

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

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on protected characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

Stage 2 – Full Equality Impact Assessment

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

When an EqIA 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 EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.

Please read the Council’s Equality Impact Assessment Guidance before beginning the EqIA process.

1. Responsibility for the Equality Impact Assessment

Name of proposal	Intermediate Housing Policy Statement
Service area	Housing Strategy and Commissioning
Officer completing assessment	Hannah Adler
Equalities/ HR Advisor	Ashley Hibben
Cabinet meeting date (if applicable)	16 January 2018
Director/Assistant Director	Dan Hawthorn

2. Summary of the proposal

Please outline in no more than 3 paragraphs

- The proposal which is being assessed*
- The key stakeholders who may be affected by the policy or proposal*
- The decision-making route being taken*

The Intermediate Housing Policy Statement clarifies Haringey Council's policy on several aspects of intermediate housing. It sits beneath the Housing Strategy 2017-2022, which was accompanied by an Equalities Impact Assessment. The Housing Strategy's EqIA can be found here

<http://www.minutes.haringey.gov.uk/documents/s88250/Housing%20Strategy%20App3%20EqIA%20v1%200.pdf> .

Intermediate housing is aimed at households who are unlikely to access social housing but whose household incomes mean they may struggle to access market housing. The policy statement aims to strengthen the mechanisms by which the Council can prioritise intermediate housing for households on lower incomes who will most benefit from it. These mechanisms are marketing bands and priority. First priority for intermediate housing will go to: social housing tenants, households on the housing register, households who are required to move due to estate renewal, and children of Haringey social housing tenants who are currently living with their parents. Intermediate housing will go to the household on the lowest income should a number of households express an interest simultaneously. With regard to marketing, there are income bands in place to ensure households on lower incomes are offered this housing first.

The policy statement also clarifies the intermediate housing products that the Council wishes to see developed in the borough. It states that the Council is interested in all types of intermediate housing for ownership and for rent, and notes that intermediate rented products may be more suitable for Haringey residents. Finally, the policy statement clarifies that in the West of the borough the Council expects to see a higher proportion of affordable housing being Social Rent / Affordable Rent than across the borough as a whole, and consequently the Council expects to see a slightly lower proportion of intermediate housing in the West. Appendix C of the Housing Strategy is amended to reflect this policy statement.

The Intermediate Housing Policy Statement does not:

- Set the desired percentage of intermediate housing in Haringey – this is provided for in Haringey's planning policy.
- Set the definition of intermediate housing – this is provided for in the National Planning Policy Framework.

This policy statement will therefore impact the following groups:

- All Haringey residents whose household income is less than £90,000 since these residents are eligible for intermediate housing for ownership, and, within this group, all Haringey residents whose household income is less than £60,000 since these residents are eligible for intermediate rented housing. Households with a lower household income will have first priority, and intermediate housing is being targeted

at households with a maximum income of £40,000 for 1-2 bed properties and £60,000 for larger properties, so households towards the lower end of these income bands are more likely to be able to benefit from intermediate housing.

There is a lower limit below which household income is likely to be too low to access intermediate housing. These households will be better served by social housing. The policy statement is clear that intermediate housing is not a replacement for social housing.

- Since first priority goes to social housing tenants, households on the housing register, households who are required to move due to estate renewal, and children of Haringey social housing tenants who are currently living with their parents, the policy statement will have the greatest potential impact on these groups.

The policy statement has potential impact rather than direct impact since intermediate housing is one part of the housing offer in Haringey. Accessing intermediate housing would always be a choice.

If some groups are prioritised, others will have been deprioritised. Since first priority goes to social housing tenants, households on the housing register, households who are required to move due to estate renewal, and children of Haringey social housing tenants who are currently living with their parents, those who are de-prioritised are those living in privately owned (and not as a leaseholder or freeholder on an estate undergoing renewal) or privately rented housing. Since those living in privately owned housing are less likely to need intermediate housing, those living in the private rented sector are the main group being deprioritised. Therefore, the equalities impact of this group being deprioritised will also be considered. However, those living in this sector will still be able to access intermediate housing as they are included in priority group 2 ('Anyone else living or working in the borough').

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?

Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis. Please include any gaps and how you will address these

This could include, for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national. For restructures, please complete the restructure EqIA which is available on the HR pages.

Protected group	Service users	Staff
Sex	Census data. Council held housing data.	This policy statement only impacts on staff insofar as they may be Haringey

Gender Reassignment	n/a	residents.
Age	Census data. Council held housing data.	
Disability	Census data. Council held housing data.	
Race & Ethnicity	Census data. Council held housing data.	
Sexual Orientation	n/a	
Religion or Belief (or No Belief)	n/a	
Pregnancy & Maternity	n/a	
Marriage and Civil Partnership	n/a	

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?

