



WALTHAM FOREST COUNCIL FULL EQUALITY ANALYSIS (EA) TEMPLATE

Decision Cabinet – Housing Strategy

Date 11/01/2024

The Council must have due regard to its Public Sector Equality Duty (PSED) when making decisions at member and officer level. An EA is the best method by which the Council can provide the evidential analysis to comply with the equality duty, particularly for major decisions. However, the level of analysis required should only be proportionate to the relevance of the duty to the service or decision. Some decisions will require detailed equalities consideration, e.g. a decision on adult

social care provision or reduction of grants to voluntary organisations, whereas the performance of other functions will have less of an equalities impact, e.g. the appointment of committees where only a limited assessment is required. In rare cases, the Courts have said there may be no impact. If you think this may be the case, then you should undertake the EA screening process first to determine if you need to complete this full EA and have a rational basis for this conclusion.

What is the Public Sector Equality Duty (PSED)? [Double click here for more information / Hide](#)

The public sector equality duty (s.149, Equality Act 2010) requires the Council, when exercising its functions, to have “due regard” to the need to:

- 5. eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited under the Act,
- 6. advance equality of opportunity between those who share a “protected characteristic” and those who do not share that protected characteristic and
- 7. foster good relations between persons who share a relevant protected characteristic and persons who do not share it (this involves having due regard, in particular, to the need to (a) tackle prejudice, and (b) promote understanding).

These are collectively referred to in this EA as the equality aims. Advancing equality (the second equality aim) involves having due regard, in particular, to the

need to:

- Removing or minimising disadvantages suffered by people due to their protected characteristic
 - Taking steps to meet the needs of people from protected groups where these are different from the needs of other people including steps to take account of disabled people’s disabilities *and*
 - Encouraging people from protected groups to participate in public life or in other activities where their participation in disproportionately low
- NB Please note that, for disabled persons, the Council must have regard to the possible need for steps that amount to positive discrimination, to “level the playing field” with non-disabled persons, e.g. in accessing services through dedicated car parking spaces.

Fostering good relations [Double click here for more information / Hide](#)

IMPORTANT NOTES:

1. **THIS FRONT SHEET IS AN ESSENTIAL PART OF THE EA – COMPLETE THE TEMPLATE AND SUBMIT IT AS A SINGLE DOCUMENT.**
2. **IN RARE CASES, WHEN COMPLETING THE ASSESSMENT IT MAY BECOME APPARENT THAT THE RECOMMENDATIONS WOULD LEAD TO UNLAWFUL DISCRIMINATION E.G. A PROPOSAL TO PAY MEN MORE THAN WOMEN. IF SO, STOP, RECONSIDER YOUR PROPOSAL AND SEEK ADVICE.**

THE HEAD OF SERVICE OR DIRECTOR WHO IS RESPONSIBLE FOR MEMBER LEVEL REPORTS MUST BE SATISFIED WITH THE FINALISED EQUALITY ANALYSIS AND FOR MAJOR PROPOSALS, IT IS SENSIBLE TO ENSURE YOUR LEAD MEMBER HAS BEEN CONSULTED.



Fostering good relations involves having due regard, in particular, to the need to tackle prejudice and promote understanding.

Protected Characteristics [Double click here for more information / Hide](#)

Protected Characteristics defined in the Act are age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex and sexual orientation. Marriage and civil partnership are also a protected characteristic for the first equality aim to eliminate discrimination.

Guidance on compliance with the PSED for officers and decision makers [Double click here for more information / Hide](#)

To comply with the duty, the Council must have “due regard” to the three equality aims. This means the PSED must be considered as a relevant factor in a decision alongside other relevant matters such as budgetary, legal, economic and practical implications. What regard is “due” will depend on the circumstances of each proposal and importance of equalities to the decision being taken. Some key principles for compliance during the decision-making process are set out below:

1. The duty is mandatory and important and must be met by the decision-maker and not delegated.
2. EAs must be evidence based and accurate – negative impacts must be fully and frankly identified so the decision-maker can fully consider their impact.
3. There must be an assessment of the practical impact of decisions on equalities, measures to avoid or mitigate negative impact and their effectiveness.
4. There must be compliance with the duty when proposals are being formulated by officers and then by members or officers when taking the decision: the Council cannot rely on an EA produced after the decision is made but sometimes a “provisional” EA is appropriate e.g. before consultation on a proposal.

