

<b>Equality Impact Assessment (EqIA) Name of Project</b>	High Road West Regeneration Scheme	<b>Cabinet meeting date If applicable</b>	Cabinet
<b>Service area responsible</b>	Chief Operating Officer		
<b>Name of completing officer</b>	Sarah Lovell	<b>Date EqIA created</b>	10th November 2015
<b>Approved by Director / Assistant Director</b>	Helen Fisher	<b>Date of approval</b>	23 <sup>rd</sup> November 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	Sarah Lovell	5.
2. Equalities / HR	Zakir Chaudhry	6.
3. Legal Advisor (where necessary)	Michelle Williams	7.
4. Trade union		8.

## Stage 2 - Description of proposal including the relevance of the proposal to the general equality duties and protected groups

2.1 This document assesses the impact of a Cabinet decision to:

*“agree to commence the re-housing process for phase 2 of the Love Lane Estate. This will require all secure Council tenants within phase 2 to be put on the housing register and awarded ‘Band A’ priority status for re-housing.”*

2.2 This decision will mean that each of the 87 secure council tenant households in Phase 2 of the Love Lane Estate will be awarded the highest re-housing banding, once they have completed, and the council has processed, a full needs assessment.

2.3 This will mean that there could be up to 87 more households in ‘Band A’ bidding for properties and may result in homeless households and people in ‘Band B’ having to wait longer to secure permanent accommodation as the Love Lane secure council tenants will have a higher priority for re-housing. It will however, mean that more temporary accommodation properties will be available, as void properties on the Love Lane Estate will be able to be utilised to provide temporary housing for tenants on the temporary accommodation waiting list.

2.4 Officers are recommending that the Cabinet agree to commence the re-housing process for phase 2 of the Love Lane Estate, despite the fact that this may result in homeless households and people in ‘Band B’ having to wait longer to secure permanent accommodation because:

- The Council has made the decision to demolish the Love Lane Estate and as such all secure council tenants living on the Estate need to be re-housed.
- The Council only has a finite (7 years from February 2015) period in which to re-house all residents and demolish the Love Lane Estate;
- A development partner is expected to be in place in early 2017 and work could start on site in 2018; initiating the re-housing process as soon as possible allows a broader choice for residents as the development work begins;
- Phase 2 tenants have expressed a desire to relocate now, delaying the decant process will reduce their options for re-housing;
- Within the Love Lane Resident Guide the Council has committed to maximising tenants’ re-housing choice;
- The bidding for properties will be spread over long period (at least three years). The Council has designated Re-housing Officers who will help manage the process and prevent unmanageable spikes appearing at either end of the programme;

- Vacant properties on the Love Lane Estate will be utilised to meet the objectives identified within the housing strategy, until such times as they are needed for regeneration. A detailed void strategy is currently being developed, this strategy will detail, for example, the percentage of void properties used for temporary accommodation and how properties will be vacated prior to demolition.
- Officers are producing an annual supply and lettings plan, which will detail how many void properties, will be allocated to the identified groups on the housing waiting list. This will include the percentage of properties per year can be let to residents who require re-housing as a result of estate regeneration schemes (Band A) and percentage of properties that will be let to homeless households (Band B). This plan is due to be considered by the Council's Cabinet in the New Year. If agreed at Cabinet, the plan will be reviewed and agreed on an annual basis and will set the total number of void properties which will be available to each housing waiting list group and will thus be able to ensure that proportionate amounts of housing is supplied to each group.

2.5 The Council could choose to not initiate the re-housing process for Phase 2 tenants on the Love Lane Estate. The impact of this is that the secure council tenants on the Estate will not have the opportunity to bid for existing council homes and will have less housing choice. It means that these tenants will have to wait longer for a new home that meets their need and it will take longer for the Council to vacate the Love Lane Estate. The Council will need to secure vacant possession of the Love Lane Estate so that it can be developed. This decision would however, mean that homeless household and people in Band B may wait for a shorter period of time for permanent accommodation as there would be less people in Band A. This option is not being recommended because of the points detailed in 2.4 above.

2.6 This EqIA explores whether there are any equalities implications in respect of protected groups, arising from initiating the re-housing process for secure Council tenants in Phase 2 of Love Lane Estate. To do this the EqIA focuses on the profile of households on the Love Lane Estate and the profile of households on the Housing Register.

