

## 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.

This is the **Public Sector Equality Duty**

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 protect 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

|   |  |
|---|--|
| <b>Name of proposal</b>                     | Commercial Property Business Plan<br>(Haringey Development Vehicle Cabinet Report July 2018) |
| <b>Service area</b>                         | Commercial Property  |
| <b>Officer completing assessment</b>        | Hugh Smith   |
| <b>Equalities/ HR Advisor</b>               | Hugh Smith   |
| <b>Cabinet meeting date (if applicable)</b> | July 2018  |
| <b>Director/Assistant Director</b>          | Helen Fisher, Director of Housing, Regeneration, and Planning                                |

## 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 proposal is to not proceed with the establishment of the HDV. A component of the HDV was the transfer of part of the Council's commercial property portfolio from the Council to the HDV, as set out in the Commercial Property Business Plan. It follows that this business plan will not proceed. This EqIA assesses the impact of not proceeding with the business plan.

While the Council is deciding to reverse its decision of July 2017 to establish the HDV, there is no change to the status quo in respect of the commercial portfolio as that decision was never implemented. The Council will review and assess the impacts, in equality terms, of not going ahead with the project as planned.

The HDV would have had a commercial portfolio of high-street retail, industrial estates, office, childcare and some units that provide community facilities. The HDV would have utilised these assets to drive regeneration, and create employment space and homes.

Lendlease would have acted as overall asset manager. The revenue generated from rent, development opportunities and disposal of assets would have supported the ongoing operations of the HDV and been reinvested to meet HDV objectives.

The key stakeholders are the current businesses and leaseholders that occupy the properties in the commercial portfolio.

**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.*

| <b>Protected group</b>            | <b>Service users</b>   | <b>Staff</b> |
|-----------------------------------|--|--------------|
| Sex                               | Census 2011  | N/A          |
| Gender Reassignment               | We do not hold this data. The Equality and Human Rights Commission have published a national estimate. | N/A          |
| Age                               | Census 2011  | N/A          |
| Disability                        | Census 2011  | N/A          |
| Race & Ethnicity                  | Census 2011  | N/A          |
| Sexual Orientation                | ONS Annual Population Data 2016  | N/A          |
| Religion or Belief (or No Belief) | Census 2011  | N/A          |
| Pregnancy & Maternity             | Census 2011  | N/A          |
| Marriage and Civil Partnership    | Census 2011  | 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.*

The Commercial Portfolio Business Plan would have involved the transfer of non-housing properties to the HDV. We do not have equality data for leaseholders of individual units that will be in the portfolio. However, we understand the diversity of the borough and we are aware it is likely that there are a range of businesses within the commercial portfolio, including retail businesses such as cafes and restaurants, offering cultural and ethnic traditions of different BAME groups.

The portfolio includes 5 children’s centres and 1 stay and play facility, and three community centres, including Northumberland Park resource centre, Broadwater Farm based enterprise and community centre and the community centre based on Tiverton Road.

It includes childcare and nursery services, public sector buildings, charities and retail businesses that promote cultural aspects of the diverse local communities. The decision to proceed with the HDV would not have impacted on these organisations as the HDV would have taken over the management of business leases and would not have changed any lease conditions at the point of transfer. It may have had an initial positive impact as there will be improvements in management functions and lease services. It is likely that the conditions or rents of these properties would have changed at lease renewal or review points in order to meet the economic requirements.

VAT would have been introduced for all Commercial Properties which would have impacted on all public functions within the Commercial Portfolio, as well as small businesses, which are likely to be owned by protected groups, such as BAME communities. The HDV Board, advised by the Council, would have developed a phased approach in order to reduce the impact for small businesses and public functions within the portfolio. The decision not to proceed with the HDV means that this impact will not occur through the Commercial Portfolio Business Plan

**A) Sex<sup>1</sup>**

|          | Female | Male  |
|----------|--------|-------|
| Haringey | 50.5%  | 49.5% |
| London   | 50.9%  | 49.1% |
| England  | 50.8%  | 49.2% |

As in common with national and regional trends, there are slightly more females than males.

|          | Female headed lone parent families | Male headed lone parent families |
|----------|------------------------------------|----------------------------------|
| Haringey | 93.8%                              | 7.3%                             |
| London   | 92.5%                              | 7.5%                             |
| England  | 90.3%                              | 9.7%                             |

Haringey has a higher proportion of female headed families compared to London and England. They are more likely to use services, such as childcare, health and advice services that could be in the Commercial Portfolio.

