

Cumulative Equality Impact Assessment of  
Medium-Term Financial Plan Saving Proposals 2019/20 –  
2023/24  
January 2019

Appendix 2.

**Compilation of all full EqlAs conducted for MTFS proposals**

# PA1 - EqIA Charging for Managed Accounts

## 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 protected characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

### Stage 2 – Full Equality Impact Assessment

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

When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision-making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.

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

### 1. Responsibility for the Equality Impact Assessment

Name of proposal	Charging for Managed Accounts
Service area	Commissioning
Officer completing assessment	Raj Darbhanga
Equalities/ HR Advisor	
Cabinet meeting date (if applicable)	
Director/Assistant Director	Charlotte Pomery

## 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*

### **Introduce charging administration fees for appointeeship**

Adults have the right to manage their own financial affairs. However, this may be difficult for some individuals who due to lack of capacity, illness and or disability.

Where a person becomes unable to manage their own financial affairs and has not put into place a lasting power of attorney, the matter can be taken to the Department for Work and Pensions (DWP) and or Court of Protection to request a third party is put into place to support the individual.

The third party can be a friend, family member or an organisation (including the council as corporate appointee). Where the individual requiring this support only has only has DWP income, then an appointee can be appointed by the DWP.

Most local authorities provide a money management service for adult social care users who are unable to manage their own financial affairs. The council recognises the importance of supporting vulnerable adults to manage their finances and to protect them from potential or actual financial abuse.

The council currently only becomes DWP appointee or court appointed deputy for finances as a last resort where there is no other party (or suitable party due to safeguarding concerns) to undertake this role.

#### **What is appointeeship:**

A Department for Work and Pensions appointee is the person who is appointed by the DWP to manage an individual's DWP income.

The appointee responsibility includes making and maintaining any benefit claims, collecting payments and managing the money including the payment of bills.

#### **Current Practice:**

Currently the council does not charge administration fees for the management of appointeeship clients as it does for deputyship clients, where there are administration fees for managing client funds and assets.

The full set of deputyship charges for local authorities are set out by the Court of Protection (Practice Direction 19B Fixed Costs in the Court of Protection).

**Proposal:**

The Council is currently able to charge for court of protection clients based on legislative guidance issued by the Court of Protection. There is no national policy for governing charging for DWP appointeeship. Policy and charges are therefore subject to local Council decisions.

As the number of DWP clients increase, the council recognises the administrative costs of managing appointee client accounts is increasing and there is a need to off-set this increasing cost. As the level and type of service provided to appointeeship clients is similar to deputyship clients, the proposal is to introduce **annual administration fees** comparable with deputyship charges for appointeeship clients.

**The proposed fees applicable from 01 April 2019 for DWP appointeeship clients is as follows:**

It should be noted that the likely fee that will apply to all DWP appoint clients will be the Category II fee (see below) and the savings proposal of £70K is based on this fee only. It should also be noted that the fees are comparable with deputyship charges.

Category	Description	Fee Amount not exceeding
Category I	Work up to and including the date the DWP appoint the LBH council as the corporate appointee. This fee will <u>not</u> be applied to existing clients (unless they are converted to court of protection). This will be a one-off fee.	£745
Category II	Annual management fee where LBH acts as corporate appointee for DWP income/ Benefits (a) For the first year (b) For the second year and subsequent years  Where the net savings of an individual are below £16,000 an annual management fee not exceeding 3.5% of the client's net assets on the anniversary of the DWP appointing the council as corporate appointee.	£745  £650
Category III	Annual management fee for property where the council is involved in the maintenance of the property. This will only be applied with agreement of	£300

	client or family and service manager.	
Category IV	Preparation of appointee annual report. This will be optional and will only apply with agreement of client or family and service manager where requested.	£216

Where the appointeeship ends before the date the annual fees are due to be charged then pro rata fees will be calculated.

***The above fees are based Practice Direction 19B Fixed Costs in the Court of Protection. The fees and charges are subject to change.***

**For existing clients as at 01 April 2019 (proposed implementation date):**

1. For clients with savings over £16K and where the council has been DWP corporate appointee for over a year, the first (category II) fee to be applied at 01 June will be £650 and **not** £745. If the appointment has been for under a year, then a pro-rata fee will apply.
2. For DWP appointee clients who have less than £16K in savings and where the council has been DWP corporate appointee for over a year, the first annual management fee (category II) will be 3.5% of the savings held on 01 June 2019. If the appointment has been under a year, then a pro-rata fee will apply.

**OR:**

[For existing DWP corporate appointee clients the category II fee will apply on the anniversary date the council was appointed DWP appointee.](#)

**What will this mean:**

The proposal will impact on current corporate DWP appointee clients where the council manages their DWP income / benefits.

**Consultation**

This will be necessary if the proposal is to go ahead. Any consultation will need to involve the clients affected to ensure the introduction of administration charges does not have an adverse effect or impact on their wellbeing.

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**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	Mosaic data of service users	N/A
Gender Reassignment	Current data on service users does not breakdown by gender reassignment.	N/A
Age	Mosaic data of service users	N/A
Disability	Mosaic data of service users	N/A
Race & Ethnicity	Mosaic data of service users	N/A
Sexual Orientation	Current data on service users does not breakdown by sexual orientation.	N/A
Religion or Belief (or No Belief)	Current data on service users does not breakdown by religion or belief.	N/A
Pregnancy & Maternity	Current data on service users does not breakdown by pregnancy and maternity.	N/A
Marriage and Civil Partnership	Current data on service users does not breakdown by marriage and civil partnership.	N/A

**Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?**

*Explain how you will overcome this within the proposal.*

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

See 5.

**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

A consultation will take place. This will be developed and involve current corporate DWP clients.

**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?*

N/A at this stage.

**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

Those affected will be either current or future service users of Adult Social care and where the council manages their DWP income.

**1. Sex**

As of 9 August 2018, of the 188 service users where the council manages their income through DWP Appointeeship, there were 101 (54%) male users and 87 (46%) female users.

This proposal will impact more on males and this is slightly disproportionate compared to the 3514 Adult Social Care Service Users of which 1881 (54%) were female and 1625 (46%) male.

However, compared to the overall Haringey data from the Haringey (2017 Greater London Authority projections), where 49% are female and 51% are male, the slightly 'more' impact on males is expected.

## **2. Gender reassignment**

This data is not available.

## **3. Age**

As of 9 August 2018, of the 188 service users where the council manages their DWP income, 129 are over 61+ (61%) and 59 (29%) are under 61 years of age.

