



Haringey Council

Cabinet – 17 March 2015 – Consultation on Haringey’s draft Housing Strategy 2015-2020

Appendix C – Equality Impact Assessment (EqIA)

Name of Project	Haringey’s draft Housing Strategy 2015-2020	Cabinet meeting date <i>If applicable</i>	17 March 2015
Service area responsible	Housing Investment & Sites Team		
Name of completing officer	Liz Smale	Date EqIA created	14 January 2015
Approved by Director / Assistant Director	Dan Hawthorn	Date of approval	23 February 2015

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

- **Eliminating discrimination, harassment and victimisation**
- **Advancing equality of opportunity**
- **Fostering good relations**

In addition the Council complies with the Marriage (same sex couples) Act 2013.

Haringey Council also has a ‘**Specific Duty**’ to publish information about people affected by our policies and practices.

All assessments must be published on the Haringey equalities web pages. All Cabinet papers MUST include a link to the web page where this assessment will be published.

This Equality Impact Assessment provides evidence for meeting the Council’s commitment to equality and the responsibilities outlined above, for more information about the Councils commitment to equality; please visit the Council’s website.

Stage 1 – Names of those involved in preparing the EqIA	
1. Project Lead – Liz Smale	5.
2. Equalities / HR – Zakir Chaudhry	6.
3. Legal Advisor (where necessary) – Alison Vydulinski	7.
4. Trade union – N/A	8.

Stage 2 - Description of proposal including the relevance of the proposal to the general equality duties and protected groups
<p>Every council needs a Housing Strategy because access to a good quality, affordable home is important to everyone living in the borough, whatever their background, and underpins health, educational attainment, safe and attractive neighbourhoods and vibrant communities.</p> <p>A Housing Strategy:</p> <ul style="list-style-type: none"> • Is a summary document that brings together all the issues about housing in a council area both in the private housing sector (such as private rented and owner occupied homes) and the public sector (such as council- and housing association-owned homes). • Sets out: <ul style="list-style-type: none"> ○ The council's vision and priorities/aims for housing of all types in the borough ○ A description of the local housing market and information about residents living in the borough and their housing needs now and in the future ○ How the council needs to take account of housing priorities set by national government and, in Haringey's case, the Mayor of London ○ How the council will use its own resources and work in partnership with others to achieve its housing vision and priorities/aims <p>Haringey currently has a Housing Strategy (2009-2019) which was written 5 years ago but is now out of date. A great deal has changed since it was written in 2008/09, particularly national policies on housing and welfare. Haringey's local housing market and housing needs have also changed and the council has less resources to help solve the borough's housing problems.</p> <p>Haringey's draft Housing Strategy 2015-2020 explains the council's updated approach to housing in all tenures and in all areas of the borough. The Housing Strategy will be delivered through a wide range of housing-related and other council strategies and policies which are already in place or will be in the next few months. These are set out in the accompanying delivery plan. The outcomes envisaged by the Housing Strategy will be monitored and reviewed annually to</p>

ensure they continue to be responsive to changes in the local, regional and national landscape.

There are a wide range of specific approaches to achieving the Housing Strategy's vision, grouped under its objectives which are to:

- **Improve help for those in housing crisis** (part of priority consulted on in first round of consultation entitled "Build strong, inclusive and successful communities")
- **Ensure that housing delivers a clear social dividend** (part of priority consulted in first round of consultation entitled "Build strong, inclusive and successful communities")
- **Drive up the quality of housing for all residents** (priority consulted on in first round of consultation was entitled "Improve the quality of housing for everyone")
- **Achieve a step change in the number of new homes being built** (priority consulted on in first round of consultation entitled "Build more homes across the borough")

An additional objective ("Ensure that housing delivery a clear social dividend") has been included to assist in making the council's strategic direction clearer. The wording of the other objectives was also changed to (a) align them closer to the objectives set out in Priority 5 of the council's Corporate Plan 2015-18 and (b) to use more brief and direct language to communicate more obviously what the council wishes to achieve.

The vision for the Housing Strategy is:

"Housing is about people and communities, not just bricks and mortar. This means mixed and inclusive neighbourhood where residents can lead happy and fulfilling lives."

In its first round of consultation, the council consulted on the following principles which might govern how it carries out it's housing activities:

- Help people help themselves by working supportively with them on their need for a home
- Build homes that people want, need and can afford
- Deliver excellent housing services whilst managing our budgets well and reducing costs
- Make best use of council-owned homes and assets
- Work in partnership with residents and stakeholders to deliver the council's housing vision

In the draft Housing Strategy, the principles are now explained through a breakdown of the component parts of the vision, namely:

- Housing is about people and communities.
- We want mixed and inclusive neighbourhoods
- We want to work together with residents so they can lead happy and fulfilling lives

The reason for taking this approach is ensure the principles were rooted in the vision rather than having them as separate considerations and to bring out the importance for the council of achieving mixed and inclusive communities.

The outcome from the first round of consultation was overwhelming support for the vision, priorities and principles set out in the consultation document. In addition, analysis of comments from 330 respondents revealed the following concerns:

- Affordability of housing in the borough
- Scepticism that the council will achieve its vision and priorities/aims
- Build more homes
- The management and quality of the private rented homes in the borough
- That homes should be set in a good quality environment (internally and externally)

It should be noted that delivery of the Housing Strategy will take place through a wide range of other council policies and strategies.

This equalities impact assessment:

- **Examines the four objectives of the draft Housing Strategy from an equalities perspective**
- **Examines the outcomes of the consultation on the proposed vision, priorities (objectives) and principles of the draft Housing Strategy to identify any equalities impacts**

Examining the equalities impact of the 4 proposed objectives of the draft Housing Strategy

This EqIA has involved examining and interpreting a great deal of data. In order to help readers through the material more quickly, a summary appears in this section with the full information and supporting data in Appendix 1 at the end of this document.

Proposed Objective: Improve help for those in housing crisis

The draft Housing Strategy 2015-2020 sets out a number of headline proposals under this objective which include:

- Prevent people becoming homeless, preventing people spending a long time on the council's Housing Register, or in temporary accommodation provided because they are homeless
- Continue to allocate social housing in the borough to those in greatest housing need

An examination of available protected characteristic data took place on:

- who approaches and is accepted as homeless,
- who is in temporary accommodation (TA) and for how long
- Who is on Haringey's Housing Register
- Who is being allocated social rented homes.

Conclusion on the objective "Improve help for those in housing crisis"

The key issues highlighted by the data on **homelessness** and **TA** show that:

- Female lone parents have the highest level of homelessness acceptances in Haringey and this level is increasing year on year.
- Black households approach as homeless at a level which is more than twice their representation in Haringey's population compared with White households who present in numbers which are around two thirds of their representation in Haringey's general population. This indicates that Black households are particularly affected by homelessness in the borough.
- Two groups of households are disproportionately represented as homeless in Haringey: those aged between 16 and 24 and between 25 and 44.
- Homeless acceptance due to mental or physical disability is higher than the Census 2011 data shown indicating that disability may be a factor in causing homelessness for these groups of households.
- For households placed in temporary accommodation (TA) because they are homeless, Black households are the biggest group waiting in TA between 0 and 4 years whilst White households are the biggest group waiting in TA for 5-9 years
- Drilling down further, households headed by Black females account for 36% of all households in TA and households headed by White females account for

a further 24% of all households in TA.

- The largest age group in TA 25-44 year olds
- Female households in TA outnumber male households by 3 : 1 which is higher than the ratio of households by sex in the Housing Register (1.8 : 1)(see further below)

Key issues arising from the data on the **Housing Register** are:

- the proportion of Black housing applicants on the Housing Register far outweighs their presence in the general Haringey population and particularly so in terms of housing need as represented by Bands A-C, the higher levels of housing need. This appears to indicate a particularly high level of housing stress for Black households in Haringey. As there is a high level of homelessness acceptances in Black groups, this is also reflected in the Housing Register.
- Female applicants outnumber male applicants 3:1 but in Band B females outnumber males by 4:1. Band B is where most homelessness applicants are placed.
- The vast majority of applicants on Haringey's Housing Register by number are in the age group 25-44 and this is the largest group in every band except Band A. By proportion this age group is the largest in Band B which is where most homeless households are placed.
- The level of disability of applicants in Band A appears to be lower than the likely equivalent in the 2011 Census.
- Black female applicants are the biggest group in Band B where most homeless households are placed. White female applicants are the next biggest group. Together they make up nearly 18% of the Housing Register.

On **social housing allocations**, the key issues highlighted by the data are:

- Housing applicants in Black and White groups receive the bulk of available social housing lettings
- Lettings to female housing applicants far outweigh the number made to male housing applicants but by a slightly lower ratio than their presence on the Housing Register (1.8 :1 (HR) to 1.7 : 1 (Lettings).
- Proportionately, lettings to housing applicants with a disability recognised by Haringey's Allocations Scheme are lower than similar levels of disability shown in the Census.

How will Haringey's new Housing Strategy respond to the issues outlined above?

Loss of a private rented home or lack of access to stable, good quality and affordable homes are the main reason households look to the council for housing assistance. The Housing Strategy sets out the council's plans to build new affordable homes although the number achieved will never be enough to meet the

needs of everyone who needs them. Indeed the number of affordable low rent homes planned by the council itself (250) will meet the needs of around 5% of the current applicants on the Housing Register who are in Bands A-C (4587). The Housing Strategy also sets out the council's intention to support households to prevent their homelessness and reduce the need for temporary accommodation by commissioning early intervention and support services that sustain independence and provide alternative accommodation pathways.

Several strategies and policies will underpin and deliver Haringey's new Housing Strategy. These are:

- Haringey's Homelessness Strategy, which will be refreshed during 2015/16 starting with a homelessness review, will examine further the issues highlighted by the above brief examination of the data on the differential impacts of homelessness and recommendations for responding to these needs will be set out in the revised Homelessness Strategy.
- Haringey's Housing Allocations Scheme which governs the allocation of council and housing association lettings in the borough and who is able to join the Housing Register.
- The council also intends to develop a private sector housing strategy during 2016/17 which will set out Haringey's direction on improving quality and management in the private housing sector including bringing empty homes back into use.

Recommendations for Objective 1

- Currently no regular monitoring takes place on lettings of social rented homes in terms of protected characteristics. Monitoring should take place at least annually to identify and put in place mitigating actions to remedy any discrimination taking place due to the rules set out in the Housing Allocations Scheme.
- The housing circumstances and needs of households aged 18-24 and 25-44 which are the biggest age groups accepted as homeless, in TA and on the Housing Register need to be understood and an appropriate response put in place.
- The housing circumstances of female Black Households and female White households on the Housing Register and in TA, need to be examined further to understand their particular housing needs. The Housing Strategy needs to reflect what can be done for this group of residents (around 1800 people plus associated family) for whom an appropriate housing response is needed.

Proposed Objective: Ensure that housing delivers a clear social dividend

Under this objective, the headline proposals are set out followed by relevant protected characteristic or other information available on each. The amount of protected characteristics data available under this objective is not as comprehensive as for the first objective.

The headline proposals under this objective include:

- Provide lifetime tenancies for council tenants and encourage other social housing providers to do the same

In terms of lifetime tenancies, data on existing council tenants was explored. There is no similar data for housing association tenancies in the borough.

The following was found about Haringey tenants who currently enjoy lifetime tenancies:

- Asian, White and Mixed households are under-represented in Council tenancies compared with their representation in Haringey's population.
- Black and Other households are over-represented in Council tenancies compared with their representation in Haringey's population
- Whereas the representation of males and females in Haringey's population is more or less the same, female tenants outnumber male tenants by a ratio of 1.6 : 1.
- Council tenants in the age ranges 16-24 and 24-44 are both under-represented compared with the general population whilst council tenants in ages range 45 and upwards are all over represented compared with the general population of similar age
- For the majority of tenants, there is no information recorded about disability needs. Information is recorded for just under 20% of tenants.

- Ensuring the council's housing services are of a measurably high standard and subject to continuous improvement and that residents are engaged in shaping them

From September 2014 Homes for Haringey became responsible for delivering community housing services as well delivering the council's landlord function. The Executive Leadership Team monitors standards and equality and diversity impacts of its business activities on a quarterly basis. This approach should enable continuous improvement to be monitored and any differential impact for service users related to protected characteristics identified and mitigated at an early stage.

- The council and other social landlords working together with tenants to help them improve their health, education, skills and employment prospects in return for which residents are expected to take responsibility for their housing and their wider lives.

The council's business growth activities supported by its Economic Development Strategy will enable this aspect of the Housing Strategy. For example, over 20,000 new jobs will be facilitated over the period from now until 2036 (from 73,000 (2011 baseline) to 95,000 by 2036 (+29.5%)).

The EqIA for the Economic Development Strategy expected that the impact of outcomes from it will be in proportion to the representation of protected characteristics in Haringey's population.

- Place a high priority on affordable home ownership, giving as many families as possible a realistic chance of getting onto the housing ladder

An analysis of protected characteristics and affordability of homes is set out in the section below examining the objective “Achieving a step change in the number of homes built”.

- *Look for pioneering ways that residents can have a direct stake in Haringey’s growth and regeneration, particularly in Tottenham and Wood Green where change is greatest*

There is no data available on this. The council should build in equalities monitoring of Haringey residents who engage with activities coming out of this proposal to ensure proportionate outcomes and benefits.

Recommendations for Objective 2

- Equalities monitoring should take place for all projects and activities which deliver new homes and jobs to ensure that all Haringey residents benefit proportionately.
- Where monitoring shows that residents with particular protected characteristics are not benefiting, an examination of why this is happening should take place and mitigating action taken.

Proposed Objective: To drive up the quality of housing for all residents

The draft Housing Strategy 2015-2020 sets out a number of headline proposals under this objective which include:

- Tackling poor quality in the private rented sector by
 - Setting up a lettings and management agency
 - Licensing all private rented landlords in the borough
- Complete the decent homes programme for council-owned homes
- Set new standards for homes built and managed by housing associations, especially estates with more than one housing association landlord
- Drive up standards in the design of new homes
- Tackling poor quality in the private rented housing sector:

Haringey has already taken action to improve conditions in the private rented sector by putting in place additional licensing schemes for private sector homes in multiple occupation. The council does not currently monitor landlords it works with or the occupants of homes in multiple occupation (HMOs) it licenses.

In advocating additional licensing of HMOs in Harringay ward and in Tottenham wards, the council undertook an equalities impact assessment (EqIA) in 2012 of all areas affected. Using census data, the EqIA identified that:

- In terms of age, young people might be disproportionately impacted if the number of HMOs reduced in number as a result of additional licensing as they relied on HMOs as their main housing option, but then improvements in conditions of HMOs as a result of licensing would mean they benefited disproportionately.
- In terms of race, Black and minority ethnic households which predominate in the wards affected by additional licensing would also benefit disproportionately from improved HMO conditions as a result of licensing
- No data was available for sex, sexual orientation and religion/belief
- There was no likely impact for disabled people who would likely be prioritised for social housing.

In relation to the council's new proposals for the private rented sector, equalities impact assessments will be undertaken when developing the proposals for a lettings and managing agency and for a selective licensing scheme covering all private landlords in Haringey.

- Complete the Decent Homes programme for council-owned homes

Homes for Haringey's Asset Management Strategy, 2010/2017, covers all investment in the Councils housing stock, including decent homes.

In compliance with the Council's public sector equality duty, an Equality Impact Assessment was undertaken as part of drawing up the Strategy. The findings were incorporated into Homes for Haringey's planning processes for delivering decent homes. This included ensuring that all residents receive the standard of work that is consistent with the Decent Homes policy, and that consideration of specific language and other needs were identified and addressed when drawing up programmes of work.

The tender process used to award the contract was in line with the council's procurement policy and guidelines, had equalities considerations at all the key stages.

- Set new standards for homes built and managed by housing associations, especially estates with more than one housing association landlord

Equalities monitoring of estates owned and managed by more than one housing association landlord should be put in place to ensure improvements impact proportionately on tenants affected.

- *Drive up standards in the design of new homes*

Achievement of this activity will benefit all residents who access new homes with higher design standards. It is routes to accessing these new homes which may not have proportionate outcomes for residents with protected characteristics.

