

EQUALITY IMPACT ASSESSMENT

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

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

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

Stage 1 – Screening

Stage 2 – Full Equality Impact Assessment

An EqlA provides evidence for meeting the Council's commitment to equality and the responsibilities under the Public Sector Equality Duty.

When an EqlA has been undertaken, it should be submitted as an attachment/appendix to the final decision making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqlA to help inform their final decision. The EqlA once submitted will become a public document, published alongside the minutes and record of the decision.

1. Responsibility for the Equality Impact Assessment

Name of proposal	Investing in the Real Lettings Scheme
Service area	Housing Strategy & Commissioning
Officer completing assessment	Martin Gulliver
Equalities/ HR Advisor	Daisy Daventry
Cabinet meeting date	14 March 2017
Director/Assistant Director	Lyn Garner Director of Regeneration, Planning & Development

2. Summary of the proposal

The Real Lettings scheme is a partnership between St Mungos and local authorities to purchase private properties which can then be used to provide housing to homeless households and thus discharge the council's responsibility for permanent re-housing. The Real Lettings Scheme properties will be located throughout London, but it is expected that properties taken up by Haringey will be within the borough or within neighbouring boroughs. Most properties will be two bedroom properties suitable for small families.

This scheme provides additional housing for around 70 homeless households over 5 years, and will therefore affect those who are, or likely to become, statutorily homeless and in the council's temporary accommodation.

This proposal will be taken to the March Cabinet for approval.

3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?		
Protected group	Service users	Staff
Sex	1) Internal data from homelessness and temporary accommodation 2) P1E Homelessness data https://www.gov.uk/government/collections/homelessness-statistics	Staff are not affected unless they are currently homeless or likely to become homeless in Haringey.
Gender Reassignment	http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment/figures-about-haringey#age_structure	See above
Age	See data sources listed as for 'Sex'	See above
Disability	See above	See above
Race & Ethnicity	See above	See above
Sexual Orientation	Census 2011	See above
Religion or Belief (or No Belief)	Census 2011	See above
Pregnancy & Maternity	See data sources listed as for 'Sex'	See above
Marriage and Civil Partnership	Census 2011	See above
Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?		
<p>The Real Lettings Scheme will provide a small increase in family units of around 70 properties over the five years. These properties will be in addition to the larger AST scheme..</p> <p>The scheme will focus on smaller properties of two bedrooms and so will benefit families <i>with one or two children. When compared to the general population, homeless households living in Haringey temporary accommodation are:</i></p> <ul style="list-style-type: none"> • <i>More likely to be younger</i> • <i>More likely to be from the BME community,</i> • <i>More likely to be headed by a female, and</i> • <i>As a household are more likely to be headed by a lone parent</i> • <i>More likely to have dependent children</i> • <i>More likely to be pregnant</i> <p>The benefit of this scheme will be a reduction in the time smaller households spend in temporary accommodation, which will benefit those groups who are over-represented among homeless households.</p>		

4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

In the last year, the council has consulted on the TA Placement Policy which ended on 22nd August 2016 and the Homelessness Strategy and Delivery Plan which ended on 29th January 2017. The council has used the outcomes of these consultations to inform the development of the Real Lettings Scheme.

For the TA Placement Policy, all 3,200 residents of temporary accommodation received either a paper copy of the consultation booklet or an email with a pdf of the booklet attached. Drop-in sessions were also held in hostels, and in the YMCA. The consultation resulted in 326 responses – over 10% of those living in temporary accommodation.

The consultation on the Homelessness Strategy and Delivery Plan was undertaken as part of a consultation on ‘Four housing policies to meet housing demand’ which also included alterations to the Allocations Policy and Tenancy Strategy, and a new Intermediate Housing Policy. This consultation was also targeted at those living in temporary accommodation and current tenants and received 328 responses.

4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

In the TA Placement consultation, there was strong support (64%) for keeping households with children in the local area. This proposal creates additional supply of family housing in North East London to enable households to remain in the local area.