The proposal will be felt across the age range under and 61+. However, it is expected that the impact will fall mostly on the 61+ as they are predominant in the people being provided with a service, of the 3514 Adult Social Care Users, 2038 (58%) are 61+.

## **4. Disability**

Care and support is provided to vulnerable adults all of whom have a disability. Adults who receive this service and where their DWP income is managed by the council through DWP Appointeeship will be affected by this proposal.

## **5. Race and ethnicity**

As of 09 August 2018, the ethnicity of the 188 service users is as follows:

Asian / Asian British	7	4%
Black / African / Caribbean / Black British	57	30%
Mixed / Multiple	2	1%
White	102	54%
Other Ethnic Group	9	5%
Unidentified	11	6%

The impact of this proposed change will impact across all ethnicity groups, however, there is likely to be great impact for the following groups: Black / African / Caribbean / Black British and White. This is expected as these groups are predominant in the people being provided the Appointeeship service and Adult Social Care. This also supported by the overall Haringey data from the Haringey (2017 Greater London Authority) projections.



**6. Sexual orientation**

Data is not collected in relation to the management of finances via DWP Appointeeship.

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

Data is not collected in relation to the management of finances via DWP Appointeeship.

**8. Pregnancy and maternity**

Not available

**9. Marriage and Civil Partnership**

Not available

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

Not available

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?

Implementation of this proposal would affect current and future adult social care service users aged 18 and over where the council manages their benefit income through Department for Work and Pensions (DWP) Appointeeship.

The policy will continue to provide an equitable process for financial assessments and contributions based on affordability.

Analysis of previous changes to the contributions policy indicates that the proposed changes would impact on the protected characteristics of disability. This is also supported by the analysis above. This is expected given that the profile of those most likely to receive care and support from the Council.

**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>	N
<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	N
<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.	N

**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
Potential impact on income for any resident affected.	All subject to individual assessment and engagement with individual on any potential impact.	Raj Darbhanga	From date of implementation and ongoing.


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.

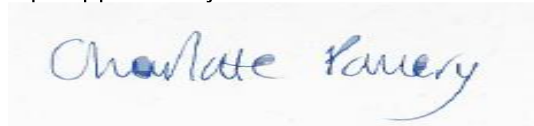
N/A

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

We will keep details of all individuals assessed for charging and monitor any impact.

**7. Authorisation**

EqIA approved by .



.....  
(Assistant Director/ Director)

Date .....18<sup>th</sup> January  
2019.....

**8. Publication**

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

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

## PA5 - EqIA In-house negotiator

### 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 protected characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

#### Stage 2 – Full Equality Impact Assessment

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

When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.

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

### 1. Responsibility for the Equality Impact Assessment

Name of proposal	Care fund negotiations with providers
Service area	Adult social care
Officer completing assessment	Shana Nessa
Equalities/ HR Advisor	Louise Hopton Beatty
Cabinet meeting date (if applicable)	TBC
Director/Assistant Director	John Everson

### 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*

Adult social care will use market intelligence and skilled knowledge to liaise with providers to ensure care costs charged to the borough reflected in service provision. The work will include analysis of care packages for new service users with learning disabilities or mental health that are in residential placements costing more than £1,000 per week. The Negotiator will work with social care staff to promote service user independence by increasing the uptake of assistive technology.

The care negotiator works with the provider to mutually agree an appropriate cost of care. In cases where the analysis indicates a fair price, we would not challenge the provider, and in some cases costs may be enhanced

The care negotiator will work with care providers to ensure there is evidence that the care being provided to individual service users', matches what the Council has commissioned. Where there is a difference in care, this is reflected in the renegotiation of care costs.

This process also helps confirm that provider's additional costs are validated with other similar providers to ensure parity. This approach to negotiation ensures value for money where the Council is only paying costs of the actual care package provided, and also that provider's costs are comparable to the market. This is also a good way of ensuring that providers are paid in a fair and equitable way for the all the services they provide.

Any decisions related to changes to care packages involving service users will be carefully based on adult social care procedures in line with Care Act 2014 to review care needs for service users, with a Social Worker undertaking the review with the service user or/ and their family carer present.

### 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	Mosaic data of service users	N/A
Gender Reassignment	Current data on service users does not breakdown by gender reassignment.	N/A
Age	Mosaic data of service users	N/A
Disability	Mosaic data of service users	N/A
Race & Ethnicity	Mosaic data of service users	N/A
Sexual Orientation	Current data on service users does not breakdown by sexual orientation.	N/A
Religion or Belief (or No Belief)	Current data on service users does not breakdown by religion.	N/A
Pregnancy & Maternity	Current data on service users does not breakdown by pregnancy and maternity.	N/A
Marriage and Civil Partnership	Current data on service users does not breakdown by marriage and civil partnership.	N/A

**Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?**

*Explain how you will overcome this within the proposal.*

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

By adopting a consistent approach, this will reduce the likelihood of discrimination in the proposal which aims to look at charging to the Council for service users needs versus actual delivery of 1:1 support.

For the purpose of this decision, we will be analysing the following data by relevant protected characteristic:

- New adult social care users aged 18-64 with mental health or learning disabilities who are also in residential care (source: Mosaic data at November 2017).
- Whose care costs exceed £1,000 per week.

We have broken down the data by protected characteristic where we have known it:

Sex	Service users	LBH
Male	66%	49.5%
Female	34%	50.5%

Age	Service users in cohort	LBH
18-29	24%	27%
30-44	24%	36%
45-59	43%	21%
60+	8%	16%

Disability	Service users in cohort	LBH
Disabled	94%	14%
Not Disabled	6%*	86%

\*Mental Health

The Disabled category for service users in the cohort consists of a breakdown of 213 service users aged 18-64 that have a learning disability, 16 have physical support needs and 6 have sensory impairments.

Ethnicity	Service users in cohort	LBH
Asian / Asian British	8%	9%
Black / African / Caribbean / Black British	31%	19%
Mixed / multiple	4%	6%
No data	2%	0%
Other Ethnic Group	4%	5%
White	52%	61%

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 and engagement will be done on a 1:1 basis with service users and their family/ carers in line with Care Act 2014 guidance. The source of the data is Mosaic Adult social care database via the Council's Performance Team using Mosaic Financial Commitments (B13 report).

**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?*

249 service users are involved in this proposal. Consultation and engagement will be done on a 1:1 basis with service users and their family/ carers in line with Care Act 2014 guidance. This will be done on an as and when basis as part of an annual review.

