

Equalities Impact Research: Final report

Ash Patel
Hazel Klenk
Shomsia Ali
Gill Leng
Lovedeep Vaid

Learning and Work Institute

Patron: HRH The Princess Royal | Chief Executive: Stephen Evans
A company limited by guarantee, registered in England and Wales
Registration No. 2603322 Registered Charity No. 1002775
Registered office: 21 De Montfort Street, Leicester, LE1 7GE



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1. Introduction

London Councils is committed to fighting for more resources for London and getting the best possible deal for London's 33 councils. It lobbies for local governance for London boroughs, promoting their leadership of local communities and services and arguing for the tools necessary for them to do that job. London Councils also act as a catalyst for effective sharing of practice, knowledge, information and services between boroughs.

The Learning and Work Institute (L&W), was commissioned by London Councils to review the local equalities implications of social policy reforms or emerging socio-economic phenomena and how these affected London's population. The review looked across the broad housing, employment and skills, and social security policy areas to identify key groups more acutely affected by government led reforms or social issues. Where possible, the review assesses the intersectionality in both the feminist tradition (considering the overlap of dimensions of oppression), (Crenshaw 1989) as well as the intersectionality of social policy issues.

This report assesses and presents fresh evidence on the local impacts of reform on households, individuals, communities and services across London, and how those affected are responding to reforms. It draws on an extensive review of published evidence, as well as primary research with stakeholders, frontline service providers, and (importantly) Londoners affected by these issues.

The last decade has seen a ground swell of policy reform. Indeed, since 2010, the Coalition and Conservative Governments have embarked on a far-reaching programme of changes to the United Kingdom's housing, employment and skills and welfare system. These represent the most fundamental changes to the system in a generation, intended both to improve and reduce dependency on social security and to contribute to the Government's deficit reduction strategy.

This project is intended to provide a foundation for prioritising areas of government policy which have equalities and diversity implications and which could be influenced by local government and their partners.

Specifically, the research would provide:

1. A 'rapid review' of evidence to provide a broad context to equalities issues related to housing, employment and skills, taking a cross-cutting approach to these policy areas and considering their cumulative impact on the equality of Londoners.
2. A prioritisation of key policy areas for more detailed investigation through a 'deep dive' into the evidence base, primary research, and consultation.

3. An assessment of equalities implications for Londoners and recommendations as to how London Councils can work with partners at a local, regional and national level to effect positive change for Londoners.

Methodology

The research was delivered over three phases. The first phase provided an initial scoping stage and trawl through existing evidence. It specifically involved:

- i. Conducting scoping interviews with key stakeholders and housing, employment and skills and welfare policy leads. In total five scoping interviews were conducted; these were conducted using a topic guide which provided a loose structure to frame the discussion. They were supplemented with discussions and meetings with key stakeholders, including the London Equalities Network.
- ii. Conducting, in parallel, an extensive review of published evidence – comprising a review of around 120 published sources from academics, independent researchers, local government and other public bodies. Publications that were directly relevant to this phase of the research were comprehensively reviewed with key details added to an evidence matrix. Around 70 publications were fully reviewed as part of this stage. For a full list of papers reviewed for this research see Bibliography and selected papers (below).
- iii. Both a summary of the evidence reviewed and a paper proposing areas that could be explored further in the second phase of the research were presented to London Councils. The paper recommended six issues that warranted more detailed investigation based on the research conducted at this stage. From these, London Councils and L&W agreed to progress three in the second phase of the research. Through this process, the following areas were explored in greater depth:
 1. Right to Rent related discrimination.
 2. In-work poverty.
 3. The six-week wait for initial Universal Credit (UC) payments.

The second phase of the research, explored the three ‘focus’ areas in more detail, going further in the existing research and through primary research. The options paper, describing the areas of focus and rationale for their selection can be found in Annex A. This phase of the research included:

- An online call for evidence for the key areas identified in phase one. The call was disseminated through L&W’s partners networks and Equalities toolkit website¹ as well as through the London Voluntary Service Council network. Unfortunately, the response to the open call was very low.
- Both topic and population-based focus groups were conducted. In total three

¹ Learning and Work Institute, accessed 29 January 2018, <https://www.equalitiestoolkit.com/>

focus groups were carried out. Two population based focus groups were carried out – one focused on in-work poverty with residents in Beckenham and the other on UC payments with residents from Southwark. A topic based focus group was also held with frontline service representatives in Southwark.

- Policy solutions workshops focusing on in-work poverty and the delay in UC payments were held and involved key London-based stakeholders and representatives. These workshops were held towards the end of the project and drew on learning from all previous research elements with activities designed to develop practicable local solutions to mitigate some of the impacts.
- It was intended that focus groups with landlords and a solutions workshop around Right to Rent based discrimination would also be helpful. However, due to low levels of interest, these focus groups did not take place (further discussion about this can be found below, in the 'Right to Rent' section).

The third and final phase of the research involved synthesising findings across both strands.

Report Structure

Given the nature of this project, this report is structured around three discrete chapters, which each focus on the 'phase 2' areas of focus. The chapters each follow a similar format, with a presentation of the broad policy context, followed by a review of literature and evidence focusing on the specific topic and presentation of findings. Chapters 2 (in-work poverty) and 3 (UC processing) go on to present policy solutions identified and agreed through stakeholder workshops.

The final chapter draws together findings and implications indicating where they potentially dovetail. It also provides a summary on the intersectionality of disadvantage in this regard.

The evidence matrix and phase 2 option paper are presented in Annexes A and B, respectively.

2. Employment, skills and apprenticeships

This chapter focuses on employment skills and apprenticeships; it provides an overview of the literature reviewed during phase 1 of this research and then goes on to provide a more detailed exploration of Londoners' experience of in-work poverty and low paid employment. The recovery from the economic downturn has in part been led by a strong employment rate. However, at the same time a prolonged period of wage stagnation, restructuring of the labour market with a growth in flexible, insecure work, and high cost of living have squeezed household budgets.

Broader employment, skills and apprenticeships context

England has one of the most centralised employment and skills systems in the developed world – with central government and its agencies directly responsible for employment and skills policy, design, funding and oversight. Local areas have little ability to influence priorities, funding and delivery, with services having different objectives, accountabilities and ways of working; and often operating to different boundaries and timescales, causing fragmentation in the system.

While successive national Governments have sought to reform both the employment and skills systems over the last two decades they have continued to face significant strains in addressing economic and social challenges, and have failed to make a decisive impact on improving outcomes for people or places. Consequently, it is estimated that nine million people lack literacy and numeracy skills, 5.5 million people want jobs or more hours, and one in 10 of those in work will be in insecure employment. On current trends, by 2024 there will be more than four million too few high skilled people to meet demand for high skilled jobs; and more than six million too many low skilled.

The Government's Industrial Strategy (HM Government 2017), Green Paper on work, health and disability (Department for Work and Pensions & Department of Health 2016) and Post-16 Skills Plan (Department for Business, Innovation & Skills & Department for Education 2016), as well as the Mayor of London's draft skills and adult education strategy (Mayor of London 2017), set out a range of new economic and social challenges which the systems need to urgently address. On employment, this includes a need to improve outcomes for those furthest from work, reduce long term and youth unemployment, tackle the gap in employment outcomes for disabled people, and to address significant differences in opportunity between areas.

On skills, challenges include:

- large numbers of adults with poor basic skills and capabilities.
- Shortages of higher-skilled technical and vocational workers.
- Geographical differences contributing to lower growth.
- Poor productivity and low pay in many areas.
- The potential impact of changes to migration policy as a result of the process

of the UK's withdrawal from the EU on both the supply of workers and demand for skills.

- The extent to which automation and technology will change the world of work and the jobs that we do.

Meeting these challenges will require the employment and skills systems to be well co-ordinated, high performing, responsive to the needs of employers and local areas; and focused on growth and productivity with an ability to anticipate and respond to change quickly.

With regards to employment, England has recovered strongly from the global downturn, with the employment rate now higher and unemployment lower than before the recession began. However, beneath this headline success story there are significant challenges. First, comparing top line national statistics on unemployment and claimant count suggests a large proportion of the unemployed do not claim unemployment benefits.² Secondly, certain groups face significant penalties in the jobs market. Figure 1 below sets out the 'gap' between the national employment rate and the employment rates of key groups.

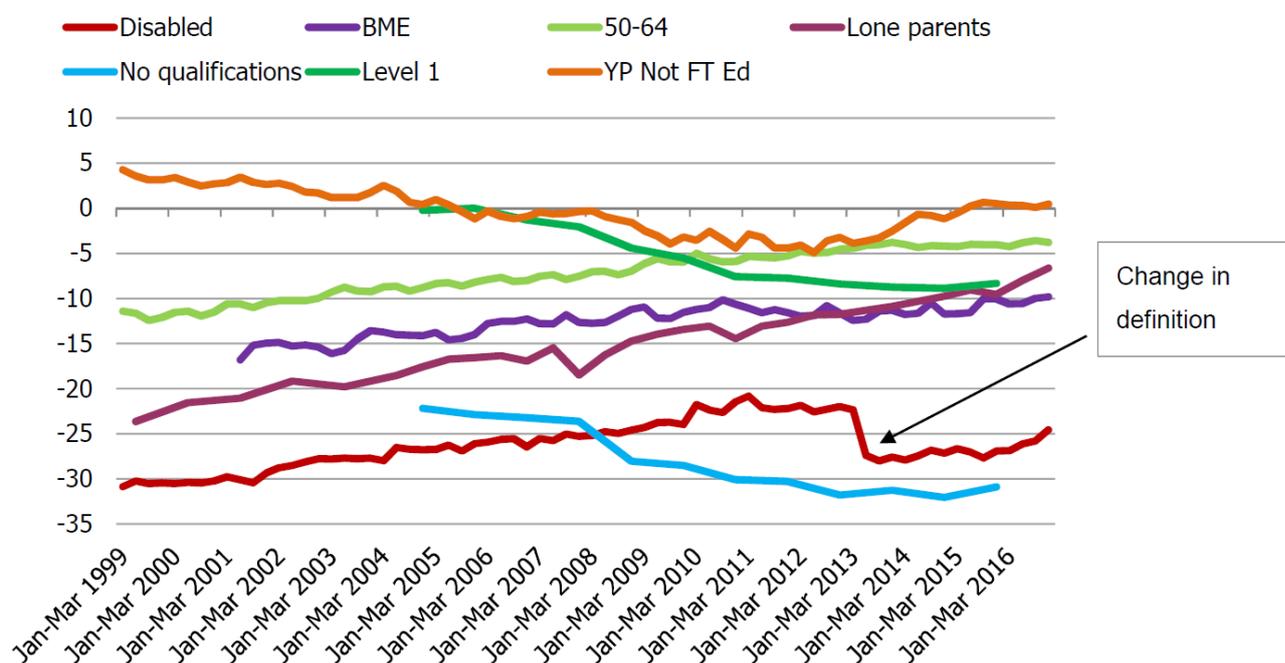
While gaps have narrowed slowly for some groups, for others they remain stubbornly wide – most notably for disabled people, ethnic minorities and the lowest qualified.

Third, while employment overall has recovered we have seen an acceleration in the growth of low pay and insecure employment. Recent analysis has shown that the incidence of insecure employment has risen by 25 per cent since 2011, and that one in 10 workers are now in insecure work (Bivand & Melville 2017) Research by the Resolution Foundation has found that around one in five workers are low paid (D'Arcy 2017).

These trends in employment, combined with rising costs of living and cuts in financial support for low income working households, has also manifested itself in significant growth in working poverty – with now more than half of all non-pensioners that are poor living in working households, for the first time since comparable records began.

² Unemployment rate is calculated from Labour Force Survey, available at: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/uklabourmarket/january2018>; Claimant count calculated from Claimant Count and Vacancies time series dataset available at: <https://www.ons.gov.uk/employmentandlabourmarket/peoplenotinwork/unemployment/datasets/claimantcountandvacanciesdataset>; both from Office for National Statistics.

Figure 1: Employment rate 'gaps' for disadvantaged groups (2016)



Source: Annual Population Survey and L&W analysis (Local Government Association and Learning and Work Institute 2017).

With regards to workforce and adult skills, significant challenges remain at all levels. On basic skills, nine million people lack basic skills like literacy or numeracy while 13.5 million people lack basic digital skills. This lack of skills locks people out of the chance to work and to build a career, with those qualified below Level 2 (equivalent to five good GCSEs or equivalent) nearly three times more likely to be out of work than those qualified at Level 4 or above (degree level).

On intermediate skills, and specifically apprenticeships, there are significant inequalities in access with young people who are eligible for free school meals half as likely as those not receiving free meals to start a Level 3 apprenticeship in some parts of the country (Social Mobility Commission 2016); Black and Minority Ethnic (BAME) applicants are half as likely to be successful in applications as their white peers; and women over-represented in low-paying sectors and underrepresented in Science, Technology, English and Maths (STEM) (Aldridge 2017).

With specific relevance to London, our own research has also shown that when compared to people from BAME communities, white apprenticeship applicants were twice as likely to succeed in their application as BAME applicants.³ Sector and geography play an important role with BAME applicants being more likely to apply to sectors with high competition, and to live in areas (such as London) with relatively low apprenticeship vacancies.

³ Research conducted for Department for Education and is currently unpublished.

Evidence on in-work poverty

Recent analysis suggests that over 2 million people or 27% of Londoners are experiencing living in poverty after taking housing costs into account. Significantly, the majority of them (58%) live in a working family (Tinson et al. 2017) which means more people in work are experiencing poverty than those who are out of work, reflecting a nationwide trend that has been gaining strength since 2011/12 (McBride et al. 2017).

There are several factors identified in the literature which appear to be driving the risk of in-work poverty. Analysis shows that despite increasing opportunities for in-

“You’re damned if you do and damned if you don’t. As a parent in London because of the cost of living, if you want to live life rather than just survive life, I think you’ve got to at least be earning £30,000, just to be... able to do the things you should at least expect to be able to do in work; pay your bills, get your shopping... get yourself through a month, and be able to put enough aside for a rainy day.” **Deborah, Apprentice**

work progression being a key objective of welfare reform, these policies (namely reduction in Local Housing Allowance, the benefit cap, and the bedroom tax (Tinson et al. 2017)) are exacerbating the issue of in-work poverty (Policy in Practice 2017b). Further, traditional social and economic policy levers that suppressed rising poverty previously, such as rising employment, state support for low-income families no longer

appear to apply (Joseph Rowntree Foundation 2017).

Understanding poverty in London

Poverty can be defined in a number of ways. Table 1 shows weekly household income thresholds determining whether a household falls into poverty. These rates vary by household type and marker for poverty used. The conventional indicator of poverty is the UK Poverty line; a relative measure demarking the point at which incomes fall below 60 per cent of the median household income for the UK. Alternative measures include looking at Minimum Income Standards (MIS) or the number of people earning below the national living wage (not contained within the table). The table also provides the income threshold for *destitution* which is the point at which income is so low, households cannot afford basic food, shelter, heat or other essential items.

