassignment

Our knowledge of residents who have undergone gender reassignment is extremely limited. In part, this may be attributable to residents not wishing to disclose this information.

Those that have undergone gender reassignment will be treated fairly and have equal access to support throughout the decanting and rehousing process. In the interim, officers supporting residents should consider specific questions relating to the tenants sexual orientation and how this might link to their housing options.

As part of our continued commitment to increasing awareness of all diversity and cultural needs, we provide ongoing training for staff, taking on good anti-discrimination practice. This serves to ensure that residents are placed in a sensitively in an appropriate setting which meets their needs.

Any issues or concerns brought to our attention will be dealt with sensitively on a case by case basis. Housing Services encourage residents to declare any issues in terms of harassment, hate crime or domestic abuse which could impact on where we place a resident on a temporary or permanent decant basis. We recognise that this is an elective process on the part of the resident and Housing Services will respect the confidence given to our officers when a resident chooses to disclose this information to us.

## **Pregnancy and maternity**

This is not a characteristic affecting residents at our sheltered or extra care schemes.

## **Marriage and Civil Partnership**

From the most recent Diversity report, (December 2017), 15% of residents in the affected sheltered schemes are either married or co-habiting with a partner. 84% of residents in the affected sheltered schemes are single, widowed, divorced or separated. The status of 1% of residents is unknown.

It is thought that the marital or civil partnership status of residents will not impact on residents affected by the redevelopment of the Sheltered Schemes.

## **Health Impact**



Sheltered housing provides a preventive service, reducing the need for more acute intervention later. Housing management and support services in sheltered housing is targeted to assist people to live an active and fulfilling life. The benefits can be seen in the tenancy sustainment, maintenance of independence, the prevention of accidents and poor health, and improvements to physical and mental health. Sheltered housing can prolong independence and self-care by providing a range of low level support services, and supporting people to access more intensive services as and when they need them.

We realise that residents who are settled in these affected schemes will be attached to their scheme and will be unhappy with the upheaval that the redevelopment or closure of their scheme may cause. We recognise that residents may find it difficult to adapt to change. The Council will place great care and attention to detail in order to minimise disruption. We will maintain continuity of service irrespective of a decommissioning decision.

We understand that residents from schemes facing closures will worry and this in turn could have an adverse impact on their health and well-being. To this end, we have published a local lettings plan which will affirm our offer to our residents affected by the closure or redevelopment of one of our housing schemes. In our meetings with residents we will describe in detail how the sensitive transfer and transition process, following accepted good practice, will mitigate any distress as is possible.

Transition plans are put in place for each resident and they will be supported before, during and after they move, when they are moved to another sheltered scheme.

By having well designed and affordable sheltered housing schemes, it will enable current residents to move from accommodation which is less than appropriate or suitable for their needs. Within these redeveloped schemes, we will no longer provide bedsits. All of these schemes will be fully accessible with the provision of lifts to all floors and ramps as required. Security will be greatly improved in all of the schemes. All accommodation will include the provision of light, adequate and modern communal facilities in each scheme.

We will forge stronger links to the local community and our intention is to build social capital and serve the wider community, with the potential to further strengthen the contribution to the local facilities available to local communities through the development of community hubs. According to Census 2011, about 32% (13,449) of the population are aged 65 years and above and live in one-person households. Almost half (48%) of all one person households in Havering are occupied by persons aged 65 years and over, which is the highest proportion in London according to the Census 2011 (Household Composition by Age), Office for National

Statistics (ONS). Our sheltered schemes will provide organised social activities and opportunities during the day, which can promote lifelong learning, healthy living and active ageing. Aside from drawing in other older residents from outside of the scheme the aim is to become more inclusive of the wider older persons community within the borough, providing new opportunities to widen the social networks of scheme residents and to promote and build social cohesion.