It is likely that the conditions or rents of Commercial Portfolio properties would have changed when leases were renewed or reviewed in order to meet the economic requirements of the business case. This may have affected premises that provide a function disproportionately used by women and female headed lone parent families, such as childcare, health and advice services. The decision not to proceed with the HDV means that this impact will not occur through the Commercial Portfolio Business Plan

**B) Gender reassignment**

<sup>1</sup> Census 2011

We do not hold data on the number of people who are seeking, receiving or have received gender reassignment surgery, and there is not national data collected for this protected characteristic. The Equality and Human Rights Commission estimate that there is between 300,000-500,000 transgender people in the UK<sup>2</sup>. For the purposes of this EqIA, we will use the inclusive term Trans\* in order to represent the spectrum of transgender and gender variance.

### C) Age<sup>3</sup>

| Population Statistics |                  |         |              |         |            |           |                       |            |
|-----------------------|------------------|---------|--------------|---------|------------|-----------|-----------------------|------------|
|                       | Haringey (popn.) |         | Haringey (%) |         | London (%) |           | England and Wales (%) |            |
|                       | 2001             | 2011    | 2001         | 2011    | 2001       | 2011      | 2001                  | 2011       |
| All ages              | 216,511          | 254,900 | 216,511      | 254,900 | 7,172,091  | 8,173,900 | 52,041,916            | 56,075,900 |
| 0 – 4                 | 14,734           | 18,100  | 6.8          | 7.1     | 6.7        | 7.2       | 5.9                   | 6.2        |
| 5 – 9                 | 13,680           | 15,800  | 6.3          | 6.2     | 6.3        | 5.9       | 6.4                   | 5.6        |
| 10 – 14               | 13,634           | 15,200  | 6.3          | 6.0     | 6.1        | 5.6       | 6.6                   | 5.8        |
| 15 – 19               | 12,974           | 14,300  | 6.0          | 5.6     | 5.8        | 5.8       | 6.2                   | 6.3        |
| 20 – 24               | 18,313           | 18,800  | 8.5          | 7.4     | 7.4        | 7.7       | 6.0                   | 6.8        |
| 25 – 29               | 23,263           | 28,100  | 10.7         | 11.0    | 9.7        | 10.2      | 6.6                   | 6.8        |
| 30 – 34               | 23,066           | 28,500  | 10.7         | 11.2    | 9.7        | 9.7       | 7.7                   | 6.6        |
| 35 – 39               | 21,121           | 22,700  | 9.8          | 8.9     | 8.8        | 8.1       | 7.9                   | 6.7        |
| 40 – 44               | 15,575           | 20,100  | 7.2          | 7.9     | 7.1        | 7.5       | 7.0                   | 7.3        |
| 45 – 49               | 11,856           | 17,700  | 5.5          | 6.9     | 5.8        | 6.8       | 6.3                   | 7.3        |
| 50 – 54               | 10,846           | 13,400  | 5.0          | 5.3     | 5.7        | 5.6       | 6.9                   | 6.4        |
| 55 – 59               | 8,453            | 10,600  | 3.9          | 4.2     | 4.5        | 4.5       | 5.7                   | 5.7        |
| 60 – 64               | 7,817            | 9,200   | 3.6          | 3.6     | 3.9        | 4.2       | 4.9                   | 6.0        |
| 65 – 69               | 6,805            | 6,700   | 3.1          | 2.6     | 3.5        | 3.1       | 4.4                   | 4.8        |
| 70 – 74               | 5,171            | 5,900   | 2.4          | 2.3     | 3.1        | 2.6       | 4.0                   | 3.9        |
| 75 – 79               | 4,041            | 4,500   | 1.9          | 1.8     | 2.6        | 2.2       | 3.4                   | 3.2        |
| 80 – 84               | 2,656            | 2,900   | 1.2          | 1.1     | 1.7        | 1.6       | 2.3                   | 2.4        |
| 85 – 89               | 1,645            | 1,600   | 0.8          | 0.6     | 1.1        | 1.0       | 1.3                   | 1.5        |
| 90+                   | 861              | 800     | 0.4          | 0.3     | 0.5        | 0.5       | 0.6                   | 0.8        |

The proportion of the population aged 25-39 in Haringey is significantly higher than London (31.1% vs. 28.1%). Haringey's younger population has a similar age profile to London, with 24.9% of Haringey residents aged less than 20 years (compared with 24.5% in London). Those aged 20 – 64 make up 66.3% of the total population. The population of residents aged 65 and over in Haringey is 8.8%, much lower than 11.1% of residents in London. Consideration will be needed on public functions which benefit different age groups, such as nurseries and health services.