5. Officers and members making a decision where there is an equality impact must give conscious and open minded consideration to the impact of the duty on the decision, e.g. be prepared to change or amend a decision although negative equalities impacts does not stop a decision being made (see 7).
6. The duty is **not**, however, to achieve the three equality aims but to take them into account when making the final decision – therefore, **the duty does not stop difficult but justifiable decisions being made.**
7. The decision maker may take into account countervailing (i.e. opposing) factors that may objectively justify taking a decision which has negative impact on equalities, e.g. financial targets, value for money or service needs.
8. The duty is ongoing: EAs should be reviewed over time and there should be evidence of how impact will be monitored after the decision.
9. The above is a general guide to this changing area of law. You should also refer to the Council’s EA Page <http://forestnet.lbwf.gov.uk/index/residents-first/equalities/equality-analysis.htm> for more detailed guidance, and specific advice from the Council’s Equalities Lead should be sought on complex issues.

What to do if your proposal is scheduled for Cabinet/Committee? [Double click here for more information / Hide](#)

The Proposals [Click and hover over the questions to find more details on what is required](#)

1. What is the Proposal?

The proposal is for a new Housing Strategy (2023-2028). The Housing Strategy builds on the work of the Commission and addresses wider challenges. It is a modern and innovative Housing Strategy for the borough, fit for the challenges of the next five years.

2. What are the recommendations?

Cabinet is recommended to:

- Review the Strategy (Appendix A), including the desired outcomes and priorities, and offer their feedback.
- Review the Delivery Plan (Appendix C) and identify any gaps or opportunities.
- Approve the Housing Strategy going to Full Council in 2024, subject to Cabinet's feedback being actioned.

3. Who is affected by the Proposal? *Identify the main groups most likely to be affected by the recommendations, directly and indirectly.*

All residents of Waltham Forest are likely to be affected by the recommendations. However, some will be more directly affected. This includes people at risk of homelessness, who are homeless or in temporary accommodation, people who are renting in the Borough, or people who might be looking for affordable housing in the area. It also includes older people, people who need specialist housing, and people who are suffering from poor housing conditions such as overcrowding or fuel poverty. Finally, people living in area where new developments will be built will also be affected more directly.

Age [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#)

Key borough statistics: Waltham Forest has an estimated total population of 271,200 as at 2015. It has a higher proportion of young and working-age people compared to the national average but similar to the London as a whole. The median age of residents is 34.1 years compared to the London average of 34.6 years and the UK average of 40 years.

Note: These statistics provide general data for this protected characteristic. You need to ensure you have sufficient information about those affected by the proposals.
For more detailed breakdowns or further information please contact Insight and Performance Team (ed.maguire@walthamsforest.gov.uk, ext. 4855).

	Waltham Forest	Waltham Forest (%)	London (%)	England and Wales (%)
Aged 0-4	22,100	8%	7%	6%
Aged 5-15	37,000	14%	13%	13%
Aged 16-24	28,800	11%	11%	11%
Aged 25-49	115,400	43%	42%	34%
Aged 50 – 64	40,000	15%	15%	18%
Aged 65+	27,900	10%	12%	18%
Total	271,200	100%	100%	100%

Source: 2014 Mid-year population estimates, Office for National Statistics

[Double click here to show borough wide statistics / hide statistics](#)

Age *Click and hover over the questions to find more details on what is required*

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

People aged 25-34 are the most at risk of homelessness, representing more than a third of people being assessed as owed a prevention or relief duty.

What is the proposal’s impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

Young adults are less likely to own a home, and more likely to rely on the Private Rented Sector. This poses specific challenges such as risk of eviction, increasing rents, and sometimes poor conditions of rental properties. Engagement showed that many young people are worried about not being able to buy a home. People aged 25-34 are the most at risk of homelessness, representing more than a third of people being assessed as owed a prevention or relief duty. The strategy will improve the outcomes of those groups, by aiming at reducing homelessness and increasing the availability and affordability of housing. It will also improve the outcomes of older people, by providing good homes for older people and those with specialist needs.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Impacts are positive.

Key borough statistics: The 2011 Census asked people to rate their health as very good, good, fair, bad or very bad. The data shows that a total of 13,500 residents of Waltham Forest considered their health to be bad or very bad (5% of the population). In addition, the 2011 census asked people if they had a health problem or disability that has lasted or was expected to last for at least 12 months and which limited the person's day-to-day activities, either a little or a lot. As many as 37,600 residents said in the census that their day-to-day activities are limited because of their health. This is made up of seven per cent of population who said their day-to-day activities were limited a lot (17,900 people) and eight per cent whose activities were limited a little (19,700). In total, this is 15 per cent of residents compared to 18 per cent nationally.

