**Annex: FULL EQUALITIES IMPACT ASSESSMENT FORM B**

**Function being assessed:**

The function being assessed is the proposed changes to the Council’s housing service. These changes seek to provide an improved service that is easier to access, costs less, supports those who need it and invests in new homes. This change will affect all 5,856 Council tenants and leaseholders (RBK residents). This comprises 4,334 Council tenants, 1,489 leaseholders, along with 35 housing association tenants whom the Council manages. The data used for this equalities’ impact assessment (EIA) also incorporates a further 5,308 household members.

The proposed changes include:

- **Investing in council housing** - building more desperately needed new council properties and continuing to invest in current housing
- **A clearer deal for residents** - being upfront about what the council does and doesn’t do and what’s expected of residents
- **Supporting those who need it** - targeted services for our more vulnerable council tenants
- **A new ‘core’ housing offer** - ‘A well maintained, affordable and settled home’
- **Reducing paperwork and bureaucracy** - saving money on the council’s operating costs so we can spend more on the things that matter
- **Digital by choice** - an improved 24/7 digital offer for council tenants and leaseholders, but by choice not compulsion.

The Council also puts forward proposals to explore suitable partnership arrangements aimed at collaboratively delivering the suggested changes to its housing service. The Council stipulates the need for any potential partner to meet the following fundamental core principles:

- Understand the Kingston community and have a demonstrable interest in improving outcomes for Kingston.
- Have a demonstrable track record in innovation and delivery in the areas that RBK wants to collaborate on.
- Be a not-for-profit organisation who is entering into a partnership that is characterised by collaboration rather than being primarily commercially and profit driven.

**Is this a new function or a review of an existing function?**

This is a review of the Council’s current approach to providing housing services to residents.

**What are the aims/purpose of the function?**

The Council’s housing service currently:

- Requires more Council homes in order to meet demand
- Runs the Housing Revenue Account (HRA) at a loss
- Carries out 14,000 repairs per year (about 3 per property on average)
- Has a limited digital offer with online services only used by an extremely low number of residents.

Therefore, the proposed changes aim to modernise and improve the standard and management
of council housing in Kingston in order to deliver a sustainable effective service for the Council’s residents. For example, by increasing and improving the digital offer, the Council will enable more quality access to services and support at the times that our residents prefer and choose.

Is the function designed to meet specific needs such as the needs of minority ethnic groups, older people, disabled people etc?

The review of the Council’s approach to delivering its housing services intends to significantly improve the housing offer, and, by doing so, enable all groups to access housing services more easily.

The review will also significantly improve the Council’s ability to identify and monitor the impact of changes to its service in the future as it will improve the data that the Council holds on its residents as part of developing a new digital offer. This, in turn, will also lead to the capability to effectively track ‘customer journeys’ through services provided, mapped against protected characteristics, to define detailed outcomes across equalities’ groups and address any known imbalances in service provision to ensure those with protected characteristics are not disadvantaged in service provision.

Age

Kingston has a relatively young population compared to the rest of England. 32% of the population is aged between 20 and 39, with a particularly high number of 20–24 year old’s, due in part to the large student population attending Kingston University. At least 44.4% of Kingston Council residents are aged 44 or younger, which is larger than the already young Kingston population.

According to the ONS (2015) over 61s make up 17.5% of both the wider Kingston population and Council residents. Older adults have consistently been the lowest users of the internet. However, national trends show that internet use amongst older adults aged 65 to 74 years of age has increased, from 52% in 2011 to 78% in 2017 (ONS, 2017). However, only 41% of over 75 year olds use the internet (ONS, 2017). This is compared with 99% of people aged 16 – 34, 97% of people aged 35 – 54 and 90% of people aged 55 – 64 who have all recently used the internet (ONS, 2017).

The STAR survey 2016, shows that access to the internet amongst both council tenants and leaseholders is fairly high (57% tenants and 78% leaseholders). However, it is important to note that 38% of tenants would prefer email communication from the council; with 69% of the 38% aged 16 – 34 years of age. Nevertheless, there is still a fairly high number (37% out of the 38%) of older tenants aged 50 – 64 who would prefer email communication. This was similar amongst leaseholders as well, with 100% of under 35s making use of the internet compared with 47% of those aged 65+.

By investing in more council housing young people will benefit from more affordable homes as overall affordable supply is increased. Young people are being priced out of living in Kingston, including a swing to ‘generation rent’ in line with countrywide trends. Not only can young people generally not afford to buy a home for themselves, but they now find it increasingly difficult to rent in London, with Kingston being no exception to this. Consistent with rising house prices and low
wages and high employment levels these changes should allow the Council to address the growing demand for housing for all groups of people by building more homes in the borough which are truly affordable.