Table 1: Poverty level thresholds (weekly income)

	Before housing costs (BHC)			After housing costs (AHC)			Destitution
	UK poverty line	MIS Inner London	MIS Outer London	UK poverty line	MIS Inner London	MIS Outer London	UK
Single, working-age	£193	£432	£384	£144	£203	£216	£70
Couple, working-age	£288	£652	£593	£248	£351	£379	£100
Single, pensioner	£193	£318	£297	£144	£196	£175	
Couple, pensioner	£288	£437	£391	£248	£299	£253	
Lone parent, one child (aged one)	£251	£400	£411	£193	£263	£274	£90
Couple with two children (aged three and seven)	£403	£607	£627	£347	£456	£476	£140

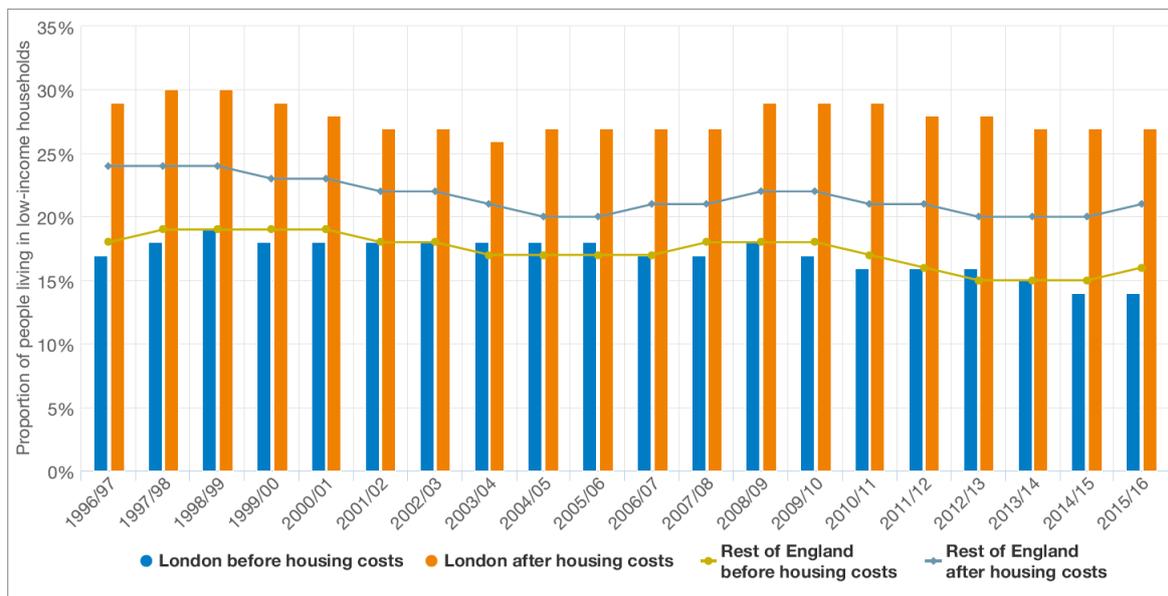
Source: Minimum Income Standard for London, (Padley and Hirsch 2017)

Selecting the correct measure of poverty is effectively a subjective process. While the poverty line remains the most prevalent measure, there is a growing call for it to reflect the point at which a person’s or household’s resources are “well below their minimum needs, including the need to take part in society” (Joseph Rowntree Foundation 2017: 7). Using the MIS as the threshold below which households become vulnerable to poverty would raise the proportionate income threshold from 60 per cent, to 74 per cent for single working age households, 76 per cent for couple with 2 children and 83 per cent for lone parents with 1 child (Padley & Hirsch 2017). As a consequence, using the MIS approach will expose a greater share of households and individuals to poverty.

With regards to the current levels of low income households, figure 2 shows that while poverty appeared to be falling within London from 17 per cent in 2006/07 to 13 per cent in 2015/16 before housing costs are accounted for, there has been no change in the rate over the same period once housing costs are introduced – estimated at 27 per cent of the London population over the period. This is equivalent to around 2.3 million people living in the capital. When compared to the rest of England, the implications of housing costs on Londoners becomes clear. While

trends in low income housing within and outside of London broadly track each other when housing costs are not accounted for, their introduction raises the proportion of low income households in London noticeably higher than the rest of the England (respectively 27 per cent compared to 21 per cent).

Figure 2: Poverty over time

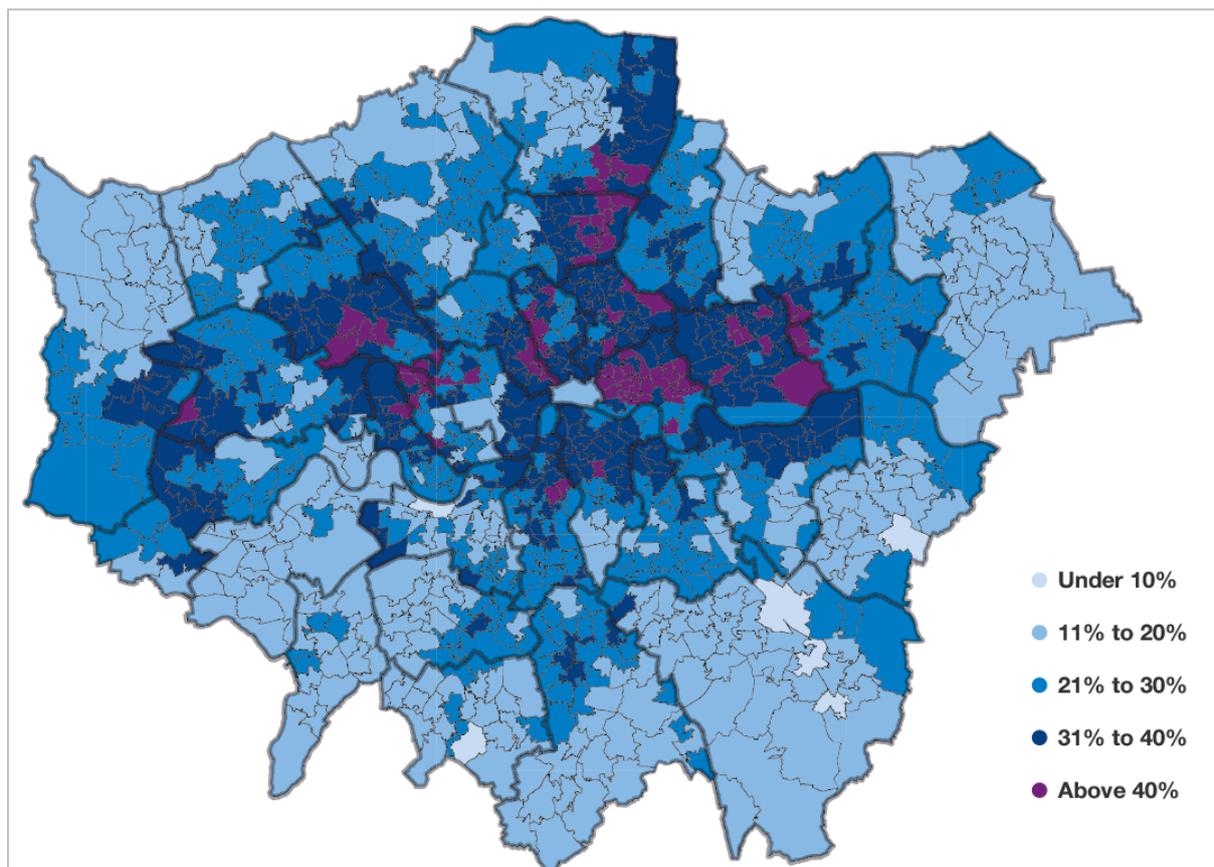


Source: London Poverty Profile, using DWP Households Below Average Income data

If measuring poverty relative to MIS, recent analysis has shown that 39 per cent of all individuals in London were below MIS, significantly higher than the 30% of individuals below MIS in the UK as a whole. Between 2010/11 and 2015/16 the proportion of individuals with incomes below 75 per cent of MIS (the point at which individuals face a greatly increased risk of material deprivation or financial hardship (Hirsch et al 2016)) fell slightly from 27 per cent to 26 per cent. Put another way, more than a quarter of Londoners currently have incomes which mean they are unable to afford some things that most people deem essential.

Further, as well as observable differences between London and other parts of the UK, variation at sub regional levels exist. Indeed, poverty operates at a very local level. Figure 3 show the distribution of low income households across London. The proportion of people in poverty in London is generally highest in Inner East London, as well as parts of Outer North London, tracing the outline of the Lee Valley.

Figure 3: Poverty rate across London

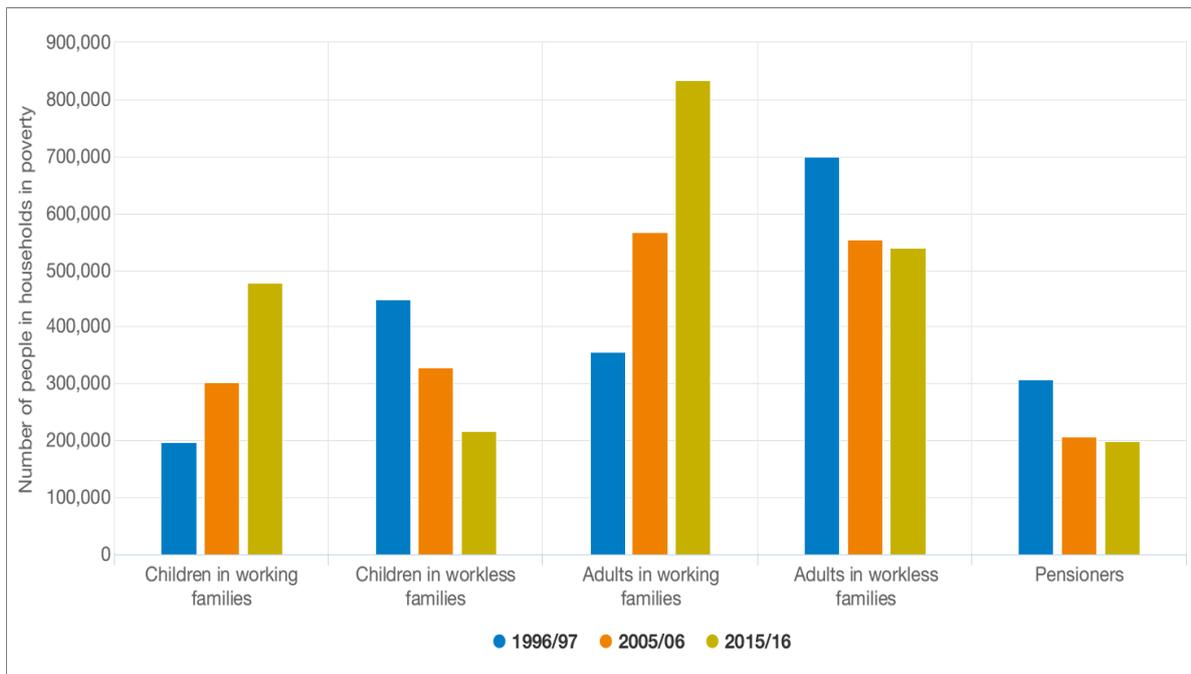


Source: London Poverty Profile, based on small area model-based households in poverty estimates for England and Wales, ONS. The data is for 2013.

Poverty and working households

Irrespective of the headline rate of low income household, significant changes have occurred *within* this group. Specifically, while the number of Londoners (both children and adults) living in workless households in poverty has fallen over the last two decades, the number of people in working families in poverty has risen dramatically. Compared with a decade earlier, there are 270,000 more adults in working families in poverty, and 180,000 more children in working families in poverty.

Figure 4: Work and poverty

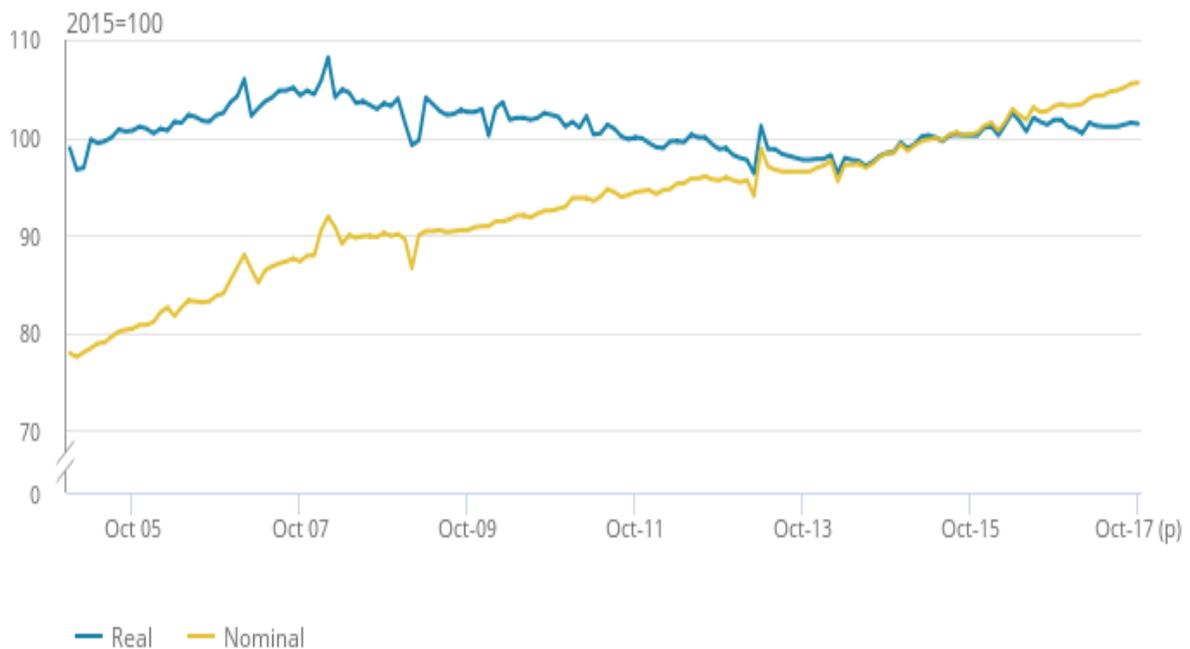


Source: London Poverty Profile. Households Below Average Income dataset, Department for Work and Pensions. The data uses three year averages to the year shown.

However, this does not necessarily mean that ‘work does not pay’; when looked at probabilistically, those in working families are less likely to be in poverty: 18 per cent of adults and 30 per cent of children in working families are in poverty, compared with 55 per cent of adults and 70 per cent of children in workless families (Tinson et al. 2017).

It does, however, expose the proportion of jobs that are low paid. The recently published Taylor review, shows that more than a quarter of jobs earn less than 75 per cent of the median hourly wage (Taylor et al. 2017). Furthermore, as can be seen by figure 3, while wages have nominally increased over the last decade, they have remained flat in real terms – when measured against their peak, real term earnings are 3.4 per cent lower.

