

SSA EQUALITY IMPACT AND NEEDS ANALYSIS

Directorate	Housing and Regeneration
Service Area	Regeneration department
Service/policy/function being assessed	Withdrawal of the Tenants offer and local lettings plan (Alton Regeneration scheme)
Which borough (s) does the service/policy apply to	Wandsworth
Staff involved in developing this EINA	Bernard Brennan / Anna Singleton/ Andy Algar/ Alex Jones
Date approved by Directorate Equality Group (if applicable)	
Date approved by Policy and Review Manager All EINAs must be signed off by the Policy and Review Manager	
Date submitted to Directors’ Board	

1. Summary

Please summarise the key findings of the EINA.

Baseline assessment

The EINA includes a baseline assessment of protected groups living in a core impact area defined by the boundary of the Wandsworth 007B lower layer super output area, within which the site lies. This local area has a total population of 1,881 people living in 799 households.

Background:

The Council Tenant’s Offer was first published in 2014 and outlines its offer to secure tenants and who occupy blocks that are identified for demolition.

In summary, the Tenants’ Offer extends to those secure tenants whose blocks were identified for demolition as part of the masterplan proposals. The headlines of the offer are that secure tenants will be offered a new home with a secure periodic tenancy that meets their current housing need, and then a new Council home will be delivered as part of the regeneration. Secure tenants are given Band A priority if they opt for early moves, and this is contained within the Local Lettings Plan for the Regeneration of the Alton Estate which was most recently approved in February 2021 (Paper No. 21-45).

Proposal:

The new administration will consider a report to terminate the existing procurement and has asked officers to identify and assess alternative options and, subject to this report being agreed, external consultancy support will be secured to support this work.

The decision to terminate the masterplan procurement removes any immediate prospect of demolition. As the Tenants’ Offer is predicated on the prospect of demolition will need to be withdrawn. In the absence of the Tenants’ Offer the Local Lettings Plan can also no longer apply.

This consequence is made clear in the Alton Regeneration ‘Council Tenant rehousing information booklet’ most recently published in October 2021.

Impact:

Positive:

- The withdrawal of the offer will free up allocation officers who have been allocated to cases arising from the scheme to spend time working with other applicants from other priority queues.

Neutral:

- All existing tenants have secure tenancies at their existing property so there is no loss of security of tenure for remaining tenants in the redevelopment area

Negative:

- Existing residents will remain in their existing accommodation, some of which are living in overcrowded conditions.
- Tenants will lose existing priority rehousing status associated with the tenant’s offer
- Tenants lose the right to be rehoused automatically into either one of the satellite sites (Fontley Way and McKinney House) or to one of the future blocks on the existing site.
- The proposal negatively impacts on the number of people affected in some age groups by comparison to the proportional representation on the estate.
- The proposal negatively impacts on the number of people affected from one ethnic background more than any other by comparison to their proportional representation on the estate.

2. Evidence gathering and engagement

a. What evidence has been used for this assessment? For example, national data, local data via DataRich or DataWand

Evidence	Source
Data from our internal records on our tenant profile.	Tenant profile (by ethnicity, age, disability, and gender) as of 31 st March 2022.

b. Who have you engaged and consulted with as part of your assessment?

No consultation planned, but we are seeking comments from those in the impacted area over the proposal to remove the Tenants Offer and the Local Lettings Plan for the Alton estate, which will run from w/c 5 September 2022 until 26 September 2022

3. Analysis of need

Potential impact on this group of residents and actions taken to mitigate impact and advance equality, diversity, and inclusion

There are currently 80 secure tenants living within the current redevelopment area. The existing Tenants’ Offer enables residents to be relocated on a ‘one move’ basis which helped to avoid

unnecessary costs, upheaval, and stress on residents. Also included within this was the opportunity to either be provided new accommodation appropriate to their need in the same area, or the opportunity to be rehoused to existing stock in the borough in areas chosen by those applicants.

The offer also ensured that all secure tenants in the development area were offered accommodation suitable to their housing need which is periodically updated by officers.

To obtain an accurate breakdown of impacted tenants by protected characteristics, our end of year tenant profile (as of 31st March 2022) was obtained which provides a reliable update on the makeup of our tenants by some protected characteristics.

The end of year tenancy profile was broken down to the individual blocks which are impacted by the proposed changes which includes the following blocks:

- 1-45 Allbrook House (Cons)
- Danebury Avenue (3, 11-29 Odd)
- Danebury Avenue (31-115 Odd)
- Danebury Avenue (117-211 Odd)
- Danebury Avenue (213-243 Odd)
- Harbridge Avenue (1-31 Odd)
- Harbridge Avenue (2-32 Even)
- Harbridge Avenue (33-83 Odd)
- Harbridge Avenue (34-84 Even)
- Harbridge Avenue (85-115 Odd)
- 1-28 Kingsclere Close (Cons)
- 1-14 Portswood Place (Cons)

The information on tenants from these blocks is used to determine the potential impact and outcome of this strategy change.