Proposed Objective: Achieve a step change in the number of new homes being built

The draft Housing Strategy 2015-2020 sets out a number of headline proposals under this objective which include:

- Maximising the number of new homes being built through close working with partner housing associations
- Offering a range of different types and sizes of homes of different prices and tenures in each neighbourhood which will enable households to move up the housing ladder but stay within their communities
- Defining “affordable housing”, both rented or part-owned, as spending up to 35% of earned income on housing costs
- Placing a high priority on building homes which are affordable to buy on lower incomes
- Pushing ahead with estate renewal to include new homes with different tenures, prioritise the building of larger social homes
- Building new social homes in parts of the borough where it is scarce, whilst prioritising more private rented homes and homes for sale in areas which are now predominantly social housing.
- Experimenting with new types of homes such as subsidy-free affordable housing, new approaches to shared ownership and purpose-built private rented homes

The analysis undertaken examines the impact on residents in Haringey with protected characteristics of the high priority to build homes which are affordable to buy on lower incomes.

Conclusion on affordability

In the context of focusing on developing more affordable home ownership options in the central and eastern parts of Haringey, the data indicates that:

- According to two thresholds of housing affordability (35% and 45% of net median income spent on housing costs), council and housing association homes in Haringey are very affordable by households on the median income for the borough. Homes charging Affordable Rents with rents up to 65%

of market rents are marginally affordable at 35% of net income and affordable at 45% of net income spent on housing costs. Shared ownership homes are marginally affordable at 35% of net income and are affordable at 45% of net income spent on housing costs. The latter (45%) is the government threshold for affordability of shared ownership. Homes with Affordable Rents (80% of market rent) are not affordable at 35% of net income spent on housing costs and only marginally affordable at 45% of net income. Private rented homes and outright sale homes are not affordable by households on Haringey's median income.

- Home ownership is high in the west of Haringey where as in some areas of east Haringey, social rented housing is the dominant tenure.
- Occupations with lower pay are more represented in the east of Haringey whereas occupations with higher pay are represented more in west Haringey. Incomes data show that only wards in west Haringey have incomes above the Haringey median income of £33,140.
- Incomes in east and central Haringey have reduced between 2010 and 2012/13 whereas they have risen in west Haringey over the same period
- Black households are represented more in the east of Haringey than they are in the west of the borough and conversely White households are represented more in the west of the borough, than in the east.
- Initial data on buyers of shared ownership homes show that Black and ethnic minority buyers are under-represented in new schemes whilst White buyers are over-represented in comparison with their representation in the general population of Haringey.
- Initial data on buyers of shared ownership homes show that the previous tenure of most buyers was the private rented sector.
- Initial data on buyers of shared ownership homes indicates around 50% of households lived in Haringey. Of this a smaller proportion already lived in east Haringey.

What does this tell us about the affordability of housing for residents with protected characteristics?

The above evidence indicates there is a possibility that over time Black residents in Haringey may not benefit from the plans to build more homes in the borough through promoting affordable home ownership in east Haringey. White households may benefit more easily. To help support existing communities whilst also increasing a greater mix of tenure, ways of ensuring Black households have access to and benefit from low cost home ownership products need to be explored.

How can the potential effects be mitigated?

The ability of local people to afford the new homes being built, especially in the east of the borough, is dependent on them accessing jobs and also increasing their incomes to a sufficient level to afford the new homes on offer as a result. Haringey's Business Growth plans include increasing the number of jobs in Haringey from 73,000 (2011 baseline) to 95,000 by 2036 (an increase of 29.5%). It is planned to change the profile of Haringey-based jobs so that retail and public sector employment are less dominant, and there is a better range of jobs, including a greater proportion of jobs in more highly-skilled

sectors, such as sustainable technology, digital design and skilled/ craft manufacturing. The opportunities being created over the next 10 years should be open to all Haringey residents with monitoring undertaken to ensure the outcomes are delivered proportionately.

Examining the outcomes of the first round of consultation on the proposed vision, priorities (objectives) and principles of the draft Housing Strategy to identify any equalities impacts

Eight respondents explained the importance of taking into account the needs of households which include members of all ages with disabilities: disabilities needs should be considered in terms of availability and design of homes and in terms of staff training to understand the needs of households with disabilities.

Stage 3 – Scoping Exercise - Employee data used in this Equality Impact Assessment

Identify the main sources of the evidence, both quantitative and qualitative, that supports your analysis. This could include for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of recent relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national.

Data Source (include link where published)	What does this data include?
N/A – the proposed Housing Strategy does not impact on Haringey Council employees	

Stage 4 – Scoping Exercise - Service data used in this Equality Impact Assessment

This section to be completed where there is a change to the service provided

Data Source (include link where published)	What does this data include?
2011 Census data http://www.haringey.gov.uk/sites/haringeygovuk/files/130327_key_statistics_analysis_and_fact_sheets.xls	Tenure, ethnicity, sex, disability, age,
	Population, household spaces, dwelling

GVA (2014) Haringey Strategic Housing Market Assessment based on a Housing Needs Survey of 1,004 Haringey residents with a minimum of 10% of respondents (100 people) from each of the Local Housing Market Areas identified within the borough	stock, occupancy, age, ethnicity, household composition, occupational levels, tenure, house price and rents, household incomes
Joint Strategic Needs Assessment - Housing http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment/other-factors-affecting-health/jsna-housing	Population, tenure, house prices and affordability, homelessness, ethnicity of homeless households
Trust for London/New Policy Institute, London's Poverty Profile 2013 http://www.londonpovertyprofile.org.uk/	Population, ethnicity, income and wealth inequality, tenure

Stage 5a – Considering the above information, what impact will this proposal have on the following groups in terms of impact on residents and service delivery:

Positive and negative impacts identified will need to form part of your action plan.

	Positive	Negative	Details	None – why?
Sex	✓	✓	<p>Under Objective 1, “Improve help for those in housing crisis” of the draft Housing Strategy: The housing circumstances of female Black Households and female White households on the Housing Register and in TA, need to be examined further to understand their particular housing needs. The Housing Strategy needs to reflect what can be done for this group of residents (around 1800 people plus associated family) for whom an appropriate housing response is needed. Addressing these needs</p> <p>Under Objectives 1, 3 and 4, “Improving help for those in housing crisis”, “Drive up the quality of housing for all residents” and “Achieve a step change in the number of new homes being built” should lead to a positive outcome for this group, On</p>	

			the latter, it should be noted that the 250 new council-owned homes (low rent) planned will meet only 5% of the current needs on Haringey's Housing Register.	
Gender Reassignment				Data is insufficient to comment. The case for collecting this information in this context should be explored.
Age	✓	✓	Households aged 16-24 and 25-44 are over-represented in homelessness acceptances, in temporary accommodation and on the Housing Register. Why this is so needs to be understood. The Housing Strategy Objective 4 of "Achieve a step change in the number of new homes being built" which includes plans to assist more people to access home ownership is likely to benefit first time buyers who tend to be in younger age groups. However, age groups of all ages who have insufficient income will not benefit. The design of new homes will include lifetime	

			homes and sustainable design standards will benefit all age groups. Objective 1 “Improve help for those in housing crisis” includes plans to enable vulnerable households with assessed housing needs of all ages to benefit from initiatives which enable independent living. Objective 3 “Drive up the quality of housing for all residents” should also assist all age groups.	
Disability	✓		The Housing Strategy Objectives 4 and 1 “Achieve a step change in the number of new homes being built” and “Improve help for those in housing crisis” both address the needs of disabled people in terms of the design of new homes to be built (lifetime homes and sustainability of homes), and enabling independent living (through Disabled Facilities Grants, etc)	
Race & Ethnicity	✓	✓	Under Objective 1 “Improve help for those in housing crisis”, there are similar issues as raised in the sections on Sex and Age. A better understanding of	

			<p>housing circumstances of Black groups over-represented in homelessness and in TA is required and an appropriate response developed. Under Objective 4, “Achieve a step change in the number of new homes being built”. All groups may not benefit. For example, evidence in this analysis shows that Black residents in Haringey may not benefit from the plans to promote affordable home ownership in east Haringey. White households may benefit more easily. Under Objective 3 “Drive up the quality of housing for all residents” all ethnic groups should benefit from activities under this objective with the outcome that there is a reduction in the level of assistance being required from the council under Objective 1 “Improve help for those in housing crisis”.</p>	
Sexual Orientation				Data is insufficient to comment. The case for collecting this information in this context should be

				explored
Religion or Belief (or No Belief)				Data is insufficient to comment. The case for collecting this information in this context should be explored.
Pregnancy & Maternity				Data is insufficient to comment. The case for collecting this information in this context should be explored.
Marriage and Civil Partnership				Data is insufficient to comment. The case for collecting this information in this context should be explored.

Stage 5b – For your employees and considering the above information, what impact will this proposal have on the following groups:
Positive and negative impacts identified will need to form part of your action plan.

	Positive	Negative	Details	None – why?
Sex				The Housing Strategy has no impact on staffing structures
Gender Reassignment				As above
Age				As above
Disability				As above
Race & Ethnicity				As above
Sexual Orientation				As above
Religion or Belief (or No Belief)				As above
Pregnancy & Maternity				As above
Marriage and Civil Partnership				As above

Stage 6 - Initial Impact analysis	Actions to mitigate, advance equality or fill gaps in information
The Housing Strategy will contribute to the equalities agenda by building more homes in the borough, improving support for those facing housing crisis, improve the quality of existing housing in the borough and ensure housing delivers a clear social dividend.	The council will continue to monitor the equalities profile of lettings of new affordable homes built in the borough which are funded by Haringey or other public sources to ensure they are used to meet housing need recognised in Haringey's Allocations Policy. The council will also collect equalities information on shared ownership buyers to ascertain their profile in relation to Haringey's current population. The Housing Strategy will be delivered by a wide range of council policies and strategies each of which will be subject to equalities impact assessments and equalities monitoring.

Stage 7 - Consultation and follow up data from actions set above	
Data Source (include link where published)	What does this data include?

Stage 8 - Final impact analysis

Stage 9 - Equality Impact Assessment Review Log

Review approved by Director / Assistant Director

Dan Hawthorn

Date of review

23/2/2015

Review approved by Director / Assistant Director

Date of review

Stage 10 – Publication

Ensure the completed EqIA is published in accordance with the Council's policy.

Appendix 1 – Housing Strategy EqIA - Stage 2 - Data

Note on broad categorisations of data:

In this EqIA, **broad ethnic categories** (Asian, Black, Mixed, White, Other) include a range of ethnicities. The following table shows the make up of each broad ethnic category:

Broad ethnic category	Ethnicity data collected
Asian	Asian or Asian British Asian or Asian British - Bangladeshi Asian or Asian British - East African Asian or Asian British - Indian Asian or Asian British - Pakistani Other Asian
Black	Black or Black British Black or Black British - African Black or Black British - Caribbean Other Black
Mixed	Asian and White Black Caribbean and White Black African and White Mixed Black Mixed Asian Other Mixed

Broad ethnic category	Ethnicity data collected
White	White or White British White or White British - Irish White or White British - Greek Cypriot White or White British - Kurdish White or White British - Turkish White or White British - Turkish Cypriot White or White British - Gypsy White or White British - Traveller White or White British - Irish Traveller Other White European Other White
Any other ethnic group	Chinese Any other ethnic group

For some analysis, Haringey is split into **three broad areas: west, central and east**. The wards included in each broad area are:

	Wards
West Haringey	Alexandra Crouch End Fortis Green Highgate Hornsey

	Wards
	Muswell Hill Stroud Green
Central Haringey	Bounds Green Harringay Noel Park St Ann's West Green Woodside
East Haringey	Bruce Grove Northumberland Park Seven Sisters Tottenham Green Tottenham Hale White Hart Lane

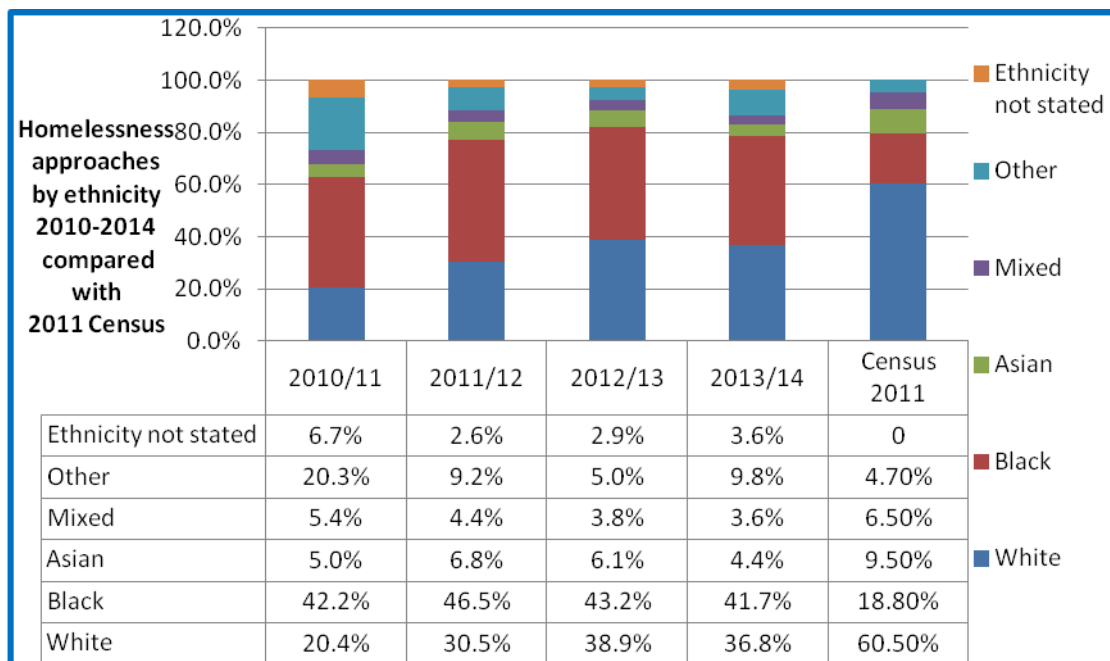
Proposed Objective: Improve help for those in housing crisis

The draft Housing Strategy 2015-2020 sets out a number of headline proposals under this objective which include:

- Prevent people becoming homeless, preventing people spending a long time on the council's Housing Register, or in temporary accommodation provided because they are homeless
- Continue to allocate social housing in the borough to those in greatest housing need

Data on homelessness in Haringey

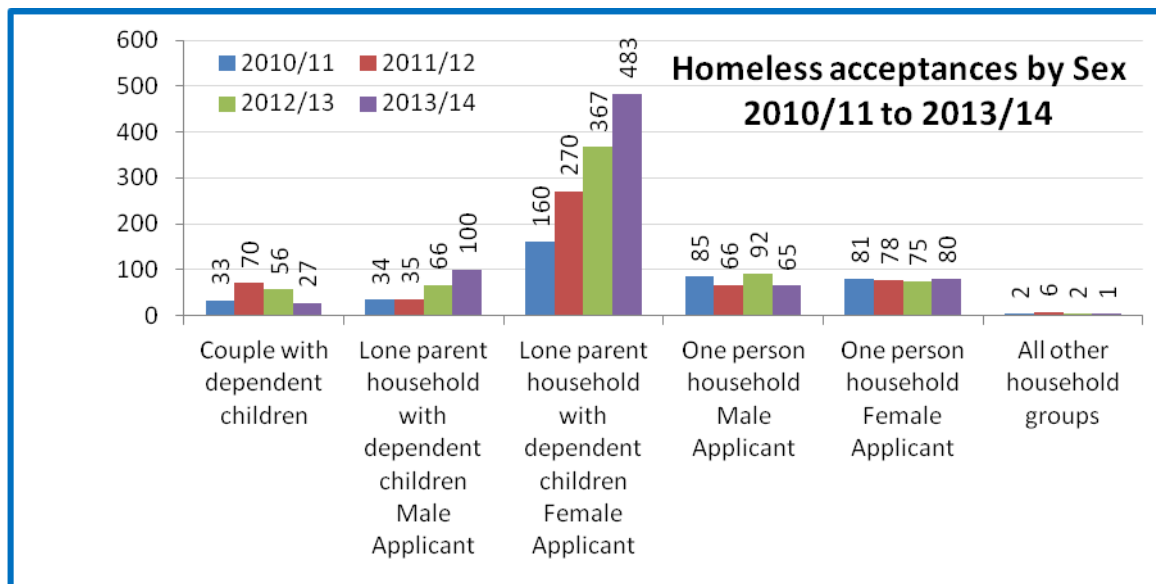
Ethnicity of households approaching Haringey Council as homeless



The graph to the left details approaches of homelessness households to Haringey Council by ethnicity and compares this to the representation of each ethnicity in the 2011 Census for Haringey's population.