The proposals to improve the targeted services for the Council's more vulnerable tenants will improve the service offered to older vulnerable tenants. This improved and enhanced service will potential result in an increase in tenancy sustainment as a result of support from the Council.

Disability
In Kingston (Census, 2011) there is a higher proportion of residents who state they have no limitation in day-to-day activities (87.6%), than London (85.8%), and England (82.4%). Kingston has one of the highest life expectancies in England and, as a result, has a much higher than the national average level of dementia patients amongst its 75 and older population. The total number of people with dementia in Kingston in 2014 was estimated at 1,600 and this is expected to increase to 1,800 by 2017. Freeing up resources, by meeting the needs of the vast majority of service users through an attractive digital offer, unburdening the housing service and its customers from unnecessary and unsought physical and telephonic interactions and reducing the levels of paper work and bureaucracy can free up resources to target services towards those service users who need more intensive support and need or would prefer to do business with us face-to-face.

961 (8.6%) of Council residents have stated they have a disability. This is somewhat lower than the Kingston, London and England averages, hinting that Council residents are less limited in day-to-day activities. Investing in more council housing may potentially increase the number of adaptable affordable homes available for disabled residents, both directly and indirectly.

Across the United Kingdom in 2017, of disabled adults aged 16 to 24 years, 97.1% were recent internet users, compared with 99.5% who were not disabled. Of disabled adults aged 75 years and over, 34% were recent internet users, compared with 50% who were not disabled (ONS, 2017).

It is also critical to point out how digital services can best support individuals with disabilities. This includes advances in technology which allow for more effective digital communication. This will be explored further in the sections below.

Similarly to older tenants, disabled tenants will benefit from the proposals to free up officer time by increasing the uptake of the Council’s digital offer and the improved and enhanced service for the Council’s more vulnerable tenants.

Gender
The 2011 Census estimated that there were 78,103 males and 81,957 females living in the borough. The more recent ONS Midyear Estimates for 2015 estimate the male population at 85,458 and 88,067 females. This equates to 49.2% male and 50.8% female respectively. Kingston Council residents are 44.7% male and 54.7% female, which is a slight overrepresentation compared with the wider female population in Kingston.

The 2011 Census showed that Kingston had a total of 3,541 lone parents which ranks it 301 out
of 348 when compared to other local authorities. The 2011 Census showed that out of the 3,541 lone parents in the borough the vast majority (90.6%) are female, with only a small minority (9.6%) being male. It is expected that these figures will be similar amongst Kingston residents, however, this will not be known until the Council improves the data it holds on its residents as part of its new digital offer.

Men are only slightly more likely to have used the internet recently (90% compared with women at 88%) and less likely to have never used the internet (7.8% compared with women at 10.5%) according to the ONS (2017). Both older men and women are less likely to have used the internet. For example, recent internet use by men aged 65 to 74 years was 79% and by men aged 75 years and over was 47%. In comparison, recent internet use by women in these age groups was lower at 76% and 35% respectively.

**Graph 1: Recent internet use in 2011 and 2017 by age group and sex, UK (ONS, 2017)**

Graph 1 above shows that the largest increase in the number of recent internet users was in women aged 75 years and over, which trebled from 0.3 million in 2011 to just over 1 million in 2017.

**Ethnicity**
Between 2001 and 2011, the proportion of Kingston's population that came from Black, Asian and Minority Ethnic (BAME) groups rose from 15.5% to 25.5%. The Greater London Authority (GLA) estimates that in 2014, 28% of Kingston residents were BAME - and forecast this to increase to 32% in 2024, as Kingston becomes more diverse and more like the rest of London in its diversity.
Based on the Kingston residents’ tenant profile data, 28.3% of the residents are white British, 3.2% are white other, 1% are mixed race, 6.6% are Asian, and 3.1% are black, 8.1% described themselves as other and 3.1% refused to answer. However, there are considerable data integrity issues with the ethnicity data set due to 46.6% unknown/blank responses. Therefore, until after the project cleanse and improves the housing data held on residents, we will not be able to assess the potential impact of the changes on specific ethnic groups. Nonetheless, more general observations can still be made. Improving the digital offer and digital take-up can drive transformation culturally as well as driving transformation in the way the social business perceives itself and operates, benefiting all residents.

The Labour Force Survey shows that 88.9% people in the country use the internet. When broken down by ethnicity, only the White cohort fall short of the average at 88.4%, compared to, 91.2% of people identifying as Asian, 94.9% of people identifying as other or mixed and 92.1% of people identifying as Black, Black British or African Caribbean (ONS, 2017 Recent and Lapsed Internet Users and Internet Non-Users, by Ethnic Group then by UK Region and Age group).

