

Equality Analysis

To be completed following the initial screening sheet

Carrying out an Equality Analysis (EA) involves assessing the likely (or actual) effects of change on people in respect of protected or additional equality characteristics (full list below). This includes looking for opportunities to promote equality, diversity and inclusion that may have previously been missed or could be better, as well as identifying negative or adverse impacts that can be removed or mitigated where possible.

EAs should be carried out prior to implementing a policy, with a view to identifying its potential impact on equality.

This template aims to guide you through the following 4 stages of your Equality Analysis:

1. **Evidence** - Identification of who is affected by your proposal, demonstrated through data.
2. **Analysis** – Understanding the impact of your work on groups of people with protected characteristics.
3. **Action** – The steps to be taken to promote equality and/or mitigate any negative impact(s)
4. **Outcome** – What difference has your EA made? If the proposal cannot be changed to adequately mitigate negative impact, what justification, if any exists, to support the proposal.

Please complete the sections and boxes in blue. Add more rows or columns if required.

Equality Analysis Summary

Name of proposal, policy, service function, or restructure requiring an Equality Analysis	Drafting a new Tenancy Strategy for Southend-on-Sea (2024-2029)
Department	Regeneration & Housing
Service Area	Housing Policy and Operations
Date Equality Analysis Begun:	July 2023
At what stage of the proposal is this Equality Analysis being conducted?	Planning Phase <input checked="" type="checkbox"/> X Midway Point <input type="checkbox"/> Reflective Analysis <input type="checkbox"/>

Names and roles of staff carrying out this Equality Analysis:

EAs are most effective when they take a wide range of views into consideration. You may wish to discuss your EA with your wider team and/or members of the staff forums

Name	Role	Service Area
Faye Creasey	Housing Project and Policy Support Officer	Housing Policy and Operations
Nicola O’Keeffe	Senior Housing Project and Policy Officer	Housing Policy and Operations

1. Evidence

1.1 Sources of information

It is important that you demonstrate, with evidence (data), that you are aware of the people impacted by your proposal. Please list the sources of information, including data and results from consultation exercises, that will inform this Equality Analysis.

Useful data sources include:

- Internal Staff Forums
- [The Southend Equality Analysis Dashboard](#)
- [SmartSouthend](#)
- [Index of Multiple Deprivation](#) – expected to be updated sometime next year
- [Nomis – Labour Market Profile](#)
- [ONS](#)
- [Public Health Fingertips](#)
- [Poppi - Projecting Older People Population Information System \(poppi.org.uk\)](#)
- [Pansi - Projecting Adult Needs and Service Information System \(pansi.org.uk\)](#)
- [Gov.uk \(general advice and good practice\)](#)
- [Residents' Perception Survey - 2021](#)
- [Internal Staff Forums](#)

Please note that the [Policy Team](#), [Operational Performance and Intelligence](#), and the [Insights Team](#) can direct you to more specific or tailored data sources if needed.

If you are conducting a staffing restructure, you must include an anonymised equalities profile of the affected staff. HR can provide this data to help assess potential equality-related issues. After the restructure is complete, conduct another equalities profile for comparison. The Equality Analysis may need updating based on the restructure's outcomes.

Table 1

Source of information	Reason for using (e.g., likely impact on a particular group).
Tenant profile (by protected characteristics) as of August 2023	
Allocations to both council and housing association properties in the last 12 months (1 st August 2022 – 31 st July 2023)	
2021 Census data	
Southend-on-Sea Domestic Abuse Act Needs Assessment 2021	

Please Note: Reports, data, and accompanying evidence can be added as appendices.

1.2 Gaps in information or data

Are there any information gaps and data?

Yes

No

Maybe

Do the gaps relate to any protected characteristics?

Yes

No

Maybe

Describe any gap(s) and the impact this has on your ability to complete the EA. (Please also indicate in your action plan, section 5, whether you have identified ways to fill these gaps.)

2. Analysis: How people with protected characteristics will be impacted by your proposal

2.1 Impact assessment

Use the table below to record the expected impact of your proposal on each of the characteristics. To help you understand more about the disadvantaged experienced by the different protected groups, this [checklist](#) provides a source of prompts to consider.