Figure 5: Average weekly earnings (total pay; Great Britain): Real and nominal, whole economy, seasonally adjusted



Source: Office for National Statistics, Monthly Wages and Salaries Survey

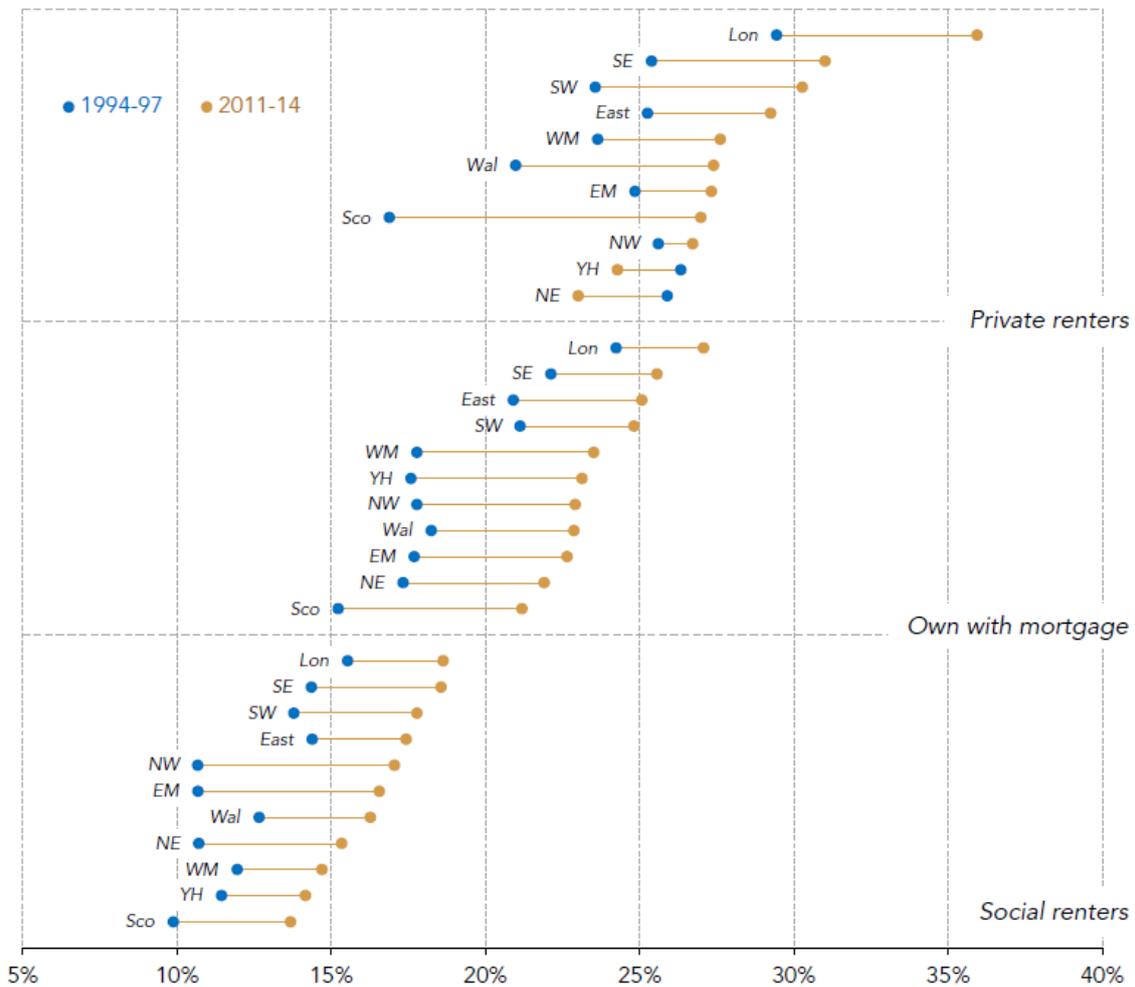
This trend is not distributed equally across the UK population, with younger people (aged under 39) earning 10 per cent below their peak, and (crucially) Londoners earning 11 per cent lower than peak earnings (Resolution Foundation 2017). Men were also identified as experiencing larger squeezes on their income compared to women, though this needs to be contextualised as women had disproportionately benefitted from the National Living Wage during the period, explaining their relatively strong performance (Resolution Foundation 2017).

“Each day is a challenge... you have to take one day at a time.”
Aniya, employed (maternity leave)

At the same time Londoners have seen notable rises in housing costs, particularly within the private rented sector (see figure 4), and more recent years have seen a return of inflation⁴ squeezing household incomes further. Combined, this is likely to entrench the experience of in-work poverty for the next few years.

⁴ <https://www.ons.gov.uk/economy/inflationandpriceindices/timeseries/l55o/mm23>

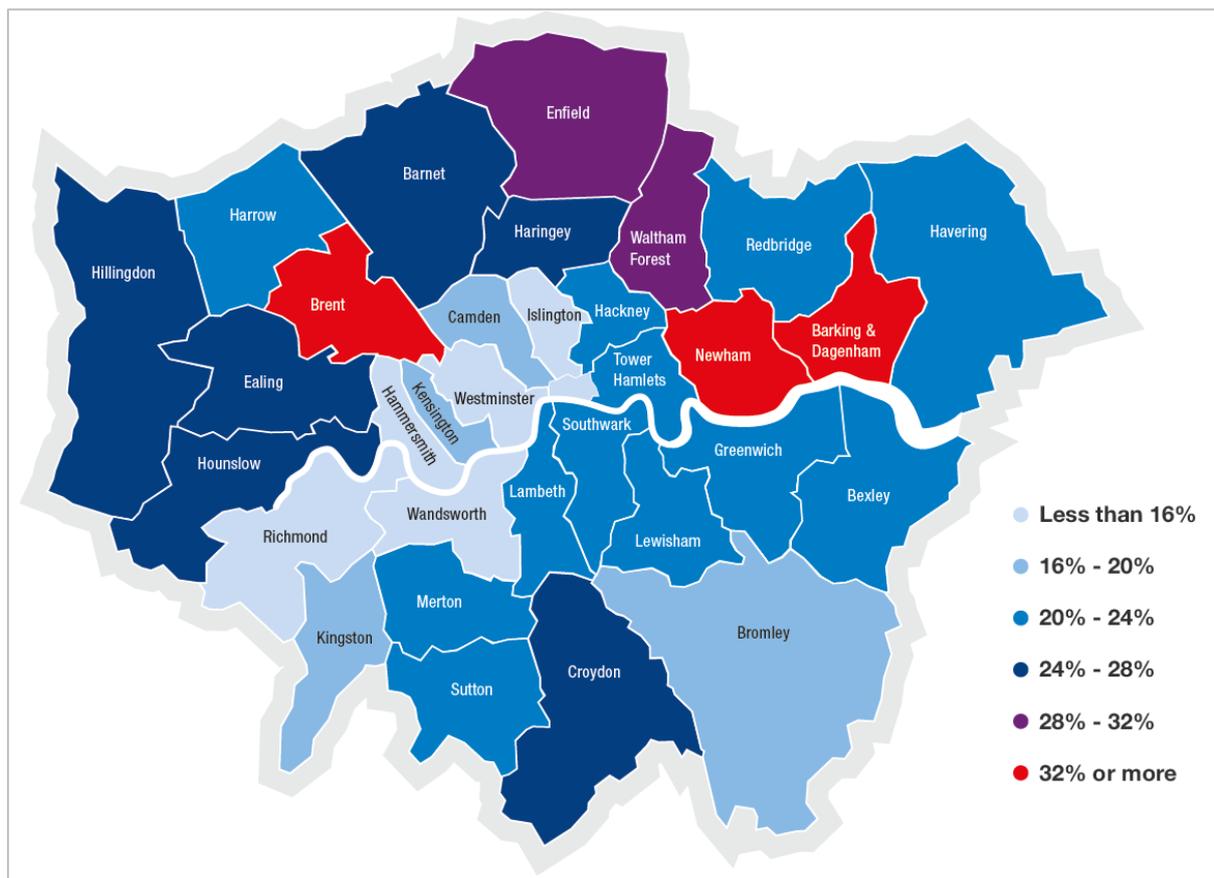
Figure 6: Housing cost to net household income ratio (three year averages)



Source: DWP, Family Resources Survey and Resolution Foundation 'nowcasting' (Clarke et al. 2016).

Additionally, the distribution of low paid jobs by households is not evenly distributed across London. The overall proportion of jobs held by people living in London in 2015–16 that were low paid was 22 per cent; 20 per cent in Inner London and 23 per cent in Outer London. Newham, Brent and Dagenham had the highest proportion of residents who were low paid, accounting for around a third of all residents. In contrast, Richmond had the lowest proportion of low-paid residents at 12 per cent.

Figure 7: Low pay by residence



Source: London Poverty Profile. Annual Survey of Hours and Earnings, ONS. The data is an average for 2015 and 2016.

Poverty and insecure work

In parallel with the increase of in-work poverty, there has also been an increase in insecure work. The number of insecure workers has risen from 2.4 million in 2011 to 3.1 million in 2016, equivalent to one in ten of everyone employed.⁵

As well as adding to the instability of employment, several recent studies have shown that those working in

insecure jobs are also likely to experience a ‘precarious pay penalty’ (Resolution Foundation 2016). For example, analysis by the Resolution Foundation found a 7 per

“Zero hours contracts. They don’t work. They mess your benefits right up – if you’ve got work one and not the next, they’ll have it back.” **Ffion, unemployed**

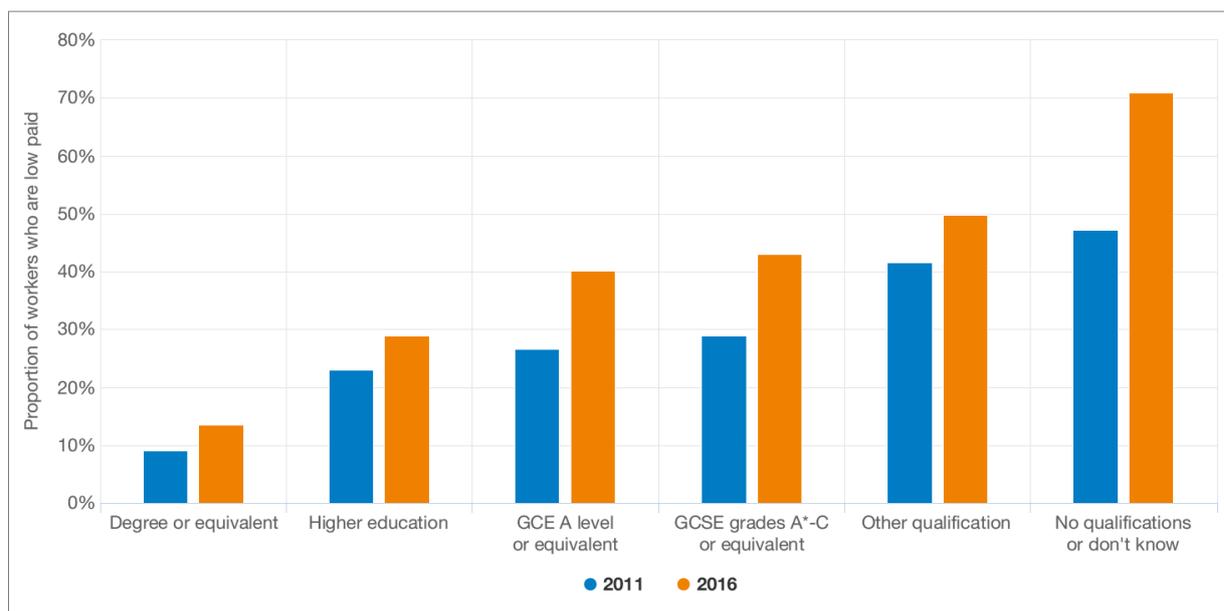
⁵ Insecure work is defined here to include all forms of non-permanent employment with the exception of fixed-term contracts, people on zero-hour contracts including where these are permanent contracts, and self-employed people in occupations where there is a high risk of being low-paid. Estimates for non-permanent employment and zero hour contracts are sourced from 2016 Q2 ONS data; self-employed and at risk of low pay are based on estimates provided by Broughton N, Richards B (2016).

cent reduction in pay (equivalent to 93p an hour) directly associated with zero hours contract work; they estimate for a typical zero-hour contract worker, working 21 hours a week, this amounts to £1,000 a year. However, their analysis found the pay penalty becomes is greater still in lower-paying roles, with the lowest 20 per cent of earners experiencing a zero hours contract pay penalty of at least 10 per cent. Other forms of non-traditional employment also carry a pay penalty when workers doing such work are compared to others with similar characteristics doing similar jobs, including temporary work (6 per cent) and permanent agency work (2 per cent) (Trade Union Congress 2016; Bivand & Mellville 2017).

Characteristics of those likely to experience in-work poverty

Unsurprisingly, the experience of in-work poverty was not evenly distributed across the population of London. Many Londoners are caught in a low-paid, low skills trap; they may have worked for their current employer for a long time and therefore may not have up-to-date CVs or job application skills, they may also have limited digital skills and outdated/less relevant training and qualifications, or they may lack the necessary basic literacy and numeracy skills to progress in work.

Figure 8: Low pay by qualification (London only)



Source: London Poverty Profile. Labour Force Survey, ONS. The data is a four-quarter average of each year shown.

Education: There was a strong correlation between the highest qualification held and their vulnerability to low paid work, though across all groups there were marked increases in being in low paid work across all groups (see figure 6).

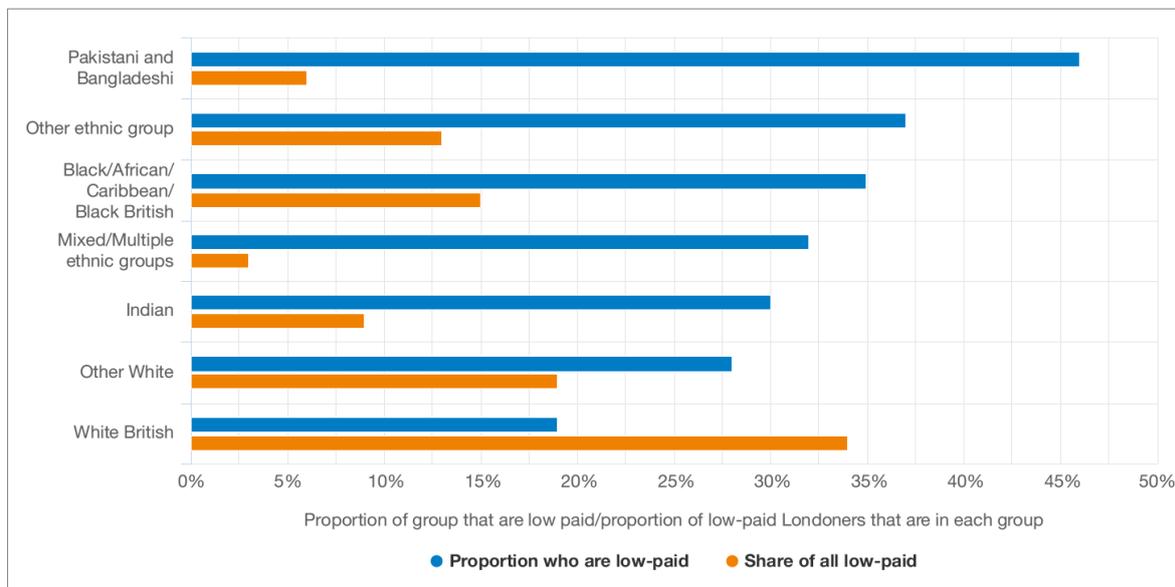
Ethnicity: With regards to ethnicity, BAME workers are over a third more likely than white workers to be in temporary or zero-hours work with 1 in 13 BAME employees is in an insecure job, compared to 1 in 20 white employees. Black workers in particular face insecurity at work, and are more than twice as likely as white workers

to be in temporary and zero-hours work (Trade Union Congress 2016; Bivand & Melville 2017).