**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

Men are overrepresented among service users in this cohort. They are likely to be neutrally impacted by the proposal because they will benefit from:

- a greater focus on support planning and agreed outcomes
- greater consistency in practice
- clearer procedures, which should make it easier for Brokerage to plan their care.

The proposal is an exercise to ensure value for money from the Council so that the Council is not overcharged by providers. If it is necessary to change a persons care package this will be done in line with a Care Act assessment to ensure fairness and consistency, but also that service provision is based on needs.

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

We do not hold any service user data on the gender reassignment protected characteristic and we do not have any data on the transgender population of Haringey. However, we are aware that people who are seeking, receiving and have received gender reassignment surgery experience discrimination, harassment and victimisation. The Council will continue to adopt their Equality policy to prevent this happening to service users when delivering social care.

Positive		Negative		Neutral impact	x	Unknown Impact	
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### 3. Age

Adults aged 45-59 are overrepresented in this proposal. They are likely to be positively impacted by this proposal because they will benefit from:

- a greater focus on support planning and agreed outcomes
- greater consistency in practice
- clearer procedures, which should make it easier for Brokerage to plan their care.

There is no change in the policy with regard to short breaks and therefore the impact on children will be neutral.

Positive		Negative		Neutral impact	x	Unknown Impact	
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### 4. Disability

The policy will have a positive impact on people with learning disabilities and mental health as the process will hold providers to account, through agreed outcomes relating to eligible needs. This is likely to increase the availability of funds for service users that need adult social care to maximise independence.

Disabled service users will benefit from:

- a greater focus on support planning and agreed outcomes for service users
- greater consistency in practice
- clearer procedures, which should make it easier for Brokerage to plan care for service users.

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

White people are overrepresented among service users. They are likely to be positively impacted by this proposal because they will benefit from:

- a greater focus on support planning and agreed outcomes for service users and greater consistency in practice
- clearer procedures for Brokerage staff to ensure care costs are as reasonable as possible.

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

We do not hold any service user data on the sexual orientation protected characteristic and we do not have any data on the lesbian, gay and bisexual (LGB) population of Haringey. However, we are aware that LGB people experience discrimination, harassment and victimisation, including in social care. The Council will continue to adopt their Equality policy to prevent this happening to service users when delivering care. In the allocation of care, same sex relationships will be treated the same as heterosexual couples in regards to service users.

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

There is insufficient data regarding service users who have a religion, belief or none at all. When implementing the proposal, the Council will need to ensure that no discrimination, harassment and victimisation will occur based upon religion and faith. In addition to this, any inequalities based upon this protected group will be tackled.

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

There is insufficient data regarding service users who are pregnant or recently gave birth. When implementing the proposal, the Council will need to ensure that no discrimination, harassment and victimisation will occur based upon this characteristic. In addition to this, any inequalities identified that are based upon this protected group will be tackled.

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

We do not have this information. The proposal does not intend to remove any services away from service users, this is an exercise to ensure value for money from the Council so that the Council is not overcharged by providers. If it is necessary to change a persons care package this will be done in line with a Care Act assessment to ensure fairness and consistency, but also that service provision is based on needs.

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

This proposal will impact on the protected characteristics of age, sex, disability and ethnicity and therefore is likely to have an inter-sectionary impact

**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:
  - d) Remove or minimise disadvantage suffered by persons protected under the Equality Act
  - e) Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups
  - f) 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 should not result in any direct or indirect discrimination for any protected group. It should help all service users as they will benefit from:

- a greater focus on support planning and agreed outcomes for the service user
- greater consistency in practice

**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	N
<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.	N

**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

Age, Sex, Disability, Race,	The Council will try to maximise the positive impact of support planning and agreeing outcomes for the service users, which has previously not been consistent practice. Reviews will promote enabling the independence of the person being cared for, maximising choice and control over their own lives.	John Everson  Heads of Service Leads: Anita Marsden/ Jeni Plummer/ Vikki Monk-Meyer/ Peter Brennan	April 19
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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:**

Service users will be at the centre of their care planning process and any effects on equalities for either party, will be highlighted by the care worker and captured in the support plan, which will help to define agreed outcomes relating to their eligible needs.

Service users will be treated fairly and equitably, recognising their individual circumstances and offered services based on their eligible health and care needs.

**7. Authorisation**

EqlA approved by .....  
(Assistant Director/ Director)

Date .....

**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.

## PA6 - EqIA Transfer of High Cost Day Opps

### 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 protected characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

#### Stage 2 – Full Equality Impact Assessment

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

When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision-making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.

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

#### 1. Responsibility for the Equality Impact Assessment

Name of proposal	Day Opportunities
Service area	Commissioning
Officer completing assessment	Sebastian Dacre
Equalities/ HR Advisor	
Cabinet meeting date (if applicable)	
Director/Assistant Director	Charlotte Pomery

## 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 has three ex-day centre premises that, with certain adaptations, could be leased to a local provider to support 15-20 high cost service users currently receiving services out of borough at reduced cost, and closer to their existing support networks. This is proposed as it chimes with stakeholder views and capacity analysis that there is insufficient capacity and variety in borough and to improve outcomes for users.

This could yield £540,000 in savings in full year 2020/21, depending on:

- Which service users move to the new service
- The outcome of the procurement exercise
- The capacity of the service to support a higher number of service users by using the leased premises as a 'hub' to support more service users.

There will be a capital outlay requirement of approximately £177k and a £10-15k social work resource requirement to manage (on a 3-4 month basis), the transition/support planning process of moving service users from out of borough back into area.

## 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	Mosaic data of service users	N/A
Gender Reassignment		N/A

	Current data on service users does not breakdown by gender reassignment.	
Age	Mosaic data of service users	N/A
Disability	Mosaic data of service users	N/A
Race & Ethnicity	Mosaic data of service users	N/A
Sexual Orientation	Current data on service users does not breakdown by sexual orientation.	N/A
Religion or Belief (or No Belief)	Current data on service users does not breakdown by religion or belief.	N/A
Pregnancy & Maternity	Current data on service users does not breakdown by pregnancy and maternity.	N/A
Marriage and Civil Partnership	Current data on service users does not breakdown by marriage and civil partnership.	N/A
All areas	Feedback on outcomes from provider monitoring information	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 proposal concerns users with a learning disability and users with a learning disability and autism at moderate to complex levels of need. They are therefore disproportionately affected by these proposals which are designed to improve outcomes and maximise independence.

More men than women will be affected and here it is the younger cohort of people with learning disability who tend to be living out of borough, hence they equally may be affected more by the proposal.