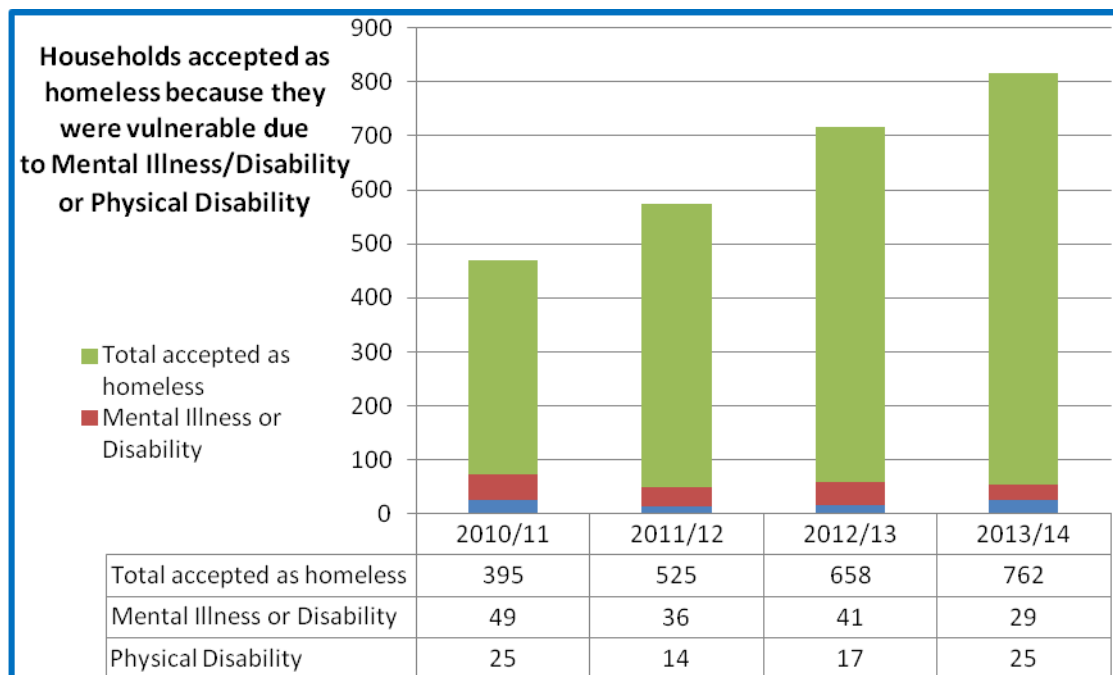
The data shows that Black households are the biggest group to approach as homeless over the four year period, shown at over 40% of all applicants and this level of approach remains consistent. This is more than twice the level of their presence in the population indicated by 2011 Census data (18.8%). White households are the second largest group approaching as homeless. The level of their approaches (at less than 40%) is also much less than their presence in the population indicated in the 2011 Census (60.5%). Their level of approach as homeless is showing an upward trend.

For Mixed, Asian and Other households, homelessness approaches are lower than their presence in the population indicated by the 2011 Census.



The chart left shows data on the number of households accepted as homeless under the homelessness legislation by sex. Female lone parents are the biggest group in this category and their number has increased annually. 2011 Census data shows there is a relatively equal gender split in Haringey with just over half the population being female (50.5%). Haringey's forthcoming refreshed Homelessness Strategy will set out the council's response on assisting female lone parents which are particularly affected by homelessness.

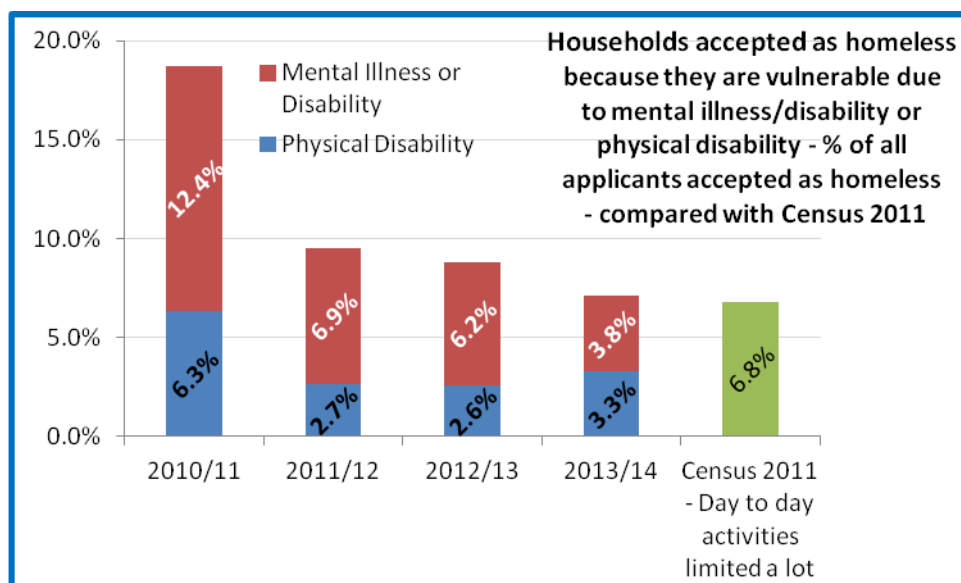
Homelessness by Disability



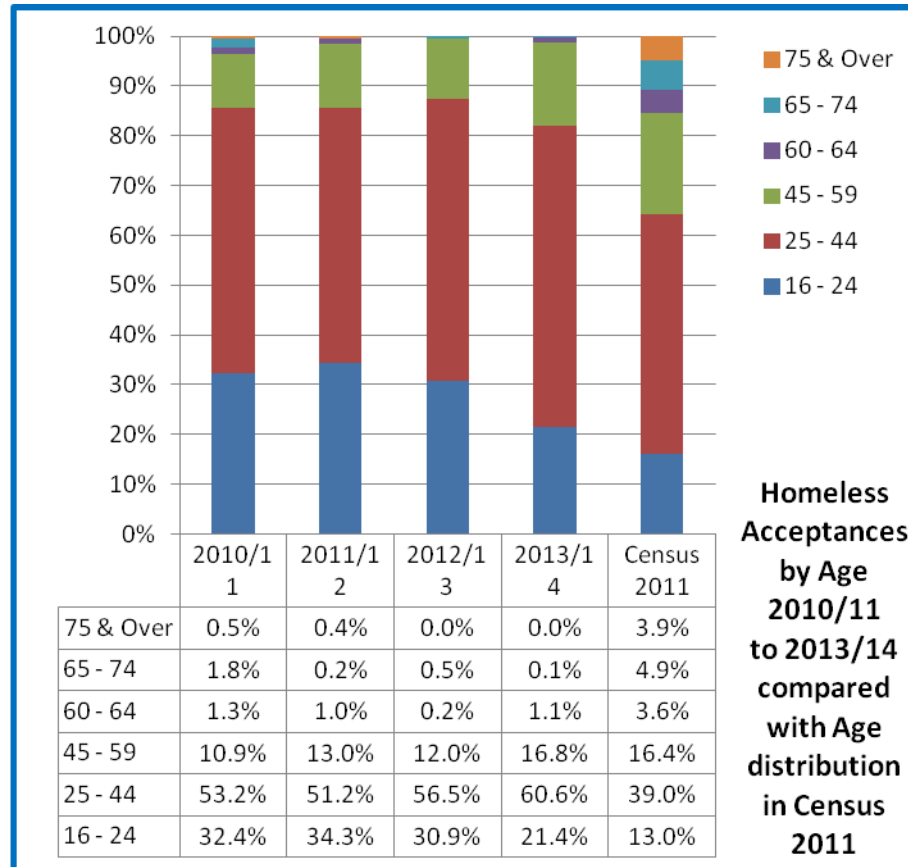
The chart (left) on disability and homelessness acceptances shows low numbers of households who are vulnerable due to mental ill health or disability or physical disability.

The chart below shows homelessness acceptances due to mental or physical disability in percentage terms compared to Census 2011 data on households in Haringey whose day-to-day activities are limited a lot by a long-term health problem or disability.

The percentages of homeless acceptance due to mental or physical disability is higher than the Census 2011 data shown indicating that disability may be a factor in causing homelessness for these groups of households.



Homelessness by Age



The age of households accepted as homeless compared with the Census 2011 age distribution shows two groups of households are disproportionately represented as homeless in Haringey:

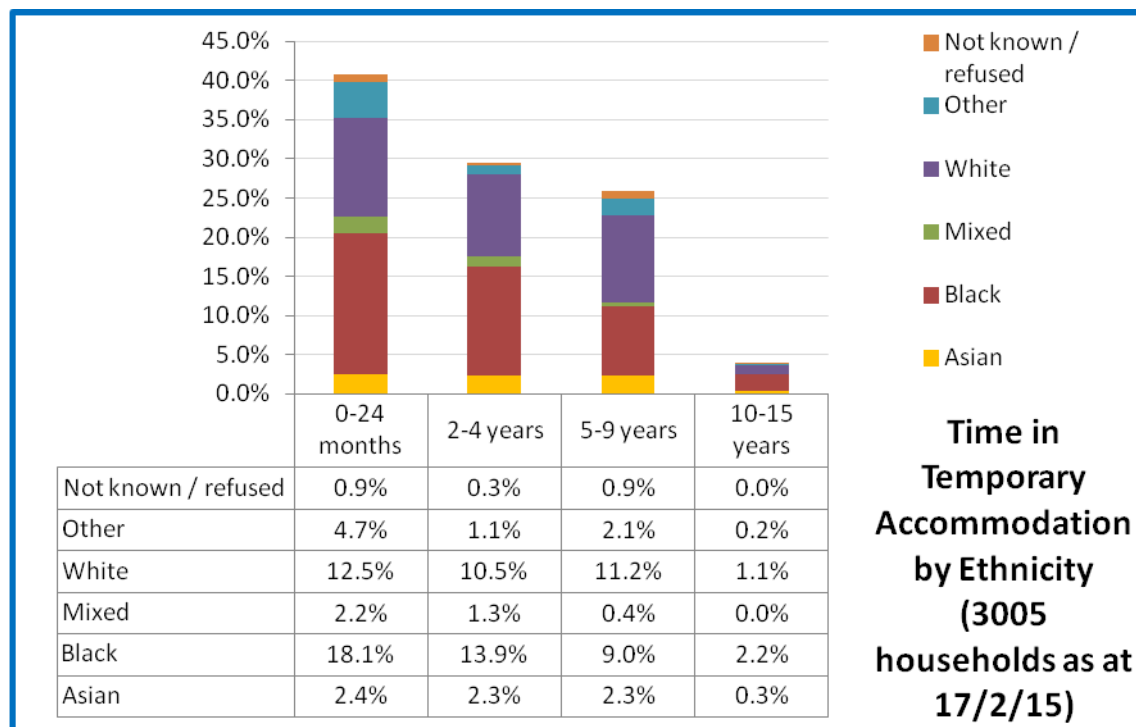
- Age group 16-24
- Age group 25-44

Until 2013/14, households in the 45-59 age group had been under-represented in homelessness acceptances.

Haringey's refreshed Homelessness Strategy will address the needs of these age groups.

Households placed by Haringey Council in Temporary Accommodation because they are homeless

Temporary accommodation (TA) is provided to households for whom there is no suitable alternative at the time they present to and/or are accepted as homeless by the council. Most temporary accommodation is good quality, self contained and in the private rented sector. There were 3,005 households in TA at the end of December 2014. In November 2012 homeless law changed so that councils can discharge their homelessness duty to the private housing sector and homeless households have no right to a social rented home as previously. In practice discharging households to the private rented sector has become increasingly difficult because of the lack of affordable good quality private rented homes available. As a result, the number of households in TA is increasing over time with applicants relying on a diminishing supply of social rented homes.

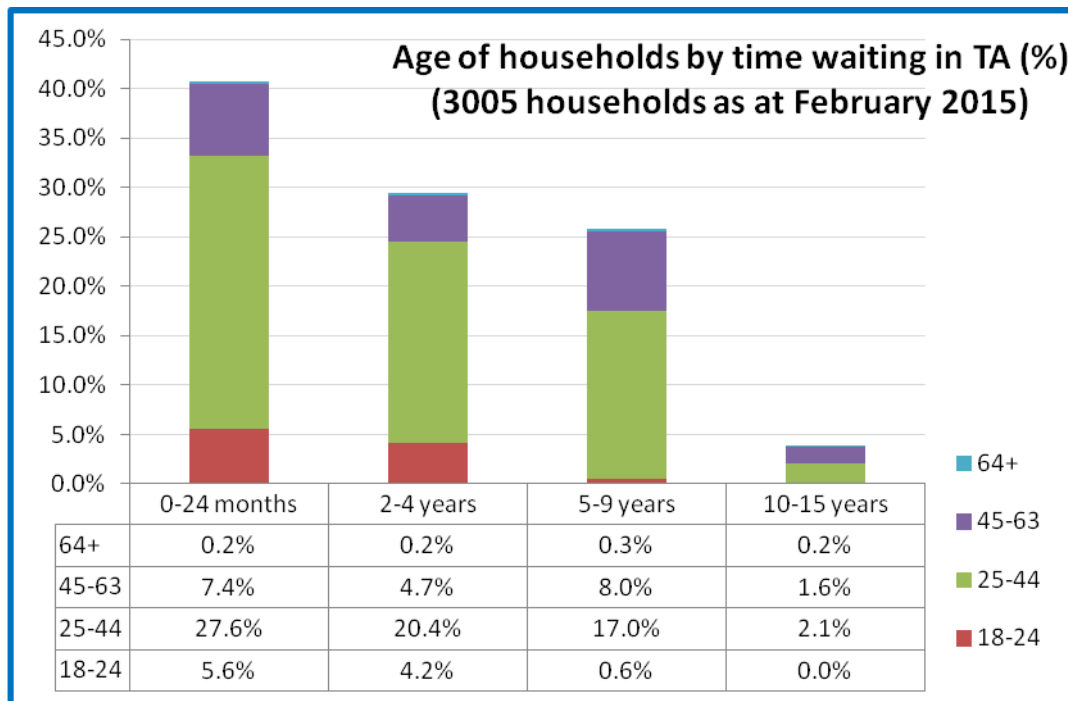


The chart to the left sets out the percentage of households placed by the council in temporary accommodation (TA) because they are homeless by time waited in this accommodation and broad ethnic categories as at the end of December 2014.

Around 40% of households in TA have been waiting up to 24 months, some 30% have been waiting between 2 and 4 years, around 25% have been waiting 5-9 years in TA and just under 5% have been waiting between 10-15 years. Not shown are a handful of households who have been waiting longer than this: 3 households have been waiting in TA for 15-20 years and one household for 23 years.

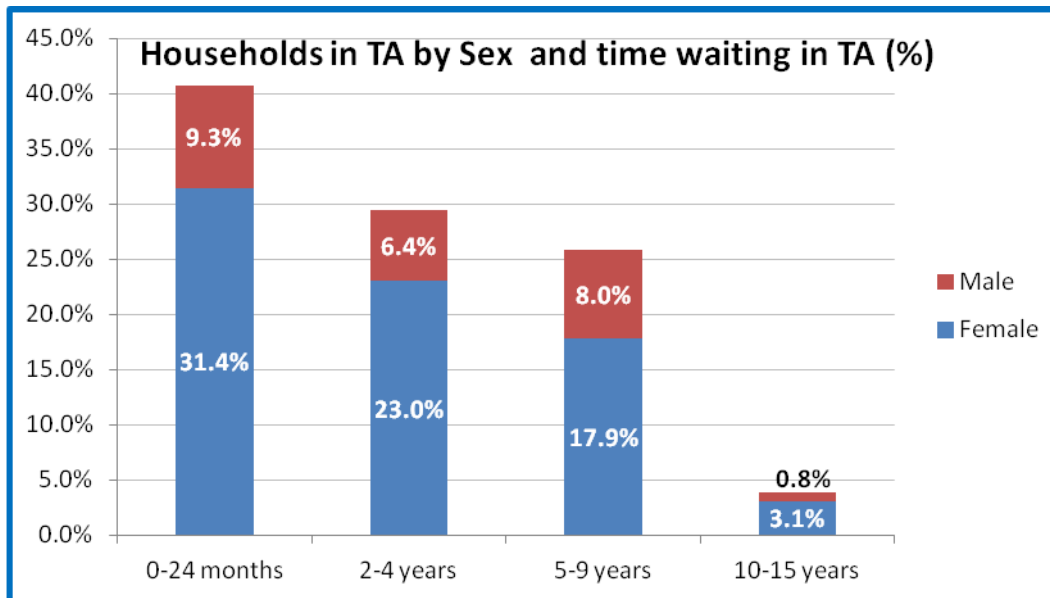
In terms of ethnicity, Black households in TA are the largest group waiting 0-24 months and 2-4 years. This accords with the level of approach and acceptance as homeless outlined above. White households are the largest group waiting in TA for 5-9 years. Asian households maintain the same level of representation between 0 and 9 years of waiting in TA.