When looking more generally at low paid employment, 46 per cent of Bangladeshi and Pakistani employees were likely to be in such work, which is more than double the rate for White British employees at 19 per cent. However, as a share of all low paid employees, Bangladeshi and Pakistani employees only accounted for 6 per cent, largely reflecting the size of this community in London.

The research which intersects ethnicity with age and with gender considers the barriers these groups face entering the labour market rather than progressing within it. For example, an evaluation of the Moving on Up initiative highlights the fact that young black men, who comprise a significant proportion of London’s population, continue to experience lower employment rates than their white British counterparts (Social Innovation Partnership 2017).

Figure 9: Low pay and black and minority ethnic groups



Source: London Poverty Profile. Labour Force Survey, ONS. The data is an average of three October to December quarters from 2014 to 2016.

Immigrant communities: Given the relatively high number of immigrant communities in London, it is likely that literacy and language skills are key barriers for in-work progression and therefore those with these needs may be more likely to experience in-work poverty. An in-work progression pilot in Hounslow and Harrow found that ESOL courses were taken up by the largest number of clients overall reflecting the large migrant population in the two boroughs; which echoes wider evidence from ESOL providers across London that demand outstrips supply (Colechin et al. 2017). Additionally, evidence shows that low-paid workers have been most adversely impacted by the changes to the funding of ESOL provision as they are no longer eligible for subsidised provision but are often unable to cover course fees due to earning a low income. This draws a connection between low-paid

workers having less access to training provision or educational opportunities, which has implications for reasons behind why those with ESOL needs are staying in low paid, low skilled jobs (NIACE 2012).

Women: Gender also appears to be an important factor when considering insecure and low paid work. Research by the TUC has shown that while the same number of men and women (1.6m) are in insecure jobs, employed women are proportionately more likely to be in insecure work, with almost 11 per cent of women in insecure employment compared to just over 9 per cent of men. Importantly, the TUC assesses that most of the increase in insecure work since 2011 has come from

"I haven't got a property, I've got nothing to show for all my years' of working. Don't get me wrong, thanks to my family, my partner's family, my kids don't want for too much. But, I still shop and buy extra toiletries, I'll double up on them in case – you can always beg food, you can't beg something to wash with... it's about dignity." Deborah, Apprentice

women, accounting for 58 per cent of the increase in insecure jobs (Trade Union Congress 2016). This finding is compounded when intersected with age; as workers age the gender pay gap increases and more women occupy low paid positions (Clarke et al. 2017).

Research also shows that women from ethnic minority

groups, in particular Bangladeshi, Pakistani and Arab women face disadvantage in the labour market compared to men and women of other ethnicities (Catney & Sabater 2015).

Mothers and lone parents: More generally, a number of factors make it harder for mothers to work or act as barriers to in-work progression or higher earnings; these include the high cost and relative inflexibility of childcare in London, poorly paid part-time work, male spouses working long hours (Bell 2013). Lone parents are 18 per cent short of the cost needed to raise a child, when working full time on the 'national living wage', and 14 per cent short when working full time for the median wage. This compares to 13 per cent for couple households where both are working at the national living wage (Hirsh 2017). Considering that lone mothers account for 92 per cent of lone parents, the experience of the poverty experienced by working lone parent families is a deeply gendered issue (Hall et al. 2017). Research recommends allowing second earners to keep more income before withdrawing means-tested benefits; expanding publicly funded affordable childcare; and more generous family leave, including longer paternity leave (Lawton & Thompson 2013).

Disabled people: Disabled employees are significantly more likely to be in low paid jobs, when compared to non-disabled people; respectively 37% of disabled employees and 27% of non-disabled employees were in such work.⁶ This

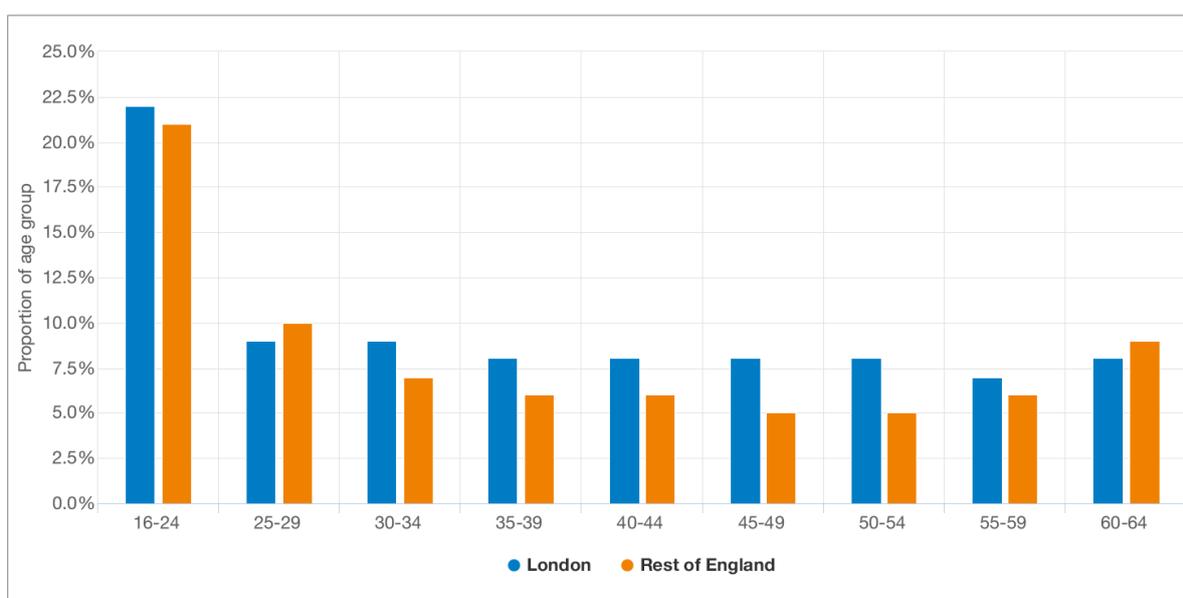
⁶ Labour Force Survey, ONS. The data is an eight-quarter average for 2015 and 2016.

disadvantage in the labour market persisted even after disaggregating those with and without 'A' level equivalent qualifications.⁷

Despite the clear disadvantage faced by disabled people within the labour market, and their overrepresentation within low paid employment, it has been suggested that people with disability need to earn at least £10.63 per hour to meet their minimum income standards (Stewart & Bivand 2016).

Young people: Local Authorities (LAs) have been subject to substantial cuts and their direct control of young people's services (Careers Information Advice and Guidance) has become extremely limited (Melville et al. 2015). For many young people early in their careers, entry into low paid, low quality work is the only option available exposing them to much greater risk of being in insecure employment. Figure 8 shows that London employees aged 16 to 24 are much more likely to be in insecure employment at 22 per cent compared to other age groups, though broadly similar to the rest of England.

Figure 10: Insecure employment by age



Source: London Poverty Profile. Labour Force Survey, ONS. The data is an average of three October to December quarters from 2014 to 2016.

Recommendations to mitigate in-work poverty

The focus of the majority of existing interventions (until very recently) has been to support vulnerable groups into employment rather than support those who are already in work. This has meant, nationally and in London, a clear support gap for low-income working individuals (Colechin et al. 2017). By extension, much of the

⁷ While 25 percent of disabled people with 'A' levels were likely to be in low paid work, only 20 percent of non-disabled people were; this gap grows among those with lower than 'A' level qualifications; respectively 61 percent compared to 48 percent.

existing research focusses on inequalities in labour market participation (i.e. who is securing work) rather than inequalities within labour market activity (i.e. who has access to progression opportunities in work). Given the distribution of the experience of low-income across households (i.e. overrepresentation of BAME, low-parent, households with disabled members, etc.), initiatives seeking to alleviate exposure to

“When I work, it gives me confidence and respect, you know, that's what it's all about – getting out and meeting people... It's getting out there... when I do the cleaning job, it's all neat and tidy, I feel pride... I'm happy. Money doesn't make me happy, it's like I put something back into the community.” **Mario, employed part time**

in-work poverty will by consequence also reduce disadvantage experienced by disproportionately overrepresented groups.

Addressing in-work poverty not only increases personal and household income, thereby reducing poverty, but also has the potential to deliver significant

economic gains to government as public expenditure on welfare spending and tax credits is reduced. Indirect savings are also accrued in other public service areas such as healthcare, crime and social services (Bivand & Simmonds 2014).

Furthermore, recent analysis by L&WI has suggested a correlation between rising insecure work, and falling productivity; while the analysis is preliminary and the phenomena requires further dedicated research, the authors note:

“We cannot say from this correlation analysis whether lower productivity causes higher levels of insecure employment or vice versa, or whether ... there is any causal relationship between the two variables, as correlation does not necessarily imply causation. The result, however, is interesting suggesting that there could be some negative causal relationship between increasing insecure employment and declining productivity but establishing such a relationship exists would require further research.”

London Councils can provide support to address in-work poverty in a number of ways. This can involve:

- i. encouraging their member boroughs to adopt a number of favourable policy positions (whilst recognising that local authorities are local democratically-led organisations and therefore policy adoptions will be subject to political discussion and scrutiny).
- ii. In line with the London Councils' role as the representative body of the London boroughs, applying its collective weight to influencing policies and activities.
- iii. Support boroughs by helping to broker additional provision where locally available support may be limited. For example, work with national

organisations such as the Money Advice Service, the Pensions Advisory Service, or National Careers Service to develop a London focused provision. Alternatively, work with pan-London organisations and networks such as the London Advice Service Alliance, to develop more effective cross boundary access to provision if services within the boundaries of a borough are at over-capacity.

More specifically, there are a number of clear and concrete ways in which London Councils can provide support to address the issue of in-work poverty. These are discussed below.

Support local authorities to strengthen internal structure as a business

London Councils can encourage local authorities to assess and review how the local authority, as an organisation, business and employer, operates to ensure that their policies support decent employment for their residents. This may include:

- Reviewing Planning policies and strategies: notwithstanding the need to build more affordable homes, local authorities have a role to play in ensuring Planning policies and strategies protect land designated as employment land and supporting businesses to be considerate businesses providing decent employment.
- Supporting local authorities to adopt a leadership role in addressing in-work poverty. This may involve local authorities looking internally within their organisational structure, to strengthen the role of their economic development teams, providing strategic local leadership on skills, employment and enterprise, particularly working with local employers and businesses.
- Review the role of their adult learning services, particularly given the strong links between low skills/qualification levels and low value/paid employment, to ensure the curriculum is led by local and wider London labour markets needs and projected needs so that residents have the skills to secure and progress in work.

Be exemplary employers – lead by example

Local authorities are significant employers. Along with the NHS, local authorities are often the biggest employers in their borough. As employers, local authorities need to lead by example as good employers. This could include:

- Promoting and adopting flexibility at work, at all job levels as appropriate.
- Exploring how the apprenticeships levy can be used to upskill and train those in lower scale roles to promote in-work progression, wage progression and the benefits of life-long learning.
- Local Authorities should lead by example on flexible apprenticeships.

As significantly large employers and as levy paying employers, London local authorities can lead the way on this, ensuring that their employment practices encourage flexibility and supports the training and progression of its employees.

This report recognises that London Councils is a representative body, working on behalf of all local authorities across London. It recognises that London Councils represents the collective voice of all its members, regardless of party political leadership. London Councils' role is to represent rather than lead or form the views of its member boroughs. Notwithstanding this, London Councils can play an important role in shaping borough policies by sharing best practice and providing an evidence base to support the adoption of policies which may be politically sensitive.

This is particularly applicable to the issue of supporting local authorities to become London Living Wage (LLW) employers themselves as well as ensuring this in their supply chain. It is acknowledged that there are sizable challenges in adopting the LLW; for example the impact of this on the cost of providing social care to vulnerable residents. However, evidence shows that receiving a living wage is one of the most effective tools for addressing the in-work poverty of Londoners. The more local authorities who become LLW employers, the more Londoners are likely to not be trapped in low-paid jobs.

Lobby for effective change

There are a number of policy changes London Councils can argue for to address some of the causes of in-work poverty. Some of this activity will involve seeking to influence central government departments, others will involve working with their own members (akin to the issue around LLW above) and other activities will include raising the profile of certain policy changes. This includes general advocacy for flexibility at work, including job share and remote working, greater need for quality part-time and flexible working, especially for parents, those aged 50 and over and disabled people. In addition:

- Advocate flexible, part-time and higher-level apprenticeships (central government).
- Advocate higher paid (current minimum wage is £3.50 an hour), good quality apprenticeships (central government and business communities).
- Advocate for a LLW increase from the beginning of the financial year 2018/19 (business communities and support more local authorities to adopt this).
- Support a London rate for the National Minimum Wage (working with the London Mayor).
- Support a campaign to remove 21-24 age group restrictions to National Living Wage (working with the London Mayor).
- Support boroughs to advocate for lifting the public sector pay cap to ensure households with public sector workers are insulated against experiencing in-

work poverty as a result of inflation outpacing wage growth (considering the number of individuals employed by local government).

Share and promote good practice to improve in-work progression

Learning from in-work progression pilots such as Skills Escalator, Step Up (not yet published), Timewise Foundation, and Ambition London funded by JP Morgan, reveals the challenges of supporting those in low paid work to progress as well as what works best. Based on these recommendations, best practice to support in-work progression for low paid workers includes:

- One-to-one adviser led support that is flexible – given that many in-work clients are time poor – and tailored to individual needs.
- Ensuring that wider support services are understood, engaged and tailored to the needs of low paid workers, and ensuring that this support is joined-up (learn from Lambeth Working – a good practice example of joined-up support to meet multiple needs).
- The support offer should recognise nuances of support wanted by different cohorts. This could be enabled by place-based projects, a ‘no wrong doors approach’, and tailored support.