**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 EqlA guidance*



We have established a co-design group which includes users, carers and staff, as well as officers. We are keen to hear directly from services users, as they will be most affected. We are undertaking activities such as visits to centres of excellence with users and carers in order to ensure we consider all opportunities for the future.

We will undertake in-depth reviews and if necessary re-assessments of individuals, which will involve the user and their carer as appropriate, where anyone has been identified as someone who could benefit from in-borough provision.

**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?*

We have shared early stage thinking on this proposal with stakeholders and they have expressed support for both bringing users back into the borough and ensuring we have an improved offer locally.

**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

For people with learning disabilities currently in day provision and those young people with a learning disability taking up services in Haringey, this proposal will have a positive impact. Those affected will be either current or future service users with learning disability of day provision through LB Haringey.

Through co-design and further examination of the data, we will ensure that the future offer reflects the needs as currently identified and that flexibility is built in both to the redesign of spaces and the sort of service commissioned to enable future needs and outcomes also to be met effectively.

**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:**

- g) Remove or minimise disadvantage suffered by persons protected under the Equality Act
- h) Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups
- i) 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?

This proposal will build our capacity to respond to duties under the Equality Act for people with learning disabilities, with or without autism. This includes:

- The model will seek to minimise disadvantage suffered by people with learning disabilities.
- The model will seek to meet the needs of people with learning disabilities in the borough, reducing travel time and increasing opportunities to link effectively to normal, community life.
- One of the features of a day opportunity model is to ensure that users do participate in community life, through testing a range of community based activities including leisure, employment, training and building social relationships

**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. <u>Clearly set out below the key adjustments you plan to make to the policy.</u> If there are any adverse impacts you cannot mitigate, please provide a compelling reason below	N
<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.	N

**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
Disability	Ensure that the needs and outcomes of learning-disabled	Sebastian Dacre	Through to April 2020

	people are met through this process by working within a co-design model to scope out and commission the provision, by undertaking reassessments and reviews as required and by testing best practice elsewhere to bring into Haringey.		
Age	As above, and in addition: ensuring that the needs of older people with learning disability are fully taken into account.	Sebastian Dacre	Through to April 2020

Please outline any areas you have identified where negative impacts will happen as a result of the proposal, but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.

N/A


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

The co-design group will support the monitoring of service delivery, including equalities impact of the proposal and its implementation.

Progress will also be reported to the P2 Steering Group, which will consider equalities as part of the data analysis.

**7. Authorisation**

EqlA approved by .



.....  
(Assistant Director/ Director)

Date .....18<sup>th</sup> 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.

## PL1 - Additional HMO Licensing Scheme for HMO

### EQUALITY IMPACT ASSESSMENT

The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to the need to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity for those with 'protected characteristics' and those without them
- Fostering good relations between those with 'protected characteristics' and those without them.

In addition the Council complies with the Marriage (same sex couples) Act 2013.

#### Stage 1 – Screening

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

#### Stage 2 – Full Equality Impact Assessment

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

When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.

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

#### 1. Responsibility for the Equality Impact Assessment

Name of proposal	Property Licensing – Borough wide Additional HMO Licensing Scheme
Service area	Community Safety & Enforcement
Officer completing assessment	Lynn Sellar
Equalities/ HR Advisor	
Cabinet meeting date (if applicable)	12 <sup>th</sup> February 2019
Director/Assistant Director	Stephen McDonnell – Director of Environment and Neighbourhoods.

## 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 proposing to extend the current Additional Licensing scheme for HMOs not governed by Mandatory Licensing. All licensing schemes are intended to address the impact of poor quality housing, rogue landlords and anti-social tenants. In an area subject to licensing, all private landlords must obtain a licence and if they fail to do so, or fail to achieve acceptable management standards, the authority can take enforcement action. Schemes run for a maximum period of five years and a fee is payable for each license.

Licensing offers the following benefits:

- Provide an improved strategic approach to managing the sector
- Help to identify all properties that are rented out privately
- Establish a register of landlords operating in Haringey
- Give us the opportunity to inspect the properties to assess living conditions and to offer advice to landlords, managing agents and tenants about their obligations.
- Redefine how the service operates by shifting the emphasis from a customer complaints led, reactive service.
- Ensure that a proper standard of management of privately rented property is maintained and that properties do not become, dangerous and/or severely overcrowded
- Reduce the levels of anti-social behaviour in the borough and take action against those whose properties or tenants cause persistent ASB

- Reduce enviro-crime locally including improvement in the management of waste

Stakeholders directly affected by the proposal:

Private sector landlords, managing agents and their tenants within the areas in scope will be directly affected by the proposals.

We anticipate that the majority of residents will be positively affected by the proposal.

Council employees may be affected (change in the operating model) Further work is required to understand the full implication of the impact on staff. Any changes will be addressed in line with the Council's HR policies and a separate EqIA completed if necessary.

Timeline:

A report was presented at the Cabinet meeting of 14<sup>th</sup> November 2017 and Members agreed to a borough wide public consultation on the proposal. The consultation ran for 12 weeks between 12<sup>th</sup> December 2017 and 5<sup>th</sup> March 2018.

Following the statutory consultation period, a report will be presented to Members of the Cabinet in February 2019 for the introduction of a borough wide additional HMO Licensing scheme.

A comprehensive publicity campaign will take place February 2019-May 2019

The licensing scheme will be launched in May 2019

### 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	<i>Equalities Profile of Haringey – 2013 Mid Year estimates:</i> <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</a>  <a href="#">Property Licensing Consultation</a>	
Gender Reassignment	EHRC national data <a href="#">Property Licensing Consultation</a>	
Age	<i>Equalities Profile of Haringey – 2013 Mid Year estimates:</i> <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</a>  <a href="#">Property Licensing Consultation</a>	

