

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 between those with a ‘relevant protected characteristic’ and those without one;
- Fostering good relations between those with a ‘relevant protected characteristic’ and those without one.

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

Name of proposal	Garage rent proposal 2019/20
Service area	Garages, Homes for Haringey
Officer completing assessment	Gethin Segel
Equalities/ HR Advisor	Hugh Smith
Cabinet meeting date (if applicable)	12 th February 2019
Director/Assistant Director	Astrid Kjellberg-Obst

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*

Summary of the proposal;

To increase garage rents to take account of inflation and to generate additional income for the Housing Revenue Account that can be used for housing investment. This will be achieved by taking the following actions;

1. Maintaining the current concessionary discounted rent offered to Haringey residents who are either disabled or over the state pension age.
2. Maintaining the current below market rate rents offered to tenants and leaseholders of Haringey renting their first garage. These rents will be increased as restructured:
 - Reducing the number of rent bands from 14 down to 6
 - Applying an average increase equivalent to RPI as at September 2018
 - Cumulative effect of the above will be an average increase of 4.9% per customer
3. Increasing garage rents for private renters, businesses and tenants and leaseholders of Haringey Council renting their second or subsequent garage, as follows:
 - Applying a flat rate rent of £25.00 per week
 - This will result in an average increase of 77.2% per customer

The key stakeholders being affected will be private renters and any tenants and leaseholders of Haringey Council renting their second or subsequent garage.

This proposal will be presented to Cabinet as part of the 2019/20 fees setting process

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	2011 Census data. Customer data held by Homes for Haringey	Not applicable
Gender Reassignment	EHRC	Not applicable
Age	2011 Census data. Customer data held by Homes for Haringey	Not applicable
Disability	2011 Census data. Customer data held by Homes for Haringey	Not applicable
Race & Ethnicity	2011 Census data. Customer data held by Homes for Haringey	Not applicable
Sexual Orientation	ONS	Not applicable
Religion or Belief (or No Belief)	2011 Census data. Customer data held by Homes for Haringey	Not applicable
Pregnancy & Maternity	2011 Census data. Customer data held by Homes for Haringey	Not applicable
Marriage and Civil Partnership	2011 Census data. Customer data held by Homes for Haringey	Not applicable

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.

- All private renters will be equally effected by the introduction of market rate rents.
- Any tenants and leaseholders of Haringey Council renting their second or additional garage will be equally affected by the introduction of market rate garage fees.
- All tenants and leaseholders of Haringey Council can rent one garage at a preferential rate, which is at least 25% lower than the market rate.

Sex

Homes for Haringey's client group is governed by legislation and policy controlling access to social housing. As a result, in comparison with the general population of Haringey, women are overrepresented in the client group.

Homes for Haringey do not hold data on the characteristics of private renters of garages. At this stage, we do not have any data to suggest that women would be any

more or less likely than the rest of the population to be affected by the proposal. Therefore, it is anticipated that the proposal will not have a disproportionate impact on this protected characteristic.

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 and 500,000 transgender people in the UK.

At this stage, we do not have any data to suggest that this group would be any more or less likely than the rest of the population to be affected by the proposal. Therefore, it is anticipated that the proposal will not have a disproportionate impact on this protected characteristic.

Age

Haringey has a relatively young population with a quarter of the population under the age of 20, and 91% of the population aged under 65 (89% London and 83% England). 38% of the borough's population is aged 25-39 higher than the London. The Borough has a higher proportion of young adults and a smaller proportion of older people than in the rest of London. There are more children living in the East of our borough than in the west.

Homes for Haringey do not hold data on the characteristics of private renters of garages. At this stage, we do not have any data to suggest that young people would be any more or less likely than the rest of the population to be affected by the proposal. Therefore, it is anticipated that the proposal will not have a disproportionate impact on this protected characteristic.

All tenants and leaseholders of Haringey Council who are over the state pension age will be eligible for the pre-existing concessionary discount which will be maintained at 2018/19 levels, which is 58% lower than the market rate. Individuals over the state pension age will therefore not be affected by the proposal.

Disability

Homes for Haringey's client group is governed by legislation and policy controlling access to social housing. As a result, in comparison with the general population of Haringey, individuals with disabilities are overrepresented in the client group.

All tenants and leaseholders of Haringey Council and private renters who are disabled will be eligible for the pre-existing concessionary discount which will be maintained at 2018/19 levels, which is 58% lower than the market rate. This group will therefore not be affected by the proposal.

