

EQUALITY IMPACT ASSESSMENT

12 HRA Site Regeneration Programme

Title:	12 HRA Site Regeneration Programme			
Service impacted by proposal	Housing Services			
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SECTION 1: AIMS AND IMPLEMENTATION OF THE 12 SITE REGENERATION PROGRAMME

Background

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

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

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

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

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

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

Identifying the aims of the proposal

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Who are the stakeholders affected by this proposal?

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

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

Within these sites, the following resident groups are affected:

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

➤ Private tenants

The programme also affects other stakeholders such as:

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

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

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

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

Which equality objective(s) are relevant to this proposal

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

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

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

Implementation of the Regeneration Programme

The Regeneration Programme will be led by the Housing Regeneration Board. All project documentation can be found at https://www.havering.gov.uk/homepage/78/building_new_homes_for_havering

SECTION 2

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

SECTION 3

CONSIDERATION OF DATA AND RESEARCH

Quantitative and qualitative data that informed the impact assessment includes:

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

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

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

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

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

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

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

Gaps in information:

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

Action needed:

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

SECTION 4

ASSESSMENT OF IMPACT

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

Ethnicity

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

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

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

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

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

Gender

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

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

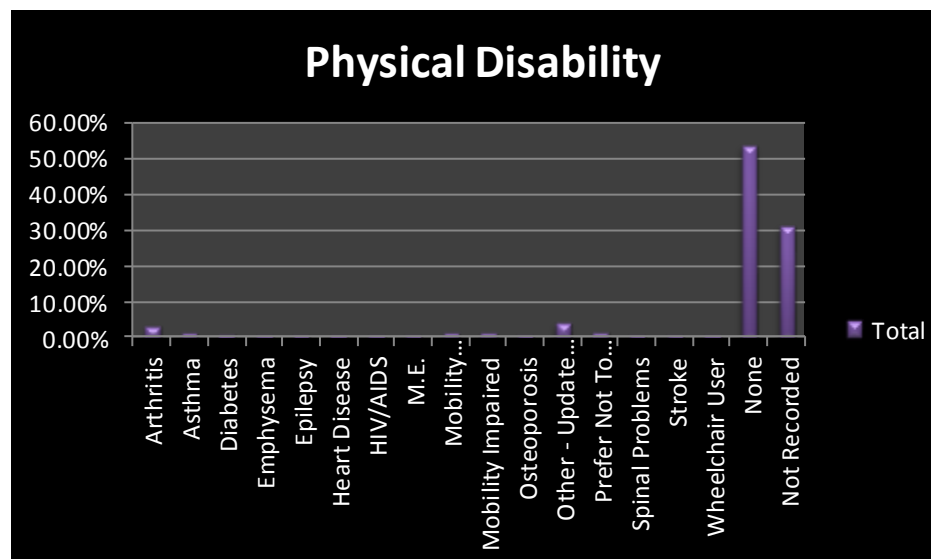
The Regeneration Decant Policy and Possession Procedure which supports the programme will ensure that any vulnerable tenants and residents are supported through the programme by assisting them to find suitable accommodation and locating amenities close to their new home. The support offered to residents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

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

Disability

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

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

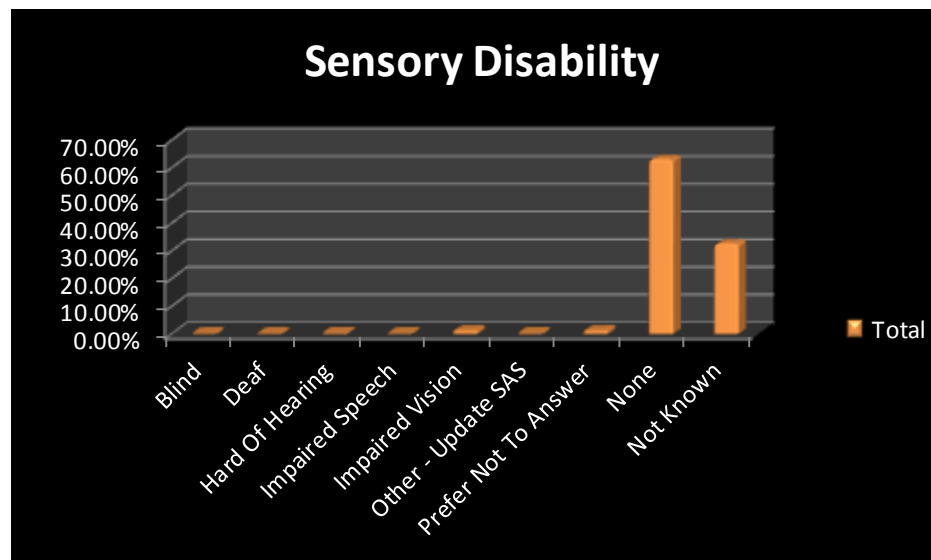


Source: Housing Services Diversity Report (December 2017)

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

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

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



Source: Housing Services Diversity Report (December 2017)

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

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

Age

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

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

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

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

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

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

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

Religion/Belief

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

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

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

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

Pregnancy and maternity

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

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

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

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

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

Marriage and Civil Partnership

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

Sexual orientation

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

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

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

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

Gender reassignment

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

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

Health Impact

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

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

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

Socio Economic Factors

Where applicable these have been highlighted within the assessment for each protected characteristic. In addition, the Council recognises the importance of maintaining social support networks which are often based on locality (neighbours, friends and family). The Local Lettings Plan's (LLP) commitment to residents is that re-housing offers will be based on choice, given the re-housing options available.

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

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

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

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

Section 4: Measures to mitigate adverse impact

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

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

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

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

SECTION 5: Monitoring and Review

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

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

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