	<a href="#">MHCLG English Housing Survey, Private Rented Sector (2017)</a>	
Disability	<p><i>Equalities Profile of Haringey – 2013 Mid Year estimates:</i>  <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</a></p> <p><i>ONS Disability in England &amp; Wales, 2011</i></p> <p><a href="#">Property Licensing Consultation</a></p> <p><a href="#">MHCLG English Housing Survey, Private Rented Sector (2017)</a></p>	
Race & Ethnicity	<p><i>Equalities Profile of Haringey – 2013 Mid Year estimates:</i>  <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</a></p> <p><a href="#">Property Licensing Consultation</a></p> <p><a href="#">MHCLG English Housing Survey, Private Rented Sector (2017)</a></p>	
Sexual Orientation	<p>ONS sub-national sexual identity data, 2013-15</p> <p><a href="#">Property Licensing Consultation</a></p>	
Religion or Belief (or No Belief)	<p><i>Equalities Profile of Haringey – 2013 Mid Year estimates:</i>  <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</a></p>	
Pregnancy & Maternity	<p><i>Census, 2011</i></p> <p><a href="#">Property Licensing Consultation</a></p>	
Marriage and Civil Partnership	<p><i>Equalities Profile of Haringey – 2013 Mid Year estimates:</i>  <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</a></p> <p><a href="#">Property Licensing Consultation</a></p>	
<p><b>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?</b></p> <p><i>Explain how you will overcome this within the proposal.</i></p> <p><i>Further information on how to do data analysis can be found in the guidance.</i></p>		
<p>Haringey is an exceptionally diverse and fast-changing borough.</p> <p>Haringey has a population of 254,900 according to the 2011 National Census made up of 101,955 households. The number of households in Haringey has continued to increase since 2011.</p> <p>The borough ranks as one of the most deprived in the country with pockets of severe deprivation in the east. Haringey is the 13th most deprived borough in England and the 4th most deprived in London.</p>		

Home ownership in Haringey remains lower than London at 38.9% with the level of private renting amongst the highest in London. The level of over occupancy in Haringey is significantly above that for London.

The 2011 census recorded a reduction in full time workers and an increase in part time and self-employed workers. The 2011 census recorded that more people in Haringey identified as never having worked or in long-term unemployment than in London. Over a quarter of households (28%) living in Haringey have no adult in employment. This figure is similar to that of London as a whole.

Our key finding of our analysis in relation to key equalities characteristics are as follows:-

### **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.

The private rented sector (PRS) is increasingly being used as an alternative to home ownership for young people who cannot afford to get onto the property ladder. We know that private renting is being used increasingly by families with young children. Haringey has a higher than average population of young adults and so it is likely that young adults are over-represented in the private rented sector.

Young children are over-represented in the private rented sector and notably in properties which are in poorer condition. Moreover, private renters are, on average, younger than social renters and owner occupiers, with a mean age of 40 years (compared with 52 years for social renters and 57 years for owner occupiers).

### **Disability**

14% of residents have a long-term health problem that limits their day to day activity, lower than England but in line with London. 5.7% of residents report being in bad health, slightly higher than England and London.

In 2016-17, 23% of privately rented households in the UK reported a household member with a long-term illness or disability. It is therefore likely that a higher proportion of residents in the private rented sector have a long-term illness or disability than is generally the case in haringey.

The English House condition Survey 2015-16 identified that 23% of households in the private rented sector included at least one member who had a long-term illness or disability, lower than the proportion of such households in the social rented sector; where 49% of households included someone with a long-term illness or disability. Among owner-occupiers, 29% of households had at least one member with a disability or long-term illness. Although this is higher than in the private rented sector, this might be due to the fact that owners are in general older than renters and are therefore might more likely to have age-related illness or disability.

### **Gender reassignment**

The council does not have local data regarding this protected characteristic. There is no reason to believe that there will be specific impacts for this protected group and we will try to ensure that discrimination, harassment and victimisation is tackled based upon this and any other protected group.

### **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.

Lone parents, of whom the vast majority are women, are over-represented in the private rented sector and notably in properties which are in poorer condition.



### **Race and Ethnicity**

Almost two-thirds of the borough's population, and over 70% of its young people, are from ethnic minority backgrounds. Haringey's population is the fifth most ethnically diverse in the country with over 100 languages spoken. Over 65% of residents come from non-White British communities, compared to 20% in England and 55% for London. 190 different languages are spoken in our schools. The proportion of non-White British communities varies from 35.2% in Muswell Hill in the west of the borough to 83.4% in Northumberland Park in the east of the borough.

BAME individuals are over-represented in the private rented sector and notably in properties which are in poorer condition. It is notable that migrants are more likely than UK nationals to live in private-rented accommodation.

### **Religion and 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 in the private rented sector. However, we know that recent and second-generation migrants in the UK are likely to live in the private rented sector rather than social or privately owned housing. It is likely that a significant proportion of these individuals will be members of minority faith groups and are therefore represented among private rented sector tenants.

There is no reason to believe that there will be specific impacts for this protected group and we will try to ensure that discrimination, harassment and victimisation is tackled based upon this and any other protected group.

### **Sex**

There is a relatively equal gender split in Haringey, just over half of the population is female (50.5%), in line with England and London.

The English House condition Survey 2015-16 identified that 61% of households in the PRS had a male HRP. Lone parents, of whom the vast majority are women, are over-represented in the private rented sector and notably in properties which are in poorer condition.

### **Sexual orientation**

3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013 (ONS Integrated Household Survey). In Haringey this equates to 6,491 residents.

We do not have local data regarding the representation of this protected group in the private rented sector. There is no reason to believe that there will be specific impacts for this protected group and we will try to ensure that discrimination, harassment and victimisation is tackled based upon this and any other protected group.

### **Marriage and Civil partnership.**

A third of the population of Haringey is made up of single households.

Lone parent households account for 10% of the borough's household make up.

Haringey has a higher proportion of couples in a registered same sex civil partnership than England and London. 0.6% (or 1,191 residents), compared to 0.2% for England and 0.4% for London.

We do not have local data regarding the representation of this protected group in the private rented sector. There is no reason to believe that there will be specific impacts for this protected group and we will try to ensure that discrimination, harassment and victimisation is tackled based upon this and any other protected group.

All groups who own, manage or live in privately rented accommodation are likely to be affected by the introduction of a property licensing scheme. People of ethnic minority origin, single parents and young children and certain vulnerable people are key tenant groups and are therefore likely to be affected as they are over-represented in the private rented sector and notably in properties which are in poorer condition.

Generally, the effect of property licensing is to formalise the lightly regulated private rented housing market by imposing an increased regulatory framework to force obligations on landlords / licence holders. It should lead to better quality accommodation and greater community stability for groups who are unable to access social housing or homeownership. Therefore it can assist with community cohesion and tackle exclusion. Better managed private sector dwellings also improve the quality of life of many other Haringey residents, as they are often indirectly affected by low level neighbourhood anti-social behaviour such as fly tipping and noise.

The introduction of a borough wide Additional Licensing scheme will enable us to collect data on demographics/equalities of people living in, managing and owning private sector dwellings in Haringey.