*“I worked out the [with] the grants and loan combined for a year, you would still have to pay full rent for the year, full council tax – you won't get help elsewhere... you've got to pay for your childcare, you've got to pay for your books, your laptop... for the first six months of your studying, you've got to live on six months of nothing... there's no help for families that do want to go on and study and better themselves.” **Aniya, employed (maternity leave)***

Local authorities, given their close relationship with residents, have a key role to play in signposting individuals to relevant support and services, and promoting available opportunities. This is particularly important in terms of promoting access to careers advice and skills provision, given the strong links between poor skills/qualification level and low-value/low paid employment.

Encourage responsible employers

Research shows that employer buy-in is key; encouraging the adoption of Living wage, improved affordable childcare, providing flexible employment options and promoting progression in work through encouraging employers to train and invest in skills (Bivand & Simmonds 2014). Existing examples are: GLA procurement code, procurement strategies of the Scottish and Welsh Governments, and strategies being developed by devolved local authorities, the Mayor's Good Work Standard.

- Fund pay rises that are equal to inflation rates.

- Local authorities should prioritise direct employment and in-sourcing, as well as control pay and terms and conditions.
- Promote LLW to local businesses, for example, through business rate discounts, as Brent Council did.
- Ensure employers have a comprehensive understanding of the effects of zero-hour contracts as these contracts not only introduce insecurity and instability to workers' incomes, but they also affect claimants' benefit entitlement the following month, making it difficult for these individuals to budget.
- Acknowledging that being an 'anti-poverty' employer has cost implications which is unattractive to employers, consideration should be given to creating a campaigning vehicle to enable aspirant employers to form a 'coalition of the willing' in order to promote the case for 'Good Jobs' in the broadest sense (Philpott 2014).

However, influencing local employers is likely to be more effective if boroughs themselves are seen to be providing good jobs. This has been recognised by Camden Council, who in trying to fulfil their role as an agent of civil activism, have chosen to role model good behaviours – in the Council's (2017) own words, "it is important that the Council doesn't ask others to do anything it is not prepared to do itself". London Councils may want to support other boroughs wishing to emulate this model.

Other recommendations

- Increase access to publicly funded affordable childcare.
- Increase access to low cost/affordable housing – local authorities should build public sector housing with low cost rent; the construction of such programmes could be associated with local employment and training opportunities.
- Increase access to free in-work training and upskilling opportunities/ 'lifelong learning' (especially to meet language, literacy and digital needs that the low paid cohort often have)/vocational training, and ensure that this provision is flexible enough to meet varied personal circumstances – given their care responsibilities/wider responsibilities – of the in-work cohort.

3. Welfare reform

This chapter explores the broad changes to welfare benefits that are likely to adversely affect London's households. It first presents a broad overview of the evidence around welfare reform, and then focuses on the implementation and consequences of Universal Credit (UC), with a specific focus on process and wait for the initial payment. It comes at a critical time as UC proceeds to go live across the country, and off the back of recent reforms announced as part of the 2017 Autumn Budget.

Broad welfare reform context

Since 2010, the successive Coalition and Conservative Governments have embarked on a far-reaching programme of changes to the welfare system. These represent the most fundamental changes to the system in a generation (Wilson & Foster 2017). Reforms were rationalised on the basis that, *"The welfare bill is too high, and the welfare system traps too many people in benefit dependency"* (Conservatives, 2015). The Summer 2015 Budget (HM Treasury 2015) set out three key objectives for reform, to:

- make welfare "more affordable and fair to the taxpayers who pay for it";
- continue "to support the most vulnerable"; and
- "Reward work and back aspiration" – through welfare, tax and wage reforms.

Underlying the reforms is the assumption that those affected will be able to mitigate the adverse consequences by increasing their income through work, and/ or by reducing their outgoings, through housing choices. For those less able to respond, the system will continue to provide a safety net (Wilson & Foster 2017).

Analysis by Policy in Practice (2017), shows that even allowing for mitigation introduced by the Government (changes in personal taxes and introduction of the National Living Wage), the cumulative impacts of welfare changes will see the incomes of 7 million low-income households lower by an average £31 per week by 2020 in cash terms. However, the impacts increase significantly when inflation is accounted for, leaving households a further £33 per week worse off on average between 2017 and 2020 alone.

The impacts of welfare reform have varied between areas (Wilson et al. 2013; Beatty & Fothergill 2013). While all areas have seen significant impacts as a consequence of reform, those in the northern of the country have been particularly adversely affected. In addition, three types of area have been hardest hit:

1. Older industrial areas particularly in the North East and North West, Birmingham and the Black Country.

2. Less prosperous seaside towns – for example Blackpool, Torbay, and Great Yarmouth.
3. (Of particular relevance) Inner London boroughs – where rents are exceptionally high, localised areas of very high worklessness and large numbers of low income households.

The number of Local Housing Allowance claimants out of work has fallen across London and by more than 40% in Inner London. Workless households appear to be being priced out of private housing in large parts of London, with research also suggesting that landlords are increasingly reluctant to rent to Housing Benefit claimants, particularly in London (Wilson & Foster 2017). In money terms, London households in receipt of benefits are also hit relatively hard. It is estimated the loss per working age adult is £50 a year above the GB average. This is primarily attributable to Housing Benefit reforms affecting tenants in the private rented sector, plus the household benefit cap, which have a sizable impact in London (Beatty & Fothergill 2013).

Community networks have played an important role in supporting those affected by reforms. However, there is evidence that reforms have negatively impacted on some individuals' abilities to access those networks (Moffatt et al 2015; Real Life Reform 2015), and in particular disabled people and those living in more geographically isolated areas (CRPD 2016; Inclusion 2016). More recent research has also found evidence of some increased segregation and stigmatisation within cities (Winter et al. 2016).⁸

Impacts on households and individuals

Certain groups are disproportionately affected by welfare reforms – in particular disabled people and those with health conditions (EHRC 2017; Liverpool City Council 2017; Kennedy et al. 2016), and households with dependent children, particularly lone parents and those with large families (Lane 2014; Power et al. 2014); and many disadvantaged young people (Fitzpatrick et al. 2017; Mitchell et al. 2013). Unfortunately, detailed sub-group analysis is limited, making assessment of intersectionality difficult. One study, focused on BAME women suggests that gender inequalities intersect with and compound racial inequalities making this group particularly disadvantaged due to tax and benefit reforms since 2010. Black and Asian lone mothers respectively stand to lose £4,000 and £4,200 per annum by 2020, equivalent to more than 15 per cent on their net income (Hall et al. 2017).

Reforms are being felt in a number of ways. There is extensive evidence of households 'going without' (Davies & Wilson 2014) – cutting back on essentials including food, heating and clothing – as well as cutting back on what might be considered non-essentials like socialising, leisure and family activities. A few studies

⁸ Note: this was a Manchester based study.

find growing arrears – often in rents, water and other utilities. This further undermines households’ abilities to deal with emergencies.

These cutbacks appear to be leading to negative impacts on wellbeing, causing stress and anxiety and in some cases contributing to or exacerbating ill health (and in particular mental health (see Stuckler et al. 2017)).

Among family and communities, welfare reforms have put increased strain on relationships. Parents have often tried to shield children from negative impacts, but this can further increase the pressure on parents and some research nonetheless finds increased stress and anxiety among children – particularly relating to housing (Colechin et al 2015; Moffatt et al. 2015).

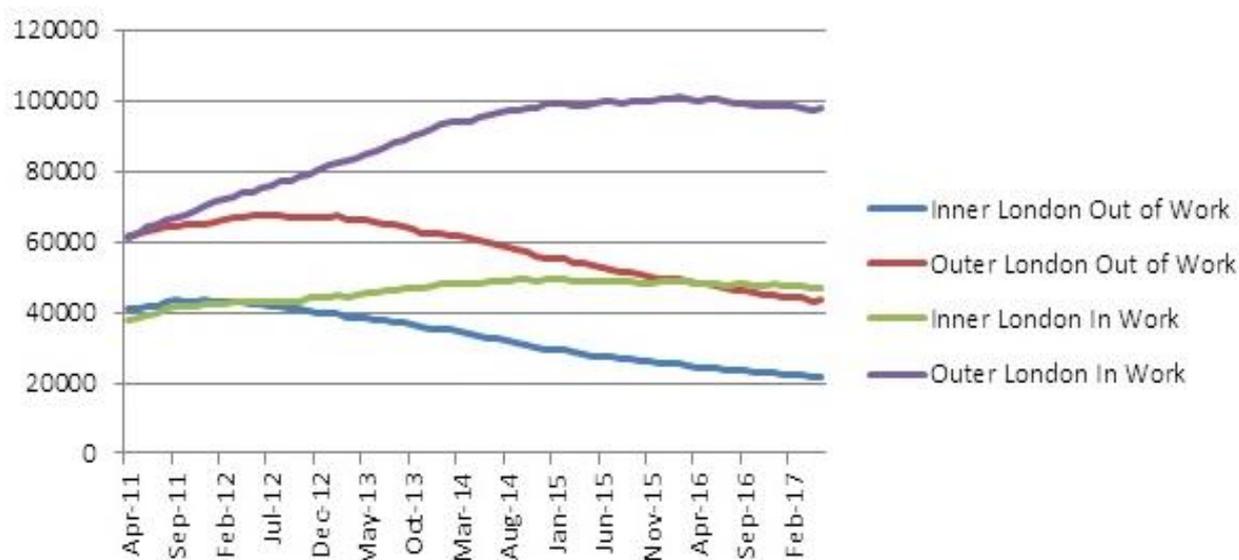
Finally, there is evidence that homelessness acceptances have increased in recent years because of welfare reform (House of Commons 2016; DCLG 2017).

Households and individual response to reforms

The evidence on both housing and employment is mixed. On housing, reforms appear to have led to only modest changes in housing choices over most of the last seven years (Department for Work and Pensions 2014). However, there is some evidence of changes in more recent years suggesting a movement from Inner to Outer London, with double the rate of increase in Housing Benefit claimants in the suburbs compared to the rest of the country (Wilson & Foster 2017). At the same time, as can be seen from figure 9, growth in the Housing Benefits claimants within inner London has been markedly lower.

On employment, welfare reforms appear overall to have led to small positive impacts. The benefit cap has led to those affected being more likely to move into work – with around one in five finding work, rising to 30 per cent of those with the largest losses. The additional impacts on employment (over and above what would have happened without reform) are estimated to be around 5 percentage points – equivalent to 2,500 more people in work after the first year (Department for Work and Pensions 2014).

Figure 11: London LHA Claimants April 2011 – May 2017



Source: London Councils (2017)

Local area and community responses to reforms

Councils have taken a range of measures to respond to reforms – including targeted information campaigns; direct financial assistance (usually via Discretionary Housing Payments); one-to-one support and signposting to/joint working with other partners.

Many councils have created cross-organisational partnerships to co-ordinate responses and join up provision, including with Jobcentre Plus and on some occasions with health and other services (Bell & Treloar 2012). Delivery of support has included innovative new approaches of one-to-one support, particularly for those with the largest losses or needing the most housing (and to a lesser extent employment) support (Clarke & Williams 2014). However there are significant challenges in this – in particular due to budget reductions and increasing pressure on services.

Social landlords have also increased the range of advice and support offered to residents, in particular so as to reduce the risks of rental arrears (for example see Williams et al 2013). However landlords also increasingly need to take enforcement action against residents, and potentially change their allocations and lettings policies so as to reduce the risk of future residents running up debt.

A range of other organisations and provision have also been affected by, and responded to, reforms – including schools (Lane 2014)⁹, health services, advice services and the wider voluntary sector (for an overview see Wilson & Foster 2017).

⁹ For example, acting as an outreach location for welfare advice geared towards parents.

Again funding reductions and increased demand have increased the pressure on these services.

Evidence on in the initial payment for Universal Credit

There are three main objectives of UC:

- simplification of the benefit system;
- making work pay; and
- tackling poverty and worklessness.

It is a single benefit replacing six existing means-tested benefits and tax credits. When fully rolled out, planned for early 2022 it will affect around 8 million households across the UK (Millar & Bennett 2017). The most recent data on UC rollout within London shows that around 85 thousand households are in receipt of the benefit, with a continued upward trend.¹⁰ Early analysis along with evidence gathered during initial stakeholder interviews, suggest that while in principle, the objective of UC is a

“The month arrears is based on a white collar worker who may generally be paid monthly, but that's not usually in arrears – it's two weeks behind... this theory it's based on an average person is a nonsense that is being dispelled as manual workers still tend to get paid fortnightly or weekly.” **Community-Based Employment Support Adviser**

good idea, in practice there are a number of challenges which exist to realising these objectives and the implications for those affected are worrying (Judge 2013).

Primary research conducted as part of this study and evidence from CAB (Drake 2017) revealed multiple issues namely with administration and

implementation. This report centres on the 6-week payment policy, as well as the considerably longer wait many are experiencing subject to administrative errors, and the implications it has for claimants.

Focus groups conducted as part of this study also demonstrated that other issues, not necessarily directly related to the process, compounded the effect of the policy. These included:

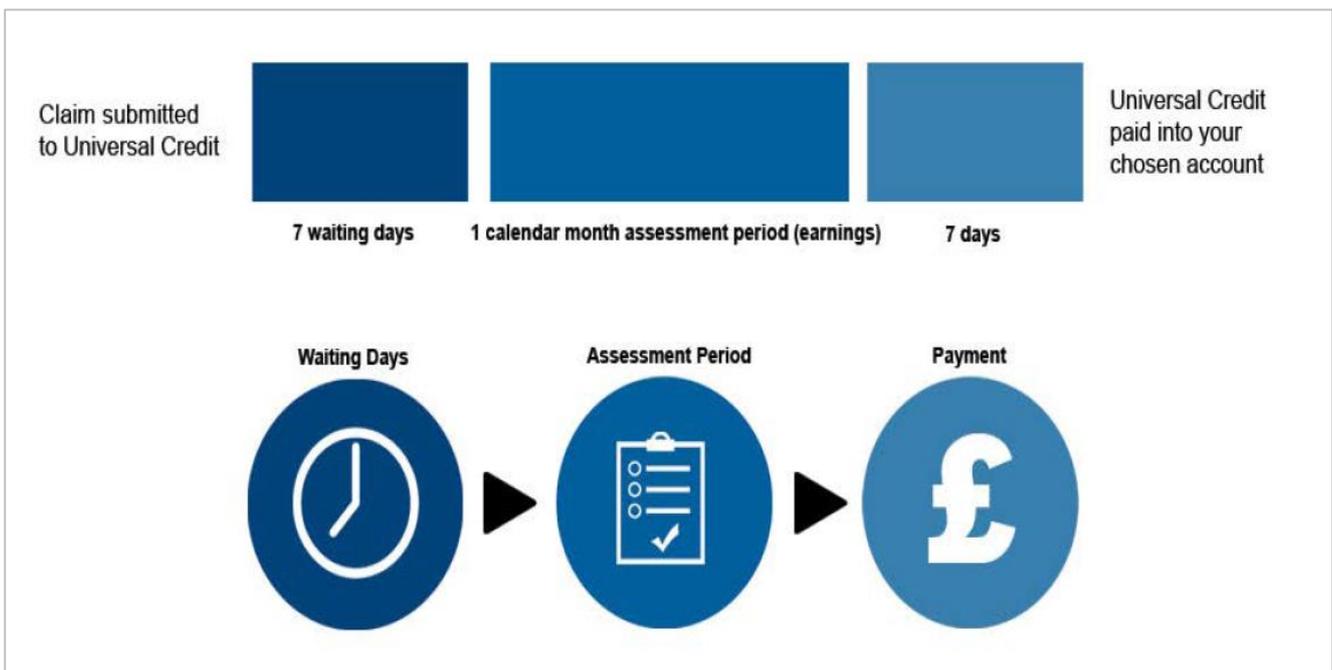
- **Difficulty budgeting** with some UC claimants finding it difficult plan for the transitional period, particularly those in debt, or with fluctuating incomes.
- **Opening a suitable bank account** to receive UC payments. Some are finding it difficult to open an account that can be used to receive the monthly payment, leading to delays in receiving their benefits. This can be particularly challenging for non-UK born claimants.

