

## 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

<b>Name of proposal</b>	The use of permanent council housing stock as temporary accommodation
<b>Service area</b>	Housing
<b>Officer completing assessment</b>	Martin Gulliver
<b>Equalities/ HR Advisor</b>	Daisy Daventry
<b>Cabinet meeting date</b>	February 2017
<b>Director/Assistant Director</b>	Dan Hawthorn - Director of Housing & Growth

#### 2. Summary of the proposal

The council is considering the use some of its vacant permanent council housing stock to provide temporary accommodation (“TA”) to homeless households, instead of using this stock to provide housing on a permanent basis.

The stock to be used will be one bedroom properties and will house “two bedroom” families while they wait for permanent rehousing. This will mean that a higher number of families can be housed in the borough, but lead to longer waiting times for one bedroom households.

### 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	Internal reports (TA0181) run on 20 December 2016 and listing all households in TA on 20 December 2016	This policy does not affect staff unless they are a homeless household living in TA provided by Haringey, or are in a household likely to be so.
Gender Reassignment	Albert Kennedy Trust Gender Reassignment is not recorded for current residents of TA	
Age	see data sources listed in 'sex'	
Disability	Internal report (HW0137 "Single vulnerable households in TA) run on 20 December 2016 and listing single person households with vulnerability in TA.	
Race & Ethnicity	see data sources listed in 'sex'	
Sexual Orientation	Albert Kennedy Trust Sexual Orientation is not recorded current residents of TA.	
Religion or Belief (or No Belief)	None available.	
Pregnancy & Maternity	see data sources listed in 'sex'	
Marriage and Civil Partnership	N/A	

### Outline the key findings of your data analysis.

The tables below show the demographic breakdown of the one and two bedroom homeless households living in Haringey's temporary accommodation as at 20 December 2016.

This data was used to compare the characteristics of those who would benefit from the policy (two bedroom households) with those who may face longer waiting times (one bedroom households).

Age of head of household	One Bed		Two Bed	
	Nº	%	Nº	%
Under 21	11	7%	24	1%
21-30	66	44%	576	36%
31-40	31	21%	573	35%
41-50	20	13%	302	19%
51-60	11	7%	123	8%
61-70	5	3%	13	1%
Over 70	5	3%	8	0%
<b>Total</b>	<b>149</b>	<b>100%</b>	<b>1,619</b>	<b>100%</b>

	One Bed		Two Bed	
Gender	N°	%	N°	%
Female	86	58%	1,300	80%
Male	63	42%	319	20%
<b>Total</b>	<b>149</b>	<b>100%</b>	<b>1,619</b>	<b>100%</b>

  

	One Bed		Two Bed	
Ethnicity	N°	%	N°	%
Asian	7	5%	106	7%
Black	59	40%	700	43%
Mixed	7	5%	89	5%
Other	13	9%	134	8%
White	57	38%	543	34%
Not Known/Refused	6	4%	47	3%
<b>Total</b>	<b>149</b>	<b>100%</b>	<b>1,619</b>	<b>100%</b>

#### 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?

Consultation on this paper has not been undertaken directly, as we have recently concluded consultation the Homelessness Strategy on 29 January 2017, and specifically, the consultation a new Temporary Accommodation Placement Policy. This 8 week consultation ended on 7<sup>th</sup> September 2016 and received 369 responses or around 12% of all households in TA. The exceptionally high response rate demonstrates that the location of temporary accommodation is extremely important, and there was very strong support for giving priority for local placements to those who are working (70%) or have children taking exams (64%).

#### 4. b) Outline the key findings of your consultation

The TA Placement Policy (see 4a) set out the priorities given for households to be placed in the borough, and placed within London. Respondents were asked to rank proposed criteria and suggest their own for in-borough and in-London placements. After “length of local connection”, the most common additional criteria was for “families with children in school” and “single parents”. Both these groups will benefit from the increased in-borough placement available from the use of permanent stock as TA.

#### 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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80% of two bedroom households are female headed compared with only 58% of one-bedroom households. As 72% of two bedroom households are single parents, this policy will have a positive impact on such households due to the support they will receive from family and friends in their Haringey support networks by remaining in the borough.

## 2. Gender reassignment

Positive		Negative		Neutral impact		Unknown Impact	X
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Transgender people aged 16 – 25 are more likely to be homeless compared to non-transgender people and maybe more likely to constitute a household with a one bed need. Data on gender reassignment is not collected as part of the application process and so there is no information available to confirm the size of accommodation required by this group. Also, it should be noted that there is an LGBT pathway in place which helps households find suitable accommodation which would help mitigate any potential impact on this group. Overall however, there is insufficient information to fully assess the impact and so impact is consequently unknown.