#### 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

During the consultation period (12 weeks) we used a wide range of consultation techniques to ensure that all sections of the community had an opportunity to take part. This included:

- Email to 600 landlords/Letting Agents operating in Haringey Council.
- Hand delivered letter to every household within the proposed 29 Selective Licensing areas (approximately 30,000).
- Approximately 36,000 letters hand delivered to identified private sector properties in the borough.
- Leaflets, Posters and paper questionnaires distributed to Libraries.
- Information available on the Council's, web site.
- Officers attending the Borough Wide Neighbourhood Watch Meeting and local Neighbourhood Watch meetings.
- Details of the consultation emailed to all London Boroughs to share with their landlord' forums/letting agents.
- Press release and consultation picked up by:
  - Local: Ham and High, Parikiaki, Tottenham Independent
  - National: BBC Newsround
  - Trade Press: Residential Landlord Association, Landlord Today, Housing 24.
- Bridge Renewal Trust promoted the consultation through weekly e-bulletin and social media.
- Details of the consultation sent to HFH Resident' Associations and all Neighbourhood Watch representatives.
- Article in Haringey People Magazine – distributed to all households in the borough.
- Regular reminders with links to the consultation were posted out via Social Media.
- 2 appearances in Haringey People extra – emailed to 40,000 subscribers.

Our approach was independently evaluated by a third party to ensure compliance. All consultation material was translated on request, and hard copies of the questionnaire made available at various locations across the borough.

**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?*

A public consultation exercise ran from 12<sup>th</sup> December 2017 to 5<sup>th</sup> March 2018. Consultation activities included an online questionnaire, four public meetings, nine drop in sessions at various locations across the borough and a dedicated phone line. In addition, the Bridge Renewal Trust were asked to independently hold a number of focus groups with private sector tenants and partner agencies, specifically they were asked to target tenants with protected characteristics.

We estimate that the consultation resulted in just over 900 people either taking part and offering feedback on the proposals or/and making contact to discuss the proposals in more detail. The results are broken down as follows:

Completed the online-questionnaire	607
Attended a Public meeting	99
Telephone/Face to face contact	150.(estimate)
Attended a Bridge Renewal Focus Group/Telephone interview.	57

M.E.L. Research on line questionnaire

Break down of respondents

As part of the on-line consultation, equality monitoring information was collected. A breakdown of respondents by protected groups is set out below.

**AGE**

How old are you? (585 respondents completed this question)

Under 20	0%
21-24	1%
25-29	4%
30-44	33%
45-59	34%
60-64	9%
65-74	10%
75-84	2%
85-89	0%
90 and over	0%

Prefer not to say 7%

Haringey has a relatively young population with a quarter of the population under the age of 20, and 91% of the population under 65. Of the 585 respondents completing this question 81% were below 65. A nil response was recorded for under the age of 20. This age group is less likely to be either a landlord, home owner or tenant and therefore licensing is unlikely to affect them.

#### SEX

Q26. Gender (543 respondents completed this question)

Male	49%
Female	51%

The gender split is in line with the borough profile.

#### GENDER REASSIGNMENT

Q27. Does your gender differ from your birth sex? (548 respondents completed this question)

Yes	1%
No	90%
Prefer not to say	9%

1% of respondents confirmed that their gender differs from their birth sex. No data is available for the profile of Haringey.

#### PREGNANCY AND MATERNITY

Are you pregnant? (259 respondents completed this question)

Yes	2%
No	98%

Q29. Have you had a baby in the last 12 months? (257 respondents completed this question)

Yes	2%
No	98%

2% of the 259 respondents confirmed that they were pregnant at the time of completing the questionnaire and 2% of the 257 respondents confirmed that they had given birth within the last

12 months. These figures are lower than the overall conception rate among women in England and Wales.

#### **MARRAGE AND CIVIL PARTNERSHIP**

Q30. What is your marital status?

(559 respondents completed this question)

Single	23%
Married	39%
Co-habiting	16%
Separated	2%
In a same sex civil partnership	1%
Divorced	3%
Widowed	1%
Prefer not to say	14%

The above responses are broadly in line with the Borough profile, except for the number of respondents confirming as single is lower than the borough profile of 50%

#### **SEXUAL ORIENTATION**

Q33. Which of the following best describes your sexual orientation?

(548 respondents completed this question)

Bisexual	1%
Gay/Lesbian	5%
Heterosexual/Straight	65%
Prefer not to say	29%

3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013 (ONS integrated Household Survey) This compares with 6% of the 548 respondents to the consultation questionnaire.

#### **Race and Ethnicity**

Q31. Are you...?	A refugee	0%
	An asylum seeker	0%

Neither of the 100%  
above

(547 respondents completed this question) Nil response was received from respondents identifying as either a refugee or asylum seeker.

Q34. What is your ethnic background?

(554 respondents completed this question)

White: British	55%
White: Irish	4%
White Other: Gypsy/Roma	0%
White Other: Greek/Greek Cypriot	3%
White Other: Turkish	0%
White Other: Kurdish	0%
White Other: Irish Traveller	0%
White Other: (please specify)	10%
Mixed: White and Black Caribbean	0%
Mixed: White and Black African	0%
Mixed: White and Asian	1%
Mixed Other (please specify)	1%
Asian: Indian	2%
Asian: Pakistani	0%
Asian: Bangladeshi	1%
Asian: East African Asian	0%
Asian Other (please specify)	1%
Black: African	1%
Black: Caribbean	2%

	Black Other (please specify)	0%
	Chinese or other ethnic group: Chinese	0%
	Any other ethnic background (please specify)	1%
	Prefer not to say	18%
Ethnic group (452 respondents completed this question)		
	White British	68%
	White Other	20%
	Mixed	2%
	Asian	4%
	Black	4%
	Chinese or Other	2%

The majority of respondents confirming their ethnic background or group, identified as white British/white other. In contrast, the borough profile confirms that 65% of residents identify as non-white British.

#### DISABILITY

Q36. Do you consider yourself to be a disabled person? (541 respondents completed this question)

Yes	6%
No	94%

14% of residents have a long term health problem or disability in Haringey, compared to 6% of the 541 respondents.

#### Results of the on-line Consultation

Overall, support for a borough-wide Additional Licensing scheme is strong (70% in support). Opposition to the scheme is highest amongst landlords (39%), whilst residents are most in favour (80%). Around half of all respondents (53%) feel it will have a positive impact on them, with residents again most positive (65% positive), whilst landlords are most negative (34% negative).

Support for a Selective Licensing scheme in parts of Haringey is fairly well supported (57% overall), but less so than an Additional Licensing scheme. PRS tenants are most in favour of the scheme (70%), whilst two thirds of landlords are opposed to it (66%). Six out of ten landlords

(61%) feel it will have a negative impact on them, whilst over half of PRS tenants and residents feel it will be positive (54% and 53% respectively).