¹⁰ Households on Universal Credit Dashboard: <https://uchdash.herokuapp.com/index.html>

- **Deductions from UC** for benefit overpayments, advances and other debts such as rent arrears. UC claimants are experiencing financial difficulties due to the amount which can be deducted (considerably higher than under legacy benefits).

While the Autumn 2017 budget proposes a reduction in this process to five weeks, the delay in the initial payment is a core design feature of the benefit. Figure 12 illustrates the process for claiming UC; as noted the recent budget announcement removes the 7 ‘waiting days’ period from February 2018, effectively reducing the time between submitting the application and receiving the first payments to 5 weeks.

Figure 12 Universal Credit Application process



Source: House of Commons Work and Pensions Committee 2017

In reviewing the UC application process, in response to a growing concern about the hardship the process was creating, the House of Commons Work and Pensions Committee concluded:

“The baked-in six week wait for the first payment in Universal Credit is a major obstacle to the success of the policy. In areas where the full service has rolled out, evidence compellingly links it to an increase in acute financial difficulty. Most low income families simply do not have the savings to see them through such an extended period... Universal Credit seeks to mirror the world of work, but no one in work waits six weeks for a monthly paycheque.” (House of Commons Work and Pensions Committee 2017:8)

“Four weeks is the tipping point for me. Six weeks is when you’re at the very edge. 12 weeks shouldn’t be.” **CAB staff**

The policy assumes that claimants will have sufficient funds from their previous income instalment to tide them over until the initial payment arrives. Many, however, do not; over 26 per cent of all working-age adults have no savings (Money Advice Service 2016), and around 42 per cent of adult Londoners have less than £100 in savings.¹¹ Not only does this result in some people not coping financially during this period, but also thwarts its policy aim as it leaves people unable to search for work (House of Commons Work and Pensions Committee 2017).

While the reduction from six weeks to five is welcome, given the financial circumstances of many low and middle-income households described above, the prospect of waiting five weeks to receive any social security remains incredibly daunting.

For many, due to administrative errors, the wait for the initial payment is considerably longer, with claimants waiting up to 12 weeks for their first payment which further

"I had to wait 8 weeks. For someone who has never been in arrears with their rent, all of a sudden, I got this big debt saying, 'Oh I'm in arrears for £600 or something quid'."
UC claimant

exacerbates debt issues and puts claimants in a precarious financial situation (Citizens Advice (2017) . Indeed, DWP's own analysis shows that just under a quarter of new claimants do not receive their full payment within the time frame, and that

15 per cent receive no payments in 6 weeks (Department for Work and Pensions 2017b). Though there could be several reasons for the delay, much of it is likely to be related to the verification process.

Application process

CAB research shows that delays are being caused by administrative errors coupled with claimant errors at the application stage, and claimants experiencing issues managing online claims (Drake 2017). Elaborating on the claimant errors, focus groups highlighted that the application process itself is a highly complicated process that is not user orientated. UC recipients reported having to complete applications under compressed time scales that often felt arbitrary, with little guidance as to what information they may be required to have. Additionally, the questions contained within the form itself were in some instances imprecise, as one adviser explained:

"The form asks 'how much rent do you pay?' That's not the correct answer, because the rent you pay might include water rates, heating, bit and pieces.

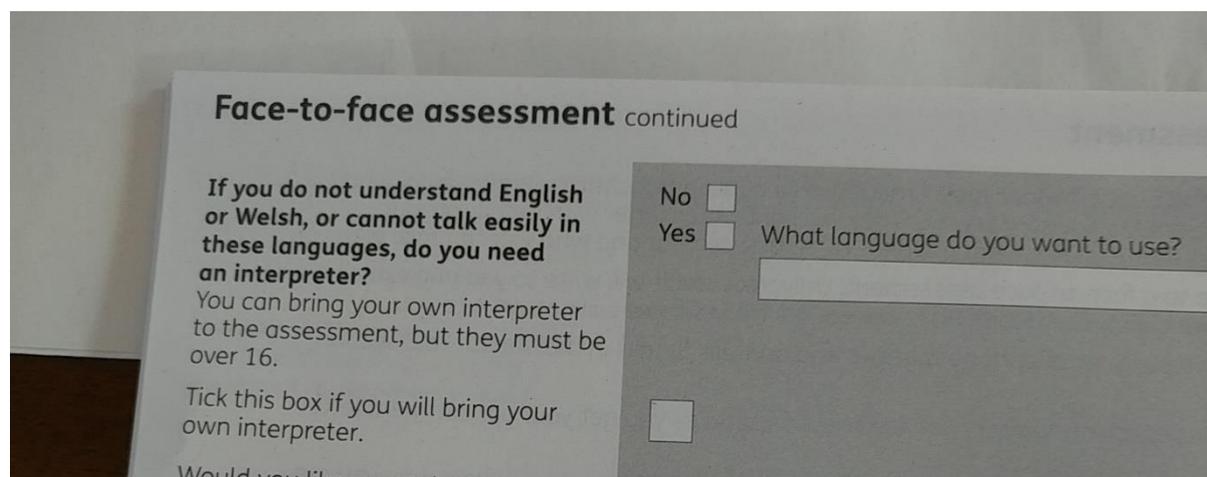
¹¹ Based on analysis conducted by Money Advice Service and CACI Webb A (2016) Millions at risk with savings of £100 or less, <https://www.moneyadviceservice.org.uk/blog/millions-at-risk-with-savings-of-100-or-less>

But unless you know exactly what they want – and it doesn't tell you on the form – you're not going to get that right."

Similarly, a UC claimant explained that an inconsistency arose between the rent figure provided by the landlord and himself. Responding to the question on the form, the claimant put the rent he paid for the month of March; his landlord had subsequently provided a rent figure for the following month which included a slight rise. Ultimately, the application process was not frustrated as the claimant agreed to change the figure under duress of being told the alternative would be to restart the process from the beginning.

Focus groups also explored who would likely struggle with the application process. As would be expected, people with little or no digital capability, people with learning difficulties and disabilities, those with literacy issues and those with an ESOL need were all identified. Emphasising the lack of user orientated thinking when developing the application process and forms to complete, figure 13 shows a picture of the UC50 form to be self-completed by claimants asking whether they do not understand English – it should be noted that this question is asked several pages into the form.

Figure 13: Photograph of the UC50 09/17 form asking about understanding of English



The photograph shows a section of a form titled "Face-to-face assessment continued". The text on the form asks: "If you do not understand English or Welsh, or cannot talk easily in these languages, do you need an interpreter?" It provides instructions: "You can bring your own interpreter to the assessment, but they must be over 16." and "Tick this box if you will bring your own interpreter." There are two checkboxes for "No" and "Yes". Below this, there is a question: "What language do you want to use?" with a text input field.

Universal Credit Advance payments

Advance payments of UC are intended to mitigate financial crises during the 6-week wait (Department for Work and Pensions 2017a). Currently, around 44 per cent of all new claims draw on either a new claim or change of circumstance advance (Department for Work and Pensions 2017b). Research shows that claimants borrow from friends and family, and use a food bank more readily than using a UC advance payment to cope financially during the 6-week wait (Smith Institute 2017; Drake 2017). There are several factors underpinning this, including; claimants being uninformed or unaware about the payments, the loan not being sufficient to cover

costs for the 6-week period, and claimants being wary of taking out a loan that will then be repayable monthly from their UC entitlement (House of Commons Work and Pensions Committee 2017).

To address these challenges, the Autumn 2017 Budget announced that the period during which the advance will be recovered will be extended from six to twelve months thus reducing the monthly repayment amount and claimants will now be able to receive an advance equivalent to their first full monthly payment within five days of applying. The changes to advances are scheduled to take effect from January 2018.

"In my experience that 6 weeks is the shortest it's taken. I've had, like, 1 person who received their payment. A lot of them have gone 2, 3, months waiting for a payment." **Legal Adviser**

However, while this may encourage some to take-up the advancement offer, the Department may find again, that take-up remains relatively modest, as the policy shift fails to recognise that many low incomes are in fact debt adverse, often prefer to 'do without' than draw on credit (Smith Institute 2017). Focus groups also confirmed this, though cautioned that claimants would often borrow money from friends and family, which could in turn damage relationships and existing social networks if delays in the initial payment were delayed.

Impact on claimants

These issues have resulted in claimants experiencing exacerbated financial insecurity, squeezed incomes and commonly being unable to cover costs during the delay (House of Commons Work and Pensions Committee 2017). Compared to

"This is the first benefit for me that has been such a disadvantage to vulnerable people. And we're not talking about vulnerable like the severely ill, we're talking vulnerable as just on that cusp of being in poverty and this will just tip them over."
Mental health Welfare Adviser

those on legacy benefits, UC claimants are more likely to have debt problems, more likely to be struggling to deal with debt, and more likely to experience issues with priority debts (Drake 2017). As noted previously, research shows that UC claimants experiencing debt issues commonly cope by going

without gas or electricity, borrow money from friends or family, and use food banks (Anderson et al. 2010; Drake 2017). Inevitably, health and wellbeing consequences will follow.

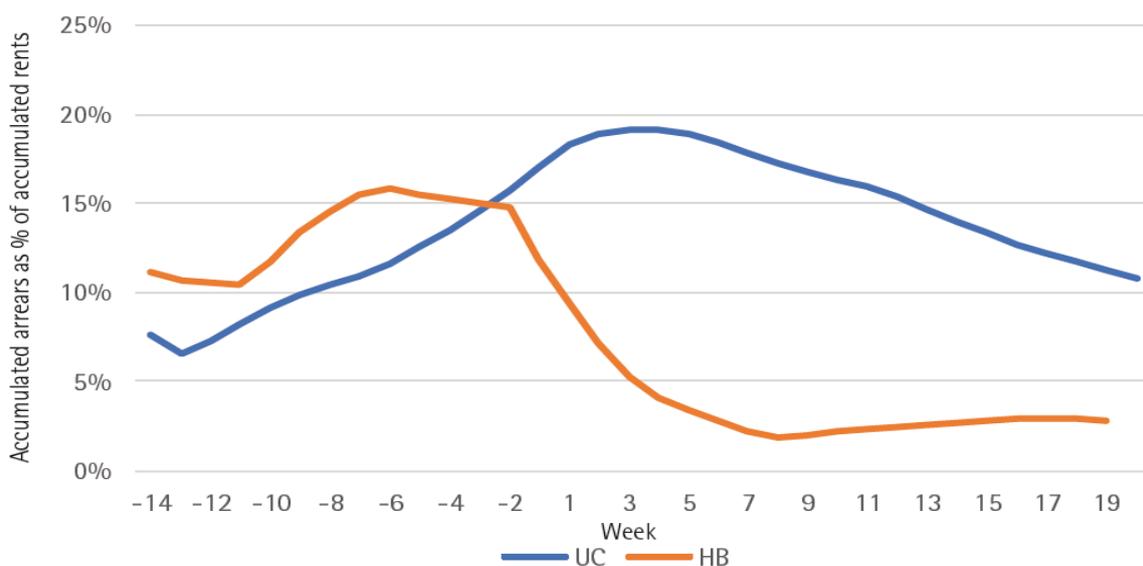
A Study by the Smith Institute (2017) profiling the level of rent arrears (as a proxy for overall indebtedness) found that in the period leading up to, and in the period following the first payment of Housing Benefit and UC, arrears were larger for those on UC than Housing Benefit at the first week of payment (the peak of rent arrears); that those on UC were more likely to underpay by more, and that driving down rent arrears occurred over a longer period of time (see figure 14).

As a consequence, local authorities are likely to amass greater levels of rent arrears, and the associated costs that might entail, including County Court action and eviction procedures. The analysis conducted by the Smith Institute suggested that this could in part be smoothed by the use of Alternative Payment Arrangements (a discretionary offer to maintain direct payment to the landlord).

Furthermore, the Autumn Budget announced that claimants in receipt of Housing Benefit at the time they make a claim for UC will continue to receive Housing Benefit for a further two weeks, reducing the level of arrears accrued during the occurring in a tenancy. This will apply to people who submit a new claim for UC from April 2018.

“Stock up on as much tinned food in advance. Prepare for a very frugal period; cut back on your social life totally. You need to scale back on any sort of plans – apologise to people; they’re not going to get birthday presents, they’re not going to get Christmas presents – this year you’re going to get cards. It’s like going to prison – people don’t know what freedom is until you lose it. Universal credit, for me, felt as if it was a sanction in its own right.” UC applicant (first payment pending)

Figure 14: Accumulated rent arrears as a proportion of accumulated rent owed each week before and after Housing Benefit and Universal Credit claim



Source: Smith Institute (2017)

Who will be most adversely affected

Research shows that welfare reform will hit certain vulnerable groups hardest. Of these groups, lone parents are under considerable financial strain, and delays in payments for any of the reasons discussed above can easily tip them into financial

It's ridiculous for lone parents with children to go through this, especially if they've got arrears... if they've already got housing arrears, they would already have a payment plan in place. And if that payment plan is in place and they can't make the payments, it will trigger County Court action. When they receive their income, what's going to be the main income? It's going to be their child tax credit, plus their child benefit, and they're going to be forced to use that to either pay the arrears or buy food." **Community based support**

crisis. New entitlement conditionality of UC, meaning that single parents with children aged 3 and 4 now must comply with the full job searching requirements that were previously only applicable to parents with school aged children, and the UC work allowance for single parents being halved, adds to the pressure. To ensure that UC helps these families to cope, Gingerbread (Rabindrakuma 2017) recommends reversing cuts to the UC work allowance,

especially for single parent households, reducing the 6-week waiting period of the initial UC payment, and assessing the quality of Jobcentre provision to ensure that lone parents' needs are met. Similar observations have been made by Women's Budget group which showed that households with children will be disproportionately affected than those without; and of these, single parent families with a BAME matriarch will among the most adversely affected (Hall et al. 2017).