## 3. Age

Positive	Y	Negative		Neutral impact		Unknown Impact	
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There will be beneficial effect for households headed by 21-40 year olds who make up 71% of two bedroom households, but with increased waiting times for those aged 21-30 who make up 44% of one bedroom households. However, it is also noted that there would be a significant increase in the number of children placed in the borough.

## 4. Disability

Positive		Negative		Neutral impact	Y	Unknown Impact	
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Physical and mental disabilities are collated when this is an applicant's Priority Need – mostly single applicants. This is not collated for households have Priority Need such as having dependant children under 18. As at 20 December 2016, 14% of one bedroom households in TA had a mental health disability and 15% had a physical disability. Although disability rates in two bedroom households are unknown, it is likely that these will be higher than Haringey's general population (13% and 6% respectively).

Households who require two bedrooms to allow a carer to reside with them, or an additional room for medical reasons will not be required to move into smaller, one bedroom properties.

The impact of waiting times will have a larger effect on these groups. The impact will be larger for those households requiring an accessible property if these are used for TA instead. This can be mitigated by ensuring that adapted properties are not used for TA.

## 5. Race and ethnicity

Positive	Y	Negative		Neutral impact		Unknown Impact	
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There are similar ethnic profiles among one and two bedroom households and the effect of longer waiting times is not expected to have an undue effect on these groups.

## 6. Sexual orientation

Positive		Negative		Neutral impact		Unknown Impact	Y
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Sexual orientation is not collected as part of a homeless application, but LGBT people maybe more likely to constitute a household with a one bed need. However, data on sexual orientation is not collected as part of the application process and so there is no information available to confirm the size of accommodation required by this group. Also, it should be noted that there is an LGBT pathway in place which helps households find suitable accommodation which would help mitigate any potential impact on this group. Overall however, there is insufficient information to fully assess the impact and so impact is consequently unknown.

## 7. Religion or belief (or no belief)

Positive		Negative		Neutral impact	Y	Unknown Impact	
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Religion is not collected as part of a homeless application, but it is not anticipated that this policy would be detrimental or that this group would be disproportionately affected.

## 8. Pregnancy and maternity

Positive	Y	Negative		Neutral impact		Unknown Impact	
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As at 20 December 2016, there were only 2 one bedroom households and 4 two bedroom households containing a pregnant woman. However, the benefits of additional TA placements in the borough will be greater for women who are pregnant and with babies aged less than 6 months as this will help maintain local support networks and access to already existing health care packages.

## 9. Marriage and Civil Partnership

Positive	Y	Negative		Neutral impact		Unknown Impact	
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Marital/ Civil Partnership status is not collected as part of a homeless application, but it is not anticipated that this policy would be detrimental or that this group would be disproportionately affected.

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

This policy will be beneficial to two bedroom households who are placed locally instead of out of the borough, and this is beneficial to many households with protected characteristics. These benefits are concentrated further when these characteristics are combined, and in particular, young black women who are over-represented among homeless households.

<b>Outline the overall impact of the policy for the Public Sector Equality Duty:</b>
<p>Although the policy will affect the same number of two bedroom households as the number of households with greater waiting times, there will be a significantly higher number of individuals who benefit.</p> <p>The largest impact on those with protected characteristics is on those with disabilities who form a higher percentage of one bedroom households. However, the impact will be minimal where the households are already placed in suitable TA before and during the extended waiting time. There will though be a detrimental affect on this group if the current accommodation is not adapted to their needs.</p>

<b>6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?</b>			
Outcome			Y/N
No major change to the proposal:			N
Adjust the proposal:			Y
Stop and remove the proposal:			N
<b>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</b>			
<b>Impact and which protected characteristics are impacted?</b>	<b>Action</b>	<b>Lead officer</b>	<b>Timescale</b>
Extended waiting times for one bedroom households	The council will increase the landlord incentives to permanently place one bed households into private sector tenancies	Denise Gandy Director of Housing Demand	To be considered as part of Annual Budget setting
Loss of adapted properties	The council will monitor the demand for adapted properties among one and two bed homeless households to ensure the adapted homes that become available are allocated to households needing these adaptations. The council will continue to adapt both TA and permanent homes to households' needs in compliance with legislation.	Denise Gandy Director of Housing Demand	Annual review as part of Annual Lettings Plan set every March.
<b>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.</b>			
None			
<b>6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:</b>			
The impact of this policy will be implemented and monitored via the Annual Lettings Plan. This plan sets out the allocation of lettings to different groups based on their housing needs, as well as by bedroom size.			

## 7. Authorisation

EqlA approved by Dan Hawthorn



Date 24 March 2017

## 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.