Race and Ethnicity

Homes for Haringey do not hold data on the characteristics of private renters of garages. At this stage, we do not have any data to suggest that BAME individuals or groups would be any more or less likely than the rest of the population to be affected

by the proposal. Therefore, it is anticipated that the proposal will not have a disproportionate impact on this protected characteristic.

Homes for Haringey's client group is governed by legislation and policy controlling access to social housing. As a result, in comparison with the general population of Haringey, BAME individuals are overrepresented in the client group.

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 is lesbian, gay or bisexual (LGB), which is the 15th largest LGB community in the country¹.

At this stage, we do not have any data to suggest that this group would be any more or less likely than the rest of the population to be affected by the proposal. Therefore, it is anticipated that the proposal will not have a disproportionate impact on this protected characteristic.

Religion or Belief

Haringey is one of the most religiously diverse places in the UK. The most common religion was Christianity, accounting for 45% of residents, less than London (48.4%) and less than England (59.4%). The next most common religions were Muslim (14.3%) – higher than London (12.3%) – and Jewish (3%). Haringey had a lower percentage of residents who were Hindu (1.8%) and Sikh (0.3%) than London (5.0% and 1.5%, respectively). A quarter of Haringey residents stated that they did not have a religion, higher than London (20.7%).

We do not have local data regarding the representation of this protected group among private renters of garages. At this stage, we do not have any data to suggest that individuals from minority religious groups would be any more or less likely than the rest of the population to be affected by the proposal. Therefore, it is anticipated that the proposal will not have a disproportionate impact on this protected characteristic.

Pregnancy and Maternity

The number of children born to Haringey residents has been increasing year on year since 2002 in line with the London and England trend. The birth rate (births per 1000 of the population) in Haringey has been consistently higher than London in this period until 2008 and is now level with London. In 2012 there were 4,209 births in Haringey.

Homes for Haringey do not hold data on the characteristics of private renters of garages. At this stage, we do not have any data to suggest that pregnant women or those with young children would be any more or less likely than the rest of the population to be affected by the proposal. Therefore, it is anticipated that the proposal will not have a disproportionate impact on this protected characteristic.

Marriage and Civil Partnership

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

We do not hold local data on the numbers of tenants or private renters who are married or in civil partnerships. Should it be established that there are any tenants or private renters in a civil partnership, it is anticipated that the proposal will not have a disproportionate impact on this protected characteristic.

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

No specific consultation or engagement has been undertaken. Provision of a rented garage is not a statutory service and only notification rather than consultation is required before an increase takes place. Those who rent Council garages do this voluntarily and can terminate their licenses on one week's notice. Notification to all existing Garage licensees will be provided in advance with sufficient timescale to allow them to terminate their license before the increase is applied. Disabled parking provision is widely available on Homes for Haringey Estates and on the highways. Estate Controlled Parking Schemes on Homes for Haringey estates ensure parking for estate residents is prioritised which includes elderly Council tenants and leaseholders with vehicles. Council tenants and leaseholders can access permits to use the Estate Controlled Parking Schemes for free. Similarly individuals with disabilities can qualify for a Blue badge to park on the highway for free.

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?

As above

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 EqIA guidance

1. Sex

The Council does not have data based on this protected characteristic. The Council does not envisage the proposal will have a disproportionate impact on this particular protected characteristic. The Council will identify and address any equality implications for this group through the monitoring of the implementation of the proposal in a way that does not discriminate against an individual or group who shares a protected characteristic. The proposal is not likely to have a disproportionate impact on this protected characteristic. However, it is considered that the likely impact for this protected group is unknown at this stage.

Women are over-represented among the Council's Tenants and Leaseholders. A preferential rate is available to Tenants and Leaseholders renting their first garage to ensure that the introduction of market rate rents is don't impact negatively on this group regardless of sex. This would apply equally to any Homes for Haringey clients meeting the characteristics of this strand. All other changes apply equally regardless of sex. Therefore, it is considered that the impact is likely to be neutral for tenants and leaseholders from minority religious groups.

Positive		Negative		Neutral impact	x	Unknown Impact	x
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2. Gender reassignment

The Council does not have data based on this protected characteristic. The Council does not envisage the proposal will have a disproportionate impact on this particular protected characteristic. The Council will identify and address any equality implications for this group through the monitoring of the implementation of the proposal in a way that does not discriminate against an individual or group who shares a protected characteristic.

Positive		Negative		Neutral impact	x	Unknown Impact	
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3. Age

There is no change to the current concessionary discount available to residents of Haringey who are over the state pension age. The proposal will therefore have no impact on individuals over the state pension age.