According to initial stakeholder interviews, it was suggested that other vulnerable groups include immigrant communities with ESOL needs, those with mental health conditions, and those with language and literacy needs. These groups are not necessarily in contact with local authorities and/or lack knowledge on the role of different services and provision available to them which means that the impact on these people is not easily captured.

"It's interesting because with Universal Credit, I think, when you say specific groups, even young males on their own I find, when they're not getting any money, they're less likely to ask for help, and so then they go on going down, spiralling down and that's when they end up on the mental health spectrum. So I think with Universal Credit, what's so unique about it, is that it touches every single group in a very specific way." **Legal Adviser**

Recommendations to mitigate against Universal Credit delay

UC was intended to simplify the benefits system, while at the same time tackle poverty and worklessness. Few would argue against these aspirations, but the scale and ambition of the UC programme has created a highly rigid, and somewhat complex procedure, underpinned by an equally rigid and structured delivery system – as Wilson (2017) notes, "the '*best*' argument that stops changing the overall mechanism to allow weekly, fortnightly or monthly payments *"is that the computer would say no – it's been built for monthly payment and it's too difficult to change"*.

Nevertheless, a prominent demand voiced across a number of commentators including many of the stakeholders who participated in this research, is to allow a 2-week payment process for those who need it with no payback policy (Wilson 2017; Drake 2017). Consistently, one group was repeatedly identified in the literature and through discussions – single parent families, and specifically those with a mother as the head of the household (Rabindrakumar 2017). However, it would be expected that other groups will be identified after further consideration.

There have also been broader calls for stopping the further roll out of UC to provide some much needed space to breathe (Hope 2017). However, there has been no official change in the government's position. In the extreme, it has been suggested that a pause in the roll-out on UC should be coupled by a 'stock take' of the benefit to assess it against its original intention, and to 'fix' the system to reduce unnecessary hardship.

Outside of the structural changes to the UC, more specific ways in which local boroughs and London Councils can mitigate the consequences of UC were identified. These are discussed below.

A new Universal Support offer

Build on and reimagine the Universal Support provision offered to those transitioning on to UC to ensure it is appealing and addresses people's needs. Local Authorities should have a central role in this, including developing an appealing offer that goes beyond digital and financial capability. Building on points raised in Learning and Work Institute's recent report for the Local Government Association, the new offer should consider:

- Improved data sharing at individual and aggregate level to plan and respond to needs and map reform impacts. This is increasingly problematic under UC, and will become more so as the General Data Protection Regulation (GDPR) comes into effect in May 2018. Local and national government and other partners need to work together urgently to agree what data can be shared.
- Working with local partners to co-ordinate engagement and widen routes in (including through social landlords, the voluntary and community sector, faith groups and health and care services); underpinned by common assessment,

triage and referral processes that can assess needs across a range of domains – building on key learning from the ‘no wrong front door’ service model employed by some children and family services (Lushey et al. 2017).

- Co-ordinating and targeting support across services, in particular by looking to use and influence local commissioning and reviewing the decision to bring Troubled Families within DWP.
- Testing and delivering more integrated caseworker-led models – with a focus on income / financial stability, employment and housing support.
- Encouraging local areas and Jobcentre Plus to set up ‘employment action teams’ resourced through re-purposed Troubled Families support, Flexible Support Fund or local European Social Fund.
- Working with Health and Wellbeing Boards and Clinical Commissioning Groups to identify opportunities to align health support alongside welfare support.

London Councils may facilitate this by providing a platform for boroughs to share best practice in providing Universal Support, drawing together and synthesising customer insights from across the boroughs to develop a more nuanced and comprehensive understanding of core service needs of Londoners moving on to Universal Credit.

Furthermore, building on a recommendation suggested for tackling in-work poverty (above) London Councils can also play a key role in advocating for and brokering additional provision as part of the Universal Support offer. Given the correlation between the UC application process and financial difficulty, and mental health, obvious organisations may include the Money Advice Service, Mind, Trussell Trust and National Debtline.

Understand customer needs

There is currently a lack of clear, consistent and accessible data available to Local Authorities and local London stakeholders, that helps to understand the groups that are most disadvantaged through UC. To develop effective interventions and identify how and why groups are disadvantaged through the process, it is crucial empirical research and analysis can be regularly and flexibly conducted. Local Authorities both individually and collectively through London Councils should:

- Advocate for greater transparency from DWP about needs of their local residence and UC application performance including metadata on UC online, broken down by protected and other key characteristics (care leavers, ex-offenders, etc.).
- Develop a minimum service requirement to ensure data sharing between DWP and London boroughs becomes mainstreamed into routine practice.

- Develop a consistent and co-ordinated campaign of Freedom of Information requests, to build a longitudinal time series of DWP data related to the roll out of UC.

Deliver practical solutions to local residents

Local Authorities should consider whether and how they can help streamline the process of applying for UC. This may require working more closely with Jobcentre Plus, and housing associations/landlords to share and internally verify key information. Other aspects include:

- Using the boroughs' presence and existing relationship with residents to more clearly communicate the requirements of applying for UC e.g. providing information sessions through existing customer touch points.
- Reviewing their role in the verification process, including whether they can verify identification if more convenient or accessible to residents.
- Providing resources to ensure things are in place to successfully apply for UC including playing a role in helping to set up bank accounts on behalf of residents, or have mobile phone access during the application process.
- UC claimants may not be fully informed about Council Tax Support locally available to them and therefore unable to benefit from it. London boroughs should review processes to ensure where eligible for such support, it is being offered, understood and taken up to reduce any unnecessary hardship.

4. Housing and homelessness

This chapter explores the evidence on housing policy and issues within London. After presenting a brief overview of the evidence reviewed during phase 1 of the research, it moves onto focussing on the Government's Right to Rent Policy. It was intended to explore whether landlords are effectively incentivised by the Government's Right to Rent policy (designed to create a hostile environment for undocumented immigrants) to employ discriminatory practices. In turn, this would be likely to increase barriers experienced by BAME Londoners to the rental market. Given the demographic profile of London as well as its active private rented market, the effects of right to rent evidence are likely to be acutely felt by BAME groups.

Broader housing context

The UK's housing crisis – in simple terms, a significant mismatch between the demand for and supply of homes – is at its most evident in London, where the 'perfect storm' of spiralling housing costs, capped benefits and a reducing supply of genuinely affordable homes to rent is leaving low income households (many working) with extreme choices about where and how they live their lives, with associated impacts on their capacity to work and study, their health and wellbeing, their support networks, and their communities.

These choices include (though are not limited to) (Greater London Authority 2017):

- i. living in sub-standard accommodation (around 19 per cent of homes fall below the 'decent homes standard': there are health and economic implications for households, for example there can be high costs associated with heating homes that are not energy efficient);
- ii. living with other households as a means to afford a home instead of forming their own (as of 2016 there were an estimated 720,000 concealed family units in London, up from 380,000 in 1996); and,
- iii. moving to another London borough e.g. outer London, or out of London altogether.

An increasing number of households are simply unable to meet their needs, including working households: at the end of March 2017 there were 54,280 households in temporary accommodation, having sought assistance with their homelessness. Homelessness in London has been rising since 2010.¹² Recent estimates suggest that 70 per cent of households in temporary accommodation are placed there by London boroughs (DCLG 2017). Lone parent families and families in employment accounted for the largest groups housed in temporary accommodation

¹² DCLG Live Homelessness Tables: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness>.

(respectively accounting for, 49 per cent and 45 per cent of housed families). Showing a clear interaction between welfare reform and homelessness, households in this type of unstable accommodation are three times more likely to have been hit by the benefit cap, seeing their Housing Benefit entitlement fall and incurring additional costs to local authorities (Policy in Practice 2017a). The Homelessness Reduction Act 2017, due for implementation in 2018, is unlikely to reduce homelessness in London alone as it will not address structural issues including the supply and affordability of local housing market (Public Accounts Committee 2017) and welfare reform (Clarke et al. 2017). Meeting these needs is costly for London's borough councils, who are increasingly beholden to the supply of expensive temporary accommodation from the private sector. Money spent on a crisis response means less to spend elsewhere on London's populations.

The need for crisis support is, unfortunately, increasing. Across England, the number of rough sleepers has increased to more than 4,000 in 2016, from fewer than 1,800 in 2010.

The demographics of the homeless population in London is different compared with the rest of the country and therefore London based data cannot be assumed as representative of deeply excluded populations elsewhere in the UK. People who become single homeless in London have been found to be significantly older than other regions. Homeless Link reported that almost 60 per cent of single homeless people being over 40 years old (Homeless Link 2016). Homeless people in London are also far more likely to be non-white and non-UK national.

London accounts for over one fifth of people sleeping rough, with Westminster LA consistently reporting the highest numbers. Particular subgroups of concern include Central and Eastern European migrants, former and current asylum seekers and illegal immigrants, which accounted for 20 per cent, 9 per cent and 12 per cent of Multiple Exclusion Homelessness service users in Westminster respectively (Fitzpatrick et al. 2011). The numbers of people from Central and Eastern Europe sleeping rough increased 77 per cent from 2011/12 to 2014/15 compared with a 28 per cent increase among UK nationals during the same time period (Homeless Link 2016). Individuals who are sleeping rough are not represented in accommodation project data. Homeless Link's (2016) annual review of accommodation projects reported that less than 0.5 per cent of service users were irregular or undocumented migrants, or people with no recourse to public funds which reflects the commissioning of such services to work with those eligible to claim Housing Benefit.

Research conducted by Safer London (2016) suggests that there is an undercounting country-wide in official statistics of the number of women made homeless as a result of fleeing domestic violence and abuse. This issue is compounded for women in London by a lack of affordable accommodation and long waiting lists for social housing which affects the housing pathway out of refuge into

settled accommodation. Consequently, refugees become overburdened and survivors of domestic violence can often find themselves in temporary, insecure and unsuitable accommodation.

The recent [Fixing our broken housing market](#) White Paper outlined proposals to increase the supply of housing, primarily through changes to the planning system. Whilst welcomed by London councils, this was with the caveat that there simply is not enough land to meet the housing needs of the London population necessitating a discussion about meeting needs outside the capital and/or relaxing green belt development restrictions (see for example London First 2015; Stringer et al. 2016).

The White Paper also notably failed to describe other aspects of the 'broken housing market': the quality and suitability of existing homes in the private sector (there is no investment proposed to tackle this and there is insufficient capacity and powers in local councils to take enforcement action), and security of tenure in the private rented sector. On the latter point, proposals will only be relevant to new homes in this sector, yet loss of an assured shorthold tenancy is the main cause of homelessness in London and one in three private renters have lived in their home for less than a year. Frequent moves are known to have an impact on a household's health and wellbeing, particularly children and young people, whose behaviour and educational attainment can be affected, and on community stability (see for example Morris et al. 2017).

Critically, the Housing White Paper did not address the unmet need for genuinely affordable homes to rent – social rent. Indeed, policies and proposals remain in place that are expected to further deplete this tenure, whether this be through right-to-buy and the sale of higher value council homes, or through the choices social landlords are increasingly making about who can afford to live in their homes, which they may choose to re-let at up to 80 per cent of market rent (an 'affordable rent'). Whilst the Mayor has introduced plans and programmes intended to address this issue, for example the introduction of the London Living Rent, these are will be insufficient to meet demand.

Finally, the recent Grenfell Tower tragedy has exposed another pressing policy issue for local authorities, central government and housing sector stakeholders. Response and outcry to the tragedy is currently clouding the existing evidence about the state of social housing (and also private rented accommodation for low-income households), however, in the coming months there will be a pressing need for research into the quality of housing stock, and the relationship between tenants, social landlords, and local authorities. A call from within public health has become vocal in understanding the "*causes of the cause*" (Sim & Mackie 2017) with commentators calling for a wide ranging assessment of the social determinants of public health:

“The burnt out skeleton of the tower now stands as a symbol of growing inequality and injustice in the UK, casting a shadow over government policies towards the quality and availability of social housing... Poverty, coupled with a lack of political willpower, has put innocent lives at risk, and further cuts to public spending place society's most vulnerable individuals, including 300,000 people with disabilities, in danger of future disasters. A critical assessment of the health and safety of vulnerable populations in UK cities is well overdue.”
(Ahmed et al. 2017:398)

Evidence on Right to Rent based discrimination

The Right to Rent scheme was introduced as part of the Immigration Act 2014, and required landlords or their nominated agents of privately rented accommodation to conduct checks on all new tenants to establish if they have a legal right to be in the UK. The scheme applies to all new tenancies starting on or after 1 December 2014. Prospective tenants can provide landlords with a number of documents to demonstrate either a permanent or time-limited right to rent. The landlord retains a copy of this documentation, which provides a statutory excuse, appropriate to the tenant's leave to remain at that time, against a civil penalty for renting to an illegal migrant. The scheme is based on landlords being able to undertake most of the checks themselves, as is the case with the checks employers carry out on new employees.

Although the Home Office evaluation (Brickell et al. 2015) of the Right to Rent pilot in the West Midlands does not contain enough data to make any definitive findings, it did anecdotally indicate potential signs of discrimination against vulnerable groups. Given that London's housing market is under much greater pressure than that of the pilot sites with landlords having a choice of tenants, there is potentially a higher risk that migrants and others who are unable to prove their eligibility will be discriminated against. This risk becomes higher still when considering the population profile of London, which is resident to 36.8 per cent of all the foreign-born population living in the UK (Rienzo & Vargus-Silva 2017).

Research into the continued impact of welfare reforms also predicts a looming crisis within the private rented sector, as the share of private renters within the overall national housing benefit caseload is set to increase further in the future. Due to the shortage of new affordable social houses, growing numbers of low-income families are being pushed towards the more expensive private-rented sector, putting it under strain and pushing landlords to act in discriminatory ways. Mystery shopping undertaken as part of the Home Office led research found that, compared to prospective White British house seekers, BAME groups were more likely to be asked for references, the length of time they had lived in the local area, and be informed about rental and additional fees.

However, while the mystery shopping exercise suggested that there were a small number of instances of potentially discriminatory behavior or attitudes, there was no

evidence of a difference in final outcome. Further, it is not possible to attribute this discrimination to the Right to Rent policy – such discrimination may simply reflect latent prejudice held by landlords in the private rented sector.

Like the findings with tenants, other qualitative research showed that respondents had not been aware, first hand, of discrimination linked to the scheme, but did raise concerns that it could be a potential unintended consequence.

An external assessment of the evaluation (Grant & Peel 2015) carried out by Joint Council for the Welfare of Immigrants of the pilot scheme found the current safeguards against discrimination of tenants, including BAME tenants was insufficient. It concluded that landlords are prepared to discriminate against those with complicated immigration status and those who cannot provide documentation immediately, that many landlords have found the checks and the ‘Code of Practice on Avoiding Discrimination’ and the ‘Code of Practice for Landlords’ confusing and have therefore implemented them incorrectly, and that the policy has not and will not achieve its stated aim to deter irregular migration or prevent irregular migrants from settling in the UK.