Explain how you will overcome this within the proposal.

Further information on how to do data analysis can be found in the guidance.

1. Income

As noted above, the policy statement impacts any household where the household income is lower than £90,000. The Council does not hold comprehensive data on household income in the borough.

We do have data showing the following:

Gross weekly pay in Haringey in GBP – Male and Female

	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
M	484.8	527.3	498.4	498.1	481.6	516.9	481.2	498.3	538.5	533.4	591.0
F	431.1	462.6	479.0	492.1	446.0	437.2	455.5	449.0	469.7	444.0	476.4

This shows that women consistently earn less than men in Haringey. This reflects national trends.

Employment levels

Disabled	39%
Not disabled	76%

This shows that disabled people are significantly less likely to be employed than those who are not disabled. This is likely to have an impact on income, and means that households where a member has a disability may have a lower household income. Additionally, mental disability can have a significant impact on maintaining full-time employment, and therefore on income.

The median income in Tottenham is lower than in the borough as a whole. Tottenham has a significantly higher proportion of BAME residents than the borough as a whole. This shows that Haringey's BAME residents are more likely to have lower earnings than its non-BAME residents.

2. **First priority**

First priority for intermediate housing goes to social housing tenants, households on the housing register, households who are required to move due to estate renewal, and children of Haringey social housing tenants who are currently living with their parents, therefore the policy statement will have the greatest potential impact on these groups.

With regard to the category of 'households who are required to move due to estate renewal', the equalities impact has been covered in detail in the Estates Renewal Rehousing and Payments Policy EQIA which can be found here:

<http://www.minutes.haringey.gov.uk/documents/s96881/FINAL%20Appendix%201%20EqI A.pdf> .

With regard to the category 'children of Haringey social housing tenants who are currently living with their parents', Haringey does not hold specific data on this group. However, their ethnicity is likely to be the same as their parents'.

Data analysis of these groups shows the following:

Population	Council tenants General Needs	Housing Association tenants General Needs (proxy used is Nominations over last 5 years)	Housing Register	Haringey
Source data	<i>OHMS 18/10/2016</i>	<i>OHMS 1 Dec 12 to 30 Nov 17</i>	<i>OHMS 1 Dec 12 to 30 Nov 17</i>	Census / JSNA
Sex				
Female	64.1 %	64.4 %	65.2 %	49.5%
Male	35.9 %	35.6 %	34.8 %	50.5%
Disability				
Yes	19.5%	No data	No data	13.8%
No	80.5%	No data	No data	86.2%
Ethnicity				
Asian	4.4%	6%	7%	9.5%
Black	32.2%	37%	40%	18.8%
Other	8.0%	9%	11%	4.7%
Mixed	2.2%	6%	5%	6.5%

White	40.1%	38%	34%	60.5%
Refused/Unknown	13.0%	4%	4%	-

Age

The age being recorded is that of the main tenant, it is therefore not straightforward to compare this data with borough-wide data, since those under 18 are not represented.

The most useful category to consider is those 65 and over:

Population	Council tenants General Needs	Housing Association tenants General Needs (proxy used is Nominations over last 5 years)	Housing Register	Haringey
Age 65+	21.4%	4%	2.7%	8.8%

Analysis of the groups who are granted first priority shows that:

Sex

- There is a significantly higher percentage of women living in council housing, social housing and on the housing register than across the borough as a whole.

Ethnicity

- There is a significantly higher percentage of black residents living in council housing, social housing and on the housing register than across the borough as a whole.
- There is a higher percentage of other ethnicities living in council housing, social housing and on the housing register than across the borough as a whole
- There is a significantly lower percentage of white residents living in council housing, social housing and on the housing register than across the borough as a whole.
- There is a lower percentage of Asian ethnicities living in council housing, social housing and on the housing register than across the borough as a whole.
- There is a slightly lower percentage of mixed ethnicities living in council housing, and a similar percentage living in social housing and on the housing register than across the borough as a whole.

Disability

- There is a slightly higher percentage of people with disabilities in council housing than across the borough as a whole.

Age

- There is a higher percentage of people aged 65+ living in council housing than across the borough as a whole.

- There is a lower percentage of people aged 65+ living in social housing and on the housing register than across the borough as a whole.

3. Groups that are deprioritised

Analysis of Haringey's Private Rented Sector shows the following:

Population	PRS tenants	Haringey
Source data	Census	Census / JSNA
Gender		
Female	47%	49.5%
Male	53%	50.5%
Disability		
Yes	7.7%	13.8%
No	92.4%	86.2%
Ethnicity		
Asian	7.3%	9.5%
Black	12.5%	18.8%
Other	5.2%	4.7%
Mixed	4.1%	6.5%
White	70.9%	60.5%
Age		
24 and under	7%	32.2%
25 to 49	79%	45.9%
50 to 64	10%	13%
65 and over	4%	8.8%

Sex

- There is a slightly lower percentage of women living in the private rented sector than across the borough as a whole.