**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?
Not applicable	

**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	Tenure, ethnicity, sex, disability, age
Approved EqIA:Service Delivery in respect of Proposed Changes to the Allocations Scheme (dated September 2014) submitted to the Cabinet on 14 October 2014, in particular pages 5 – 14.	Gender, ethnicity, religion, sexuality and vulnerability/disability information in respect of Housing Register applicants and their priority banding for the allocation of accommodation by the Council.
Approved EqIA for the High Road West Masterplan Framework (dated December 2014) submitted to the Cabinet on 16 December 2014, in particular pages 7 to 13.	Age, gender, ethnicity, language, religion/belief. and health/disability information in respect of the relevant High Road West 'census output areas' (which closely accord with the Love Lane Estate and provide the lowest scale data available) and which form part of the Northumberland Park ward.
Approved EqIA for the Local Lettings Policy for Ambrose Court and Mallory Court, Cannon Road, N17	Gender, ethnicity, religion, sexuality and vulnerability/disability information in respect of Housing Register applicants and their priority banding for the allocation of accommodation by the Council
LBH housing system	Tenure, ethnicity, sex, discability, age
Consultation draft EqIA on Haringey's draft Housing Strategy 2015, 2020	ethnicity, sex, discability, age

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	None	Details
<b>Sex</b>	✓	✓		<p>Table 1 below indicates that households on the Housing Register include a disproportionately high number of females. This could mean that a higher number of females on the Housing Register will be waiting for permanent accommodation for a longer period of time.</p> <p>The table also shows that there are a higher number of females in phase 2 of the Love Lane Estate. The impact of the decision to initiate the re-housing process will therefore, have a positive impact on females in phase 2 of the Love Lane Estate, as they will be waiting for a shorter period of time for a new home that meets their need.</p>

<b>Gender Reassignment</b>			✓	<p>Data is not readily available on the proportion/ number of Love Lane households and Housing Register households with this protected characteristic.</p> <p>However, the proposal is not expected to impact on residents in this protected group disproportionately to other groups of residents.</p> <p>Housing allocations are prioritised on the basis of need as set out in the allocations policy and do not discriminate on the basis of the protected characteristics</p>
<b>Age</b>	✓	✓		<p>Table 4 below indicates that the vast majority of applicants on Haringey's Housing Register by number are in the age group 25-44 ( this is the largest group in every band except Band A). This could mean that a higher number of people aged between 25-44 on the Housing Register will be waiting for permanent accommodation for a longer period of time.</p> <p>The table also shows that the largest age group in phase 2 of the Love Lane Estate is 45-63. The impact of the decision to initiate the re-housing process will therefore, have a positive impact on this age group as they will be waiting a shorter period of time for a new home which meets their need.</p>
<b>Disability</b>	✓	✓		<p>Table 3 below indicates that there ia a relatively high percentage of disabled households on the Housing Register in Bands B (15.3%) and Band C (18.5%). This could mean that a higher number of disabled people on the Housing Register will be waiting for permanent accommodation for a longer period of time.</p> <p>The table also shows that there is also a significantly high percentage of households i registered as having a disability on the Love Lane Estate (30%). The impact of the decision to initiate the re-housing process will therefore, have a positive impact on disabled households in phase 2 of the Love Lane Estate, as they will be waiting a shorter period of time for a new home which meets their need.</p>
<b>Race &amp; Ethnicity</b>	✓	✓		<p>Table 2 below indicates that 42.5% of households on the Housing Register are black. This could mean that a higher number of black people on the Housing Register will be waiting for permanent accommodation for a longer period of time.</p> <p>The table also shows that 51.2 % of people on the Love Lane Estate are black. The</p>

				<p>impact of the decision to initiate the re-housing process will therefore, have a positive impact on black people living in phase 2 of the Love Lane Estate, as they will be waiting a shorter period of time for a new home which meets their need.</p>
<b>Sexual Orientation</b>			✓	<p>Data is not readily available on the proportion/ number of Love Lane households and Housing Register households with this protected characteristic.</p> <p>However, the proposal is not expected to impact on residents in this protected group disproportionately to other groups of residents.</p> <p>Housing allocations are prioritised on the basis of need as set out in the allocations policy and do not discriminate on the basis of the protected characteristics</p>
<b>Religion or Belief (or No Belief)</b>			✓	<p>Data is not readily available on the proportion/ number of Love Lane households and Housing Register households with this protected characteristic.</p> <p>However, the proposal is not expected to impact on residents in this protected group disproportionately to other groups of residents.</p> <p>Housing allocations are prioritised on the basis of need as set out in the allocations policy and do not discriminate on the basis of the protected characteristics</p>
<b>Pregnancy &amp; Maternity</b>			✓	<p>Data is not readily available on the proportion/ number of Love Lane households and Housing Register households with this protected characteristic.</p> <p>However, the proposal is not expected to impact on residents in this protected group disproportionately to other groups of residents.</p> <p>Housing allocations are prioritised on the basis of need as set out in the allocations policy and do not discriminate on the basis of the protected characteristics</p>
<b>Marriage and Civil Partnership</b>			✓	<p>Data is not readily available on the proportion/ number of Love Lane households and Housing Register households with this protected characteristic.</p> <p>However, the proposal is not expected to impact on residents in this protected group disproportionately to other groups of residents.</p> <p>Housing allocations are prioritised on the basis of need as set out in the allocations policy and do not discriminate on the basis of the protected characteristics</p>

**Table 1 - Gender of Housing Register applicants as compared to High Road West residents**

The information below is based on the head of the household.

