

**Housing Delivery Test Action Plan
Equalities Impact Assessment
August 2019**

Guidance notes

Things to remember:

Under the Public Sector Equality Duty (PSED) public authorities are required to have due regard to the aims of the general equality duty when making decisions and when setting policies. Understanding the affect of the council's policies and practices on people with different protected characteristics is an important part of complying with the general equality duty. Under the PSED the council must ensure that:

- Decision-makers are aware of the general equality duty's requirements.
- The general equality duty is complied with before and at the time a particular policy is under consideration and when a decision is taken.
- We consciously consider the need to do the things set out in the aims of the general equality duty as an integral part of the decision-making process.
- We have sufficient information to understand the effects of the policy, or the way a function is carried out, on the aims set out in the general equality duty.
- We review policies or decisions, for example, if the make-up of service users changes, as the general equality duty is a continuing duty.
- We take responsibility for complying with the general equality duty in relation to all their relevant functions. Responsibility cannot be delegated to external organisations that are carrying out public functions on their behalf.
- We consciously consider the need to do the things set out in the aims of the general equality duty not only when a policy is developed and decided upon, but when it is being implemented.

Best practice guidance from the Equality and Human Rights Commission recommends that public bodies:

- Consider all the protected characteristics and all aims of the general equality duty (apart from in relation to marriage and civil partnership, where only the discrimination aim applies).
- Use equality analysis to inform policy as it develops to avoid unnecessary additional activity.
- Focus on understanding the effects of a policy on equality and any actions needed as a result, not the production of a document.
- Consider how the time and effort involved should relate to the importance of the policy to equality.
- Think about steps to advance equality and good relations as well as eliminate discrimination.
- Use good evidence. Where it isn't available, take steps to gather it (where practical and proportionate).
- Use insights from engagement with employees, service users and others who can help provide evidence for equality analysis.

Equality analysis should be referenced in community impact statements in Council reports. Community impact statements are a corporate requirement in all reports to the following meetings: the cabinet, individual decision makers, scrutiny, regulatory committees and community councils. Community impact statements enable decision makers to identify more easily how a decision might affect different communities in Southwark and to consider any implications for equality and diversity.

The public will be able to view and scrutinise any equality analysis undertaken. Equality analysis should therefore be written in a clear and transparent way using plain English. Equality analysis may be published under the council's publishing of equality information, or be present within divisional/departmental/service business plans. These will be placed on the website for public view under the council's Publications Scheme.

Equality analysis should be reviewed after a sensible period of time to see if business needs have changed and/or if the effects that were expected have occurred. If not then you will need to consider amending your policy accordingly. This does not mean repeating the equality analysis, but using the experience gained through implementation to check the findings and to make any necessary adjustments. Engagement with the community is recommended as part of the development of equality analysis. The council's Community Engagement Division and critical friend, the Forum for Equality and Human Rights in Southwark can assist with this (see section below on community engagement and www.southwarkadvice.org.uk).

Whilst the equality analysis is being considered, Southwark Council recommends considering health and wellbeing implications, as health and health inequalities are strongly influenced by the environment we live and work in. As a major provider of services to Southwark residents, the council has a legal duty to reduce health inequalities and this is reflected in its values and aims. For this reason, the council recommends considering health and wellbeing impacts in all equality analyses, not forgetting to include identified potential mitigating actions.

Section 1: Equality analysis details

Proposed policy/decision/business plan to which this equality analysis relates	Housing Delivery Test Action Plan		
Equality analysis author	Hajnalka Kurti		
Strategic Director	Simon Bevan		
Department	Planning	Division	Place and Wellbeing
Date of analysis	August, 2019		

Section 2: Brief description of policy/decision/business plan

The Council has produced a Housing Delivery Test Action Plan (HDTAP) in response to the introduction of the Housing Delivery Test by The Ministry of Housing, Communities and Local Government (MHCLG) in November, 2018.

The action plan is a practical document to review Southwark's approach to housing delivery, and to help understand the potential influencing factors and obstacles to housing delivery. With consideration of the issues identified the HDTAP sets out actions to encourage and increase the delivery of new homes. These actions also include initiatives and programmes we are currently progressing.

The actions identified in the HDTAP seek to boost the delivery of new homes, including affordable homes, which will have a positive impact on all individuals in Southwark, including those with protected characteristics.

There is a pressing need of housing in the borough, especially of affordable housing. Boosting housing delivery will deliver more market homes, intermediate affordable homes and social rented homes including wheelchair accessible dwellings more quickly to meet the varied needs of local people.

Providing more homes for general need, would increase the number of affordable homes, reducing the Council's housing waiting list for social rented homes. It would also reduce the need for temporary accommodation, which is usually social rented, providing much needed permanent housing. This is likely to have benefits for younger people who are unable to access the housing market, families with young children and the elderly and those with protected characteristics.