## Socio Economic Factors

Where applicable these have been highlighted within the assessment for each protected characteristic. In addition, the Council recognises the importance of maintaining social support networks which are often based on locality (neighbours, friends and family) The Local Lettings Plan's (LLP) commitment to residents is that re-housing offers will be based on choice, given the re-housing options available. The aim will also be to move groups of vulnerable residents together where practicable, in order to maintain social networks and a sense of community). It is of course worth highlighting that residents can opt to return to the property location /area once the site has been regenerated, thus mitigating any long term social impacts.

It is recognised that many of our residents are on full or partial housing benefit or on low incomes. However, rent levels for new properties will be set at the appropriate level, according to Council policy and formula at the time. Service charges will be based on the level of service given at the scheme. The Council is not in a position to cap rents or service charges for the new properties, but will provide advice and support where residents are having difficulty paying their rent. This could include signposting to specialist debt advice agencies where appropriate. A person's socio-economic status will not make them any less safe and secure in their homes than anyone else

The LLP sets out the offer to Council tenants. Further information on home loss and disturbance payments, as well as other reasonable expenses, will be published in an additional information pack on the Regeneration Programme.

Given recent tragic events around fire safety in London council blocks, Havering will seek to ensure that all the regenerated sites adhere to the highest standards of fire safety and other health and safety standards, including compliance with current and future regulation. This will apply across all sites and tenure types, so whatever the person's economic status, it will not make them any less secure in their homes than anyone else.

## Section 4: Measures to mitigate adverse impact

In this section you should list the specific actions that set out how you will address any negative equality impacts you have identified in this assessment.

Protected characteristic	Identified negative impact	Action taken to mitigate impact*	Outcomes and monitoring**	Timescale	Lead officer
Lesbian, Gay, Bisexual & Transgender	Lack of data will lead to an adverse impact and identification of housing needs for residents	Collate information gathered from 1-2-1's with residents and Housing Needs Assessments where a resident is willing to disclose information to Regeneration Team officers	Better understanding of needs of residents ensuring residents are placed in suitable accommodation.	Ongoing	Sheltered Housing Manager
Disability	Residents may be placed in accommodation which is not suitable for their needs	Ensure all Regeneration Team officers are aware of the constraints within each schemes buildings to ensure that residents are placed in an appropriate setting suitable for their needs.	Residents are placed in the right accommodation first time which is appropriate and provides the right level of support for their needs.	Ongoing	Sheltered Housing Manager
Ethnicity Disability (residents with a visual or hearing sensory impairment)	Unable to understand fully the effects the redevelopment may have on residents with these protected characteristics	Ensure the provision of information in appropriate formats where appropriate.	Residents are fully consulted and engaged with to enable them to make suitably informed decisions. Measured through a satisfaction survey on completion of move.	Ongoing	Sheltered Housing Manager/ Community Engagement Team
All	Lack of awareness of diversity and cultural needs	Ongoing training for staff to raise and ensure awareness of diversity and cultural issues taking on good anti-discrimination practice	Cultural and diversity needs of residents are understood and residents are placed sensitively in an appropriate setting which meets their needs as practicably as possible.	Ongoing	Sheltered Housing Manager

## SECTION 5: Monitoring and Review

In this section you should identify how frequently the EIA will be reviewed; the date for next review; and who will be reviewing it. Assessing the impact on equality is an ongoing process that does not end once a policy proposal strategy or review has been agreed or implemented. Your assessment will have helped you to anticipate and address the proposal's potential impact on different groups. However, the actual impact of the proposal will only be known once it has been introduced. You may find that you need to revise the policy if unexpected negative impacts occur.

**Reviewing a policy will involve using the experience gained through implementation to consider any possible adjustments. Issues to be considered include:**

- **How and when you will measure the impact of the policy?**
- **When will the policy be reviewed and what could trigger an early revision?**
- **Who will be responsible for monitoring and review?**
- **What type of information is needed for monitoring and when it will be analysed?**
- **How to engage stakeholders in implementation, monitoring and review?**

It will only be possible to analyse the actual effect on different groups once the regeneration is underway and residents make their choices. If and when feedback or data indicate that a review may be required, it will be a decision made by the Regeneration Programme Board.