It is likely that the conditions or rents of Commercial Portfolio properties would have changed when leases were renewed or reviewed in order to meet the economic requirements of the business case. This may have affected premises that provide a function disproportionately used by different age groups, such as childcare, health and advice services. The decision not to proceed with the HDV means that this impact will not occur through the Commercial Portfolio Business Plan

### Age profile Haringey by ward

<sup>2</sup> <https://www.equalityhumanrights.com/en/trans-inequalities-reviewed/introduction-review>

<sup>3</sup> Census 2011

| Ward                | All ages | 0-19 | %     | 20-64 | %     | 65+  | %     |
|---------------------|----------|------|-------|-------|-------|------|-------|
| Alexandra           | 11795    | 3048 | 25.8% | 7575  | 64.2% | 1172 | 9.9%  |
| Bounds Green        | 13725    | 3115 | 22.7% | 9341  | 68.1% | 1269 | 9.2%  |
| Bruce Grove         | 14483    | 4086 | 28.2% | 9183  | 63.4% | 1214 | 8.4%  |
| Crouch End          | 12395    | 2274 | 18.3% | 9013  | 72.7% | 1108 | 8.9%  |
| Fortis Green        | 12488    | 3151 | 25.2% | 7965  | 63.8% | 1372 | 11.0% |
| Haringay            | 13272    | 2363 | 17.8% | 9909  | 74.7% | 1000 | 7.5%  |
| Highgate            | 11632    | 2101 | 18.1% | 8175  | 70.3% | 1356 | 11.7% |
| Hornsey             | 12659    | 2777 | 21.9% | 8845  | 69.9% | 1037 | 8.2%  |
| Muswell Hill        | 10784    | 2337 | 21.7% | 7143  | 66.2% | 1304 | 12.1% |
| Noel Park           | 13939    | 3369 | 24.2% | 9391  | 67.4% | 1179 | 8.5%  |
| Northumberland Park | 14429    | 4726 | 32.8% | 8565  | 59.4% | 1138 | 7.9%  |
| St Ann's            | 14638    | 3248 | 22.2% | 10149 | 69.3% | 1241 | 8.5%  |
| Seven Sisters       | 15968    | 5068 | 31.7% | 9730  | 60.9% | 1170 | 7.3%  |
| Stroud Green        | 11758    | 2298 | 19.5% | 8653  | 73.6% | 807  | 6.9%  |
| Tottenham Green     | 14580    | 3710 | 25.4% | 9675  | 66.4% | 1195 | 8.2%  |
| Tottenham Hale      | 15064    | 4508 | 29.9% | 9384  | 62.3% | 1172 | 7.8%  |
| West Green          | 13372    | 3246 | 24.3% | 8854  | 66.2% | 1272 | 9.5%  |
| White Hart Lane     | 13431    | 4532 | 33.7% | 7769  | 57.8% | 1130 | 8.4%  |
| Woodside            | 14514    | 3417 | 23.5% | 9864  | 68.0% | 1233 | 8.5%  |

However, this age profile is not reflected consistently across the borough, with White Hart Lane with the highest proportion of 0-19 year olds at 33.7%, 20-65 year olds being disproportionately high in Haringey ward at 74.7% and Muswell Hill with the highest proportion of 65 years and older at 12.1%. Consideration will be needed on public functions which benefit different age groups, such as nurseries and health services.

It is likely that the conditions or rents of Commercial Portfolio properties would have changed when leases were renewed or reviewed in order to meet the economic requirements of the business case. This may have affected premises that provide a function disproportionately used by different age groups, such as childcare, health and advice services. The decision not to proceed with the HDV means that this impact will not occur through the Commercial Portfolio Business Plan.

#### D) Disability<sup>4</sup>

|  | Haringey | London | England and Wales |
|--|----------|--------|-------------------|
| Day-to-day activity limited a lot            | 6.8%     | 6.7%   | 8.3%              |
| Day-to-day activity limited a little         | 7.2%     | 7.4%   | 9.3%              |
| Day-to-day activity not limited              | 86.0%    | 85.8%  | 82.4%             |
| Day-to-day activity limited a lot: Age 16-64 | 3.8%     | 3.4%   | 3.6%              |
| Day-to-day activity                          | 4.6%     | 4.2%   | 4.6%              |

<sup>4</sup> Census 2011

|  |       |       |       |
|--|-------|-------|-------|
| limited a little: Age 16-64                |       |       |       |
| Day-to-day activity not limited: Age 16-64 | 62.4% | 61.5% | 56.5% |

Haringey has roughly the same proportion of people where day-to-day activity is limited to some extent as London, but lower than the national average. Disabled people are more likely to use public functions that are in premises of the Commercial Portfolio, such as health and advice services.