Table 2

	Impact - Please tick				
	Yes			Not Impacted	Impact Unclear
	Positive	Negative	Neutral		
Age (including looked after children)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Disability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Marriage and civil partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Pregnancy and maternity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Race	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Religion or belief	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sex	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sexual orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Carers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Socio-economic	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Armed Forces Service Personnel & Veterans	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Care Experience	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

2.2 Results of your analysis

Public bodies should take a proportionate approach when complying with the Equality Duty. In practice, this means giving greater consideration where a proposal has the potential to have a substantial effect on discrimination or equality of opportunity, and less consideration where the potential effect on equality is slight.

Where relevant, please now describe how the protected group(s) could be impacted and the degree of impact. Completing this table demonstrates that you are aware of the impact of your proposal.

Table 3

	Potential Impact
Age	<p>Flexible tenancies</p> <p>Data on current (as at August 2023) SCC tenants shows that 34% of main tenants are aged 65 and over, and a further 21% are aged 55-64. The revised tenancy strategy should have a positive impact on this cohort, as it states that the council considers it sensible to automatically award secure lifetime/periodic assured tenancies where the tenant is someone over the prevailing state retirement age or where the tenant is residing in older persons accommodation, such as sheltered or “extra care” housing.</p> <p>Older people are more likely to under-occupy their social home. As of March 2023¹, 144 tenants in Southend were affected by the bedroom tax, and 31% (45) were aged 60+. This data does not include those of state pension age as they are excluded from the bedroom tax, so the true figure of under occupation is likely to be higher. Therefore, the fact that the council have not and will not adopt flexible tenancies and will encourage RPs to focus resources on tenancy sustainment rather than issuing FTTs is a positive decision for this cohort. As in the long run, they would be disproportionately affected by flexible tenancies due to being more likely to under occupy their home. The Council also already operates a scheme where under occupying tenants who apply, are placed in Band A of the Housing Register, and can receive a financial incentive if they successfully bid for a smaller property thereby freeing up larger homes for those in need.</p> <p>Research has shown that people with dementia who receive care in their own home have better cognitive function and mental health outcomes than those who live in nursing homes or other institutional settings. Therefore, continuing to automatically award secure lifetime tenancies to tenants over the prevailing state retirement age is a positive decision.</p> <p>Damp, Mould, and Condensation</p> <p>Certain groups of people, such as the elderly or people with pre-existing illness, are at a greater risk of ill health associated with cold or damp homes. The new strategy states that the council is reviewing its own approach to damp, mould, and condensation, and developing a strategy. The council also expects all RPs operating in the city to be reviewing and</p>

¹ Data from SCC Benefits team

	<p>ensuring that their practices are compliant with legislative and regulatory requirements.</p> <p>Domestic Abuse</p> <p>According to national data, older victims are less likely to attempt to separate from their abuser – only 27% in the over 60s, compared to 68% in under 60s². The tenancy strategy states that, in line with the DA Act 2021, survivors of DA that approach/are transferred to Southend, who have a lifetime tenancy/have had a lifetime tenancy and have fled the social home to escape DA, retain their lifetime security of tenure. They will not have to be given an introductory tenancy first – in line with exceptions laid out in the Housing Act 1996. It has also been agreed that if a DA survivor goes into refuge on an interim basis to flee and returns to social housing – they will still be issued a tenancy with no less security of tenure. All of which should help to remove any barriers/disincentives for older victims who have lifetime tenancies to leave an abusive situation.</p>
Disability	<p>There would likely be no impact on this protected group since the proposed changes, in most instances, are positive changes for existing and new tenants.</p> <p>Flexible tenancies</p> <p>Of those who were allocated either a council or housing association property in the last 12 months (1st August 2022–31st July 2023), 15% were allocated an accessible/adaptable property. If a tenant no longer requires their adaptations, the tenancy can be ended anyway under existing tenancy terms (and they are given top priority to move) - so fixed term tenancies, if implemented, would not have the resultant impact of increasing adapted stock for those with disabilities.</p>
Gender reassignment	<p>There would likely be no impact on this protected group since the proposed changes, in most instances, are positive changes for existing and new tenants.</p>
Marriage and civil partnership	<p>There would likely be no impact on this protected group since the proposed changes, in most instances, are positive changes for existing and new tenants.</p>
Pregnancy and maternity	<p>Domestic Abuse</p> <p>Domestic abuse often begins or escalates during pregnancy - 1 in 3 pregnant women experience DA³. Therefore, the changes we have made with regards to domestic abuse should have a positive impact on this cohort and should help to remove any barriers/disincentives for pregnant women/mothers that are victims and have lifetime tenancies to leave an abusive situation.</p>
Race	<p>According to the 2021 Census⁴, 87.5% of people in Southend-on-Sea identified their ethnic group within the "White" category. This largely correlates to the data we hold on current (as at August 2023) SCC tenants,</p>