Only 4 out of the 9 protected characteristics could be analysed since the Council only holds comparable data on age, disability, ethnicity, and sex.

The data is limited to the named tenant in each of the properties and does not include data on household members. The same dataset has been used for the estate so direct comparison can be made.

Details of the analysis are below.

Protected group	Findings
Age	<p>Tenants under the ages of 55 to 64, 45 to 54 and 65 to 74 represent the largest groups within the affected area (30%, 29% and 16% respectively). The most significant impact can be found in the age range between 55 to 64, where the percentage affected is 30% by comparison to those tenants on the estate which is 19%. The proposed changes would therefore disproportionately affect this group in particular because of the proposal.</p> <p>The proposed changes would have considerably less impact on those tenants in younger age brackets comparative to their representation on the estate more broadly.</p>

	<table border="1"> <thead> <tr> <th rowspan="2">Age Group</th> <th colspan="2">Alton Estate</th> <th colspan="2">Affected blocks</th> </tr> <tr> <th>No. of tenants</th> <th>% Of tenants</th> <th>No. of tenants</th> <th>% Of tenants</th> </tr> </thead> <tbody> <tr> <td>Under 25</td> <td>26</td> <td>2%</td> <td>0</td> <td>0%</td> </tr> <tr> <td>25 to 34</td> <td>245</td> <td>15%</td> <td>4</td> <td>5%</td> </tr> <tr> <td>35 to 44</td> <td>350</td> <td>21%</td> <td>8</td> <td>10%</td> </tr> <tr> <td>45 to 54</td> <td>391</td> <td>24%</td> <td>23</td> <td>29%</td> </tr> <tr> <td>55 to 64</td> <td>313</td> <td>19%</td> <td>24</td> <td>30%</td> </tr> <tr> <td>65 to 74</td> <td>177</td> <td>11%</td> <td>13</td> <td>16%</td> </tr> <tr> <td>75+</td> <td>126</td> <td>8%</td> <td>8</td> <td>10%</td> </tr> <tr> <td>Grand Total</td> <td>1628</td> <td>100%</td> <td>80</td> <td>100%</td> </tr> </tbody> </table>	Age Group	Alton Estate		Affected blocks		No. of tenants	% Of tenants	No. of tenants	% Of tenants	Under 25	26	2%	0	0%	25 to 34	245	15%	4	5%	35 to 44	350	21%	8	10%	45 to 54	391	24%	23	29%	55 to 64	313	19%	24	30%	65 to 74	177	11%	13	16%	75+	126	8%	8	10%	Grand Total	1628	100%	80	100%
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Disability	<p>There are comparative data limitations for this protected group, since the only data available is the internal council tenant end of year tenant profile.</p> <p>As of the 31st of March 2022, the percentage difference between tenants with disabilities (as registered) in the affected blocks does not adversely affect this protected group as a result of this proposal.</p> <table border="1"> <thead> <tr> <th rowspan="2">Disability</th> <th colspan="2">Alton Estate</th> <th colspan="2">Affected blocks</th> </tr> <tr> <th>No. of tenants</th> <th>% Of tenants</th> <th>No. of tenants</th> <th>% Of tenants</th> </tr> </thead> <tbody> <tr> <td>No</td> <td>1487</td> <td>91%</td> <td>77</td> <td>94%</td> </tr> <tr> <td>Yes</td> <td>141</td> <td>9%</td> <td>3</td> <td>4%</td> </tr> </tbody> </table>	Disability	Alton Estate		Affected blocks		No. of tenants	% Of tenants	No. of tenants	% Of tenants	No	1487	91%	77	94%	Yes	141	9%	3	4%																														
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Gender reassignment	<p>No comment – the Housing and Regeneration Department (HRD) does not currently hold tenant data on this. However, any negative impact on this group would be minimal when considering the withdrawal of the Tenants Offer only impacts 80 households, and in total there are 1,628 tenanted households on the Alton estate, and over 15,500 social housing tenants across the borough of Wandsworth.</p>																																																	
Marriage and civil partnership	<p>No comment – the Housing and Regeneration Department (HRD) does not currently hold tenant data on this. However, any negative impact on this group would be minimal when considering the withdrawal of the Tenants Offer only impacts 80</p>																																																	