It is likely that the conditions or rents of Commercial Portfolio properties would have changed when leases were renewed or reviewed in order to meet the economic requirements of the business case. This may have affected premises that provide a function disproportionately used by disabled people, such as health and advice services. The decision not to proceed with the HDV means that this impact will not occur through the Commercial Portfolio Business Plan.

### E) Ethnicity

|   | Haringey | London | England |
|---|----------|--------|---------|
| White; English/Welsh/Scottish/N.Irish/British | 34.68%   | 44.89% | 79.75%  |
| White Irish                                   | 2.75%    | 2.15%  | 0.98%   |
| White; Gypsy or Irish Traveller               | 0.15%    | 0.10%  | 0.10%   |
| White; White Other                            | 22.97%   | 12.65% | 4.58%   |
| Mixed; White and Black Caribbean              | 1.90%    | 1.46%  | 0.78%   |
| Mixed; White and Black African                | 1.02%    | 0.80%  | 0.30%   |
| Mixed; White and Asian                        | 1.47%    | 1.21%  | 0.63%   |
| Mixed; Other mixed                            | 2.10%    | 1.45%  | 0.53%   |
| Asian/Asian British; Indian                   | 2.33%    | 6.64%  | 2.62%   |
| Asian/Asian British; Pakistani                | 0.75%    | 2.74%  | 2.10%   |
| Asian/Asian British; Bangladeshi              | 1.73%    | 2.72%  | 8.23%   |
| Asian/Asian British; Chinese                  | 1.47%    | 1.52%  | 0.72%   |
| Asian/Asian British; Other Asian              | 3.19%    | 4.88%  | 1.55%   |
| Black African                                 | 9.04%    | 7.02%  | 1.8%    |
| Black Caribbean                               | 7.10%    | 4.22%  | 1.1%    |
| Black Other                                   | 2.63%    | 2.08%  | 0.52%   |
| Other Ethnic group; Arab                      | 0.87%    | 1.30%  | 0.42%   |
| Other Ethnic group; Any Other Ethnic          | 3.85%    | 2.14%  | 0.62%   |

Haringey has less 'White British' population than London and England, and has a significant 'White Other' population compared to London and England. This includes Turkish and East European communities. There is also a significant Black African and Black Caribbean compared to the national and regional average. BAME communities are more likely to use specific public functions, such as health and advice services, as well as visit restaurants and cafes related to their ethnic background. The Commercial Portfolio is likely to contain some of these types of premises.

It is likely that the conditions or rents of Commercial Portfolio properties would have changed when leases are renewed or the relevant review point in the lease occurs in order to meet the economic requirements of the business case. This may have affected premises that provide a function disproportionately used by BAME people, such as health and advice services. The decision not to proceed with the HDV means that this impact will not occur through the Commercial Portfolio Business Plan.

### F) Sexual Orientation

We do not hold ward or borough level data on sexual orientation, and it is not collected nationally through the Census. However, the ONS estimates that 3.7% of Haringey's population are lesbian, gay or bisexual (LGB), which is the 15<sup>th</sup> largest LGB community in the country<sup>5</sup>. We will need to ensure that the inequalities and discrimination experienced by LGB people are considered throughout this EqIA.

### G) Religion

|                     | <i>Haringey</i> | <i>London</i> | <i>England and Wales</i> |
|---------------------|-----------------|---------------|--------------------------|
| Christian           | 45.0%           | 48.4%         | 59.3%                    |
| Buddhist            | 1.1%            | 1.0%          | 0.4%                     |
| Hindu               | 1.8%            | 5.0%          | 1.5%                     |
| Jewish              | 3.0%            | 1.8%          | 0.5%                     |
| Muslim              | 14.2%           | 12.4%         | 4.8%                     |
| Sikh                | 0.3%            | 1.5%          | 0.8%                     |
| Other religion      | 0.5%            | 0.6%          | 0.4%                     |
| No religion         | 25.2%           | 20.7%         | 25.1%                    |
| Religion not stated | 8.9%            | 8.5%          | 7.2%                     |

Haringey has a lower than average Christian community compared to the regional and national average, but has larger Jewish and Muslim populations. Haringey has a larger population who do not have a religion.