When respondents were asked to say why they supported licensing, 351 respondents offered comments for Additional Licencing and 282 offered a comment in respect of Selective Licensing. The top three reasons cited below were offered for both schemes:

- Better living conditions/maintained properties
- Reduce the knock on effects like fly tipping, ASB, overcrowding in HMOs etc.
- Offers protection to tenants and holds landlords accountable.

#### Bridge Renewal Trust – Engagement Event

There was overwhelming support for a licencing scheme by all participants. The top 3 issues identified by all groups as a priority for licensing to address have been categorised and are summarised below

- Improvement in property maintenance and conditions, including overcrowding and safety concerns.
- Lack of available property and high rents.
- Support for tenants to better understand their rights and deal with illegal evictions and complaints against landlords.

### 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 outcome of licensing is to improve standards within the PRS, and so tenants of any sex are likely to be positively impacted. We can reasonably anticipate benefits for women, as the vast majority of lone parent households in Haringey are headed by women and these households are overrepresented in the private rented sector.

We have no data as to the gender of landlords in Haringey but the proposal will affect any landlord or letting agent equally regardless of their gender and we do not anticipate a disproportionate impact based on this protected characteristic.

Positive	X	Negative		Neutral impact		Unknown Impact	
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#### 2. Gender reassignment -

We do not have local data regarding the representation of individuals who identify as a gender different to the one they were assigned at birth in the private rented sector. Our consultation findings lead us to believe that there will not be specific impacts for this protected group, but we will ensure that this group will not be subjected to discrimination, harassment and victimisation due to their protected characteristic. If any inequity in treatment is identified we will take steps to rectify this.



Positive		Negative		Neutral impact	X	Unknown Impact	
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**3. Age -**

The private rented sector (PRS) is increasingly being used as an alternative to home ownership for young people who cannot afford to get onto the property ladder. We also know that private renting is being used increasingly by families with young children. Additional licensing is targeted at houses in multiple occupation, including properties, which are likely to be shared houses as well as bedsit and studio accommodation, which tend to be a cheaper forms of renting and therefore more accessible to young adults who are more likely to be on low incomes. The impact of this proposal for young people in the private rented sector is going to be positive as it will help ensure that the quality of accommodation they are accessing is good and that the landlord they are renting from is fit and proper..

We have no data as to the age of landlords in Haringey but the proposal will affect any landlord or letting agent equally regardless of their age and we do not anticipate a disproportionate impact based on this protected characteristic

Positive	x	Negative		Neutral impact		Unknown Impact	
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**4. Disability** - 14% of Haringey residents have long term health problems that limits their day to day activity, which is lower than England but in line with London. 23% of households in the private rented sector included at least one member who had a long-term illness or disability. It is therefore likely that individuals with disabilities are over-represented among private-rented sector tenants and therefore those impacted by the proposal..

HMO licensing would not be able to take into consideration an individual tenant’s disability or needs associated with their disability when applying standards. The effect of licensing overall however would be positive for these households in improving overall housing conditions.

We have no data as to how many landlords in Haringey have disabilities but the proposal will affect any landlord or letting agent equally and we do not anticipate a disproportionate impact based on this protected characteristic.

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

We know from the 2011 census that Haringey is the 5<sup>th</sup> most diverse borough in the country. 65% of residents come from non-white British communities.

In summary 45% of the population was born outside of Britain. The main nationalities being Polish, Turkish, Jamaican, Irish, Ghanaian and Somalian.

Individuals and groups from ethnic minority backgrounds are over-represented among private-rented sector tenants. The impact of this proposal, in improving conditions in the private-rented sector, will therefore be positive overall for this protected characteristic.

We have no data as to the ethnicity of landlords in Haringey but the proposal will affect any landlord or letting agent equally regardless of their ethnicity and we do not anticipate a disproportionate impact based on this protected characteristic

Positive	X	Negative		Neutral impact		Unknown Impact	
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**6. Sexual Orientation -.**

We do not have local data on the representation of LGBT individuals in private rented sector accommodation. Our consultation findings lead us to believe that there will not be specific impacts for this protected group, but we will ensure that this group will not be subjected to discrimination, harassment and victimisation due to their protected characteristic. If any inequity in treatment is identified we will take steps to rectify this.

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

Haringey is one of the most religiously diverse places in the UK. At the time of the census the most common religion in Haringey was Christianity, accounting for 45% of residents, this is less than London. The next most common faith is Muslim (14.3%) and Jewish (3%). Hindu and Sikh faiths are under-represented in Haringey compared to London. As we know the PRS is the most likely tenure for new communities and will therefore provide housing for a large diverse population it is without question that different faith groups will be represented. Licensing will improve the condition of private rented housing and will therefore have a positive impact for households from religious minorities.

We have no data as to the faith of landlords in Haringey but the proposal will affect any landlord or letting agent equally regardless of their faith and we do not anticipate a disproportionate impact based on this protected characteristic

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

It is highly likely that due to the age demographics of those living in the PRS and the over-representation of lone parents that pregnancy and maternity is a characteristic that will be impacted on by licensing. The link between poor living accommodation and health is well evidenced, as is the impact of poor standards of accommodation on children’s health and development. Licensing will affect positively on both maternity and pregnancy through improving these standards for residents.

Positive	X	Negative		Neutral impact		Unknown Impact	
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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 -**

Groups that are likely to be over-represented among those affected by the proposal include:

- Young women
- Young people from BAME communities
- Young people with disabilities
- Ethnic minority individuals with disabilities
- Ethnic minority individuals from minority faith communities

These groups are all likely to be over-represented in the private rented sector and are therefore all likely to be positively impacted by the proposal’s aim to improve conditions in the private rented sector.

**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:

- j) Remove or minimise disadvantage suffered by persons protected under the Equality Act
  - k) Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups
  - l) 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?

This analysis has concluded that, overall, the extension of HMO licensing is likely to have a positive impact on all tenants and those with protected characteristics in particular. Licensing will have the greatest impact on those who are disadvantaged and who have little or no choice but having to rent in the private sector, including specific groups of tenants who share protected characteristics. .

A key purpose of the scheme is to improve housing conditions and reduce property related antisocial behaviour which will benefit residents across all protected characteristics and particularly more vulnerable groups. In particular, BAME groups, new migrants, families with young children, disabled residents and vulnerable adults will benefit from better enforcement of licence conditions and of the Housing Health and Safety Rating System standards. The proposal will therefore advance equality of opportunity to high quality housing for individuals and groups who share protected characteristics.