Health tends to deteriorate further with age with more than half of residents aged 65 and over (57 per cent) having a limiting long-term health problem or disability. Note: These statistics provide general data for this protected characteristic. You need to ensure you have sufficient information about those affected by the proposals.

For more detailed breakdowns or further information please contact Insight and Performance Team (ed.maguire@walthamsforest.gov.uk, ext. 4855).

[Double click here to show borough wide statistics / hide statistics](#)

Disability *Click and hover over the questions to find more details on what is required*

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

42% of residents owed a duty have additional support needs. The most common support needs are mental health problems, physical ill health and disability, or people at risk of or have experienced domestic abuse. Research from Shelter showed that children growing up in a poor quality home have up to a 25% higher risk of severe ill-health and disability during childhood and early adulthood.

What is the proposal's impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

The strategy aims at making every home in the Borough healthy and safe. Our set of principles for healthy home states that a healthy home has to meet the needs of people with disabilities and additional needs.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Impacts are positive.

Pregnancy and Maternity [Double click here to add impact / Hide](#)

Check box if NOT applicable

Key borough statistics: In 2014, a total of 4,600 children were born in Waltham Forest. The General Fertility Rate (number of live births per 1,000 women aged 15-44) in the borough is 74.2 (3rd highest in London) compared to the London average of 63.3.

The borough also has the 7th highest teenage (under 18) conception rates of London Boroughs (26.2 compared to the London average of 21.5 per 1,000 female population aged 15 to 17). In 2014, there were 114 teenage conceptions with 62% abortion rate among 15-17 year olds in Waltham Forest (*Source: Office for National Statistics*).

Note: These statistics provide general data for this protected characteristic. You need to ensure you have sufficient information about those affected by the proposals.

For more detailed breakdowns or further information please contact Insight and Performance Team (ed.maguire@walthamsforest.gov.uk, ext. 4855).

[Double click here to show borough wide statistics / hide statistics](#)

Pregnancy and Maternity [Click and hover over the questions to find more details on what is required](#)

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals.*

Type response here

What is the proposal's impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

Engagement highlighted that poor housing conditions increase stress and are a threat to mental wellbeing. They can also affect physical wellbeing. The strategy will improve the outcomes of this group, by aiming at reducing homelessness and increasing the availability, quality and affordability of housing.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Impacts are positive.

Race [Double click here to add impact / Hide](#)

Check box if NOT applicable

Key borough statistics: About half of Waltham Forest residents are White ethnic background (52%) and within this 38% are White British or Irish background. 15% are categorised as 'White Other', who are predominantly from the Central and Eastern European countries (Source: 2011 Census).

The largest minority ethnic group in the borough is Asian (21% of the total population) including people of Pakistani (10%), Indian (4%), Bangladeshi (2%) and Other Asian (5%) backgrounds. 17% of the resident population is Black including Black Caribbean (7%), Black African (7%) and Other Black (3%). 5% of the population have mixed/multiple ethnicities.

Note: These statistics provide general data for this protected characteristic. You need to ensure you have sufficient information about those affected by the proposals.

For more detailed breakdowns or further information please contact Insight and Performance Team (ed.maguire@walthamsforest.gov.uk, ext. 4855).

[Double click here to show borough wide statistics / hide statistics](#)

Race *Click and hover over the questions to find more details on what is required*

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

From April to June 2022, 31% of homelessness applicants assessed as owed a prevention or relief duty were from a Black / African / Caribbean / Black British background, while they make up only 17% of the general population.

What is the proposal's impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

The strategy will improve the outcomes of this group, by aiming at reducing homelessness and increasing the availability, quality and affordability of housing.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Impacts are positive

Religion or Belief [Double click here to add impact / Hide](#)

Check box if NOT applicable

Key borough statistics: The borough also has a diverse range of faith communities. According to the 2011 Census, Christianity is the main religion in Waltham Forest, with 48 per cent of residents identifying as Christian. The second biggest religion is Islam with 22% of residents saying they are Muslims compared to 5% nationally. Other religions in the borough are Hindu (2.3% of residents), Buddhist (0.8%), Jewish (0.5%) and Sikh (0.5%). 18% of residents said they are secular/have no religion and 7% chose not to state their religion in the Census.