² [Safe Later Lives - Older people and domestic abuse.pdf \(safelives.org.uk\)](#)

³ [Domestic Abuse Statistics UK • NCDV](#)

⁴ [How life has changed in Southend-on-Sea: Census 2021 \(ons.gov.uk\)](#)

	<p>as approximately 85.6% of main tenants identified their ethnic group within the white category. 2.8% of current SCC tenants identified their ethnic group as either Black Caribbean, African or any other Black/African/Caribbean background – this is reflective of the 2021 census data as 2.9% of people in Southend identified their ethnic group within the Black, Black British, Black Welsh, Caribbean or African category.</p> <p>Damp, Mould, and Condensation According to national research conducted in 2020⁵, mixed White and Black Caribbean (13%), Bangladeshi (10%), Black African (9%) and Pakistani (8%) households were more likely to have damp problems than White British households (3%). The new tenancy strategy states that the council is reviewing its own approach to damp, mould, and condensation, and will be developing a strategy, an equality analysis will be conducted as part of this. The council also expects all RPs operating in the city to be reviewing and ensuring that their practices are compliant with legislative and regulatory requirements.</p>
Religion or belief	<p>There would likely be no impact on this protected group since the proposed changes, in most instances, are positive changes for existing and new tenants.</p>
Sex	<p>Of those who were allocated either a council or housing association property in the last 12 months (1st August 2022–31st July 2023), 59% of main applicants were female.</p> <p>Flexible tenancies According to the 2021 Census, 12.1% of households in Southend are lone-parent households. Nationally, 84% of lone-parent families are headed by a lone mother⁶. Therefore, the fact that the council have not and will not adopt flexible tenancies and will encourage RPs to focus resources on tenancy sustainment rather than issuing FTTs is a positive decision for this cohort. As ultimately, women would arguably be more vulnerable to their flexible tenancy not being renewed once children leave home, due to under occupation.</p> <p>Domestic Abuse According to data provided by the Essex Police in 2020/21, 73% of domestic abuse victims were female⁷. In 2020/21, Southend moved up from 3rd place to 2nd place on the list of highest DA incidents in Essex (per 1000 of population). The tenancy strategy states that, in line with the DA Act 2021, survivors of DA that approach/are transferred to Southend, who have a lifetime tenancy/have had a lifetime tenancy and have fled the social home to escape DA, retain their lifetime security of tenure. They will not have to be given an introductory tenancy first – in line with exceptions laid out in the Housing Act 1996. The council is also proposing that if a DA survivor goes into a refuge on an interim basis to flee – and return to social housing, they would still be issued a tenancy with no less security of tenure if they go into social housing. All of which should help to remove any barriers/disincentives for victims who have lifetime tenancies to leave an abusive situation.</p>

⁵ [Housing with damp problems - GOV.UK Ethnicity facts and figures \(ethnicity-facts-figures.service.gov.uk\)](https://www.ethnicity-facts-figures.service.gov.uk/housing-with-damp-problems)

⁶ [Families and households in the UK - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/families-and-households-in-the-uk)

⁷ [PowerPoint Presentation Template \(southend.gov.uk\)](https://www.southend.gov.uk/powerpoint-presentation-template)

Sexual orientation	<p>Of those who were allocated either a council or housing association property in the last 12 months (1st August 2022–31st July 2023), 87% were heterosexual.</p> <p>There would likely be no negative impact on this protected group since the proposed changes, in most instances, are positive changes for existing and new tenants.</p>
Carers	<p>There would likely be no negative impact on this protected group since the proposed changes, in most instances, are positive changes for existing and new tenants.</p>
Socio-economic	<p>According to the 2021 Census, 9,019 (11.5%) residents are living in the social rented sector in Southend⁸. 39% of Southend-on-Sea’s residents live in areas considered to be in the most deprived 30% in the country. There are 9 neighbourhoods (out of 107) in Southend-on-Sea falling into the 10% most deprived in the country⁹.</p> <p>Affordable rents</p> <p>The new strategy states that in the interests of avoiding rent arrears, homelessness and/or financial hardship, it is the Council’s position that affordable rents in Southend-on-Sea should not exceed LHA rates. The LHA ‘rate’ is the maximum amount of housing benefit that a private renter can claim to help pay their rent and are supposed to be able to access the cheapest third (30th percentile) of the private rental market. These proposals should have a positive impact on low income households. The only exception to allowing affordable rents to exceed LHA rates will be where a provider is delivering affordable housing units in excess of S.106 developer requirements – where affordable accommodation is delivered in excess of our requirements, the council will be open to negotiation here.</p> <p>Damp, mould, and condensation</p> <p>With growing pressure on household finances because of increasing energy costs and wider concerns about the cost of living, there are concerns households are choosing between “heating or eating” over the winter months. If unable to adequately heat your home, low income households are more at risk of damp, mould, and condensation. The new tenancy strategy and its proposals around damp, mould and condensation should have a positive impact on this cohort. As we commit to reviewing our own approach expect all RPs operating in the city to be reviewing and ensuring that their practices are compliant with legislative and regulatory requirements.</p>
Armed Forces Service Personnel & Veterans	<p>There would likely be no impact on this protected group since the proposed changes, in most instances, are positive changes for existing and new tenants.</p>