29.9% of Kingston Council residents describe their main language as English, 62.1% of residents’ main language is unknown, and 8% of residents with English not as their main language. However, due to the 55.2% unknown/blank responses there are considerable data integrity issues with this data set.

**Religion or Belief**
The Council does not expect any different outcomes for residents within this group at present.

**Sexual Orientation**
There is insufficient data to assess the impact of the changes on residents from this protected characteristic. However, there is no significant reason to believe that it will impact people based on this characteristic.

**Gender Reassignment**
There is insufficient data to assess the impact of the changes on residents from this protected characteristic. However, there is no significant reason to believe that it will impact people based on this characteristic.

**Pregnancy and Maternity**
There is insufficient data to assess the impact of the changes on residents from this protected characteristic. However, there is no significant reason to believe that it will impact people based on this characteristic.

**Marriage and Civil Partnership**
There is insufficient data to assess the impact of the changes on residents from this protected characteristic. However, there is no significant reason to believe that it will impact people based on this characteristic.

**Socio—Economic Considerations**
Socio-economic factors must be taken into account when assessing the potential impact of these changes on the various protected groups. The main area in which socio-economic factors may impact residents is cases where some families may not be able to access housing services digitally, simply from an affordability perspective. Therefore, this indirectly has equalities implications, for example, with residents who are, lone parents or who have a disability and may
therefore be less likely to access and utilise digital services.

What information has been gathered on this function? (Indicate the type of information gathered e.g. statistics, consultation, other monitoring information)? Attach a summary or refer to where the evidence can be found.

The following internal and external evidence and data sets have been used:

- Kingston Council resident profile data
- Census 2011
- ONS, Internet Access – Households and Individuals (2017)
- ONS, Recent and Lapsed Internet Users and Internet Non-Users, by Ethnic Group then by UK Region and Age group (2017)
- ONS, Internet Access – Households and Individuals (2015)
- Lower Layer Super Output Area (LSOA) is a geographical area
- GLA London Borough Data Store
- Equalities and Communities Engagement Team (ECET) ranking indicators

A consultation, engagement and communications process will be undertaken and the information gathered will be taken into account when deciding how best we proceed with the implementation of the project. The consultation process will enable us to capture a variety of views from residents within the identified groups. This will help to make sure that the best possible outcomes are achieved in this process.

Does your analysis of the information show different outcomes for different groups (higher or lower uptake/failure to access/receive a poorer or inferior service)? If yes, indicate which groups and which aspects of the policy or function contribute to inequality?

The review of the Council’s approach to delivering housing services does not indicate any direct negative impact on residents at present. This includes the Council’s proposals to explore potential partnership opportunities. However, in order to effectively assess whether the changes will result in different outcomes for different groups, the Council will assess the impact of any potential partnership opportunities on different groups as the project develops and would expect any potential partner to share the Council’s views on equalities and diversity to ensure consistent service delivery standards across a diverse customer base.

The Council recognises that some residents will require additional support, in order to make use of digital self-service options. We also know that there are some residents who will not be able to use self-service options at all, and will either need someone to perform the transactions on their behalf (such as a family member) or will need to be given assistance from council staff. The Council will look more closely at who these customers are and the ways in which we can best support them in accessing the Council’s digital services.

There are also residents who are not considered as ‘digitally excluded’ but would prefer not to use digital, self-service access methods for council services, and would prefer to speak to a member of staff, either face-to-face or over the ‘phone. The Council wants to encourage and persuade residents to use digital self-service, on the basis that it is easy to use and more accessible.
The digital changes are not expected to disadvantage any residents because the digital offer will be provided in addition to existing traditional non-digital means of communicating with the Council such as face-to-face or telephone interactions. Therefore, the Council will provide a ‘digital by choice’ service as opposed to a digital by default service.

However, this analysis goes on to identify some potential different outcomes for different groups.

**Age**
Reducing the service offer to one which only provides a new ‘core’ offer may result in some older and/or disabled residents finding it difficult to access services which would have otherwise been available to them.

Older adults have consistently been recorded as being the lowest users of the internet, therefore, they are more likely to experience difficulty in accessing a new digital housing offer. Even though access to the internet amongst older people is increasing, there is still a considerable gap in access, therefore, this assessment sets out the mitigating actions the Council will take below.

However, as identified by the STAR survey 2016, some older tenants and leaseholders would prefer to be communicated with digitally, be it either via email or the website.

Exploiting the savings possible through a successful digital choice offer may enable the service to be a more pro-active provider of new-build homes and grow the social business through expanding provision and providing more skills’ opportunities for local people, for example through apprenticeships for younger people being tied to the procurement of construction contracts.