Section 3: Service users and stakeholders

Service users and stakeholders	
Key users of the department or service	Members of the public; Developers; Local Authorities; Housing Associations; Environment and Leisure Department; Housing and Modernisation Department; Councillors; Finance and Governance Department; Place and Wellbeing Department.
Key stakeholders were/are Involved in this policy/decision/business plan	Members of the public; Housing Associations; Local Authorities; Housing and Modernisation Department; Councillors; Finance and Governance Department; Place and Wellbeing Department; Planning Advisory Service.

Section 4: Pre-implementation equality analysis

This section considers the potential impacts (positive and negative) on groups with 'protected characteristics', the equality information on which this analysis is based and any mitigating actions to be taken.

The first column on the left is for societal and economic issues (discrimination, higher poverty levels) and the second column on the right for health issues, physical and mental. As the two aspects are heavily interrelated it may not be practical to fill out both columns on all protected characteristics. The aim is, however, to ensure that health is given special consideration, as it is the council's declared intention to reduce health inequalities in the borough. The Public Health Team can assist with research and data.

Age - Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
The HDTAP is anticipated to have positive social benefits for people of all ages living and working in Southwark. Reviewing our current approach to housing delivery and setting out new actions to boost the provision of a wide range of new homes would have a positive social impact for all, including those with protected characteristics. There are no foreseen negative social impacts to people based on their age.	The HDTAP is anticipated to have positive health impacts for all different groups in Southwark. Reviewing our current approach to housing delivery and setting out new actions to boost the provision of a wide range of new homes would have positive health impacts for all, including those with protected characteristics. There are no foreseen negative health impacts to people based on their age.
Equality information on which above analysis is based	Health data on which above analysis is based
Feedback from consultation events and workshops.	Feedback from consultation events and workshops.
Mitigating actions to be taken	
We will continue to monitor and review the HDTAP to ensure that the likelihood of negative impacts arising is minimal.	

Disability - A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)

The HDTAP is anticipated to have positive social impacts for all different groups in Southwark. Reviewing our current approach to housing delivery and setting out new actions to boost the provision of a wide range of new homes would have a positive social impact for all, including those with protected characteristics. There are no foreseen negative social impacts to people who have a disability.	The HDTAP is anticipated to have positive health impacts for all different groups in Southwark. Reviewing our current approach to housing delivery and setting out new actions to boost the provision of a wide range of new homes would have positive health impacts for all, including those with protected characteristics. There are no foreseen negative health impacts to people who have a disability.
Equality information on which above analysis is based	Health data on which above analysis is based
Feedback from consultation events and workshops.	Feedback from consultation events and workshops.
Mitigating actions to be taken	
We will continue to monitor and review the HDTAP to ensure that the likelihood of negative impacts arising is minimal.	

Gender reassignment - The process of transitioning from one gender to another.	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
The HDTAP is anticipated to have positive social impacts for all different groups in Southwark. Reviewing our current approach to housing delivery and setting out new actions to boost the provision of a wide range of new homes would have a positive social impact for all, including those with protected characteristics. There are no foreseen negative social impacts to people who have undergone gender reassignment.	The HDTAP is anticipated to have positive health impacts for all different groups in Southwark. Reviewing our current approach to housing delivery and setting out new actions to boost the provision of a wide range of new homes would have positive health impacts for all, including those with protected characteristics. There are no foreseen negative health impacts to people who have undergone gender reassignment.
Equality information on which above analysis is based	Health data on which above analysis is based
Feedback from consultation events and workshops.	Feedback from consultation events and workshops.
Mitigating actions to be taken	
We will continue to monitor and review the HDTAP to ensure that the likelihood of negative impacts arising is minimal.	

Pregnancy and maternity - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
The HDTAP is anticipated to have positive social impacts for all different groups in Southwark. Reviewing our current approach to housing delivery and setting out new actions to boost the provision of a wide range of new homes would have a positive social impact for all, including those with protected characteristics. There are no foreseen negative social impacts to people who are pregnant or have recently given birth.	The HDTAP is anticipated to have positive health impacts for all different groups in Southwark. Reviewing our current approach to housing delivery and setting out new actions to boost the provision of a wide range of new homes would have positive health impacts for all, including those with protected characteristics. There are no foreseen negative health impacts to people who are pregnant or have recently given birth.
Equality information on which above analysis is based	Health data on which above analysis is based
Feedback from consultation events and workshops.	Feedback from consultation events and workshops.
Mitigating actions to be taken	
We will continue to monitor and review the HDTAP to ensure that the likelihood of negative impacts arising is minimal.	