This research is supported by survey research carried out by the Residential Landlords Association (Simcock 2017) which indicates that the Right to Rent policy may reduce the likelihood of landlords renting to individuals who have nothing short of a British passport; the survey of landlords conducted as part of this study, suggested that 42 per cent of landlords were ‘less likely’ to rent to someone without a passport because of the Right to Rent scheme.¹³

Recommendations

As with the in-work poverty and UC process strands of this research, the review of literature was meant to be supplemented by additional primary research and stakeholder workshop.

Unlike the other strands of the research, which focused on engaging London residents and frontline services who had experienced adverse effects flowing from these phenomena, the research team attempted to engage landlords in this phase of the research. However, despite repeated attempts and exploration of several alternative recruitment avenues, the research team failed to engage landlords, and subsequently no landlord-based focus groups were conducted.

Despite this, methodologically, gearing primary research activities towards landlords as opposed to affected Londoners or frontline advisers and support service is appropriate for several reasons.

¹³ It should be noted that the precise question that was put to landlords was: “Are you now less likely to consider letting to any of the following groups as a result of the ‘right to rent’ scheme?” which may influence the response to the question.

1. The nature of Right to Rent based discrimination meant that identifying individuals affected by the policy to recruit into a focus group would be impractical within the time frame.
2. Identifying individuals who had been unlawfully discriminated against because of the Right to Rent policy would prove highly challenging. Indeed, whether or not individuals themselves were able to recognise they were being unlawfully discriminated against within London's highly active private rental market is in itself unlikely unless such discrimination was overt and specific.
3. Discussions with London-based frontline housing advice providers and local authority housing support teams suggested they had no experience of supporting London residents overcome unlawful discrimination they may have experienced. Their lack of experience in providing this type of support would mean their engagement in a focus group or stakeholder workshop would provide little 'real world' insight.

Discussions with London borough housing teams and advice sector representatives suggested that adverse effects of the Right to Rent policy, were obscured to the point of negligibility by more substantive drivers of housing disadvantage related to the availability of affordable housing, the quality of housing, and debt (specifically rent arrears) due to welfare reform. Indeed, London Councils have echoed concerns about the inadequacy of current and projected housing supply within their response to the Fixing Our Broken Housing Market White Paper (2017 unpublished). The response highlights that the proposals "do not go far enough in giving local planning authorities more control over development in their areas and will not achieve the Government's aim of increasing the supply of housing and accelerating development." Though recognising that London boroughs have an important part to play in enabling development, the proposals should do more to compel developers and house builders to build out permissions.

In order to meet the housing needs of particular, often vulnerable, groups, London Councils has stated that responsibility for this should not only fall on local planning teams, but should also involve a range of other services. Acknowledging the benefits of devolving responsibility for local policy setting, London Councils has called for cross-departmental involvement to be explicitly reflected in national policy:

"The housing and adult social care departments of local authorities have expertise and data on the specific housing needs of vulnerable groups and the supply of supported housing in local authority areas. It should be made clear in national policy that data needs to be shared between departments for these policies to be effective. Policies should also be evidence-based and tailored to meet local needs rather than a requirement for generic policies for prescribed groups."

When these discussions are viewed alongside the limited and qualified existing evidence base, there is a clear evidence gap that warrants more specific and intensive research. Quantifying the size of the issue and identifying affected Londoners will be a significant challenge – while frontline services reported this form of unlawful discrimination as not being a pressing issue for them, this does not necessarily mean that it is not experienced by Londoners. Indeed, it may reflect an unmet need of the community, many of whom may fail to recognise that they are being unlawfully discriminated against, or if they do fail to recognise their recourse to this response (see Pleasence et al. 2011).

In the first instance, it is recommended that research directly with London landlords is conducted. This would be the most efficient way to explore the veracity of Right to Rent based unlawful discrimination. Despite the difficulties encountered in engaging landlords in this and other research (see Simcock 2017)¹⁴ the alternative would be to identify individuals who have experienced unlawful discrimination, which would be methodologically far more difficult.

¹⁴ For example, the RLA survey referred to above, appears to have achieved less than a 5 percent response rate.

5. Intersectionality and interaction

This review has clearly demonstrated certain population groups feature commonly across all of the broad social policy areas considered. People with disabilities, single parent households, and London's migrant community featured regularly across this report. There was a clear overlap between groups experiencing issues related to in-work poverty and to the UC application process; they could broadly be characterised as living in low income households. Further, low income and benefits receipt are likely to conflate with having challenges accessing good quality housing.

Intersectionality

While some existing literature captures intersectional evidence on various protected characteristics, such as age and ethnicity which shows that BAME youth are disproportionately adversely affected in the labour market compared with their White counterparts, and gender and ethnicity which shows the same trend for women compared to their male counterparts, the majority of research conducted to date tends to view inequality through a lens of 'single' disadvantage as opposed to viewing the complex or multiple disadvantage the most vulnerable often experience. Where research and analysis does effectively explore intersectionality of inequality in detail, it often sets out to specifically explore this as a focus of the study; for example, work carried out by Sarah-Marie Hall *et al* (2017) which explored the impact of austerity on BAME women. Such research relies on accessing data of sufficient scale to be able to identify a disproportionate trend with statistical confidence – achieving this level of confidence can be challenging when considering that groups experiencing intersecting inequality usually account for a small proportion of the overall population.

An alternative approach to understanding how personal characteristics and circumstances intersect to disadvantage individuals is to do so qualitatively to gain insight into the 'lived experience' of multiple disadvantage. While this approach is more manageable by removing the need for scale, it does not so freely allow comparison with other population groups in order to understand the magnitude of the disadvantage experienced, which reduces its utility as a tool for equalities impact assessment. However, such an approach would be fitting in the tradition of research into intersectionality, and would provide a deep insight of how personal characteristics manifest into disadvantage.

Overall, this presents limitations for this report which seeks to provide an intersectional analysis of who in London is experiencing disadvantage across a range of social welfare issues. Despite highlighting examples of how intersectionality can work to adversely affect vulnerable groups, much of this has relied on isolating individual studies as there are an insufficient number of studies to provide a detailed understanding of the interaction between different forms of social disadvantage.

Part of this is shaped by the form of this study, which, in phase 2 explored issues thematically, as opposed characteristically on specific population experience. This reflects the nature of the research reviewed, which often provided relatively standardised analysis by the broad socio-demographics defined as ‘protected characteristics’; consideration of intersectionality of characteristics was carried on an ad-hoc basis. For the purposes of equalities impact assessment, this level of analysis was appropriate to discharge public bodies statutory duty to have ‘due regard’ to equalities and diversity¹⁵ and continues to be used to demonstrate compliance with the public service equality duty. More recently, there have been calls to get a better understanding of intersectionality and the experience of multiple disadvantage going beyond the protected characteristics (see for example Fisher 2015).

Interaction

As noted, some population groups appeared across the three policy areas as being disproportionately affected, suggesting an interaction between issues and possibly the experience of concomitant problems touching on the experience of low paid work, having difficulties accessing benefits, and facing housing issues (e.g. rent arrears and eviction).

As a consequence of the existing evidence base being largely structured around focussing on a single policy issue, it is difficult to fully understand how employment and skills, welfare reform and housing policy interact, particularly within a London context. Hence, while it is possible to say single BAME mothers are significantly disadvantaged by welfare reforms and UC, relevant findings related to this group are not available when considering in-work poverty. Likewise, while young males were also singled out by focus group participants as being vulnerable to adverse consequences of the delay in UC payments; this was not reflected elsewhere. These examples demonstrate the limitations of looking at intersectionality on a thematic basis as the consequences of experiencing ostensibly the same issue may have very different consequences.¹⁶

The examples do, however, also demonstrate the nuance of understanding intersectionality where two very different groups experience the same process but respond and are impacted in vastly different ways. Attempting to quantify or assess the relative disadvantage in this would not be appropriate and such issues may be better explored on a ‘group-by-group’ basis. Looking at specific groups individually is likely to provide a much deeper understanding of their specific needs which in turn could lead to the development of more effective policy interventions.

¹⁵ The statutory duty to conduct equalities impact assessments for policy decisions was removed by the Equalities Act 2010

¹⁶ The focus group elaborated that single BAME mothers often ‘went without’ and that their children did not enjoy the opportunities that many of their peers had; in contrast young males were identified as being especially vulnerable to mental health issues as a consequence.

Recommendations

It is telling that across all of the studies reviewed, only one specifically focused on intersectionality (Hall et al. 2017). There is evidently a pressing need for more research in this vein – primarily framed around the population concerned to understand their experiences within a social context. Given the absence of any coordinated research activity, London Councils may want to consider how to develop a London specific understanding of intersectional and multiple disadvantage with an equalities and diversity context.

In the first instance, there should be a request to increase the prominence and range of data related to intersectional inequality presented as part of London's Poverty Profile, developed by Trust for London emulating elements of JRF's Monitoring Poverty and Social Exclusion report series (for the most recent report in the series see Tinson et al. 2016).

Using its position to advise its members, London Councils could also look to support individual boroughs to conduct discrete pieces of relatively small-scale research with targeted local populations. Coordinating this research activity could ensure that insight from diverse range of populations groups is obtained from across London, while at the same time keeping the burden placed on any one council to a minimum. Viewed collectively, this could provide a powerful resource to understand the different needs of London's numerous communities and groups that could benefit all London boroughs.

By way of example, such a resource could be especially useful when developing the Universal Support offer (in line with the recommendation noted previously with regards to in-work poverty and UC transition). It would allow boroughs to more accurately identify all the 'core' elements of support, as well as supplementary support that may be required by different people.

Realistically, many boroughs will not have the capacity to build intersectional inequality into their usual equalities impact assessments, nor are they likely to look beyond the immediate policy of concern to fully understand how it may interact within the prevailing policy context to exacerbate disproportionate disadvantage. This leaves an important knowledge gap which London Councils may be able to at least in part, address.

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Annex A: Phase 2 Options

London Councils Equalities Research: Phase 2 options

This paper presents the options to carry forward into Phase 2 of the London Council's Equalities Research, suggested and agreed by the Learning & Work Institute (L&W), and the London Councils' Equalities Research Steering group. The recommended areas of focus were identified through:

1. The trawl of evidence and interviews with stakeholders
2. Consideration of the relevance to London (through the input of the Steering Group)
3. An assessment of how effectively the issues can be explored within the confines of the methodology and timescale proposed for phase 2.

The table below presents each area of focus, the methods (providing more detail around the focus groups L&W intend to conduct), and the anticipated aims and intended outcomes of the policy workshops, which are to be conducted towards the end of the project (mid-late November)

Areas of focus	Methods	Workshop aims and outcomes
In-work poverty: has intersectionality with skills, welfare reform, housing and employment. A growing concern for the UK given the scale of the problem, but starker in London due to the cost of living.	<p>Focus group to be conducted with Londoners currently trapped in low income and insecure work, to explore their experience of in-work poverty, what they expect will happen if things continue as they are, and what they think would help them bridge any challenges they are experiencing in the short and medium term.</p> <p>A second focus group with community organisations, employers, Housing Officers and welfare rights advisers will explore how they are responding to the challenge, service implications (or for employers' resource and productivity implications).</p>	<p>What: Understand the drivers of in-work poverty and its consequences, and how these consequences may manifest in a London context.</p> <p>How: What solutions are there to help lift households out of in-work poverty, considering the growth of insecure work, the reduced availability of training and courses (with a focus on ESOL), upward pressure on the cost of living and, welfare reforms (e.g. Tax Credits, and the benefit cap)</p>
Right to rent based discrimination: building on evidence that landlords are effectively incentivised by	Subject to viability, we will convene focus groups with landlords (and associated	What: Data from the evidence trawl, and focus groups will provide an understanding of

Areas of focus	Methods	Workshop aims and outcomes
<p>this policy to employ discriminatory practices, increasing barriers experienced by BAME Londoners to the rental market. Given the demographic profile of London as well as its active private rented market, the effects of right to rent evidence are likely to be acutely felt by BAME groups. More recently, uncertainty following the 2016 EU referendum may have presented issues for EU nationals.</p>	<p>representative bodies) to explore the precise effects on their behaviour as a result of the right to rent policy, to understand how they implement the policy in practice, and the risks that the policy exposes them to.</p>	<p>landlords' decision making and its consequence for BAME populations.</p> <p>How: What areas of landlord decision making are open to influence, to reduce adverse E&D impacts of the policy? How can the risks landlords are exposed to be mitigated at the same time? What additional activity needs to occur by others/elsewhere to reduce adverse effects on London's BAME population?</p>
<p>Universal Credit (UC) process, which seeks to deliver an initial payment to new claimants in 6 weeks is itself creating financial hardship. For many the wait is considerably longer and subject to administrative error. This in turn leads to increased pressure on local services and crisis support, and has had significant consequences on claimants (e.g. rent arrears and priority debt, going without, destitution). Cost of living within London is likely to make this an acute issue for Londoners. As the pace of UC full service rolls out further, the scale of adverse consequences</p>	<p>Focus group with claimants in London Full / Live Service areas who have experienced difficulties in claiming UC. The scope of these focus groups will be confirmed once a decision on the range of claimants to engage has been agreed.</p> <p>A further focus group with front line services (such as CAB and Law Centres, health/wellbeing services, foodbanks, community services and housing associations). The focus group will explore the full range of the consequences claimants are experiencing, the scale of the issue, and the operating pressures of</p>	<p>What: Provide a deep understanding of the issues claimants face as a result of the introduction of UC, specific to London, and the pressure this is causing elsewhere.</p> <p>How: Develop solutions based around the following themes:</p> <ul style="list-style-type: none"> > Bridging support – what can be done in the short term to minimise adverse consequences of UC roll out > Operational recommendations – how can the existing process be supported to minimise risk to claimants > Policy and campaigning – is there a common policy position that

Areas of focus	Methods	Workshop aims and outcomes
<p>due to procedural weaknesses will increase.</p> <p>To be decided: This phase can be looked at across the claimant population, or focussed in on specific populations. The Steering Group suggested Asylum Seeker and Refugees would be one such group, due to inconsistency between the 'move on' period to claim benefits, and the UC process.</p>	<p>the organisations (critically, are they able to meet the demand from claimants).</p>	<p>stakeholders (inc. London borough) can take.</p>

Other options were presented to the steering group, but were excluded for the following reasons:

1. **Apprenticeships:** exploring why BAME populations do not access apprenticeships; clustering of BAME and women towards entry level apprenticeships and evidence they are less likely to progress. *Excluded due to the level of research activity currently occurring (including by L&W)*
2. **Making the gig economy work for Londoners:** how can people be insulated from job insecurity, income volatility, and employer exploitation. *Excluded as legislative solution being explored following the publication of the Taylor review. Is also likely to be covered as part of in-work poverty.*
3. **Homelessness (specifically rough sleepers):** worrying rise in visible rough sleepers, with correlation drawn to welfare reforms; Government's approach described as too light touch, and not strategic. *Excluded: Homelessness Act 2017 may provide a legislative solution, also no clear E&D angle.*