Waltham Forest has around 150 Christian Churches, 16 Muslim Mosques, 4 Hindu Temples, 3 Jewish Synagogues, 1 Sikh Gurdwara and 1 Tao Temple.

Note: These statistics provide general data for this protected characteristic. You need to ensure you have sufficient information about those affected by the proposals.

For more detailed breakdowns or further information please contact Insight and Performance Team (ed.maguire@walthamsforest.gov.uk, ext. 4855).

[Double click here to show borough wide statistics / hide statistics](#)

Religion or Belief *Click and hover over the questions to find more details on what is required*

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

Type response here

What is the proposal's impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

No impact

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

No impact

Key borough statistics: In total, there is approximately equal number of men and women living in Waltham Forest (2014 Mid-year population estimates, ONS). However, there is a growing gender imbalance as people get older. 47% of those aged 50 and over are male and 53% are female, compared to 51% male and 49% female among the residents aged under 50.

Note: These statistics provide general data for this protected characteristic. You need to ensure you have sufficient information about those affected by the proposals.

For more detailed breakdowns or further information please contact Insight and Performance Team (ed.maguire@walthamsforest.gov.uk, ext. 4855).

Age	Male	Female
Aged 0 to 15	51%	49%
Aged 16 to 24	51%	49%
Aged 25 to 49	51%	49%
Aged 50 to 64	48%	52%
Aged 65+	45%	55%
Total	50%	50%

Source: 2014 Mid-year population estimates, Office for National Statistics

[Double click here to show borough wide statistics / hide statistics](#)

Sex [Click and hover over the questions to find more details on what is required](#)

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

Between April to June 2022, 31% of homelessness applicants assessed as owed a relief duty were single women with dependent children, 18% were single women with no dependent children, and 32% were single adult male.

What is the proposal's impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

The strategy will improve the outcomes of this group, by aiming at reducing homelessness and increasing the availability, quality and affordability of housing.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Impacts are positive.

Key borough statistics: In 2014, 1.6% of adults in the UK identified their sexual identity as lesbian, gay or bisexual. This comprised of:

- 1.1% who identified as gay or lesbian
- 0.5% who identified as bisexual.

A further 0.3% of population identified their sexual identity as other, not falling into heterosexual/straight, gay/lesbian, or bisexual categories.

London had the highest percentage of adults identifying themselves as lesbian, gay or bisexual, at 2.6%.

The likelihood of an adult identifying as LGBT decreased with age. In 2014, 2.6% of adults aged 16 to 24 identified as LGBT, which decreased to 0.6% of adults aged 65 and over. (Source: Integrated Household Survey, Office for National Statistics).

Note: These statistics provide general data for this protected characteristic. You need to ensure you have sufficient information about those affected by the proposals.

For more detailed breakdowns or further information please contact Insight and Performance Team (ed.maguire@walthamsforest.gov.uk, ext. 4855).

[Double click here to show borough wide statistics / hide statistics](#)

Sexual Orientation and Gender Reassignment [Click and hover over the questions to find more details on what is required](#)

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

Type response here

What is the proposal's impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

No impact

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

No impact

Key borough statistics:

Marital and civil partnership status	Waltham Forest	%
All usual residents aged 16+	203,100	100%
Single	88,100	43%
Married	81,300	40%
In a registered same-sex civil partnership	700	0%
Separated	7,600	4%
Divorced or legally dissolved same-sex civil partnership	15,400	8%
Widowed or surviving partner from a same-sex civil partnership	10,000	5%

Source: 2011 Census

The Civil Partnership Act 2004 came into force on 5 December 2005. The Marriages (Same Sex Couples) Act made provision for the marriage of same sex couples in England and Wales with first marriages taking place on 29 March 2014. From 10 December 2014 civil partners were able to convert their civil partnership into a marriage.

Number of marriages/civil partnerships by area of formation

	2011	2012	2013	2014
Marriages	956	773	878	n/a
Civil partnerships (total)	30	18	31	8
..Civil partnerships (male)	16	16	20	5
..Civil partnerships (female)	14	2	11	3

Source: Office for National Statistics

Note: These statistics provide general data for this protected characteristic. You need to ensure you have sufficient information about those affected by the proposals.

For more detailed breakdowns or further information please contact Insight and Performance Team (ed.maguire@walthamsforest.gov.uk, ext. 4855).