The longer waits in TA usually indicate households needing larger-sized social rented homes which are less frequently available than social rented homes with one or two bedrooms.



This chart sets out the percentage of households in temporary accommodation by age group and the time they have so far waited there.

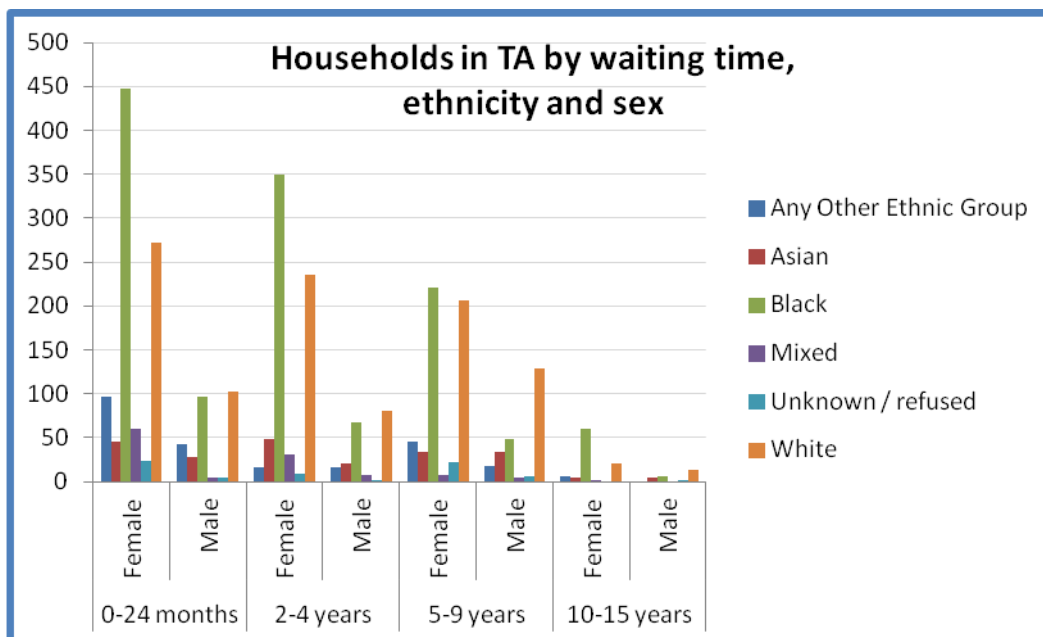
The age group 25-44 is the largest group in all years with the next largest age group being 45-63 years. People aged 18-24 do not stay as long in TA as older groups. This is most likely due to the fact they need smaller-sized social rented homes which are more plentiful in supply.



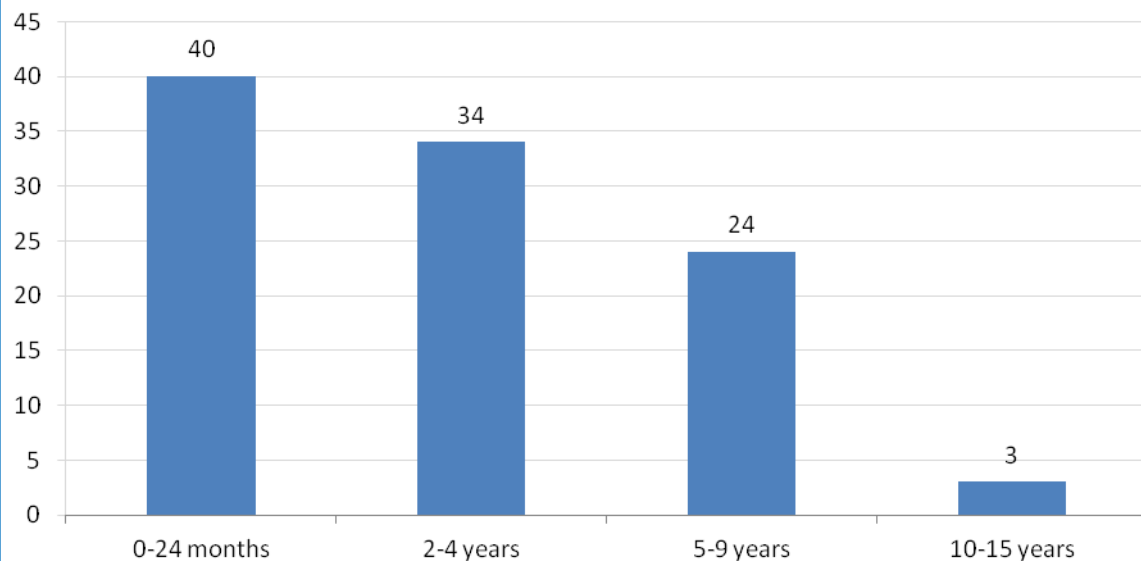
The percentage of households in TA by sex is set out in the chart to the left.

Female households in TA outnumber male households by over 3:1 in all waiting time categories, except 5-9 years where females outnumber males by 2:1. This level of representation is in keeping with the level of homelessness approaches and acceptances outlined above.

In the chart below left, households in TA by waiting time, ethnicity and sex is analysed. It can be seen that households headed by Black females are the biggest group in all waiting time categories. In fact they account for 36% of all households in TA as at the end of December 2014. The next biggest group waiting up to 9 years in TA are households headed by White females and they account for 24% of all households in TA.



Households with a Disability and time waiting in TA



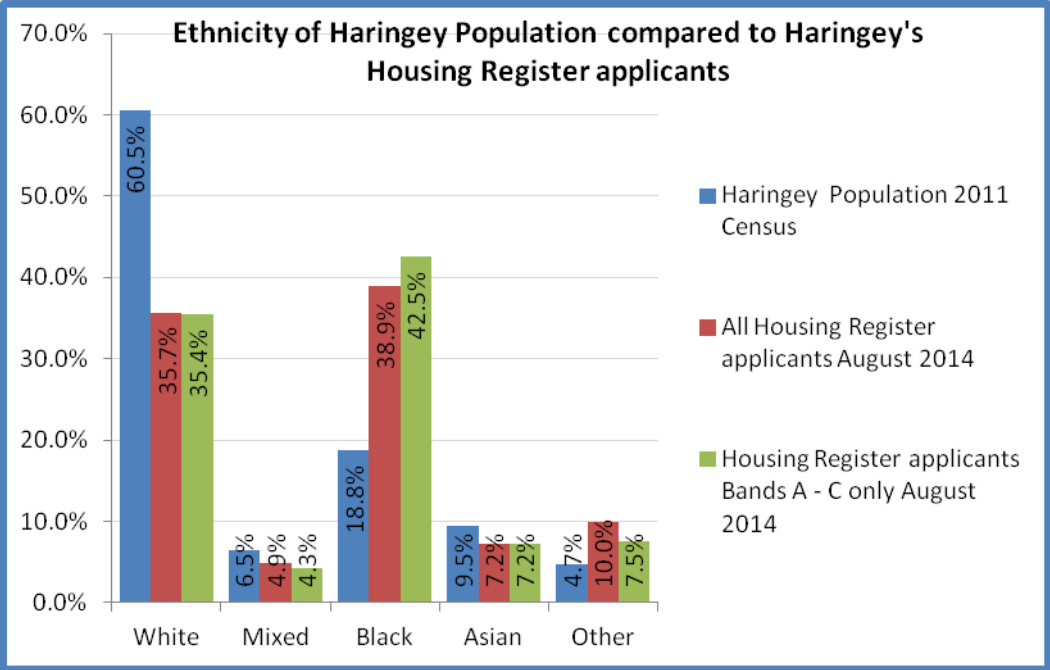
The chart to the left sets out the number of households in TA which includes a member with a disability. There are 101 households with a disability as at the end of December 2014 out of 3005 households in TA.

Social rented homes which meet the needs of households with a disability are few and far between in availability.

Haringey's Housing Register

Ethnicity of Housing Register Applicants

Haringey's Housing Register currently comprises 5 bands of housing need, A to E; Band A contains applicants with the highest need including those with disabilities (mostly physical); Band E the lowest. Band B contains applicants who have been accepted by Haringey Council as homeless under the homelessness legislation. In October 2014 Cabinet agreed to remove Bands D and E as these categories of applicant had not received offers of social rented homes for over 3 years. Applicants in these groups will be removed from the Housing Register during 2015. Available social rented homes are allocated to applicants on the Housing Register according to the rules sets out in Haringey's Housing Allocations Scheme.



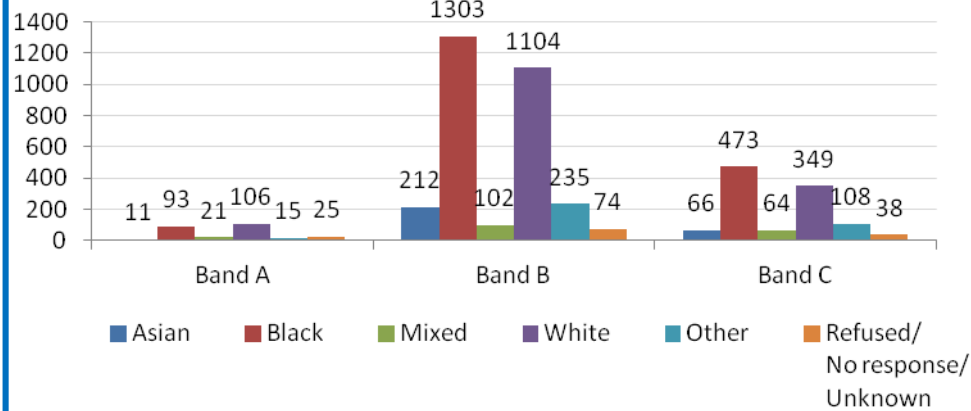
The chart to the left compares the representation of different ethnic groups in Haringey with their representation on Haringey's Housing Register and, within the Housing Register, their representation in Bands A-C. The chart shows that the proportion of Black housing applicants far outweigh their presence in the general Haringey population and particularly so in terms of housing need as represented by Bands A-C.

This appears to indicate a particularly high level of housing stress for Black households in Haringey that needs to be addressed – see also the data on homelessness above, where Black households are the biggest group approaching as homeless.

Waiting times on Haringey's Housing Register for applicants who are in the highest Bands A and B as at August 2014:

	No. of years waiting
Band A	
Wait for a 3 bedroom home	5.5 years
Wait for a 2 bedroom home	3.2 years
Band B	
Wait for a 3 bedroom home	7.2 years
Wait for a 2 bedroom home	10.5 years

Applicants on Haringey's Housing Register as at August 2014 by broad ethnicity categories and Bands A-C



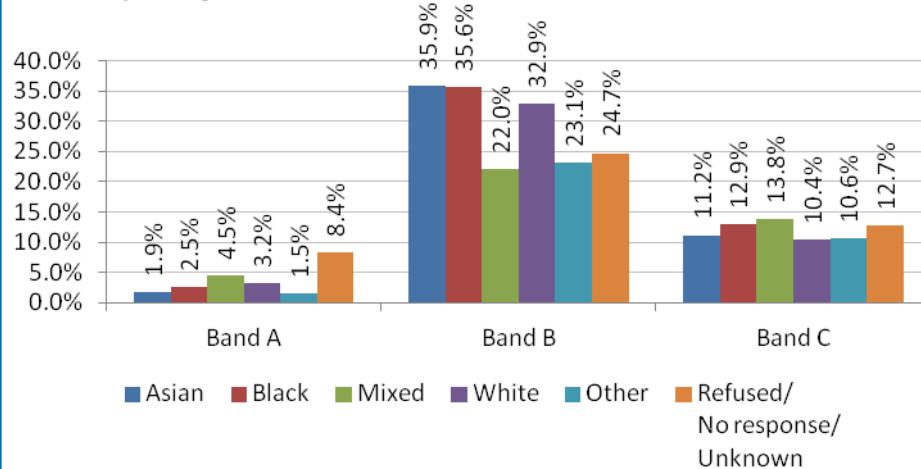
The charts to the left analyse the Housing Register by bands A-C (the bands with most housing need) and by broad ethnicity categories in terms of numbers and proportions (%)

In terms of numbers, Black applicants are the biggest group in Bands B and C and White groups are the second biggest group in each of these bands.

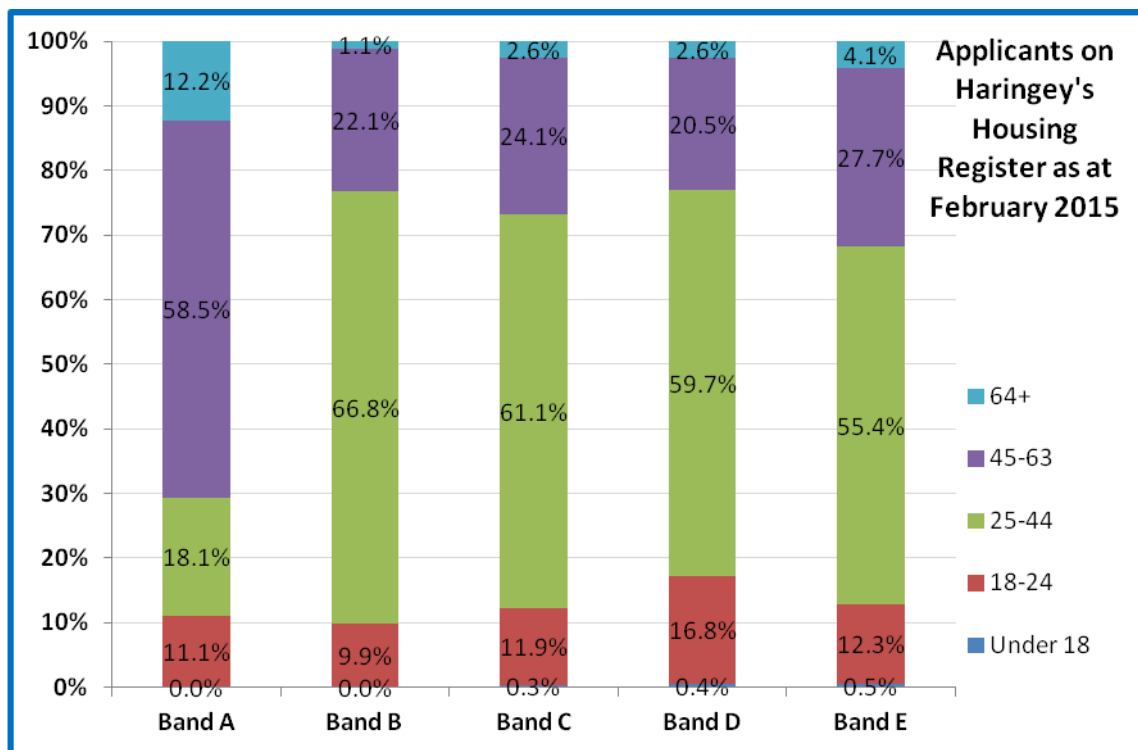
Band B is where most applicants to whom the council has accepted a duty to house under the homelessness legislation are placed.

In terms of their proportionate presence on the Housing Register, Asian applicants are highly represented in Band B as are Black applicants, with White applicants the third largest group represented in Band B.

Housing Register Applicants by Band A-C and broad ethnicity categories %



Age of Housing Register applicants



The chart to the left examines the age structure of applicants on Haringey's Housing Register.

The vast majority of applicants on Haringey's Housing Register **by number** are in the age group 25-44 and this is the largest group in every band except Band A. By **proportion** this age group is the largest in Band B

In Band A, the applicants with the highest priority by proportion are in the 64+ age group whilst in numbers, the largest group of applicants is in the age group 45-63.

Applicants who are under 18 account for 31 applicants on the Housing Register and they are to be found in Bands C to E.