It is likely that the conditions or rents of the Commercial Portfolio properties would have changed when leases were renewed reviewed in order to meet the economic requirements of the business case. The Commercial Portfolio may have contained a place of worship, in which case the business case would have impacted on groups with this protected characteristic. The decision not to proceed with the HDV means that this impact will not occur through the Commercial Portfolio Business Plan.

### H) Pregnancy and maternity

The proportion of 0-4 year olds in the Census 2011:

|                   | Number of 0-4 year olds |
|-------------------|-------------------------|
| Haringey          | 7.1%                    |
| London            | 7.2%                    |
| England and Wales | 6.2%                    |

<sup>5</sup><https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/articles/subnationalsexualidentityestimates/uk2013to2015#introduction>



Haringey has a higher proportion compared to the England and Wales average, but is marginally below the London average.

### Dependent Children

|                   | Proportion of households with dependent children |
|-------------------|--|
| Haringey          | 31.4%  |
| London            | 30.9%  |
| England and Wales | 29.1%  |

Haringey has a larger proportion of households with dependent children in comparison to the regional and national average. Therefore, it is likely that there will be a relatively large proportion of women who are considered under the pregnancy and maternity protected characteristic. In addition, as identified in the 'Sex' protected characteristic, there is a large proportion of female headed lone parent families. They are more likely to use services, such as childcare and health services, in the commercial portfolio.

It is likely that the conditions or rents of Commercial Portfolio properties would have changed when leases were renewed or reviewed in order to meet the economic requirements of the business case. This may have affected premises that provide a function disproportionately used by women who are pregnant or recently given birth, such as childcare, health and advice services. The decision not to proceed with the HDV means that this impact will not occur through the Commercial Portfolio Business Plan.

### I) Marital and civil partnership status<sup>6</sup>

|                   | Married (heterosexual couples) | Civil Partnership |
|-------------------|--------------------------------|-------------------|
| Haringey          | 32.2%                          | 0.6%              |
| London            | 40%                            | 0.4%              |
| England and Wales | 47%                            | 0.2%              |

The number of married people (only available to heterosexual couples at the time) is significantly lower than in London and England. However, the proportion of people in civil partnerships is higher in the area compared to the London and England and Wales average. All elements of the Commercial Portfolio would have treated a couple in a civil partnership the same as a couple in a marriage.