Ethnicity

- There is a slightly lower percentage of black residents living in the private rented sector than across the borough as a whole.
- There is a slightly higher percentage of other ethnicities living in the private rented sector than across the borough as a whole.
- There is a higher percentage of white residents living in in the private rented sector than across the borough as a whole.
- There is a slightly lower percentage of Asian ethnicities in the private rented sector than across the borough as a whole.
- There is a slightly lower percentage of mixed ethnicities living in the private rented sector than across the borough as a whole.

Disability

- There is a lower percentage of people with disabilities living in the private rented sector than across the borough as a whole.

Age

- There is a much lower percentage of people aged 24 and under living in the private rented sector than across the borough as a whole (note: this may be due to the data recorded being that of the main tenant).
- There is a much higher percentage of people aged 25 to 49 and over living in the private rented sector than across the borough as a whole.
- There is a slightly lower percentage of people aged 50 to 64 living in the private rented sector than across the borough as a whole.
- There is a lower percentage of people aged 65 and over living in the private rented sector than across the borough as a whole.

Broadly, analysis of Haringey's private rented sector population shows that BAME people, women and people with disabilities are less likely to live in the private rented sector than white people, men and people without disabilities. People aged 25 to 49 are more likely to live in the private rented sector than other age groups.

There are no identifiable inequalities from private rented sector tenants being granted second priority.

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?

Please outline which groups you may target and how you will have targeted them

Further information on consultation is contained within accompanying EqIA guidance

This policy was the subject of a consultation that ran from November 2016 to January 2017.

The consultation was presented and promoted to partners at a series of forums. The council engaged with residents at a series of public drop in events, held throughout the borough during November and December 2016, where information was provided to residents on the policy proposals and assistance given in completing the questionnaire. A total of 135 residents attended the four public drop-in events.

Over 11,000 council tenants, temporary accommodation residents, sheltered accommodation residents and households on the housing register were e-mailed and invited to take part in the consultation and given details of the drop in events being held. The letter also directed them to a web page www.haringey.gov.uk/meetinghousingneed which explained the policy proposals as well inviting them to complete the online SNAP survey.

The consultation was advertised through both Haringey and Homes for Haringey websites, the Bridge Renewal Trusts Community Impact Bulletin and paper copies of the consultation booklet were available at Station Road; Marcus Garvey and Wood Green customer service centres where customer officers were asked to inform tenants about the consultation. In addition, all Homes for Haringey resident groups in the borough were contacted.

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

Explain how will the consultation's findings will shape and inform your proposal and the decision making process, and any modifications made?

Consultation on the intermediate housing policy showed strong support for the policy. The consultation showed that:

- 80% agreed with the proposed criteria for intermediate services housing
- 84% agreed with the order of priority for intermediate housing as set out in the draft policy, which was as follows:
 1. Haringey social housing tenant (including tenants in temporary accommodation who have been accepted by Haringey) and military personnel who have served within the last five years
 2. Haringey resident affected by regeneration scheme either tenant or leaseholder
 3. Haringey resident
 4. Any other Haringey worker
 5. Resident in any other London borough

The proposed Intermediate Housing Policy Statement has taken on board these consultation results, but has simplified the priority matrix to three levels. It has also introduced additional criteria to reflect new policies in the Estate Renewal Rehousing and Payments Policy, and out of a desire to improve the mechanisms to prioritise existing Haringey residents for intermediate housing.

There were a number of very different concerns raised in the consultation, not all of which addressed the policy proposals. One concern was that people on lower incomes would still find it difficult to access intermediate housing. The policy statement uses an expanded definition of intermediate housing to give greater weight to intermediate rented products, which may be more affordable to those on lower incomes.

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

Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.

Further information on assessing impact on different groups is contained within accompanying EqlA guidance

1. Sex (Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)

Positive	x	Negative		Neutral impact		Unknown Impact	
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There are more women living in council housing and in housing association housing, and on the housing register, than in the borough as a whole. By prioritising social housing tenants, households on the housing register and households who are required to move due to estate renewal for intermediate housing, this policy statement may have a positive impact on women.

Additionally, in Haringey women earn less than men. By prioritising households with lower incomes for intermediate housing this policy statement may have a positive effect on households headed by women.

2. Gender reassignment (Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)

Positive		Negative		Neutral impact		Unknown Impact	x
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We do not hold data on gender reassignment so cannot assess this. However, it is likely that this will have a neutral impact.

3. Age (Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)

There are more people aged 65 and over living in council housing, and so this group could benefit from this policy statement by enabling them to access intermediate housing. However, it is less likely that older people will want to move to a new home.