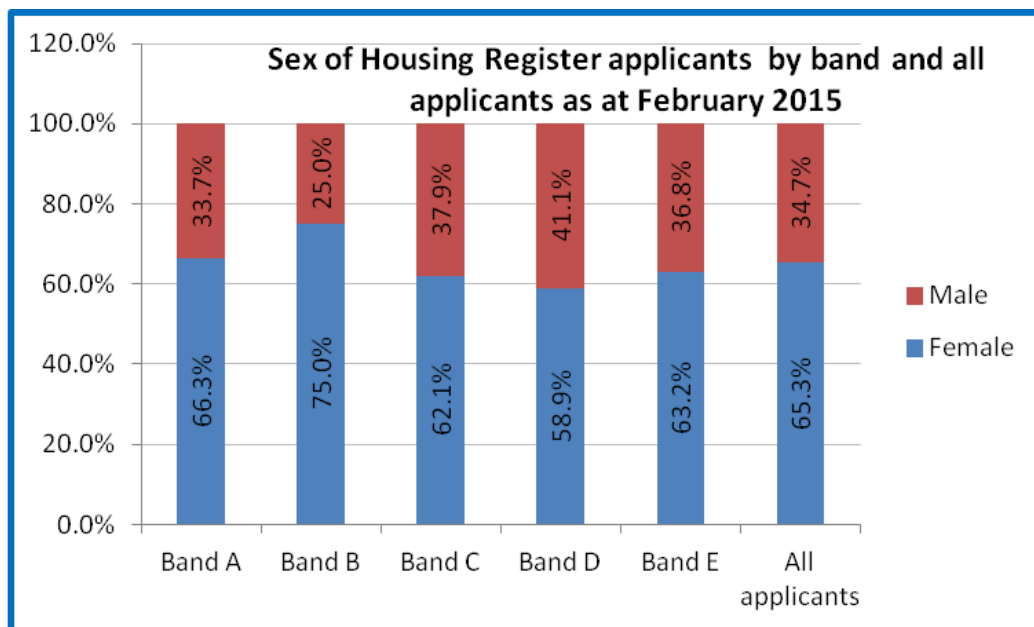
It should be noted that Cabinet agreed in October 2014 to remove Bands D and E from the Allocations Scheme as no applicant within them had received an offer over the previous 3 years. To keep applicants in Bands D and E on the Housing Register was felt to give false hope as they were highly unlikely to ever receive an offer of a social rented home. The majority of applicants in Bands D and E are in the 25-44 age group with the next highest group in the 45-63 age group and then the 18-24 age group

As at October 2014, no applicants in Band C had received offers of social rented homes for the previous 12 months.

In terms of numbers, though Band A has only 270 people in it. Numbers in the other Bands are:

Band B	3071
Band C	1246
Band D	3342
Band E	2330

Sex of Applicants on Haringey's Housing Register

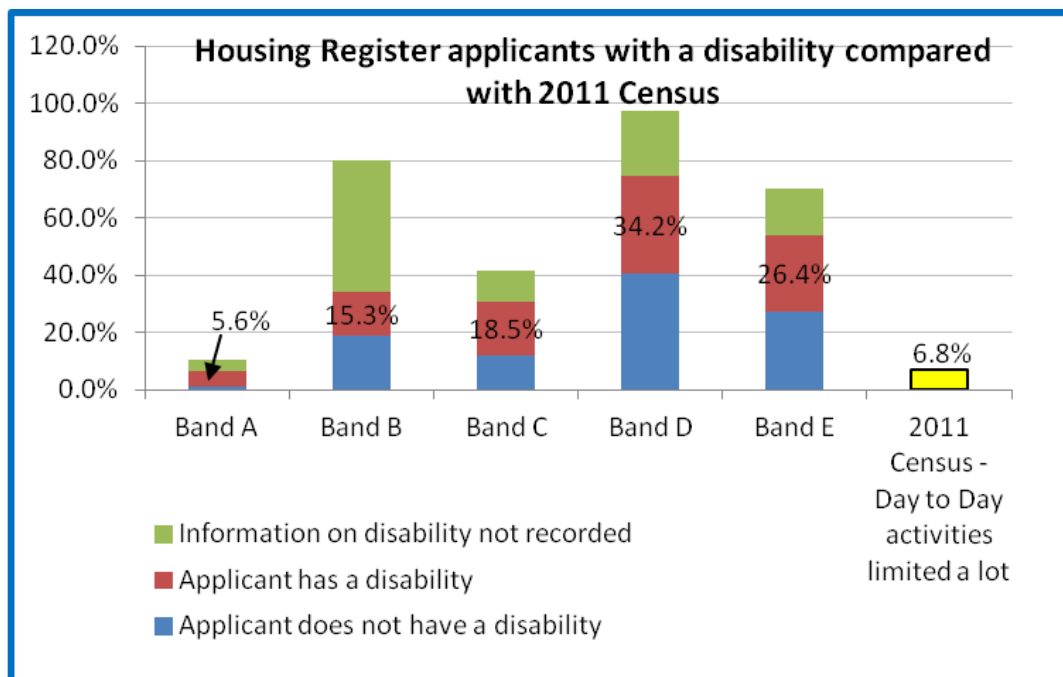


The chart to the left shows the sex of housing applicants by bands A-E and compared against all applicants on the Housing Register regardless of banding.

The data shows that for all bands except Band B, the proportions of male female applicants are roughly the same with female applicants outnumbering male applicants almost 3 to 1.

In Band B female applicants outnumber male applicants 4 to 1. The explanation for this is that most applicants in temporary accommodation because they are homeless are placed in Band B and female lone parents are by far the biggest group accepted as homeless.

Disability of Housing Register Applicants



There are 859 Housing Register applicants who have some level of disability recorded. These applicants are found in all Bands. They comprise 8.4% of the Housing Register as at February 2015.

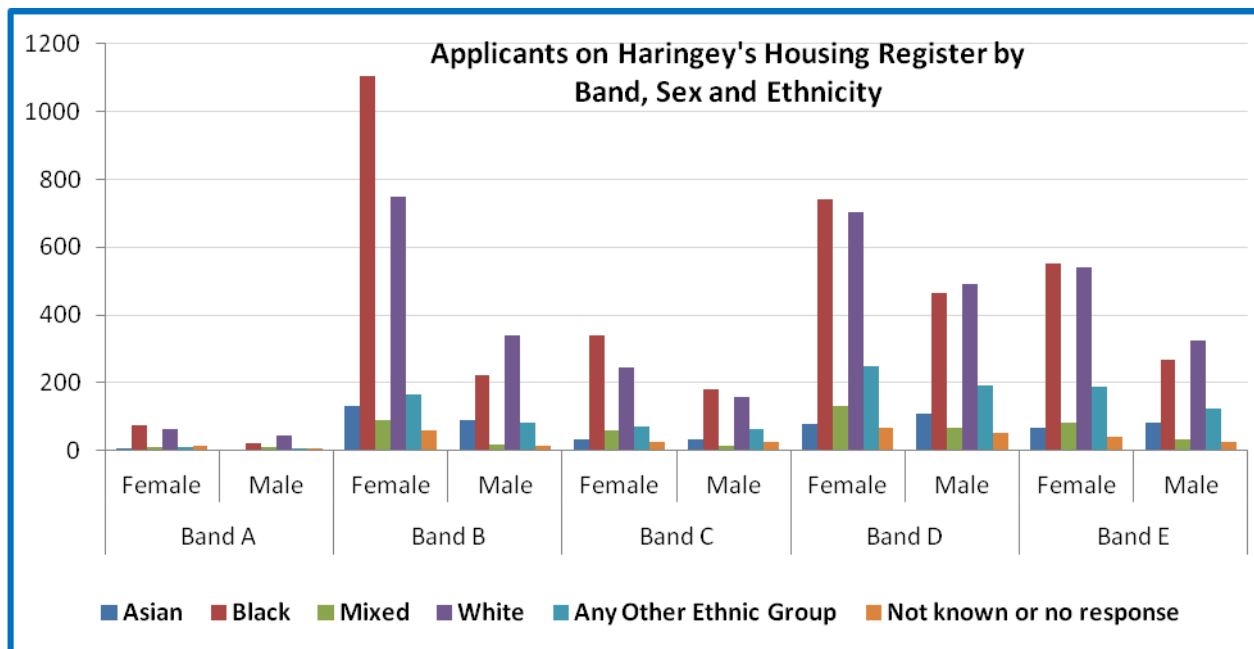
The chart on the left shows data on disability of Housing Register applicants by Band and compares this with the level of disability in the 2011 Census (day to day activities limited a lot).

This comparison should be viewed with great caution. Only applicants in Band A, which are applicants with the highest level of housing need, may have assessed disability (including medical) needs akin to the Census category used. Applicants in Band B may also have assessed disability needs similar to that in the Census category used.

Applicants in Bands C, D and E are all in bands of lower housing need where levels of disability are also lower and not enough to enable applicants to be placed in Bands A or B.

Applicants in Band A have slightly lower levels of disability than that in the 2011 Census. If the definition of disability in Band B and the Census are similar, disability is at a much higher rate (more than double the Census figure) in Band B.

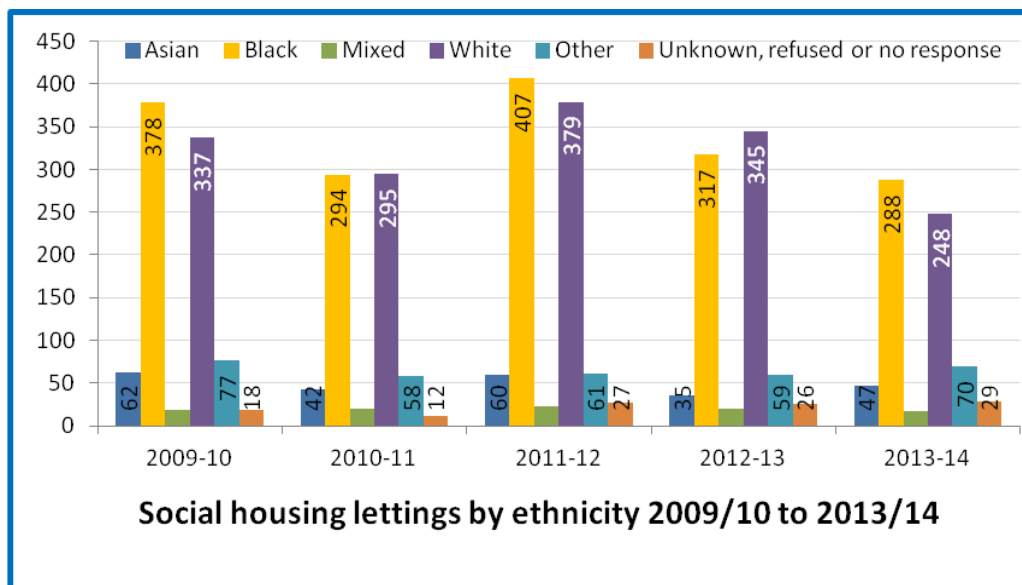
Housing Register: Band, Sex and Ethnicity



This chart analyses the Housing Register by band, sex and broad ethnic categories.

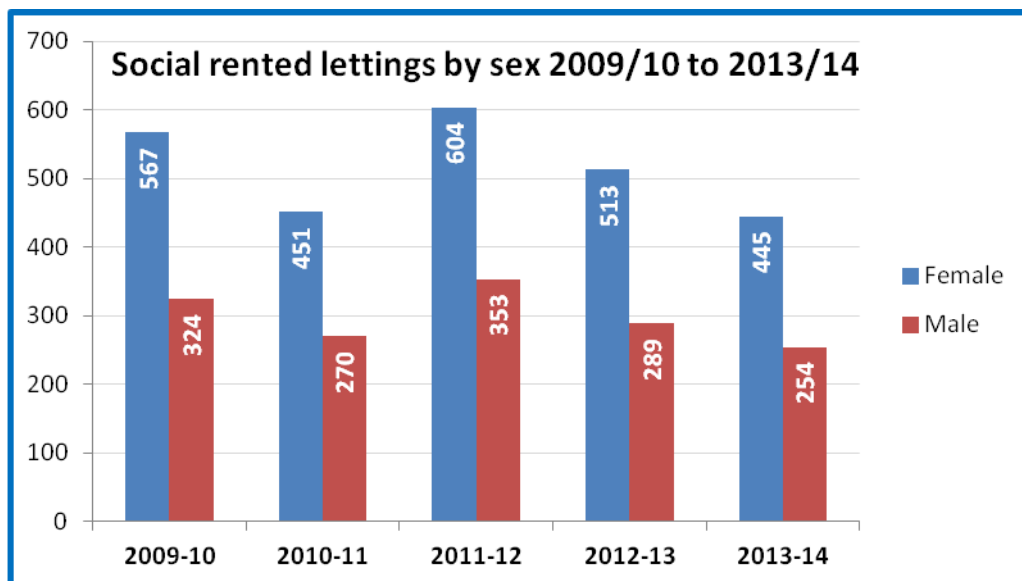
The chart shows that in Band B, Black female applicants are the biggest group (1105 applicants or 11% of the Housing Register) with White female applicants being the next biggest group (749 applicants or 7% of the Housing Register). Band B is where most Housing Register applicants who are homeless are placed.

Data on allocation of social housing in Haringey



The chart to the left sets out social housing lettings (council- and housing association-owned homes) over the period 2009/10 to 2013/14. The chart indicates that housing applicants in Black and White groups receive the bulk of available social housing lettings. In 3 out of the 5 years shown, more social rented homes were let to Black applicants than other groups.

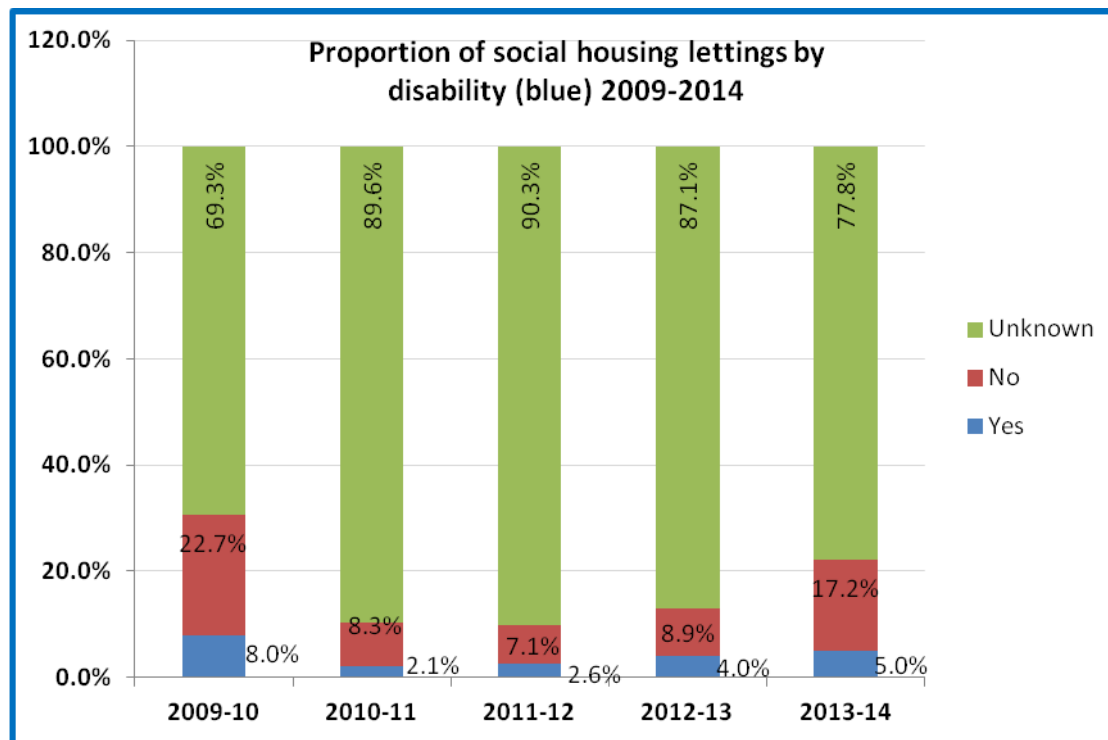
Work is needed on comparing representation of ethnic groups in the Housing Register and their outcomes in terms of social rented lettings is required



The chart to the left sets out social rented lettings (council- and housing association homes) by sex over the period 2009/10 to 2013/14. The number of lettings to female housing applicants outweighs the number to housing applicants headed by males. Over the period 2009-2014 the average ratio is 1.7 : 1 female to male lettings

The gender mix on the Housing Register as at February 2015 also shows female applicants outnumbering male applicants by 1.8 : 1 (65%:35%).

The ratios indicate that female housing applicants are receiving slightly less lettings than male applicants compared to their presence on the Housing Register.



The chart (left) sets out the proportion of council and housing association homes which were let to households where a disability was known about (see blue areas).

The 2011 Census indicated that 6.8% of households had a long-term health problem or disability which limited day-to-day activities a lot. It appears that the number of households being let a social rented home where a disability is known is lower than the Census data.