[Double click here to show borough wide statistics / hide statistics](#)

Marriage and Civil Partnership [Click and hover over the questions to find more details on what is required](#)

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

Type response here

What is the proposal's impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

No impact

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

No impact

See pages 1 and 2 for full details of these two aims. This section seeks to identify what additional steps can be taken to promote these aims or to mitigate any adverse impact. Analysis should be based on the data you have collected above for the 8 protected characteristics covered by these aims. Remember, marriage and civil partnership is not covered.

Key borough statistics: According to the **Resident Insight Survey** (wave 13 conducted in Feb-Mar 2016), 77% of Waltham Forest residents feel that their local area is a place where people from different backgrounds get on well together.

Women are more likely than men to feel that people from different backgrounds are getting on well locally (81% compare to 74%). Young people aged 16-29 are most likely to feel people are getting on well (84%), whole older residents aged 65+ are least likely to think so (66%). BME residents are more likely to think that people from different background are getting on well in their local area than White residents (83% compared to 74%), which is likely related to the different age profile of the BME and White populations.

The Living Together Survey from Dec 2015-Feb 2016 found that 62% of residents agreed that they have the opportunity to mix with people from different backgrounds to themselves. One fifth (20%) feel they do not really mix with people from different backgrounds. People in the north of the borough (Chingford) are least likely to feel they have opportunity to mix with people from different backgrounds to themselves (55% compared to 68% in Leytonstone, 63% in Walthamstow and 61% in Leyton). Younger and BME residents are more likely to mix with people from different background than older residents and those of White background. The survey also found that not enough mixing between people of different backgrounds and lack of understanding of each other are perceived to be the two main reasons which can stop people from getting on together.

Note: These statistics provide general data for this protected characteristic. You need to ensure you have sufficient information about those affected by the proposals.

For more detailed breakdowns or further information please contact Insight and Performance Team (ed.maguire@walthamsforest.gov.uk, ext. 4855).

[Double click here to show borough wide statistics / hide statistics](#)

Additional Impacts on Advancing Equality & Fostering Good Relations [Click and hover over the questions to find more details on what is required](#)

Additional Equalities Data (Service level or Corporate)

Waltham Forest has seen significant net migration inflows from more expensive adjacent boroughs such as Hackney and Haringey. Overall, there has been significant demographic changes in the last decade. Over the last ten years, all ethnic groups across Waltham Forest have grown in absolute terms, except Black/African/Caribbean/Black British residents. South and central parts of Waltham Forest are more diverse, with smaller proportions of White residents, than communities in Chingford and Highams Park. However, since 2011, the proportion of residents who do not identify as White in the south and central parts of the borough have declined. Conversely, the proportion of residents identifying with non-White ethnic groups has increased in Chingford and Highams Park.

Are there any additional benefits or risks of the proposals on advancing equality and fostering good relations not considered above?

Building housing and improving the quality and affordability of the existing housing stock, as proposed in the strategy, will allow for more people from different backgrounds to make their home in Waltham Forest.

What actions can be taken to avoid or mitigate any negative impact on advancing equality or fostering good relations not considered above? Provide details of how effective the mitigation will be and how it will be monitored.

Positive impacts

Conclusion

Consider the Guidance below and set out your conclusions from the equalities analysis of the 8 protected characteristics. If there are negative equalities impacts, but you think that the proposals should still proceed in the current or amended form, explain what the objective justification for this is, providing evidence as

appropriate. If it is helpful, refer to other documents e.g. the Cabinet report. You may find it helpful to identify one of the 4 outcomes below as being closest to your current proposals. (Use your conclusions as a basis for the “Equalities Implications” in the Cabinet report.)

This analysis has concluded that...

Protected characteristics groups will overall see an improvement in outcomes as a result of this Housing Strategy.

Outcome of Analysis *Check one that applies*

Outcome 1

OUTCOME 1 APPLIES: No major change required when the assessment has not identified any potential for discrimination or adverse impact and all opportunities to advance equality have been taken.

Outcome 3

Continue despite having identified some potential for adverse impacts or missed opportunities to advance equality. In this case, the justification should be included in the assessment and should be in line with the duty to have ‘due regard’. For the most important relevant policies, compelling reasons will be needed. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact.

Outcome 2

Adjustments to remove barriers identified by the assessment or to better advance equality. Are you satisfied that the proposed adjustments will remove the barriers identified?

Outcome 4

Stop and rethink when an assessment shows actual or potential unlawful discrimination.

Signed off by Head of Service:

A. Steel

Name:

Amy Steel

Date:

2/01/2024