

## 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 known as 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 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

<b>Name of proposal</b>	Development of vacant land to the Haringey Housing Company Limited for the development of affordable, intermediate and market housing
<b>Service area</b>	Housing & Growth
<b>Officer completing assessment</b>	Colin Keane
<b>Equalities/ HR Advisor</b>	Hugh Smith
<b>Cabinet meeting date (if applicable)</b>	13 November 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 council is in the process of setting up a wholly owned housing development company which the council will own and control to develop new homes (social rented, shared ownership, intermediate rent and open market) for the benefit of Haringey residents.

The company will develop the homes on council owned land that is suitable for development and has been identified as being readily developable for disposal to the company.

This assessment looks at the impact of the development of this first tranche of 6 sites to be developed as part of the Council's housing programme. The key stakeholders who will be affected by this decision are residents close to the proposed sites and those people who will benefit from the new homes including council house tenants, households in temporary accommodation, homeless households and residents on the council's housing register.

The council's cabinet will make the decision to dispose of these sites to the housing company.

All future sites to be brought forward for disposal to the housing company will be accompanied by an updated equality impact assessment and will ensure decision makers pay due regard to their Public Sector Equality Duty.

**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 and 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	<ul style="list-style-type: none"> <li>▪ Haringey JSNA</li> </ul>	N/A
Gender Reassignment	We do not hold this data. The Equality and Human Rights Commission have published a national estimate	N/A
Age	<ul style="list-style-type: none"> <li>▪ Census 2011</li> <li>▪ Haringey JSNA</li> </ul>	N/A
Disability	<ul style="list-style-type: none"> <li>▪ Census 2011</li> <li>▪ Haringey JSNA</li> <li>▪ Home Office data regarding hate crime</li> </ul>	N/A
Race & Ethnicity	<ul style="list-style-type: none"> <li>▪ Census 2011</li> <li>▪ Haringey JSNA</li> <li>▪ Home Office data regarding hate crime</li> </ul>	N/A
Sexual Orientation	ONS Annual Population Data 2016	N/A
Religion or Belief (or No Belief)	<ul style="list-style-type: none"> <li>▪ Census 2011</li> <li>▪ Haringey JSNA</li> <li>▪ Home Office data regarding hate crime</li> </ul>	N/A
Pregnancy & Maternity	<ul style="list-style-type: none"> <li>▪ Census 2011</li> </ul>	N/A
Marriage and Civil Partnership	<ul style="list-style-type: none"> <li>▪ Census 2011</li> </ul>	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.*

This section will cover two areas of:

1. Demographics
2. Wider socio-economic data

## **1. Demographics**

The 7 development sites are spread across 5 wards in Haringey, from east to west. Because the exact locations of the sites are commercially sensitive, we have undertaken to gather information from across Haringey. We can infer the impact of development by using whole-borough data due to the geographical spread of the sites.

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

Haringey's gender split is 51.1% male and 49.9% female. The new affordable homes will be let to households on the top of the housing register who are predominately homeless, where 73% have female heads of household; or in temporary accommodation, where 75% have female heads of household. We can therefore conclude that women will be positively impacted by the proposal.

### **B) 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. 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.

We will need to consider the inequalities and discrimination experienced for this protected group.

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

The table below outlines the age profile of Haringey residents. Haringey has a younger profile than London and England, and so young people may be over-represented among those impacted by construction. There is a disproportionate number of 25-59 year olds in temporary accommodation and a high proportion of households with children. More family accommodation will provide households in TA with a permanent home and stability for school age children.

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<sup>1</sup> Census 2011

<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%

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

The following information was obtained in the 2011 Census where people reported limitations on day-to-day activities as a result of a disability or disabilities:

	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 limited a little: Age 16-64	4.6%	4.2%	4.6%
Day-to-day activity not limited: Age 16-64	62.4%	61.5%	56.5%

The data shows that Haringey's proportion of residents whose day-to-day activity is limited a little or a lot is in line with the London average and below that for England and Wales. The need to deliver housing for Haringey residents with disabilities can therefore be considered to be consistent with that of London residents generally. It is also reasonable to conclude that individuals with disabilities will not be disproportionately impacted by construction relative to the populations of London and England and Wales.