Positive		Negative		Neutral impact	x	Unknown Impact	
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4. Disability

There is no change to the current concessionary discount available to residents of Haringey who have a disability. All other changes apply equally regardless of disability. The proposal will therefore have no impact on individuals with disabilities.

Positive		Negative		Neutral impact	x	Unknown Impact	
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5. Race and ethnicity

The Council does not have data based on this protected characteristic. The Council does not envisage the proposal will have a disproportionate impact on this particular protected characteristic. The Council will identify and address any equality implications for this group through the monitoring of the implementation of the proposal in a way that does not discriminate against an individual or group who shares a protected

characteristic. The proposal is not likely to have a disproportionate impact on this protected characteristic. However, it is considered that the likely impact for this protected group is unknown at this stage.

BAME individuals are over-represented among the Council's Tenants and Leaseholders. A preferential rate is available to Tenants and Leaseholders renting their first garage to ensure that the introduction of market rate rents is don't impact negatively on this group regardless of race and ethnicity. This would apply equally to any Homes for Haringey clients meeting the characteristics of this strand. All other changes apply equally regardless of race and ethnicity. Therefore, it is considered that the impact is likely to be neutral for tenants and leaseholders from minority religious groups.

Positive		Negative		Neutral impact	x	Unknown Impact	x
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6. Sexual orientation

The Council does not have data based on this protected characteristic. The Council does not envisage the proposal will have a disproportionate impact on this particular protected characteristic. The Council will identify and address any equality implications for this group through the monitoring of the implementation of the proposal in a way that does not discriminate against an individual or group who shares a protected characteristic. The proposal is not likely to have a disproportionate impact on this protected characteristic. Therefore, it is considered that the impact is likely to be neutral.

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

The Council does not have data for private renters of garages based on this protected characteristic. The Council does not envisage the proposal will have a disproportionate impact on this particular protected characteristic. The Council will identify and address any equality implications for this group through the monitoring of the implementation of the proposal in a way that does not discriminate against an individual or group who shares a protected characteristic. The proposal is not likely to have a disproportionate impact on this protected characteristic. However, it is considered that the likely impact for this protected group is unknown at this stage.

Available data suggests Homes for Haringey's client group is broadly representative of the wider population. A preferential rate is available to Tenants and Leaseholders renting their first garage to ensure that the introduction of market rate rents don't impact negatively on this group regardless of Religion or belief (or no belief). This would apply equally to any Homes for Haringey clients meeting the characteristics of this strand. All other changes apply equally regardless of Religion or belief (or no belief). The proposal is not likely to have a disproportionate impact on this protected characteristic. Therefore, it is considered that the impact is likely to be neutral for tenants and leaseholders from minority religious groups.

Positive		Negative		Neutral impact	x	Unknown Impact	x
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8. Pregnancy and maternity

There is no data available on the percentage of the Homes for Haringey client base or private renters of garages with this protected characteristic. The proposal is not likely to have a disproportionate impact on those with protected characteristic. However, it is considered that the likely impact for this protected group is unknown at this stage.

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

People who are in a civil partnership will be treated the same as people who are married.

Positive		Negative		Neutral impact	x	Unknown Impact	
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10. Groups that cross two or more equality strands e.g. young black women

The Council does not have data for private renters of garages based on protected characteristics. It is therefore not possible to determine whether any groups that cross two or more equality strands will be affected.

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 relevant protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a relevant 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 relevant protected characteristic and those who do not?

The proposal could result in increased rents for private renters who share protected characteristics. It is not possible at this stage to determine whether this will be the case. The Council will monitor the implementation of the increase to identify any disproportionate impact on any protected groups.

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 EqlA guidance

Outcome	Y/N
<p>No major change to the proposal: the EqlA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <u>If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them.</u></p>	Yes
<p>Adjust the proposal: the EqlA 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</p>	No
<p>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.</p>	No

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 relevant 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.

Not applicable

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

1. There are gaps in our understanding of our client base specifically related to both Gender Reassignment and Pregnancy/maternity. We will work to collect Equalities data on all garage licensees to ensure that gaps in our understanding of our client base are filled.
2. We will begin collection of equalities data on private renters of garages

3. An analysis of the license terminations will be undertaken quarterly throughout the financial year to ascertain if there have been any unanticipated negative impacts on particular groups with our client base.

7. Authorisation

EqlA approved by **Astrid Kjellberg-Obst**
Executive Director of Operations

Date 30th January 2019

8. Publication

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

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