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Race/ethnicity	<p>When looking at the comparison between representation in terms of ethnicity, those from a Black ethnic background are disproportionately affected by the proposal when you compare representation across the estate with those from the affected blocks. It is important to note again this is a small cohort of 80 tenants when we compare that to some 1,628 tenants across the estate.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th rowspan="2">Ethnic Group</th> <th colspan="2">Alton Estate</th> <th colspan="2">Affected blocks</th> </tr> <tr> <th>No. of tenants</th> <th>% Of tenants</th> <th>No. of residents</th> <th>% Of residents</th> </tr> </thead> <tbody> <tr> <td>Asian</td> <td>201</td> <td>12%</td> <td>10</td> <td>12.5%</td> </tr> <tr> <td>Black</td> <td>394</td> <td>24%</td> <td>24</td> <td>30%</td> </tr> <tr> <td>Mixed</td> <td>56</td> <td>3%</td> <td>1</td> <td>1.25%</td> </tr> <tr> <td>Other</td> <td>78</td> <td>5%</td> <td>3</td> <td>3.75%</td> </tr> <tr> <td>Unknown</td> <td>158</td> <td>10%</td> <td>7</td> <td>9%</td> </tr> <tr> <td>White</td> <td>741</td> <td>46%</td> <td>35</td> <td>44%</td> </tr> </tbody> </table>	Ethnic Group	Alton Estate		Affected blocks		No. of tenants	% Of tenants	No. of residents	% Of residents	Asian	201	12%	10	12.5%	Black	394	24%	24	30%	Mixed	56	3%	1	1.25%	Other	78	5%	3	3.75%	Unknown	158	10%	7	9%	White	741	46%	35	44%
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Religion and belief, including non-belief	No comment – the Housing and Regeneration Department (HRD) does not currently hold tenant data on this. However, any negative impact on this group would be minimal when considering the withdrawal of the Tenants Offer only impacts 80 households, and in total there are 1,628 tenanted households on the Alton estate, and over 15,500 social housing tenants across the borough of Wandsworth.																																							
Sexual orientation	No comment – the Housing and Regeneration Department (HRD) does not currently hold tenant data on this. However, any negative impact on this group would be minimal when considering the withdrawal of the Tenants Offer only impacts 80 households, and in total there are 1,628 tenanted households on the Alton estate, and over 15,500 social housing tenants across the borough of Wandsworth.																																							
Across groups i.e., older LGBT service users or Black, Asian & Minority Ethnic young men.	No comment – the Housing and Regeneration Department (HRD) does not currently hold tenant data on this. However, any negative impact on this group would be minimal when considering the withdrawal of the Tenants Offer only impacts 80 households, and in total there are 1,628 tenanted households on the Alton estate, and over 15,500 social housing tenants across the borough of Wandsworth.																																							

Data gaps

Data gap(s)	How will this be addressed?
As addressed, data on all protected characteristics is not currently collected.	A large proportion of our tenants will have been a tenant of the Council for many years and data is mainly collected once the tenant has signed up to the property. In addition, the Council is mainly collecting data on age, ethnicity, disability, and gender, which restricts our ability to provide a richer assessment of other protected groups based on our tenant profile. This is something we can consider changing going forward, however, there will still be limitations since we may only be able to collect data on new tenants rather than existing tenants, since we will need to rely on existing tenants to contact us to provide us with data.

4. Impact

Protected group	Positive	Negative
Age	No positive impacts identified	<p>Tenants in some age groups appear to be more adversely affected when you look at the proportional representation across the estate.</p> <p>For those in favour of a move or in overcrowded accommodation, this will have a negative impact on them.</p>
Disability	No positive impacts identified	<p>No adverse effect on these residents when looking at comparative data across the Alton estate.</p> <p>Those with disabilities would have been offered an early move or new accommodation which has been modified to a minimum M4(2) accessible and adaptable standard by comparison to their current accommodation.</p> <p>For those in favour of a move or in overcrowded accommodation will now have to wait for an allocation of social housing via the General Needs queue which has lower priority.</p>

Sex	No positive impacts identified	For those in favour of a move or in overcrowded accommodation, this will have a negative impact on them
Gender reassignment	No positive impacts identified	For those in favour of a move or in overcrowded accommodation, this will have a negative impact on them
Marriage and civil partnership	Although we were unable to provide comparative analysis on this protected group, no positive impacts identified	For those in favour of a move or in overcrowded accommodation, this will have a negative impact on them
Pregnancy and maternity	Although we were unable to provide comparative analysis on this protected group, no positive impacts identified	For those in favour of a move or in overcrowded accommodation, this will have a negative impact on them
Race/ethnicity	No positive impacts identified	Those tenants who identify as being from a black background are deemed to be more adversely affected than any other group when you compare their representation in the redevelopment area relative to the representation across the estate. For those in favour of a move or in overcrowded accommodation, this will have a negative impact on them
Religion and belief, including non-belief	No positive impacts identified	For those in favour of a move or in overcrowded accommodation, this will have a negative impact on them
Sexual orientation	Although we were unable to provide comparative analysis on this protected group, no positive impacts identified	For those in favour of a move or in overcrowded accommodation, this will have a negative impact on them

5. Actions to advance equality, diversity, and inclusion

Action	Lead Officer	Deadline
Not applicable in this case		

6. Further Consultation (optional section – complete as appropriate)

Consultation planned	Date of consultation
No consultation planned, but we are seeking comments from those in the impacted area over the proposal to remove the Tenants Offer and the Local Lettings Plan for the Alton estate, which will run from w/c 5 September 2022 until 26 September 2022	5 September 2022 to 26 September 2022 (comments sought for executive committee on 27 September 2022).