We have information about homeless applicant's priority need. In 2015/16, 3% of applicants had a physical impairment and fewer than 5 applicants had a mental health or learning disability indicated as their priority need.

The new affordable homes developed will have at least 10% of homes specifically designed to meet the needs of households with a physical disability, increasing the stock of accessible

<sup>4</sup> Census 2011

accommodation in Haringey.

### E) Race and Ethnicity

The table below sets out the mix of residents within Haringey. Haringey has a higher proportion of residents who are recorded as White Other and BAME than London or England, and so these groups may be over-represented among those impacted by construction.

There is evidence to suggest that in the east of Haringey incomes are lower and there is a higher proportion of black residents. Therefore with lower incomes these residents will be more likely to benefit from increased affordable housing with access from the housing register. The same applies to homeless households and those in TA, of which 44% identify as black, 8% Asian and 8% Chinese/other.

	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%

### F) Sexual Orientation

We do not hold ward or borough level data on sexual orientation, and it is not collected nationally. 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 EqlA, and as part of any decision to take the proposal forward.

### **G) Religion and Faith<sup>6</sup>**

The religion of residents is included in the table below. There is no significant evidence to suggest that any one particular religion will be disproportionately affected by the development of more affordable housing and the housing register's allocations policy has separately been assessed.

	<i>Haringey</i>	<i>London</i>	<i>England and Wales</i>
Christian	45.0%	48.5%	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	0.5%	0.6%	0.4%
No religion	25.2%	20.7%	25.1%
Not stated	8.9%	8.5%	7.2%

### **H) Pregnancy and Maternity**

As stated in the age category, there is a higher percentage of women heading households in temporary accommodation and being accepted as homeless and generally on lower incomes. Pregnant women and mothers will benefit from additional affordable housing being developed across Haringey.

### **I) Marriage and Civil Partnership Status**

There is no significant evidence to suggest that the development of more affordable housing will impact adversely on marriage or civil partnership as the homes will be allocated to those people on the housing register.

## **2. Wider socio-economic data**

The development of more affordable housing will allow opportunities to tackle wider inequalities in the borough, as outlined below:

### **Community Pride and Housing**

The Council's Housing Strategy in October 2016 outlines the issues in regards to housing demand and supply in the borough. The strategy can be found here:

<http://www.minutes.haringey.gov.uk/ieListDocuments.aspx?CId=118&MId=7846&Ver=4>

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

<sup>6</sup> Census, 2011

The equality impact assessment for the Housing Strategy found that there were a range of inequalities in housing across Haringey, including:

- Female lone parents vulnerable to homelessness
- Disabled people and supported housing needs
- Black households are more vulnerable to homelessness and are less likely to engage with shared ownership schemes
- LGBT young people are more vulnerable to homelessness.

The housing company development programme intends to address these inequalities by providing 50% affordable housing, a range of bedroom sizes will be provided in order to meet the differentiated demand for housing.

The current tenure mix for Haringey, London and England are shown below;

<i>(Census 2011)</i>	<i>Haringey</i>	<i>London</i>	<i>England</i>
% Households Owned – 2011	38.8%	48.2%	63.5%
% Households Social Rented – 2011	26.7%	24.1%	17.6%
% Households Private Rented – 2011	31.5%	25.1%	16.7%

The homes developed will be tenure blind homes ensuring there is not a differentiation in quality and design. The development will provide communal outdoor space for all residents to use which will provide an opportunity to foster good relations between different protected groups.

#### **Safe and secure**

The ‘Secure by Design’ principle of the development will help groups effected by hate crimes to feel safer and allow all residents of the developments to feel part of a safer community and will help foster good relations between different protected groups.

#### **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*

Consultation will be undertaken as part of the planning application process and prior to start on site to ensure the least disruption to local people occurs. Lessons learned from the consultations and end of development reviews will feed into future development plans and equalities assessments.

#### **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?*

The housing company will adopt an approach to community and stakeholder engagement in accordance best practice and the company’s Business Plan.