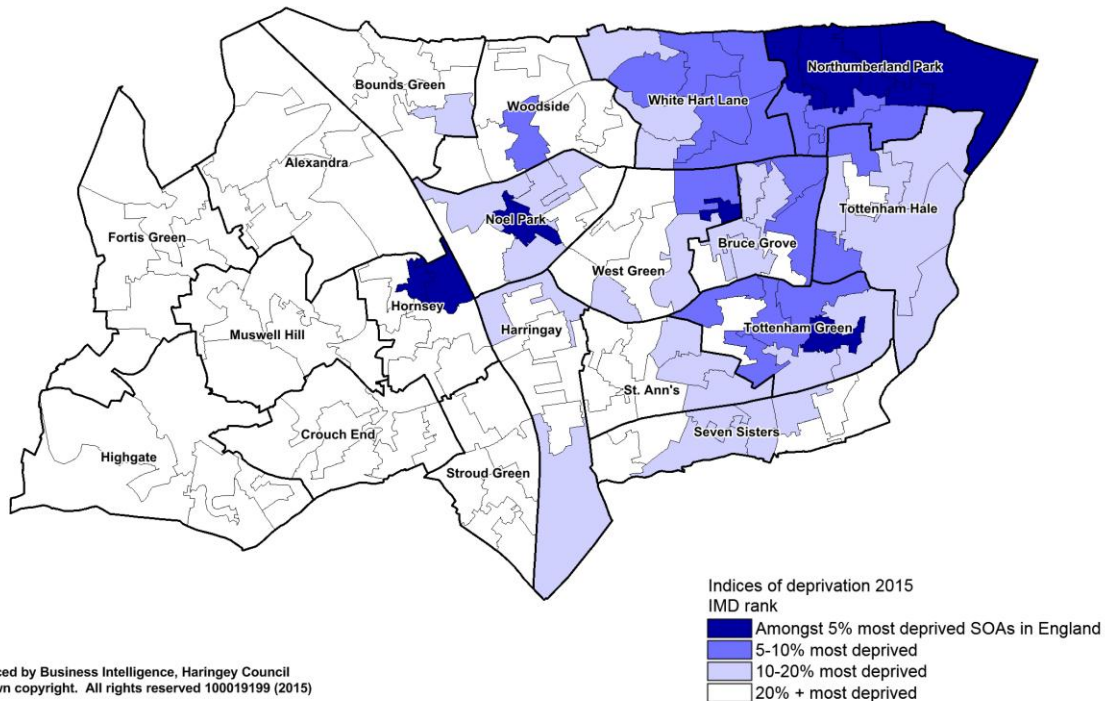
<sup>6</sup> Census 2011

## 2. Wider Inequalities

The Commercial Portfolio Business Case would have provided opportunities to tackle inequalities experienced in Haringey. This includes:

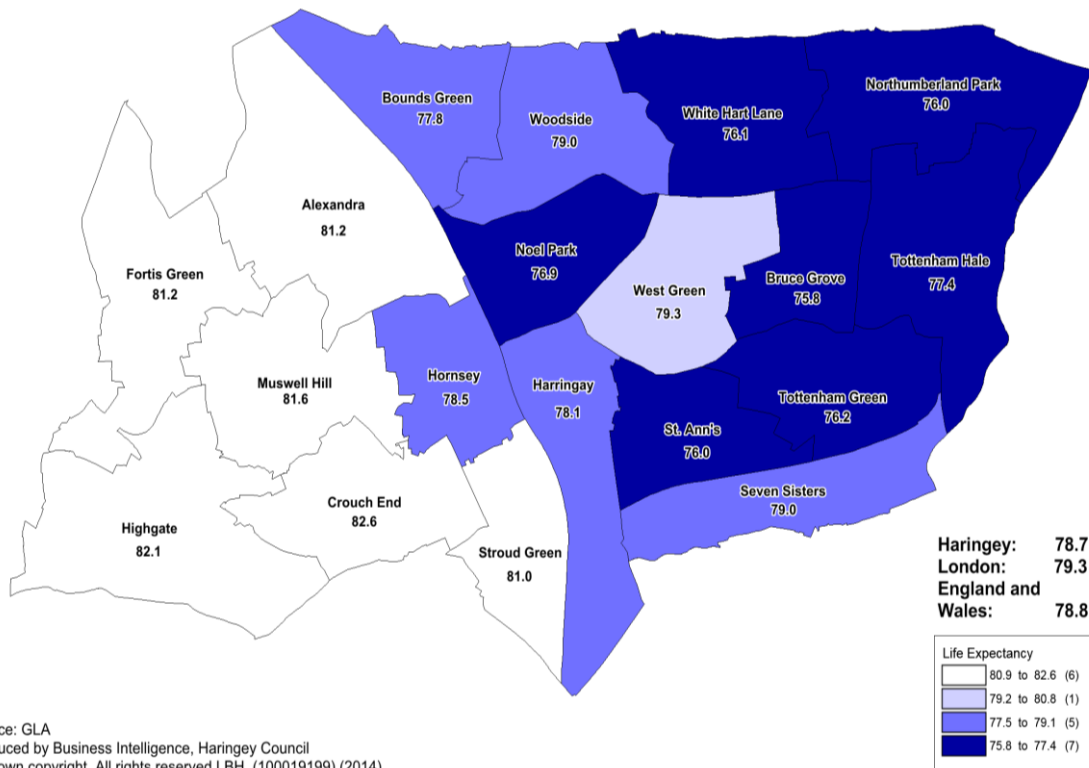
### 1. Better Prospects

Indices of Multiple Deprivation 2015  
Rank of IMD  
Haringey SOAs



There is a clear gap between the East and the West of the borough in regards to deprivation. This is likely to include younger people and BAME communities. The development of commercial space would have allowed for new local businesses to create jobs.

## 2. Healthier Living



There is a clear life expectancy inequality between the east and the west of the borough, which is likely to create inequalities for younger people and BAME communities who are more likely to live in the east of the borough. In managing the leases of properties, the HDV would have used vacant properties and their lease policy to promote healthy eating and life styles and created preventative measures to reduce health inequalities, such as obesity and strokes.

## 3. Community Pride

The Commercial Portfolio Business Plan would have provided longer term opportunities to provide space for some housing development which will help meet the housing demand for particular protected groups, as outlined in the [Housing Strategy and EqIA](#).

**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

All consultation and engagement activities have already taken place, as outlined below.