**Disability**
As acknowledged earlier, significantly more disabled residents are likely to have recently used the internet than not. It is the Council’s understanding that some disabled residents may find it difficult to access and utilise the Council’s housing services digitally. Residents with a learning disability or a communication disability (visual or hearing impairment) will find it harder to use self-service options.

Additionally, access to the internet amongst younger disabled people is lower than their non-disabled peers and therefore shows that they may need additional support to access the service. More significantly, older disabled residents will require more support and attention than their non-disabled peers, as there is a more noteworthy disparity between disabled adults aged 75 and over accessing the internet compared to non-disabled adults.

This document sets out the mitigating actions that will be taken to minimise the potential adverse effects of the changes on people who fall within this protected characteristic.

**Gender**
Less women may access housing services digitally as a result of lower internet usage rates. This is compounded by the fact that women make up a larger percentage of residents than men.

This document sets out the mitigating actions that will be taken to minimise the potential adverse effects of the changes on women.
**Ethnicity**
According to the ONS 2017 statistics, people who considered themselves as White are least likely to access the internet and will require additional support in order to enable access. Whereas, residents from the BAME community are more likely to utilise housing services digitally as they are more likely to use the internet. It is recognised that some people use face-to-face services as a result of having English as a second language. Therefore, even though these groups may be using the internet, they may still be inhibited by language barriers. However, it should be noted that in many cases, even if English is not the first language, people may still be relatively fluent in English as a second language. Furthermore, the web has a built-in function that enables the easy translation of English into a number of languages.

This document sets out the mitigating actions that will be taken to minimise the potential adverse effects of the changes on people who fall within this protected characteristic.

**Religion or Belief, Sexual Orientation, Gender Reassignment, Marriage and Civil Partnership and Pregnancy and Maternity**
The Council does not expect any different outcome for residents within this group at present.

Are these differences justified (e.g. are there legislative or other constraints)? If they are, explain in what way.

The Council is required to ensure that it makes best use of its resources and, with this in mind, it must therefore ensure that it utilises all potential methods including technology which add value and reduce costs. The review of the Council’s approach to delivering housing services will improve the way services are delivered and increase value for money by giving residents the option to access housing services digitally, as opposed to the generally resource-intensive non-digital avenues available today. However, it is important to note that the new service offer will be digital by choice and not ‘digital by default’.

What action needs to be taken as a result of this Equality Impact Assessment to address any detrimental impacts or meet previously unidentified need? Include here any reasonable adjustments for access by disabled people. Include dates by which action will be taken. Attach an action plan if necessary.

The Council anticipates that the overall impact of the changes should be positive with limited adverse impact on residents who fall within any of the protected characteristics. However, as identified earlier, there are some areas where due care needs to be taken in order to manage and mitigate the identified potentially adverse impacts the changes may have on specific groups. The Council has set out the actions it will undertake below.

**Age**
The Council will consider the following actions in order to mitigate and manage any potentially adverse impact on older residents. One of the key proposals put forward as part of this project is to build on the service already provided and expand the offer in order to have the maximum impact. This will go some way in helping to mitigate some of the potential negative impacts on both older tenants and tenants with disabilities.

Therefore, as part of the project, the Council will consider additional ways in which older people
can be supported to access council services via digital channels. Given that older people already tend to be comfortable using the phone, we will also look at how phone self-service can be offered for the list of services that we wish to make ‘self-service’.

**Disability**

Disabled residents may face particular challenges to successfully accessing the digital services. The Council will consider offering a variety of features, such as 'browse aloud' for those with visual impairments and dyslexia, in addition to the measures identified above which will support older disabled residents.

**Gender**

The Council will consider how best to mitigate against the potential adverse impacts on women. This will again be considered as part of the wider digital project. It will consider ways in which it can target female residents and increase or enable access.

**Ethnicity**

The Council will explore the potential for building in language translation functionality, such as Google Translate software, in order to support web self-service channels.

**Socio-Economic Considerations**

As identified above, socio-economic factors may result in certain groups finding it more difficult to access housing services digitally. In order to address this potential negative impact, the Council will continue to provide non-digital avenues of communication, such as by telephone or face-to-face. Additionally, residents will be able to come into the office or local Council services such as libraries and access the internet to utilise the digital services the Council intends to provide.

**When will you evaluate the impact of action taken? Give review dates.**

The consultation and the data improvement project will inform this EIA and therefore will be finalised after taking into account the outcomes of the consultation. The impact of the changes will be regularly monitored and reviewed from 6 months following the implementation of the new service.

Assessment completed by:

**NAME:** Sharmake Abyan  
**SERVICE:** Housing  
**DATE:** 20 October 2017

Please send your completed assessment to your service head. A copy should then be sent to the Equality Adviser.