⁸ [Latest Southend-on-Sea census data published – Southend-on-Sea City Council](#)

⁹ [Southend 2050 – Annual Report 2021/22 – Southend-on-Sea City Council](#)

Care Experienced	<p>There would likely be no impact on this protected group since the proposed changes, in most instances, are positive changes for existing and new tenants.</p> <p>The fact that the council have not and will not adopt flexible tenancies and will encourage RPs to focus resources on tenancy sustainment rather than issuing FTTs is ultimately a positive decision for this cohort. Lifetime tenancies encourage stability, as secure, safe and stable accommodation is an essential building block for success and achievement in education, training and employment, and has a direct impact on emotional health and wellbeing.</p>
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3. Action: Can we mitigate negative impact?

3.1 Steps taken to mitigate any impact(s)

As a local authority, we are required by the [Equality Act 2010](#) to comply with the [Public Sector Equality Duty](#). We need to ensure that all our strategies, policies, services and functions, both current and proposed, give proper consideration and due regard to the needs of diverse groups in order to:

- eliminate discrimination
- advance equality of opportunity and access; and
- foster good relations between different groups in the community

Please describe the actions you will take following your assessment, including your assessment of the degree of impact (proportionality consideration), to mitigate any adverse impact, advance equality, and/or to foster good relations, including the timescale for each action and who will be responsible for the action:

Table 4

Planned action and the outcome it will achieve	Owner	When	How will this be monitored (e.g., via team/service plans)

4. Outcome: What difference has your Equality Analysis made?

What is the outcome of your Equality Analysis? Has your proposal taken into consideration steps to mitigate any negative impact? If it hasn't, and your proposal will continue to go ahead, you will need to outline a justification.

4.1 Outcome

Please choose the most relevant option:

- No change – the assessment is that the policy/practice/service is/will be robust.
- Adjust the policy/ practice proposal – this involves taking steps to remove any barriers, to better advance equality and/or to foster good relations.
- Continue the policy/ practice proposal despite the potential for adverse impact, and which can be mitigated/or justified
- Stop the policy/ practice proposal as adverse effects cannot be mitigated or justified.

4.2 Justification

If an EA identifies potential adverse impacts or missed opportunities to promote equality, provide a clear and evidence-based justification for proceeding with the proposed action.


A justification could include:

- **Legitimate Aim:** It serves a justifiable purpose, such as public health and safety, resource fairness, social cohesion, or contributes to a legal obligation.
- **Proportionality:** Demonstrate that the policy or action is a proportionate means of achieving the identified aims.
- **Mitigation Efforts:** Emphasise the Council's efforts to mitigate adverse impacts identified in the EA. This could involve implementing measures, providing alternatives, or offering support services.
- **Ongoing Monitoring:** Highlight any continuous monitoring of the proposal's impact to assess its effectiveness and identify any unintended consequences or adverse impacts. This ongoing assessment will guide future adjustments or interventions.

It is vital to demonstrate that all alternatives have been explored before deciding that the negative impact is justified, and that this is documented below.



Your Head of Service or Director is required to sign-off your analysis and outcome

Signed (lead officer):  Faye Creasey (Housing Project and Policy Support Officer)

Signed (Executive/Director/Head of Service): Olivia Westberg (Head of Housing Policy and Operations)

Once signed, please send a copy of the completed EA to Angela Dress
Angeladress@southend.gov.uk.

All Equality Analyses are recorded on Pentana and reported to CMT and DMT's on a quarterly basis.