Reasons for this could include:

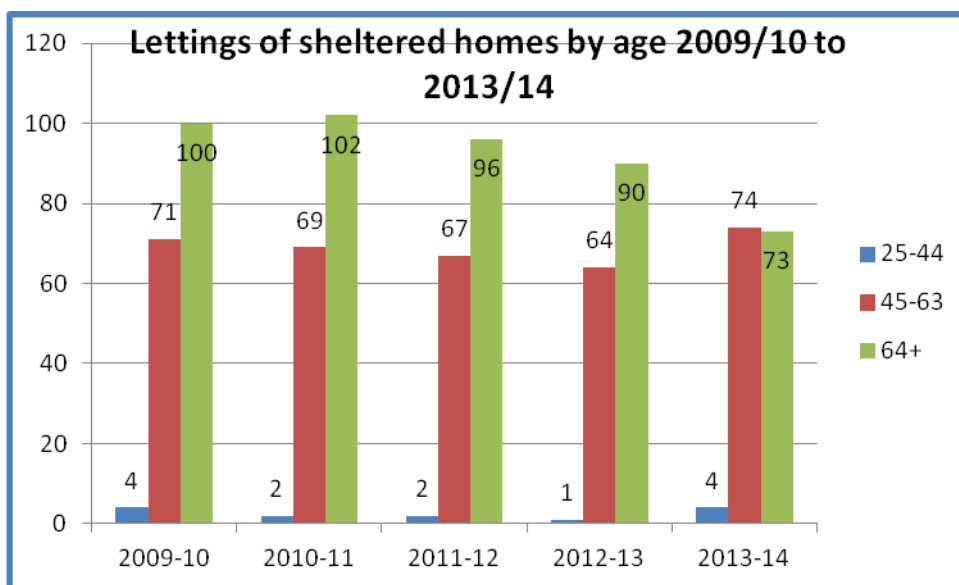
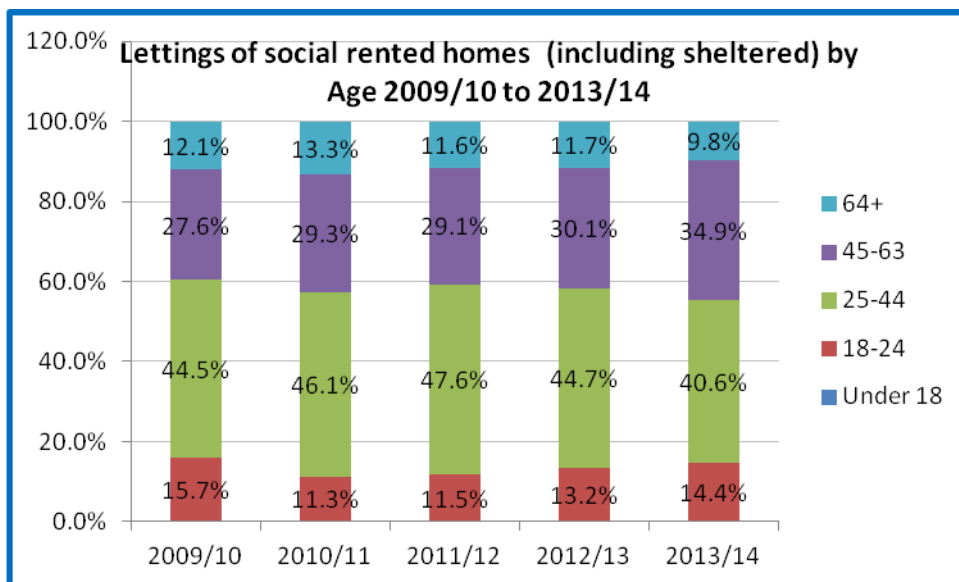
- Haringey's Housing Allocations Scheme takes into account only quite severe levels of disability when assessing and deciding applicants' priority for housing
- There is little social housing available that meets the needs of households with disabilities

The charts to the left sets out lettings of social rented homes, including sheltered homes, to applicants on Haringey's Housing Register by Age groups over the period 2009/10 to 2013/14.

The Housing Register group receiving the largest proportion of social rented homes in all years shown is the 25-44 year old group with between 40.6% and 47.6% of lettings. The group with the next highest proportion in all years shown is applicants aged between 45-63 years with between 27.6% and 34.9% of all lettings. Applicants aged between 18 and 24 receive between 11.3% and 15.7% of social rented homes and those over 64 receiving between 9.8% and 13.3%. In the period 2009/10 to 2013/14, 112 applicants aged over 64 accepted a general needs social rented homes.

Lettings to Under 18s do not show up in the chart as they are rare with only 10 occurring in the last 5 years.

Sheltered homes go to a variety of age groups. In all years until 2013-14, the age group with the most lettings of this type of accommodation were 64+. The next age group with most sheltered lettings are aged 45-63 and less than a handful in each year shown of applicants aged between 25-44.



Conclusion on the objective “Improve help for those in housing crisis”

The key issues highlighted by the data on **homelessness** show that:

- Female lone parents have the highest level of homelessness acceptances in Haringey and this level is increasing year on year.
- Black households approach as homeless at a level which is more than twice their representation in Haringey’s population compared with White households who present in numbers which are around two thirds of their representation in Haringey’s general population. This indicates that Black households are particularly affected by homelessness in the borough.
- Two groups of households are disproportionately represented as homeless in Haringey: those aged between 16 and 24 and between 25 and 44.
- Homeless acceptance due to mental or physical disability is higher than the Census 2011 data shown indicating that disability may be a factor in causing homelessness for these groups of households.
- For households placed in temporary accommodation (TA) because they are homeless, Black households are the biggest group waiting in TA between 0 and 4 years whilst White households are the biggest group waiting in TA for 5-9 years
- Drilling down further, households headed by Black females account for 36% of all households in TA and households headed by White females account for a further 24% of all households in TA.
- The largest age group in TA 25-44 year olds
- Female households in TA outnumber male households by 3 : 1 which is higher than the ratio of households by sex in the Housing Register (1.8 : 1)(see further below)

Key issues arising from the data on the **Housing Register** are:

- the proportion of Black housing applicants on the Housing Register far outweighs their presence in the general Haringey population and particularly so in terms of housing need as represented by Bands A-C, the higher levels of housing need. This appears to indicate a particularly high level of housing stress for Black households in Haringey. As there are high levels of homelessness acceptances in Black groups, this is also reflected in the Housing Register.
- Female applicants outnumber male applicants 3:1 but in Band B females outnumber males by 4:1. Band B is where most homelessness applicants are placed.
- The vast majority of applicants on Haringey’s Housing Register by number are in the age group 25-44 and this is the largest group in every band except Band A. By proportion this age group is the largest in Band B which is where most homeless households are placed.
- The level of disability of applicants in Band A appears to be lower than the likely equivalent in the 2011 Census.
- Black female applicants are the biggest group in Band B where most homeless households are placed. White female applicants are the next biggest group. Together they make up nearly 18% of the Housing Register.

On **social housing allocations**, the key issues highlighted by the data are:

- Housing applicants in Black and White groups receive the bulk of available social housing lettings
- Lettings to female housing applicants far outweigh the number made to male housing applicants but by a slightly lower ratio than their presence on the Housing Register (1.8 :1 (HR) to 1.7 : 1 (Lettings)).
- Proportionately, lettings to housing applicants with a disability recognised by Haringey's Allocations Scheme are lower than similar levels of disability shown in the Census.

How will Haringey's new Housing Strategy respond?

Loss of a private rented home or lack of access to stable, good quality and affordable homes are the main reason households look to the council for housing assistance. The Housing Strategy sets out the council's plans to build new affordable homes although the number achieved will never be enough to meet the needs of everyone who needs them. Indeed the number of affordable low rent homes planned by the council itself (250) will meet the needs of around 5% of the current applicants on the Housing Register who are in Bands A-C (4587). The Housing Strategy also sets out the council's intention to support households to prevent their homelessness and reduce the need for temporary accommodation by commissioning early intervention and support services that sustain independence and provide alternative accommodation pathways.

Several strategies and policies will underpin and deliver Haringey's new Housing Strategy. These are:

- Haringey's Homelessness Strategy, which will be refreshed during 2015/16 starting with a homelessness review, will examine further the issues highlighted by the above brief examination of the data on the differential impacts of homelessness and recommendations for responding to these needs will be set out in the revised Homelessness Strategy.
- Haringey's Housing Allocations Scheme which governs the allocation of council and housing association lettings in the borough and who is able to join the Housing Register.
- The council also intends to develop a private sector housing strategy during 2016/17 which will set out Haringey's direction on improving quality and management in the private housing sector including bringing empty homes back into use.

Recommendations for Objective 1

- Currently no regular monitoring takes place on lettings of social rented homes in terms of protected characteristics. Monitoring should take place at least annually to identify and put in place mitigating actions to remedy any discrimination taking place due to the rules set out in the Housing Allocations Scheme.
- The housing circumstances of female Black Households and female White households on the Housing Register and in TA, need to be examined further to understand their particular housing circumstances. The Housing Strategy needs to reflect what can be done for this group of residents (around 1800 people plus associated family) for whom an appropriate housing response is needed.

Proposed Objective: Ensure that housing delivers a clear social dividend

Under this objective the headline proposals are set out followed by relevant protected characteristic or other information available on each. The amount of protected characteristic data available under this objective is not as comprehensive as for the first objective.

The headline proposals under this objective include:

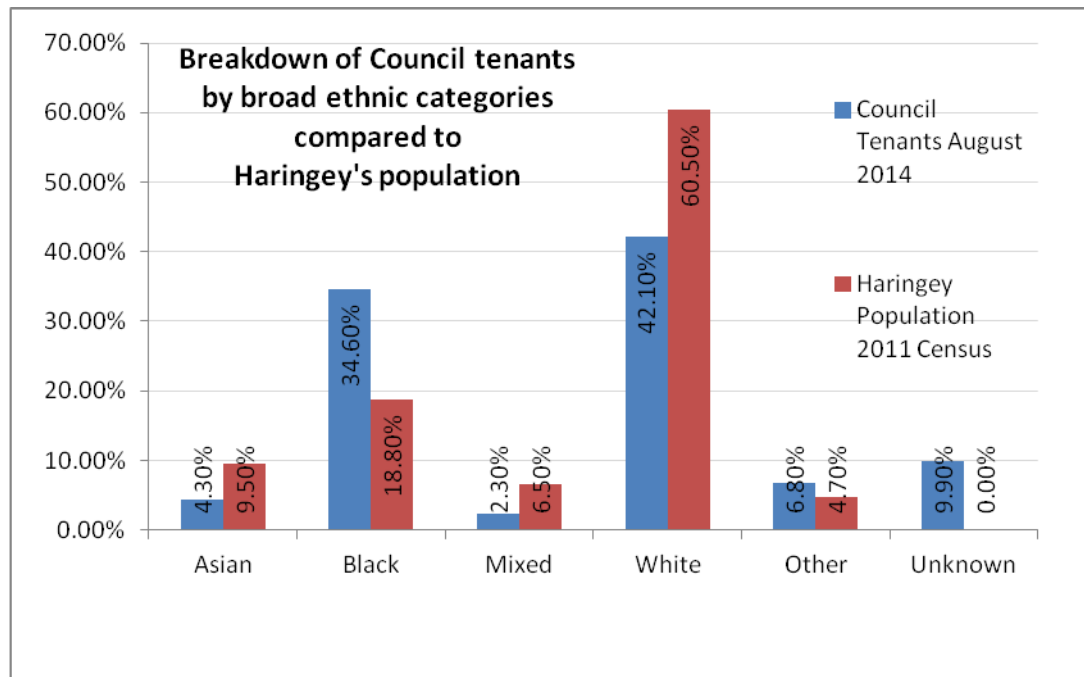
- Provide lifetime tenancies for council tenants and encourage other social housing providers to do the same
- Ensuring the council's housing services are of a measurably high standard and subject to continuous improvement and that residents are engaged in shaping them
- The council and other social landlords working together with tenants to help them improve their health, education, skills and employment prospects in return for which residents are expected to take responsibility for their housing and their wider lives.
- Place a high priority on affordable home ownership, giving as many families as possible a realistic chance of getting onto the housing ladder
- Look for pioneering ways that residents can have a direct stake in Haringey's growth and regeneration, particularly in Tottenham and Wood Green where change is greatest

Data on lifetime tenancies for council tenants and tenants of other social housing providers

Data is not collected by the council on the protected characteristics of households living in homes owned by housing associations in Haringey. An idea of the make-up of housing association tenants could be gleaned from CoRe data on social lettings but this would be based on annual figures and would not take into account the entire housing association tenant population.

Haringey Council does collect some protected characteristic data on its tenants, namely, ethnicity, sex, age and disability which is set out in the pages below.

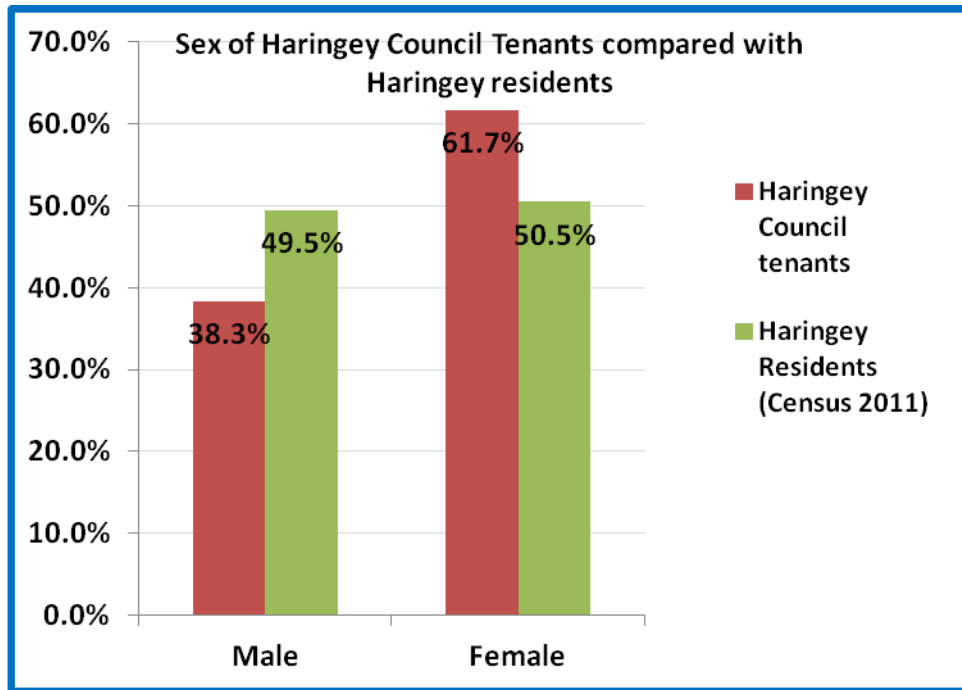
Ethnicity of Haringey Council tenants



Representation in broad ethnic categories of Haringey council tenants is shown in the chart to the left compares the tenant population with Haringey's population in the 2011 Census.

- Asian, White and Mixed households are under-represented in Council tenancies compared with their representation in Haringey's population.
- Black and Other households are over-represented in Council tenancies compared with their representation in Haringey's population

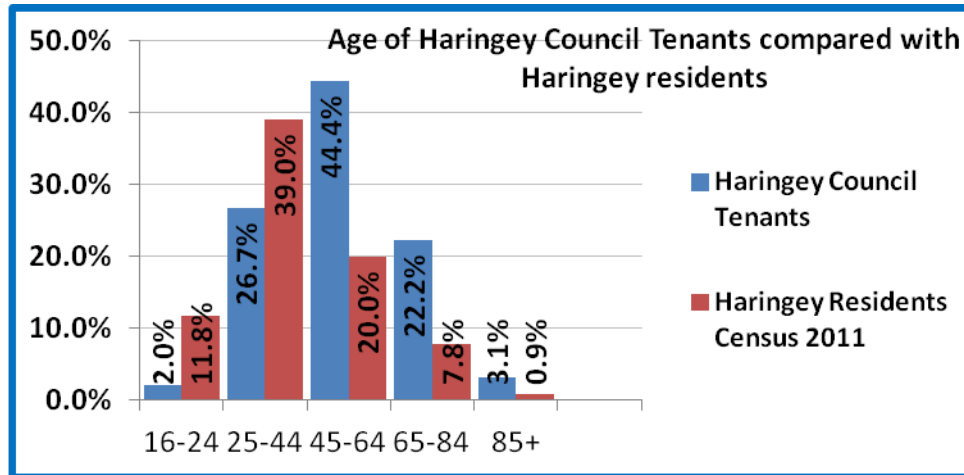
Sex of households in Haringey-owned homes



This chart compares the sex of Haringey Council tenants with Haringey residents as per the data from the 2011 Census.

Whereas the representation of males and females in Haringey's population is more or less the same, female tenants outnumber male tenants by a ratio of 1.6 : 1.