This policy statement is designed to have a positive impact on both younger and older people by providing alternative models of home ownership and rent taking into consideration the different levels of both income and savings younger and older people are likely to have.

The policy statement states that Haringey is interested in all forms of intermediate housing. Previously the Council's preferred product was shared ownership. By broadening the intermediate housing offer, the policy statement opens up this form of housing to people with different income levels and savings. Young people are likely to have had less time to accumulate savings for a deposit, which may prevent them from accessing full home ownership. By broadening the offer to include intermediate rent as well as intermediate

owned products, this policy statement may have a positive impact on young people.

Additionally, children of social housing tenants currently living with their parents are likely to be young people, and are given first priority. The policy statement may therefore benefit these young people.

Younger people (aged 25-49) are more likely to live in the private rented sector than older people. Since this group is deprioritised this policy statement could be understood as having a negative impact on these younger people in the private rented sector. However, this negative effect would be minimal and other elements of intermediate housing are specifically beneficial to younger people (as noted above) so this negative impact is likely to be outweighed by the positive impacts.

4. Disability *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive	x	Negative		Neutral impact		Unknown Impact	
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People with disabilities make up 19.5% of general needs council tenants. We do not hold accurate information for the percentage of people with disabilities amongst housing association tenants, or who are on the housing register.

Households where a member has a disability are more likely to have lower incomes. By prioritising lower income households for intermediate housing, the policy statement may have a positive effect on households where a household member has a disability. People with mental disabilities are specifically likely to have problems maintaining regular full time employment and so this would impact on the income of households where a member has mental disability. By prioritising households with lower incomes for intermediate housing this policy statement may have a positive effect on households where a member has a disability.

5. Race and ethnicity *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive	x	Negative		Neutral impact		Unknown Impact	
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There is a higher percentage of BAME residents in council housing, social housing and on the housing register than across the borough as a whole.

By giving first priority to intermediate housing to social housing tenants, households on the housing register, households who are required to move due to estate renewal, and children of Haringey social housing tenants who are currently living with their parents, this policy statement may have a positive effect on BAME residents.

As noted above, the Council does not hold detailed data showing correlation between household income and ethnicity. But there is evidence suggesting that BAME residents

may have lower earnings and so lower household incomes. By giving households with lower incomes priority, this policy statement may have a positive impact on BAME residents. Additionally, by encouraging intermediate rented products which may be more affordable to those on lower incomes, this policy statement will also help BAME residents.

6. Sexual orientation *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive		Negative		Neutral impact	x	Unknown Impact	
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We do not hold data on sexual orientation so cannot assess this. However, it is likely that this will have a neutral impact.

7. Religion or belief (or no belief) *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive		Negative		Neutral impact	x	Unknown Impact	
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We do not hold data on religion or belief so cannot assess this. However, it is likely that this will have a neutral impact.

8. Pregnancy and maternity *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Positive	x	Negative		Neutral impact		Unknown Impact	
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This policy statement may have a positive impact on people who are pregnant or who have dependent children for the following reasons.

Firstly, pregnancy and maternity can impact on household incomes due to potential loss of earnings. By giving higher priority to households on lower incomes, this policy statement may be beneficial to households where a household member is pregnant or households with young children.

Secondly, pregnancy and maternity may mean that households need to move to a larger home, which may be more expensive on the open market, or which may be in shortage in social housing stock. Intermediate housing may provide an option for a larger home that young families can afford, avoiding overcrowded homes. By opening up the intermediate housing offer to include intermediate rented homes, the policy statement has also increased the different types of lower cost housing that will be delivered in the borough.

9. Marriage and Civil Partnership *(Consideration is only needed to ensure there is no discrimination between people in a marriage and people in a civil partnership)*

Positive		Negative		Neutral impact	x	Unknown Impact	
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This policy statement will have no impact with regard to this protected characteristic.

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

There are no new observations to make with regard to this.

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

- Could the proposal result in any direct/indirect discrimination for any group that shares the protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a protected characteristic and those who do not?

This includes:

- a) Remove or minimise disadvantage suffered by persons protected under the Equality Act
- b) Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups
- c) Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low
- Will the proposal help to foster good relations between groups who share a protected characteristic and those who do not?

The Intermediate Housing Policy Statement will not result in any direct or indirect discrimination for any group. By broadening the intermediate housing offer in Haringey and by prioritising on the basis of household income, with lower income households having first priority, the policy statement enables more residents to access intermediate housing than was previously the case.

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

Further information on responding to identified impacts is contained within accompanying EqIA guidance

Outcome	Y/N
No major change to the proposal: the EqIA 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 EqIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below	

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.

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
n/a			

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.

n/a

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

The Council will monitor who is accessing intermediate housing.

7. Authorisation

EqIA approved by (Assistant Director/ Director)	Date
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8. Publication

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

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