Race - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
The HDTAP is anticipated to have positive social impacts for all different groups in Southwark. Reviewing our current approach to housing delivery and setting out new actions to boost the provision of a wide range of new homes would have a positive social impact for all, including those with protected characteristics. There are no foreseen negative social impacts to people belonging to any race.	The HDTAP is anticipated to have positive health impacts for all different groups in Southwark. Reviewing our current approach to housing delivery and setting out new actions to boost the provision of a wide range of new homes would have positive health impacts for all, including those with protected characteristics. There are no foreseen negative health impacts to people belonging to any race.
Equality information on which above analysis is based	Health data on which above analysis is based

Feedback from consultation events and workshops.	Feedback from consultation events and workshops.
Mitigating actions to be taken	
We will continue to monitor and review the HDTAP to ensure that the likelihood of negative impacts arising is minimal.	

Religion and belief - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
The HDTAP is anticipated to have positive social impacts for all different groups in Southwark. Reviewing our current approach to housing delivery and setting out new actions to boost the provision of a wide range of new homes would have a positive social impact for all, including those with protected characteristics. There are no foreseen negative social impacts to any faith group.	The HDTAP is anticipated to have positive health impacts for all different groups in Southwark. Reviewing our current approach to housing delivery and setting out new actions to boost the provision of a wide range of new homes would have positive health impacts for all, including those with protected characteristics. There are no foreseen negative health impacts to any faith group.
Equality information on which above analysis is based	Health data on which above analysis is based
Feedback from consultation events and workshops.	Feedback from consultation events and workshops.
Mitigating actions to be taken	
We will continue to monitor and review the HDTAP to ensure that the likelihood of negative impacts arising is minimal.	

Sex - A man or a woman.	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
The HDTAP is anticipated to have positive social impacts for all different groups in Southwark. Reviewing our current approach to housing delivery and setting out new actions to boost the provision of a wide range of new homes would have a positive social impact for all, including those with protected characteristics. There are no foreseen negative social impacts to people based on their gender.	The HDTAP is anticipated to have positive health impacts for all different groups in Southwark. Reviewing our current approach to housing delivery and setting out new actions to boost the provision of a wide range of new homes would have positive health impacts for all, including those with protected characteristics. There are no foreseen negative health impacts to people based on their gender.

Equality information on which above analysis is based	Health data on which above analysis is based
Feedback from consultation events and workshops.	Feedback from consultation events and workshops.
Mitigating actions to be taken	
We will continue to monitor and review the HDTAP to ensure that the likelihood of negative impacts arising is minimal.	
Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
The HDTAP is anticipated to have positive social impacts for all different groups in Southwark. Reviewing our current approach to housing delivery and setting out new actions to boost the provision of a wide range of new homes would have a positive social impact for all, including those with protected characteristics. There are no foreseen negative social impacts to people based on their sexual orientation.	The HDTAP is anticipated to have positive health impacts for all different groups in Southwark. Reviewing our current approach to housing delivery and setting out new actions to boost the provision of a wide range of new homes would have positive health impacts for all, including those with protected characteristics. There are no foreseen negative health impacts to people based on their sexual orientation.
Equality information on which above analysis is based	Health data on which above analysis is based
Feedback from consultation events and workshops.	Feedback from consultation events and workshops.
Mitigating actions to be taken	
We will continue to monitor and review the HDTAP to ensure that the likelihood of negative impacts arising is minimal.	

Socio-economic disadvantage – although the Equality Act 2010 does not include socioeconomic status as one of the protected characteristics, Southwark Council recognises that this continues to be a major cause of inequality in the borough. Socio economic status is the measure of an area's, an individual's or families economic and social position in relation to others, based on income, education, health, living conditions and occupation.	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
The HDTAP is anticipated to have positive social benefits for people regardless of their socio-economic status who are living and working in Southwark. Reviewing our current approach to housing delivery and setting out new actions to boost the provision of a wide range of new homes would have a positive	The HDTAP is anticipated to have positive health benefits for people regardless of their socio-economic status who are living and working in Southwark. Reviewing our current approach to housing delivery and setting out new actions to boost the provision of a wide range of new homes would have positive

social impact for all, including those with protected characteristics. There are no foreseen negative social impacts to people based on their socio-economic status.	health impacts for all, including those with protected characteristics. There are no foreseen negative health impacts to people based on their socio-economic status.
Equality information on which above analysis is based	Health data on which above analysis is based
Feedback from consultation events and workshops.	Feedback from consultation events and workshops.
Mitigating actions to be taken	
We will continue to monitor and review the HDTAP to ensure that the likelihood of negative impacts arising is minimal.	

Human Rights
There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour , Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol
Potential impacts (positive and negative) of proposed policy/decision/business plan
The HDTAP is anticipated to have a range of positive impacts on people living and working in Southwark. The actions presented in the HDTAP do not in any way threaten the human rights of anyone living or working in the Southwark. Reviewing our current approach to housing delivery and setting out new actions to boost the provision of a wide range of new homes would have positive social and health impacts for all, including those with protected characteristics.
Information on which above analysis is based
Feedback from consultation events and workshops.
Mitigating actions to be taken
We will continue to monitor and review the HDTAP to ensure that the likelihood of negative impacts arising is minimal.