	Housing Register	Love Lane Phase 2 Tenants (87 tenants)
<b>Male</b>	33.7% of households in band B are males 25% of households in band A are males	46 % of households are male
<b>Female</b>	75% of households in band B are females 66% of households in band A are females	54 % of households are female

**Table 2 - Disability Status of Housing Register applicants as compared to High Road West residents**

The information below is based on the head of the household

	Housing Register	Love Lane Phase 2 Tenants
<b>Disabled</b>	Band A- 5.6% Band B- 15.3% Band C- 18.5%	30%
<b>Not Disabled</b>	Unclear	70%

**Table 3 - Ethnicity of Housing Register applicants as compared to High Road West residents and 2011 census**

The information below is based on the head of the household

	Housing Register	Love Lane Phase 2 Tenants	Census 2011
<b>Asian</b>	7.2%	7.2%	9.5%
<b>Black</b>	42.5%	51.2%	18.8%
<b>Mixed</b>	4%	1.2%	6.5%

Other	7.5%	7.1%	4.7%
White	35.4%	31%	60.5%
Not known/Refused	0%	3.6%	0%

### **Notes on Table 3**

Table 3 above shows that both Housing Register applicants and Love Lane residents include approximately 65% BME households and 35% white households, as compared to 40% BME households and 60% white households across Haringey as at 2011 Census.

The re-housing of both Housing Register and Love Lane tenants disproportionately benefits BME households (compared to the wider Haringey population), who are often over represented amongst those in housing need and/or living in disadvantaged areas.

### **Table 4 - Age of Housing Register applicants as compared to High Road West residents**

	Housing Register	Love Lane Phase 2 Tenants
64 +	Band A- 12% Band B- 1% Band C- 2.6%	17.2%
45-63	Band A- 58.5% Band B- 22% Band C- 24%	42.5%
25-44	Band A- 18% Band B- 66.8% Band C- 61.1%	40.2%
18-24	Band A- 11.1% Band B- 9.9% Band C- 11.9%	0.0%
Under 18	Band A- 0% Band B- 0% Band C- 0.3%	0.0%



## Notes on Table 4

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.

<b>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.</b>				
	<b>Positive</b>	<b>Negative</b>	<b>Details</b>	<b>None – why?</b>
<b>Sex</b>				Not applicable
<b>Gender Reassignment</b>				Not applicable
<b>Age</b>				Not applicable
<b>Disability</b>				Not applicable
<b>Race &amp; Ethnicity</b>				Not applicable
<b>Sexual Orientation</b>				Not applicable
<b>Religion or Belief (or No Belief)</b>				Not applicable
<b>Pregnancy &amp; Maternity</b>				Not applicable
<b>Marriage and Civil Partnership</b>				Not applicable

<b>Stage 6 - Initial Impact analysis</b>	<b>Actions to mitigate, advance equality or fill gaps in information</b>
<p>The analysis conducted in stage 5a above, compares the profiles of Housing Register applicants and High Road West residents, with comparative information available in respect of gender, disability and ethnicity and age only.</p> <p>This demonstrates that both the Housing Register and High Road West residents include similarly high proportions of disadvantaged groups.</p> <p>It is clear from this analysis, that initiating the re-housing process for tenants in phase 2 of the Love Lane Estate, will have a positive impact for these groups (gender, disability, ethnicity and age) on the Love Lane Estate as they will have more re-housing choice and are likely to secure</p>	<p>Officers will be seeking to mitigate any negative impact on households on the Housing Register by managing the number and speed for which Love Lane households are put into Band A and thus can bid for properties. Tenants can only be put into Band A once they have completed a needs assessment and the assessment has been assessed and verified. Therefore, the Love Lane Re-housing Officers will be able to control the number of re-housing needs assessments completed and assessed, so that the Council can control the number of tenants being put into Band A and bidding for properties.</p> <p>Officers are also producing an annual supply and lettings plan, which will detail how many void properties will be allocated to the identified</p>