**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?*

Two separate correspondence letters have been issued to tenants in the commercial portfolio, providing information about the proposed transfer of their leases to the HDV if the decision is taken by the council's cabinet.

The first letter brought to tenants' attention a decision taken by Cabinet in November 2015 that the Council would be embarking on a procurement process seeking a partner with a view to setting up a new joint venture – the HDV. It also set out that the 146 properties listed in the associated Cabinet papers may potentially be transferred to the HDV. The letter also provided a link to the Cabinet Minutes and the supporting appendices as well as contact details.

The second letter updated tenants on the procurement process to select a preferred bidder announcing that Lendlease had been selected as the proposed joint venture partner for the HDV. It also informed them that the Council would be visiting their properties to carry out an inspection to assist the Council to finalise the list of properties that may transfer to the HDV. The letter also provided a link to new dedicated HDV webpages on the Council's website as well as providing contact details.

**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

**1. Sex**

The Commercial Portfolio transfer would not have initially impacted upon the different protected characteristics as it would have only transferred the ownership and management of commercial properties' leases to the HDV to manage. It may have had an initial positive impact as there may have been improvements in management functions and lease services.

VAT would have been introduced for all Commercial Properties which would have impacted on all public functions, including child centres and nurseries, within the Commercial Portfolio, as well as small businesses. A phased approach would have been developed in order to reduce the impact for small businesses and public functions within the portfolio. The decision not to proceed with the HDV means that this impact will not occur through the Commercial Portfolio Business Plan.

|          |   |          |   |                |  |                |  |
|----------|---|----------|---|----------------|--|----------------|--|
| Positive | X | Negative | X | Neutral impact |  | Unknown Impact |  |
|----------|---|----------|---|----------------|--|----------------|--|

**2. Gender reassignment**

We do not hold data on the number of people who are seeking, receiving or have received gender reassignment surgery, and there is not national data collected for this protected characteristic.

|          |  |          |  |                |  |                |   |
|----------|--|----------|--|----------------|--|----------------|---|
| Positive |  | Negative |  | Neutral impact |  | Unknown Impact | X |
|----------|--|----------|--|----------------|--|----------------|---|

**3. Age**

The Commercial Portfolio transfer would not have initially impacted upon the different protected characteristics as it would have only transferred the ownership and management of commercial properties' leases to the HDV to manage. It may have had an initial positive impact as there may have been improvements in management functions and lease services.

VAT would have been introduced for all Commercial Properties which would have impacted on all public functions, including child centres and advice services, within the Commercial Portfolio, as well as small businesses. A phased approach would have been developed in order to reduce the impact for small businesses and public functions within the portfolio. The decision not to proceed with the HDV means that this impact will not occur through the Commercial Portfolio Business Plan.

|          |   |          |   |                |  |                |  |
|----------|---|----------|---|----------------|--|----------------|--|
| Positive | X | Negative | X | Neutral impact |  | Unknown Impact |  |
|----------|---|----------|---|----------------|--|----------------|--|

**4. Disability**

The Commercial Portfolio transfer would not have initially impacted upon the different protected characteristics as it would have only transferred the ownership and management of commercial properties' leases to the HDV to manage. It may have had an initial positive impact as there may have been improvements in management functions and lease services.

VAT would have been introduced for all Commercial Properties which would have impacted on all public functions, including services disproportionately used by disabled people, within the Commercial Portfolio, as well as small businesses. A phased approach would have been developed in order to reduce the impact for small businesses and public functions within the portfolio. The decision not to proceed with the HDV means that this impact will not occur through the Commercial Portfolio Business Plan.

In managing commercial properties run by disabled people, reasonable adjustments would have been provided.

|          |   |          |   |                |  |                |  |
|----------|---|----------|---|----------------|--|----------------|--|
| Positive | X | Negative | X | Neutral impact |  | Unknown Impact |  |
|----------|---|----------|---|----------------|--|----------------|--|

### 5. Race and ethnicity

The Commercial Portfolio transfer would not have initially impacted upon the different protected characteristics as it would have only transferred the ownership and management of commercial properties' leases to the HDV to manage. It may have had an initial positive impact as there may have been improvements in management functions and lease services.

VAT would have been introduced for all Commercial Properties which would have impacted on all public functions, including services disproportionately used by members of BAME communities, within the Commercial Portfolio, as well as small businesses. A phased approach would have been developed in order to reduce the impact for small businesses and public functions within the portfolio. The decision not to proceed with the HDV means that this impact will not occur through the Commercial Portfolio Business Plan.

|          |   |          |   |                |  |                |  |
|----------|---|----------|---|----------------|--|----------------|--|
| Positive | X | Negative | X | Neutral impact |  | Unknown Impact |  |
|----------|---|----------|---|----------------|--|----------------|--|

### 6. Sexual orientation

We do not hold data on sexual orientation, and there is not national data collected for this protected characteristic.