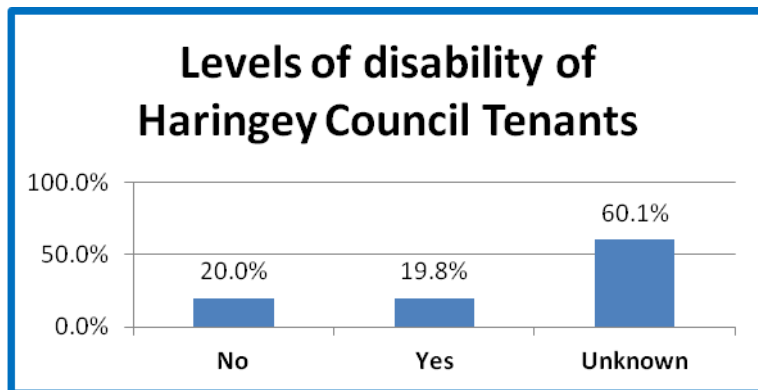
Age of households in Haringey-owned homes



This chart compares age ranges of Haringey Council tenants with the same age ranges in the general population of Haringey based on 2011 Census figures. Residents under 16 (20.4% of general population) and tenants whose age is not known (1.6%) have not been included.

Council tenants in the age ranges 16-24 and 24-44 are both under-represented compared with the general population whilst council tenants in ages range 45 and upwards are all over represented compared with the general population of similar age.

Disability in households in Haringey-owned homes



The chart to the left shows data on known data about disability in Haringey Council Tenants. For the majority of tenants, there is no information recorded about disability needs. Information is recorded for just under 20% of tenants.

- Ensuring the council's housing services are of a measurably high standard and subject to continuous improvement and that residents are engaged in shaping them

From September 2014 Homes for Haringey became responsible for delivering community housing services as well delivering the council's landlord function. The Executive Leadership Team monitors standards and equality and diversity of its business activities on a quarterly basis. This approach should enable continuous improvement to be monitored and any differential impact for service users related to protected characteristics detected and mitigated at an early stage.

- The council and other social landlords working together with tenants to help them improve their health, education, skills and employment prospects in return for which residents are expected to take responsibility for their housing and their wider lives.

The activities planned arising out of the council's Economic Development Strategy will work in tandem with this aspect of the Housing Strategy.

The EqIA for the Economic Development Strategy expected that the impact of outcomes from it will be in proportion to the representation of protected characteristics in Haringey's population.

- Place a high priority on affordable home ownership, giving as many families as possible a realistic chance of getting onto the housing ladder

An analysis of protected characteristics and affordability of homes is set out in the section below in the objective "Achieving a step change in the number of homes built".

- Look for pioneering ways that residents can have a direct stake in Haringey's growth and regeneration, particularly in Tottenham and Wood Green where change is greatest

The council should build in equalities monitoring of Haringey residents who engage with this idea to ensure proportionate outcomes and benefits.

Proposed Objective: To drive up the quality of housing for all residents

The draft Housing Strategy 2015-2020 sets out a number of headline proposals under this objective which include:

- Tackling poor quality in the private rented sector by
 - Setting up a lettings and management agency
 - Licensing all private rented landlords in the borough
- Complete the decent homes programme for council-owned homes
- Set new standards for homes built and managed by housing associations, especially estates with more than one housing association landlord
- Drive up standards in the design of new homes

Tackling poor quality in the private rented housing sector:

Haringey has already taken action to improve conditions in the private rented sector by putting in place additional licensing schemes for private sector homes in multiple occupation. The council does not currently monitor landlords it works with or the occupants of homes in multiple occupation (HMOs) it licenses.

In advocating additional licensing of HMOs in Harringay ward and in Tottenham wards, the council undertook an equalities impact assessment (EqIA) in 2012 of all areas affected. Using census data, the EqIA identified that:

- In terms of age, young people might be disproportionately impacted if the number of HMOs reduced in number as a result of additional licensing as they relied on HMOs as their main housing option, but then improvements in conditions of HMOs as a result of licensing would mean they benefited disproportionately.
- In terms of race, Black and minority ethnic households which predominate in the wards affected by additional licensing would also benefit disproportionately from improved HMO conditions as a result of licensing
- No data was available for sex, sexual orientation and religion/belief
- There was no likely impact for disabled people who would likely be prioritised for social housing.

In relation to the council's new proposals for the private rented sector, equalities impact assessments will be undertaken when developing the proposals to for a lettings and managing agency and for a selective licensing scheme covering all private landlords in Haringey.

Complete the Decent Homes programme for council-owned homes

Homes for Haringey's Asset Management Strategy, 2010/2017, covers all investment in the Councils housing stock, including decent homes.

In compliance with the Council's public sector equality duty, an Equality Impact Assessment was undertaken as part of drawing up the Strategy. The findings were incorporated into Homes for Haringey's planning processes for delivering decent homes. This included ensuring that all residents receive the standard of work that is consistent with the Decent Homes policy, and that consideration of specific language and other needs were identified and addressed when drawing up programmes of work.

The tender process used to award the contract was in line with the council's procurement policy and guidelines, had equalities considerations at all the key stages.

Set new standards for homes built and managed by housing associations, especially estates with more than one housing association landlord

Equalities monitoring of estates owned and managed by more than one housing association landlord should be put in place to ensure improvements impact proportionately on tenants affected.

Drive up standards in the design of new homes

Achievement of this activity will benefit all residents who access new homes with higher design standards. It is routes to accessing these new homes which may not have proportionate outcomes for residents with protected characteristics.

Proposed Objective: Achieve a step change in the number of new homes being built

The draft Housing Strategy 2015-2020 sets out a number of headline proposals under this objective which include:

- Maximising the number of new homes being built through close working with partner housing associations
- Offering a range of different types and sizes of homes of different prices and tenures in each neighbourhood which will enable households to move up the housing ladder but stay within their communities
- Defining “affordable housing”, both rented or part-owned, as spending up to 35% of earned income on housing costs
- Placing a high priority on building homes which are affordable to buy on lower incomes
- Pushing ahead with estate renewal to include new homes with different tenures, prioritise the building of larger social homes
- Building new social homes in parts of the borough where it is scarce, whilst prioritising more private rented homes and homes for sale in areas which are now predominantly social housing.
- Experimenting with new types of homes such as subsidy-free affordable housing, new approaches to shared ownership and purpose-built private rented homes

The analysis below examines the impact on residents in Haringey with protected characteristics of the high priority to build homes which are affordable to buy on lower incomes.

What is affordable housing?

Haringey Council has been set tough targets by the Mayor of London to build 1,502 new homes in the borough between 2015/16 and 2025/26 as the borough’s contribution to housing supply in London. The first round of consultation Haringey Council carried out on its draft Housing Strategy was on finding out stakeholders’ views on the proposed vision, priorities and principles for it. Affordability of housing was an overwhelming concern for respondents. In addition in earlier consultation about the future of Tottenham, respondents said their priority was to “Address overcrowding and provide for a mix of decent, secure social housing and well designed homes that are affordable to rent and own”. In its draft Housing Strategy, Haringey is proposing that affordable housing should mean that housing costs should equate to no more than 35% of a person’s net income depending on their individual circumstances. It is acknowledged that for some households this definition will mean that some homes will continue to be unaffordable to them.

To determine which groups with protected characteristics will benefit or not from the proposed affordable housing definition and the proposal to increase low cost home ownership, examination of housing costs and incomes across the borough is needed.

Housing Costs

The table below sets out the (average or median¹) monthly costs of different types of homes in Haringey. These different costs are then compared in terms of whether they are affordable within a Haringey median net income. The affordability is assessed in terms of two thresholds: whether the housing costs for different types of homes take up (a) 35% and (b) 45% of the net median income. The gross median income for Haringey used is £33,140² and the net income used was £2,079.97³. NB: the following table spreads over two pages.

Haringey Council Rents (Social Housing Rent) Average 2013/14	Haringey Housing Association (Target) Rents (Social Housing Rent) Average 2013	Private Sector Rents in Haringey Median , Q1, 2014	80% Private Sector Rents (Affordable Rent ⁴ homes can have rents up to this level)	65% Private sector rents (Blended average level of rents for Affordable rent homes in Haringey and London)	Median House Price, (repayment mortgage on 75% of £345,000 median house price, Q4, 2013/14 at 6% over 25 yrs)	Shared ownership homes (£185,500 ⁵ average 2013 in Tottenham, 10% deposit, average 33% equity share)
£225.33 pm (based on 98.28 pw)	£472.94 pm (based on £109.14 pw)	£1,250 pm	£1,000 pm	£812.50 pm	£1,674 pm	£793 pm
Affordable: At 10.8% of the Haringey median net income, the average	Affordable: At 22.7% of the Haringey median net income, the average	Not affordable: At 60.1% of the Haringey median net income, median	Not affordable at 35%; Marginally affordable at 45%: At 48.1% of the Haringey median net	Marginally / Affordable: At 39% of the Haringey	Not affordable: At 80.5% of the Haringey median net income, buying with	Affordable: At 38.1% of the Haringey median net income,

¹ It has not been possible to obtain median rents for Council and housing association homes. Usually caution is needed where averages are used because these may be skewed by outlying data (eg, instances of very low or very high rents). In this case, using average rents for council and housing associations homes is reasonable as there will not be wide variations in rent levels. The median figure for private rents is used precisely because of the wide variation of rents present in that sector.

² GLA modelled income estimate 2012/13

³ Net income taking into account 2% pension contributions being paid and no student loan being repaid

⁴ Affordable Rents are a type of affordable home introduced by the Government in 2010. So far, most have been built by housing associations using small government financial contributions. Their key feature is that the rents charged for these homes can be up to 80% of the equivalent market rents in the private sector. Housing associations are also allowed to convert some of their existing low rent homes when they become vacant to these higher affordable rents. In Haringey, the rents on this type of affordable home have come out at an average of 65% of equivalent market rents in the private sector.

⁵ Note that new shared ownership homes in Tottenham being released in March 2015 require a minimum income of £34,709 which is above the median income estimate of £33,140 meaning households on median incomes will not be able to afford these new homes.

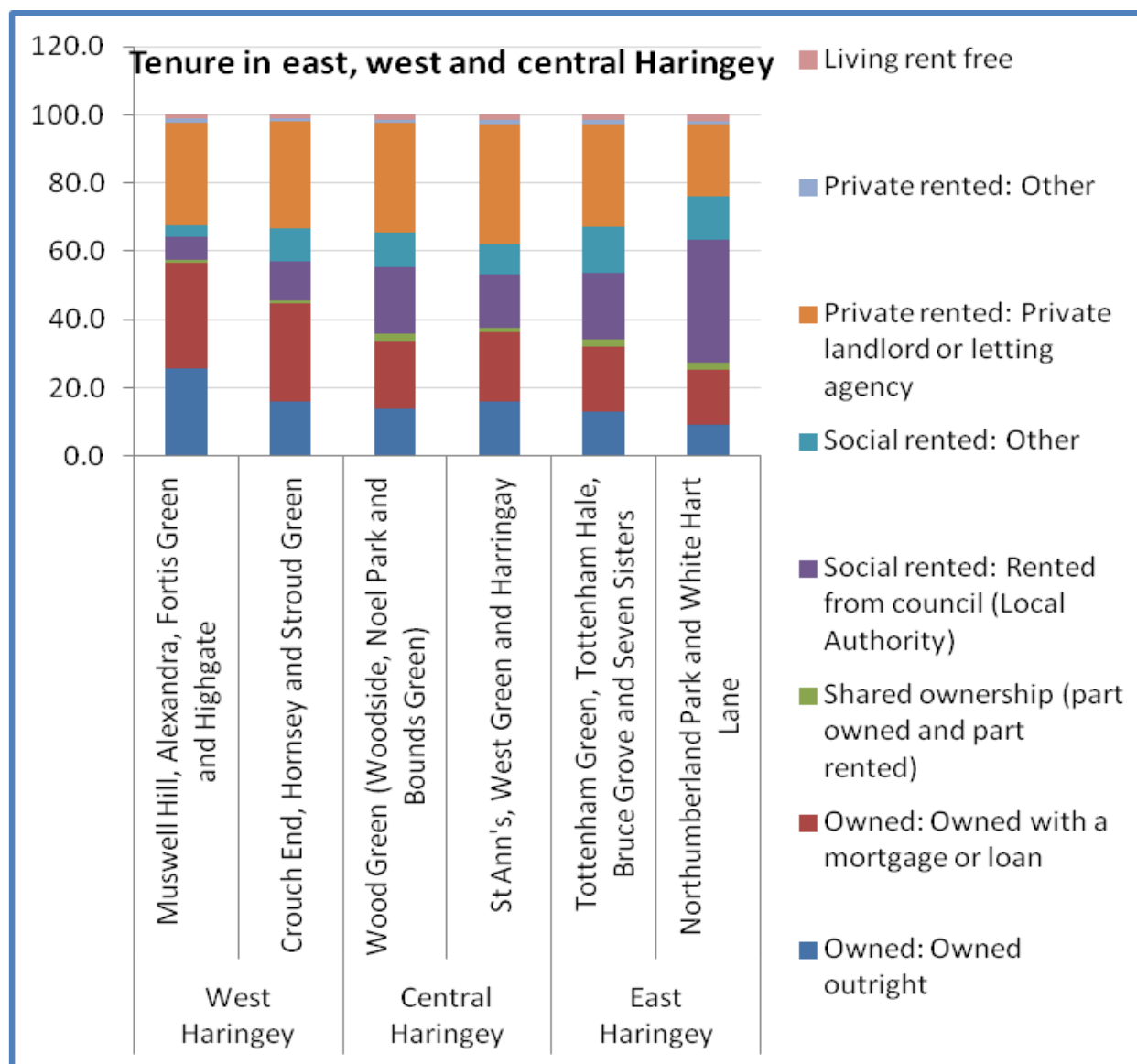
Haringey Council Rents (Social Housing Rent) Average 2013/14	Haringey Housing Association (Target) Rents (Social Housing Rent) Average 2013	Private Sector Rents in Haringey Median , Q1, 2014	80% Private Sector Rents (Affordable Rent ⁴ homes can have rents up to this level)	65% Private sector rents (Blended average level of rents for Affordable rent homes in Haringey and London)	Median House Price, (repayment mortgage on 75% of £345,000 median house price, Q4, 2013/14 at 6% over 25 yrs)	Shared ownership homes (£185,500 ⁵ average 2013 in Tottenham, 10% deposit, average 33% equity share)
Haringey Council rent is well below the thresholds of 35% and 45% of income spent on housing costs	Haringey housing association rent is well below the thresholds of 35% and 45% of income spent on housing costs	private rents is well above the thresholds of 35% and 45% of income spent on housing costs	income, Affordable Rents at 80% of private rents are not affordable within the threshold of 35% of net income spent on housing costs and are slightly above the 45% threshold.	median net income, Affordable Rents set at 65% of private rents are slightly above the threshold of 35% so may be marginally affordable. They are affordable if the threshold of 45% is used	a mortgage is well above both thresholds of 35% and 45%	buying a shared ownership home is above the 35% threshold. It is within the 45% threshold. Indeed 45% of net income is the threshold for affordability set by the government, via the Homes and Communities Agency .

The draft Housing strategy explains that new affordable home ownership and private rented homes will be focused in areas where social housing predominates and new homes, such as Council or housing associated-owned homes let less than market rents, will be built in areas where there are currently high levels of home ownership.