<p>a new home that meets their need in a shorter period of time.</p> <p>It also shows that this decision will have a negative impact on these groups of households on the Housing Register as these households are likely to have to wait longer to secure permanent accommodation.</p>	<p>groups on the Housing Register. This will include the percentage of properties per year that will be let to residents who require re-housing as a result of estate regeneration schemes (Band A) and percentage of properties that will be let to homeless households (Band B). This plan is due to be considered by the Council's Cabinet in the new year. If agreed at Cabinet, the plan will be reviewed and agreed on an annual basis and will set the total number of void properties which will be available to each housing waiting list group and will thus be able to ensure that proportionate amounts of housing is supplied to each group.</p>
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Stage 7 - Consultation and follow up data from actions set above	
<b>Data Source (include link where published)</b>	<b>What does this data include?</b>
<p>It is not proposed that the Council initiate a consultation exercise with Love Lane tenants and all of the households on the housing register to seek their views on initiating the re-housing process for phase 2 tenants on the Love Lane Estate.</p> <p>This is due to the fact that prior to agreeing the High Road West Masterplan in December 2014, the Council undertook almost three years of consultation with Love Lane residents about the Masterplan and the re-housing options for residents.</p> <p>As part of this consultation, in September and October 2014, the Council undertook a s105 consultation with secure council tenants. This consultation sought secure council tenants on the Love Lane Estate's views on the regeneration proposals including the Love Lane tenant guide. This guide set out the re-housing options for Love Lane. The consultation showed that there was clear support for the regeneration proposals and clear support for maximising resident's re-housing choices.</p> <p>The Love Lane Resident Charter, which set out Love Lane residents aspirations for the regeneration proposals and was agreed at Cabinet in</p>	

December 2014, set out the following aspirations for re-housing:

- A good range of affordable re-housing options to be provided on and off the estate to extend housing choice for existing tenants and their household members.
- All tenants who wish to be re-housed as a secure tenant (or into another form of social housing tenure) off the estate should be allowed to do so through Haringey's Choice Based Lettings Scheme. Tenants requiring re-housing off the estate should receive top priority as their relocation is required as part of a redevelopment scheme. Direct offers should only be used as a last resort for vulnerable tenants and they should receive at least three 'reasonable offers' to consider.
- A reasonable period of time must be allowed for the decant process to allow sufficient choice for tenants who wish to be re-housed off the estate and to for proper consideration of their households circumstances, needs and preferences.

The Love Lane Resident Association and the Independent Tenant and Leaseholder Advisor (ITLA ) working with Love Lane residents have been consulted on the proposal to initiate the rehousing process for secure council tenants in phase 2. Both the Residents Association and the ITLA are extremely supportive, and have, in fact, been requesting this proposal. This is primarily due to the fact that they believe this proposal will maximise residents' re-housing choice.

In early 2015 the Council consulted 9,300 households on the housing waiting list on the Council's Ambrose and Mallory Court Local Lettings Plan, which sought to prioritise the allocation of 30 properties at Ambrose and Mallory Court for Love Lane tenants. Love Lane tenants were also consulted on the Local Lettings Plan. This consultation showed that both the Love Lane residents (75% of respondents ) and households from the housing register (83% of respondents) agreed with

the proposal to prioritise the tenants of the Love Lane Estate for the new properties available at Ambrose and Mallory Court.	
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### Stage 8 - Final impact analysis

This document assesses the potential equalities implications arising from initiating the re-housing process for secure council tenants living in Phase 2 of the Love Lane Estate.

The analysis conducted compares the profiles of Housing Register applicants and Love Lane tenants living in phase 2, with comparative information available in respect of gender, disability, ethnicity and age only.

This demonstrates that both the Housing Register residents and tenants in phase 2 of the Love Lane Estate include similarly high proportions of disadvantaged groups.

It is clear from this analysis that initiating the re-housing process for tenants in phase 2 of the Love Lane Estate will have a positive impact for these groups (gender, disability, ethnicity and age) on the Love Lane Estate, as they will have more re-housing choice and are likely to secure a new home that meets their need quicker. It also shows that this decision will have a negative impact on these groups of households on the Housing Register as these households are likely to have to wait longer to secure permanent accommodation.

Officers will be seeking to mitigate any negative impact on households on the Housing Register by managing the number and speed for which Love Lane households are put into Band A and thus can bid for properties. Tenants can only be put into Band A once they have completed a needs assessment and the assessment have been assessed and verified. Therefore, the Love Lane Re-housing Officers will be able to control the number of re-housing needs assessments completed and assessed, so that the Council can control the number of tenants being put into Band A and bidding for properties.

Officers are also producing an annual supply and lettings plan, which will detail how many void properties will be allocated to the identified groups on the Housing Register. This will include the percentage of properties per year that will be let to residents who require re-housing as a result of estate regeneration schemes (Band A) and percentage of properties that will be let to homeless households (Band B). This plan is due to be considered by the Council's Cabinet in the new year. If agreed at Cabinet, the plan will be reviewed and agreed on an annual basis and will set the total number of void properties which will be available to each housing waiting list group and will thus be able to ensure that proportionate amounts of housing is supplied to each group.

### Stage 9 - Equality Impact Assessment Review Log

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Review approved by Director / Assistant Director

Helen Fisher

Date of review

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.