The Commercial Portfolio transfer would not have initially impacted upon the different protected characteristics as it would have only transferred the ownership and management of commercial properties' leases to the HDV to manage.

|          |  |          |  |                |  |                |   |
|----------|--|----------|--|----------------|--|----------------|---|
| Positive |  | Negative |  | Neutral impact |  | Unknown Impact | X |
|----------|--|----------|--|----------------|--|----------------|---|

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

The Commercial Portfolio transfer would not have initially impacted upon the different protected characteristics as it would have only transferred the ownership and management of commercial properties' leases to the HDV to manage. It may have had an initial positive impact as there may have been improvements in management functions and lease services.

VAT would have been introduced for all Commercial Properties which would have impacted on all public functions, potentially including places of worship, within the Commercial Portfolio, as well as small businesses. A phased approach would have been developed in order to reduce the impact for small businesses and public functions within the portfolio. The decision not to proceed with the HDV means that this impact will not occur through the Commercial Portfolio Business Plan.

|          |   |          |   |                |  |                |  |
|----------|---|----------|---|----------------|--|----------------|--|
| Positive | X | Negative | X | Neutral impact |  | Unknown Impact |  |
|----------|---|----------|---|----------------|--|----------------|--|

### 8. Pregnancy and maternity

The Commercial Portfolio transfer would not have initially impacted upon the different protected characteristics as it would have only transferred the ownership and management of commercial properties' leases to the HDV to manage. It may have had an initial positive impact as there may have been improvements in management functions and lease services.

VAT would have been introduced for all Commercial Properties which would have impacted on all public functions, including child centres and health services used by pregnant women and women with young children, within the Commercial Portfolio, as well as small businesses. A phased approach would have been developed in order to reduce the impact for small businesses and public functions within the portfolio. The decision not to proceed with the HDV means that this impact will not occur through the Commercial Portfolio Business Plan.

|          |   |          |   |                |  |                |  |
|----------|---|----------|---|----------------|--|----------------|--|
| Positive | X | Negative | X | Neutral impact |  | Unknown Impact |  |
|----------|---|----------|---|----------------|--|----------------|--|

### 9. Marriage and Civil Partnership

In managing leases within the Commercial Portfolio, anyone who is in a civil partnership will be treated the same as if they were in a marriage.

|          |  |          |  |                |   |                |  |
|----------|--|----------|--|----------------|---|----------------|--|
| Positive |  | Negative |  | Neutral impact | X | Unknown Impact |  |
|----------|--|----------|--|----------------|---|----------------|--|

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

We expect that the Commercial Portfolio transfer would have created a number of intersectionary issues and benefits for different protected groups. In particular, the protected groups of age, sex, race and disability may have been specifically impacted with any change of public function. These may have been cross cutting between protected groups, such as young black women may be more likely to use public functions that could be impacted by the CPBP.

VAT would have been introduced for all Commercial Properties, which would have impacted on all public functions within the portfolio, as well as small businesses. The decision not to proceed with the HDV means that this impact will not occur through the Commercial Portfolio Business Plan.

**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 decision not to proceed with the Commercial Portfolio Business Plan will not result in discrimination, harassment or victimisation for any group that shares protected characteristics.

VAT would have been introduced for all Commercial Properties, which would have impacted on all public functions within the portfolio, as well as small businesses, including those used or occupied disproportionately by groups with protected characteristics. The decision not to proceed with the HDV means that this impact will not occur through the Commercial Portfolio Business Plan.

**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 |
|--|-----|
| <b>No major change to the proposal:</b> 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   |
| <b>Adjust the proposal:</b> 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   |     |
| <b>Stop and remove the proposal:</b> the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.  |     |



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**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 |
|--|---|--------------|-----------|
| Removal of the HDV as an option to deliver improvements in management functions and lease services to premises within the commercial portfolio | Pursue alternative options to achieve improvements in management functions and lease services to premises within the commercial portfolio | Helen Fisher | 2018/19   |
|  |   |              |           |

**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:**

N/A

**7. Authorisation**

|                   |      |
|-------------------|------|
| EqIA approved by: | Date |
|-------------------|------|

**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.