**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**

The housing company development programme will have a number of positive impacts for particular protected characteristics, including sex. This includes providing more housing to meet demand, including affordable housing. This could particularly benefit female led single parent households who are vulnerable to homelessness. In addition, the new development will provide a safer communities through their design, which will benefit women who will feel safer, particularly at night, as data held by the Council indicates that women are less likely to feel safe outside in their local area at night.

Positive	✓	Negative		Neutral impact		Unknown Impact	
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**2. Gender reassignment**

We do not hold data at a ward or borough level.

The new developments will make the local area feel safer, which will benefit trans\* people who are vulnerable to transphobic hate crime.

Positive	✓	Negative		Neutral impact		Unknown Impact	
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**3. Age**

The housing company development programme will have a number of positive impacts for individuals and groups with particular protected characteristics, including different age groups. This includes providing more housing to meet demand, including helping meet the housing needs of families with children who need different bedroom sizes. In addition, the new developments will provide a safe community, which will benefit children and young people as well as older people, providing opportunities through shared communal open spaces to foster good relations between different age groups.

Positive	✓	Negative		Neutral impact		Unknown Impact	
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**4. Disability**

The housing company development programme will have a number of positive impacts for individuals and groups with particular protected characteristics, including those with disabilities. This includes providing more housing to meet demand, including housing with adaptations for disabled residents to help them live independent lives. In addition, the new development will provide a safer community, which will benefit disabled people who may experience hate crime.

Positive	✓	Negative		Neutral impact		Unknown Impact	
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**5. Race and ethnicity**

The housing company development programme will have a number of positive impacts for individuals and groups with particular protected characteristics, including race and ethnicity. As established in the Housing Strategy, particular BAME communities are more likely to use and need social and affordable housing. In addition, the new developments will provide a healthier and safer community, which will benefit different BAME communities as they are more likely to experience health inequalities and be victims of crime, including hate crime. In addition, the new development will help foster good relations between different ethnic groups through provision of shared space.

Positive	✓	Negative		Neutral impact		Unknown Impact	
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**6. Sexual orientation**

We do not hold data at a ward or borough level and therefore cannot determine if this decision will disproportionately impact on this protected group. The developments will make the local area feel safer, which will benefit lesbian, gay and bisexual people who are vulnerable to homophobic and biphobia hate crime.

Positive	✓	Negative		Neutral impact		Unknown Impact	
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**7. Religion or belief (or no belief)**

There is no significant evidence to suggest one particular religious or belief group will benefit from the development of more homes, however, new development will provide a safer environment, which will benefit different religious communities as they are more likely to experience religious hate crime, in particular Anti-Semitic and Islamophobia hate crime.

Positive	✓	Negative		Neutral impact		Unknown Impact	
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**8. Pregnancy and maternity**

The housing company development programme will have a number of positive impacts for individuals and groups with particular protected characteristics including pregnant women and mothers. This includes providing more housing to meet demand, including affordable housing. This could particularly benefit female led single parent households who are vulnerable to homelessness. In addition, the new development will provide a safe community, which will benefit women as they are more likely to experience street crime.

Positive	✓	Negative		Neutral impact		Unknown Impact	
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**9. Marriage and Civil Partnership**

We are unable to assess the impact of the housing company's development programme on marriage and civil partnership as there is little data or empirical research.

Positive		Negative		Neutral impact		Unknown Impact	✓
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**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?**

1. The proposal is not anticipated to result in any direct or indirect discrimination for any group that shares protected characteristics
2. The proposal will help to remove disadvantage experienced by particular groups by developing more affordable housing and thereby redressing a known inequality
3. The proposal ensures the Council is taking steps to meet the housing needs of protected persons
4. The proposal will help foster good relations through better and safer design as well as provision of shared space

**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
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.**

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

The performance of the housing company’s business plan, including any impact on protected groups, and reviews of completed developments will be reported to the council’s cabinet at least annually where the impacts can be reviewed and assessed.

**7. Authorisation**

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**8. Publication**  
*Please ensure the completed EqIA is published in accordance with the Council’s policy.*

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