The responses to the wider consultation of ‘four housing policies’ also showed wide support for council creating additional supply of housing. When asked “Are there any particular issues affecting housing supply and demand in the borough that you think the Council should take into account?”, just under half of the responses (61 out of the 136 responses) referred to the council creating additional supply.

5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

1. Sex

Positive	Y	Negative		Neutral impact		Unknown Impact	
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Female headed households form 74% of accepted households. The Real Lettings Scheme will have an overall positive effect on these households by increasing the supply of local housing.

2. Gender reassignment

Positive	Y	Negative		Neutral impact		Unknown Impact	
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There is no borough level data for people undergoing gender reassignment. This group makes up an estimated 0.1% of households nationally.

It is not anticipated that the Real Lettings Scheme would be detrimental to this group or that this group would be disproportionately affected.

3. Age

Positive	Y	Negative		Neutral impact		Unknown Impact	
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Adults aged 25-54 are over-represented in homelessness services as they form 79% of statutory accepted households living in temporary accommodation.

As the policy will focus on obtaining two bedroom properties, households aged 20 to 29 years old will benefit from this policy most as they form a higher proportion of households with one or two children. Those with larger families (who are generally older) and one person will benefit less from this policy.

4. Disability

Positive	Y	Negative		Neutral impact		Unknown Impact	
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There is limited data on disability amongst statutory households unless it is their priority need. However, in 2015/16, 3% of accepted households have a physical disability.

The increase in additional housing supply should also increase the supply of suitable adapted properties which can be assigned to those needing such properties.

5. Race and ethnicity

Positive	Y	Negative		Neutral impact		Unknown Impact	
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Black Households are significantly over represented amongst those who are statutory homeless acceptance (40%) in comparison to the borough (16%). The additional local supply will benefit these protected groups.

6. Sexual orientation

Positive	Y	Negative		Neutral impact		Unknown Impact	
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We do not have borough level data for people identifying as bisexual, gay or lesbian. However based on estimates for London, we work on the basis that people identifying as bisexual, gay or lesbian account for at least 10 per cent of our population LGBT people aged 16 – 25 form 25% of youth homelessness, who are therefore more likely to be part of a household with a one bed need. It is not anticipated that this policy would be detrimental to this group or that this group would be disproportionately affected.

7. Religion or belief (or no belief)

Positive	Y	Negative		Neutral impact		Unknown Impact	
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Although data is recorded at application stage, this is not a consideration in the discharge of housing need and is not recorded by the Government's P1E statistics.

8. Pregnancy and maternity

Positive	Y	Negative		Neutral impact		Unknown Impact	
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The additional supply of housing will benefit smaller households, including those who are expecting their first or second child.

9. Marriage and Civil Partnership

Positive	Y	Negative		Neutral impact		Unknown Impact	
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The Plan is not seeking to deliver a specific service for married people or people who are civil partners so will not have an impact with regard to this protected characteristic

10. Groups that cross two or more equality strands e.g. young black women

Black Female headed households are over-represented among those living in temporary accommodation and so will benefit from the additional supply of housing.

Outline the overall impact of the policy for the Public Sector Equality Duty:

The proposal will create additional supply which can benefit those who are over-represented among homeless households. This additional supply will allow more families to have a settled home locally, and reduce the need for placements out of London.

6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?

Outcome	Y/N
No major change to the proposal: the EqlA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <u>If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them.</u>	Y
Adjust the proposal: the EqlA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality.	N
Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.	N

6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty

Impact and which protected characteristics are impacted?	Action	Lead officer	Timescale
<i>No negative impacts</i>			

Please outline any areas you have identified where negative impacts will happen as a result of the proposal but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.

No negative impacts

6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:

The Real Lettings scheme will form a small but useful additional supply of small family units. It is proposed that the use of these policies will be monitored alongside the current AST lettings scheme.

7. Authorisation

EqlA approved by
(Assistant Director/ Director)

Date

8. Publication

Please ensure the completed EqlA is published in accordance with the Council's policy.

Please contact the Policy & Strategy Team for any feedback on the EqlA process.