The data below shows the distribution of tenure, occupations, incomes and ethnicities of households across Haringey

Tenure

The chart below shows the current distribution of tenure in Haringey indicated by Census 2011 data:



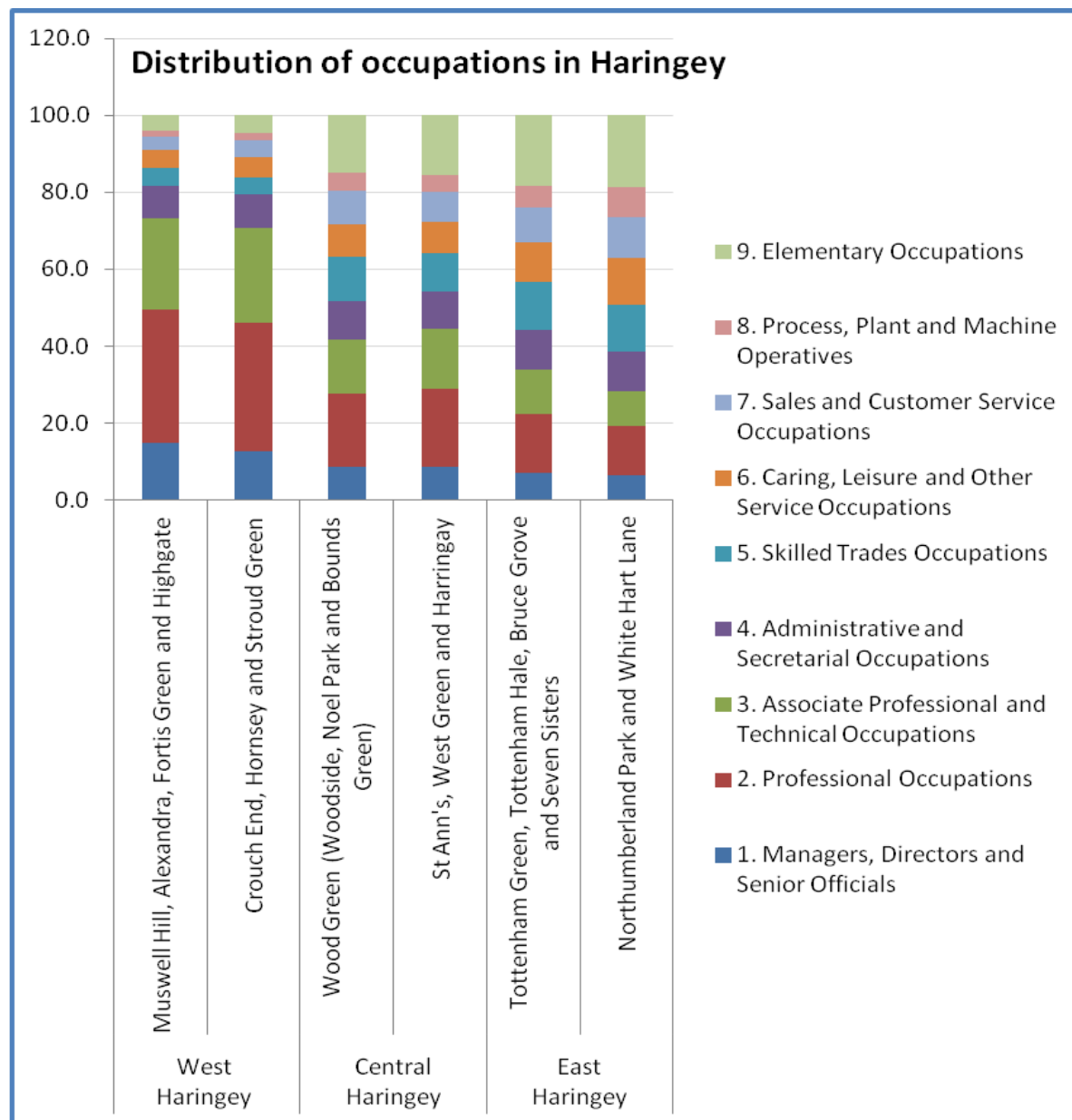
Owner occupation is the largest tenure in wards in west Haringey whilst social rented homes are the largest tenure in east Haringey wards, particularly in Northumberland Park and White Hart Lane. The private rented sector is fairly evenly represented across the borough although is particularly high in some of the central Haringey wards

It should be noted that:

- Haringey's estate regeneration plans aim to replace all habitable rooms which will mean building more larger social rented homes than smaller ones
- Some 75% of social rented tenants claim full or partial housing benefit to help pay their rents.
- Representation in broad ethnic categories of Haringey council tenants is as follows:

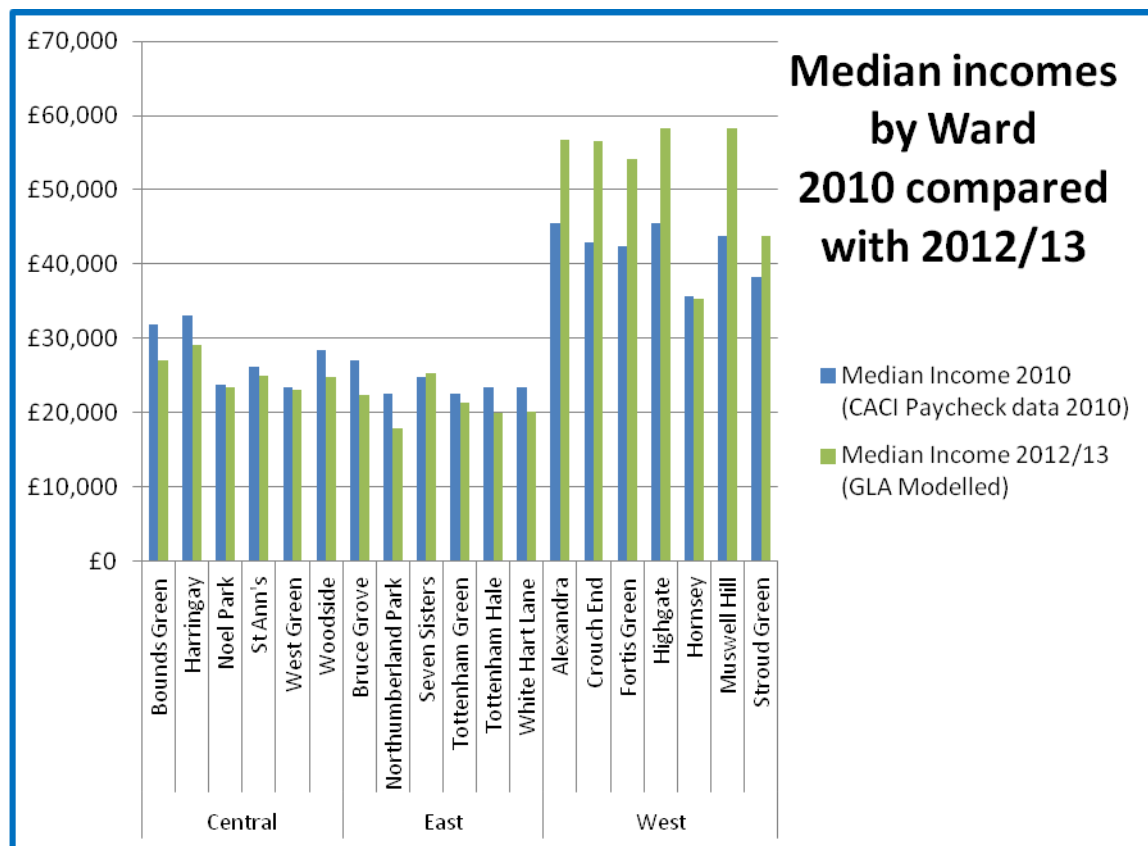
Asian	4.30%
Black	34.60%
Mixed	2.30%
White	42.10%
Other	6.80%
Unknown	9.90%

Occupations



There are a high proportion of Managers, Directors, Senior Officials and Professional Occupations in households in west Haringey compared with central and east Haringey. These types of occupations generally command higher level salaries. By contrast in east Haringey, around half of households are in generally lower paid skilled and unskilled occupations.

Income distribution in Haringey



The chart to the left shows median incomes by ward in 2010 compared with 2012/13.

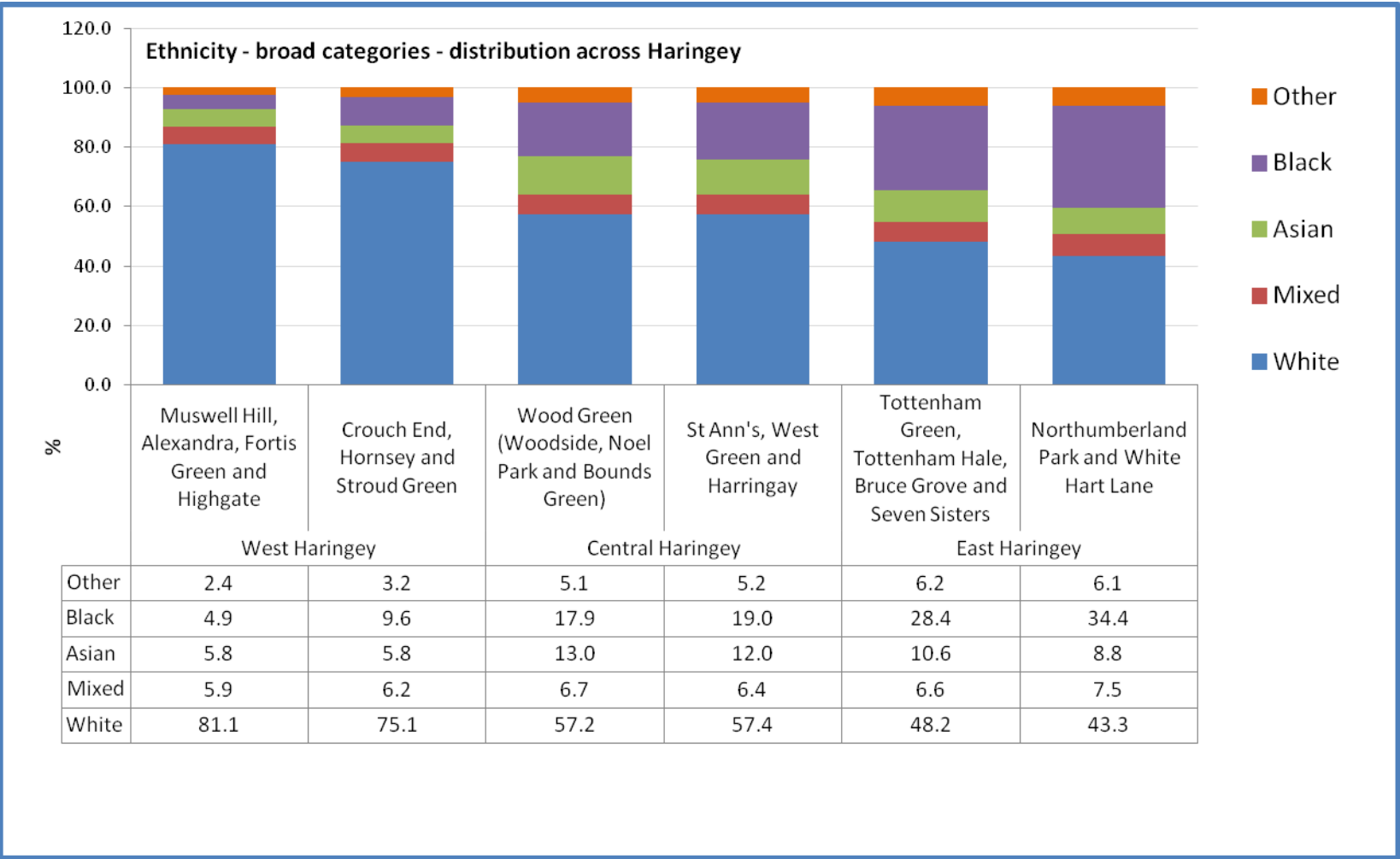
At both points in time, median incomes in wards in west Haringey are higher than both central and east Haringey wards.

By 2012/13, median incomes for wards in west Haringey have increased (except in Hornsey where a small reduction is seen) while in wards in central and east Haringey, median incomes have all fallen except for Seven Sisters where a small increase is noted.

In all wards in central and east Haringey, median incomes are less than the median for Haringey as a whole (£33,140 (GLA 2012/13)) and all below the incomes required to buy into shared ownership schemes that are coming on stream during 2015 (eg, £34,709).

The council's HaringeyStat on Business Growth (published February 2015) also points out that the median income in Tottenham is significantly lower than the average for the borough

Distribution of households in Haringey by ethnicity



There are higher proportions of white households located in the west of Haringey (81.1% in Muswell Hill and neighbouring wards) with their presence gradually lessening across central and east areas of the borough (43.3% in Northumberland Park and White Hart Lane). Higher proportions of Black households live in the east of Haringey (34.4% in Northumberland Park and White Hart Lane) and central areas of Haringey and their presence in wards in west Haringey is small (2.4% in Muswell Hill and neighbouring wards). Asian, Mixed and Other ethnicity households are distributed fairly evenly across the borough.

Available demographic data on buyers of shared ownership products in Haringey

Scheme Name	N15 scheme	N17 scheme	Central and east Haringey
Year scheme handed over	2013/14	2011/12	
No. of homes	43	68	
Gender (Female/Male) of buyers	75%/25%	47/53%	50.5/49.5*
Ethnicity of buyers			
White	67%	75%	51.5%
Black and ethnic minority	33%	25%	48.5%
Previous Tenure			
Living with Friends & Family	16%	31%	
Private renting	79%	60%	
HA Tenant	2%	9%	
Other	2%	n/a	
Lived in Haringey before	58%	46%	
of which lived in one of the Tottenham wards	n/k	22%	
Salary Ranges (Single & Joint)	£19,000-£79,500	£18,000-£50,000	Median income: £23,196 (£33,140 Haringey as a whole)
Deposit ranges	£7,500-£175,000	£3,400-£95,625	

The table to the left sets out headline demographic data about buyers of two shared ownership homes, one in central Haringey (N15) and one in east Haringey (N17) and compares this with census data about central and east Haringey and the whole of Haringey.

In terms of ethnicity, white shared ownership buyers are over-represented (67% and 75%) compared with their presence in the local population (51.5%) and black and minority ethnic shared ownership buyers are under-represented (33% and 25%) compared with their presence in the local population (48.5%).

In terms of gender, a more mixed picture is presented with one scheme overwhelmingly female buyers (N15, 75%) and the other with more male buyers (N17, 53%).

In terms of income, some of the households clearly had less than the local or borough median incomes but the data on which this table is based indicates they were not the majority of households.

Haringey Council will be working with developers of shared ownership homes to provide demographic data on buyers so that such monitoring can ascertain which households are benefiting from this tenure.

*Refers to gender representation in the Haringey as a whole rather than just central and east Haringey

Conclusion on affordability

In the context of focusing on developing more affordable home ownership options in the central and eastern parts of Haringey, the data covered in the charts and tables above indicates that:

- According to two thresholds of housing affordability (35% and 45% of net median income spent on housing costs), council and housing association homes in Haringey are very affordable by households on the median income for the borough. Homes charging Affordable Rents with rents up to 65% of market rents are marginally affordable at 35% of net income and affordable at 45% of net income spent on housing costs. Shared ownership homes are marginally affordable at 35% of net income and are affordable at 45% of net income spent on housing costs. The latter (45%) is the government threshold for affordability of shared ownership. Homes with Affordable Rents (80% of market rent) are not affordable at 35% of net income spent on housing costs and only marginally affordable at 45% of net income. Private rented homes and outright sale homes are not affordable by households on Haringey's median income.
- Home ownership is high in the west of Haringey where as in some areas of east Haringey, social rented housing is the dominant tenure.
- Occupations with lower pay are more represented in the east of Haringey whereas occupations with higher pay are represented more in west Haringey. Incomes data show that only wards in west Haringey have incomes above the Haringey median income of £33,140.
- Incomes in east and central Haringey have reduced between 2010 and 2012/13 whereas they have risen in west Haringey over the same period
- Black households are represented more in the east of Haringey than they are in the west of the borough and conversely White households are represented more in the west of the borough, than in the east.
- Initial data on buyers of shared ownership homes show that Black and ethnic minority buyers are under-represented in new schemes whilst White buyers are over-represented in comparison with their representation in the generation population of Haringey.
- Initial data on buyers of shared ownership homes show that the previous tenure of most buyers was the private rented sector.
- Initial data on buyers of shared ownership homes indicates around 50% of households lived in Haringey. Of this a smaller proportion already lived in east Haringey.

What does this tell us about the affordability of housing for residents with protected characteristics?

The above evidence indicates there is a possibility that over time Black residents in Haringey may not benefit from the plans to build more homes in the borough through promoting affordable home ownership in east Haringey. White households may benefit more easily. To help support existing communities whilst also increasing a greater mix of tenure, ways of ensuring Black households have access to and benefit from low cost home ownership products need to be explored.

How can the potential effects be mitigated?

The ability of local people to afford the new homes being built, especially in the east of the borough, is dependent on them accessing jobs and also increasing their incomes to a sufficient level to afford the new homes on offer as a result. Haringey's Business Growth plans include increasing the number of jobs in Haringey from 73,000 (2011 baseline) to 95,000 by 2036 (an increase of 29.5%). It is planned to change the profile of Haringey-based jobs so that retail and public sector employment are less dominant, and there is a better range of jobs, including a greater proportion of jobs in more highly-skilled sectors, such as sustainable technology, digital design and skilled/ craft manufacturing. The opportunities being created over the next 10 years should be open to all Haringey residents with monitoring undertaken to ensure the outcomes are delivered proportionately.