We do not anticipate any direct discrimination for any group that shares protected characteristics. The results of the consultation and the Equality Analysis has identified some potential adverse indirect impacts for lower income groups, particularly young people, migrants, single parents, if landlords decide to increase rents as a direct result of licensing. However, based on our existing licensing schemes in Haringey and that of other Councils who have introduced licensing, we believe that this is very unlikely to materialise and so the likelihood of this impact is very low.

There is a risk of homelessness for some residents should landlords decide to withdraw from the private rented sector. Although we think this is unlikely, to mitigate against this we have minimised the cost of a license, including offering a 50% early bird discount. In addition we will ensure that any monitoring or reporting requirements for landlords are kept to a minimum. Feedback from other councils and experience of our existing licensing schemes suggests that this is unlikely to happen and is therefore a low risk.

The proposal will help to foster good relations between individuals and groups who share protected characteristics and those who do not by driving up standards of accommodation that is likely to be shared by diverse small groups and by reducing property-associated anti-social behaviour that may otherwise worsen relations.

**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	Y

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>	
<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	N
<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.	N

**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
Lack of data held on some protected characteristics.	The Licensing scheme will enable us to collect much needed data on demographics/equalities of people living in, managing and owning private sector dwellings in Haringey.	Lynn Sellar	5 year timescale from implementation.
Increase in rents due to Licensing. <i>(all protected characteristics)</i>	We will minimise the cost to landlords for licensing, including offering an early bird discount of 50%. We will monitor this closely to see if there is any evidence to suggest that rent increases are driven by licensing, rather than market conditions.	Lynn Sellar	5 year timescale from implementation
Increase in the risk of homelessness. <i>(all protected characteristics)</i>	We will endeavour to work with landlord and tenants who may be affected by action in relation to Licensing to try and maintain tenancies and work through any problems identified by using internal and external support services when applicable.	Lynn Sellar	5 year timescale from implementation
Lack of understanding about the scheme/certain terminology. <i>(all protected characteristics)</i>	It is proposed that a comprehensive publicity campaign is launched when the two licensing schemes are introduced. Extra care will be taken to ensure that the information is presented in an easy to understand format.	Lynn Sellar	

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.

None identified.

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

As part of the licensing project we are working closely with connected communities officers funded through Migration Impact funding. Part of this project is to look at the impact of private renting on community groups to try and ensure that we shape or mainstream frontline functions to assist dis- advantaged groups.

Licensing also offers the opportunity for officers to visit tenants as part of the licensing inspection programme. For many residents this is the first contact they may have had with council officials. This is an opportunity for officers to identify further needs of tenants/ residents and ensure that they are accessing services and support if required.

**7. Authorisation**

EqlA approved by .....  
(Assistant Director/ Director)

Date .....

**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.

## PL2 - Review and Extension of CPZ coverage

(Encompasses: PL4 Increase in Moving Traffic Enforcement & PL6 Extending parking enforcement)

### EQUALITY IMPACT ASSESSMENT

The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity for those with 'protected characteristics' and those without them
- Fostering good relations between those with 'protected characteristics' and those without them.

In addition the Council complies with the Marriage (same sex couples) Act 2013.

#### Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on the Public Sector Equality Duty, please proceed to stage 2 and complete a full Equality Impact Assessment.

#### Stage 2 – Full Equality Impact Assessment

An Equality Impact Assessment provides evidence for meeting the Council's commitment to equality and the responsibilities under the Public Sector Equality Duty.

When an Equality Impact Assessment 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 EIA process.

#### 1. Responsibility for the Equality Impact Assessment

<b>Name of proposal</b>	The extension of Controlled Parking Zones (CPZs)
<b>Service area</b>	Environment and Neighbourhoods
<b>Officer completing assessment</b>	Ann Cunningham / Hugh Smith
<b>Equalities/ HR Advisor</b>	Hugh Smith
<b>Cabinet meeting date (if applicable)</b>	12 <sup>th</sup> February 2019
<b>Assistant Director</b>	David Murray

## 2. Summary of the proposal and its relevance to the equality duty

Good parking and traffic management is an important tool that contributes towards wider policy objectives for delivering better road network management, reduced road danger, less motor traffic and pollution, improved conditions for walking, cycling and public transport use, raising the quality and amenity in the borough's public spaces. It also ensure access for disabled drivers, by providing dedicated parking bays and allowing concessions and also provides short term parking in shopping areas and other areas of interest ensuring access to those amenities.

Controlled parking zones (CPZs), are introduced in areas where there is extreme parking pressure and the majority of local residents support those measures. Those schemes prioritise parking for residents and their visitors in the streets in and around their home. Moving Traffic enforcement supports road safety by enforcing a range of traffic restrictions, such a banned entries, one way streets, as well as yellow box junctions.

The use of parking and traffic restrictions as a traffic management tool is in line with the Local Implementation Plan and Transport Strategy, both of which have been subject to an Equalities Impact Assessment at the point of development. Proposals are therefore within the existing policy framework.

This proposal is to extend CPZ coverage in Haringey. The extension of the CPZ is projected to generate net income of £500,000 from year 3 onwards. The wards with the most new CPZ coverage are Alexandra, Fortis Green, Seven Sisters, and Tottenham Green. Resident parking permits in these areas will cost £X per year

The stakeholders affected by this proposal are residents and businesses in the parts of the borough that will be covered by new CPZ schemes noted above, and car drivers in particular.

The proposal will be considered by Cabinet in February 2019 as part of the Medium-Term Financial Strategy.

**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	Haringey Equalities Profile <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</a> GLA London Ward Profiles <a href="https://londondatastore-upload.s3.amazonaws.com/instant-atlas/ward-profiles-html/atlas.html">https://londondatastore-upload.s3.amazonaws.com/instant-atlas/ward-profiles-html/atlas.html</a>	No impact
Gender Reassignment	Haringey Equalities Profile <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</a>	No impact
Age	Haringey Equalities Profile <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</a> GLA London Ward Profiles <a href="https://londondatastore-upload.s3.amazonaws.com/instant-atlas/ward-profiles-html/atlas.html">https://londondatastore-upload.s3.amazonaws.com/instant-atlas/ward-profiles-html/atlas.html</a> TfL Roads Taskforce Technical note 12: <a href="http://content.tfl.gov.uk/technical-note-12-how-many-cars-are-there-in-london.pdf">http://content.tfl.gov.uk/technical-note-12-how-many-cars-are-there-in-london.pdf</a>	No impact
Disability	Haringey Equalities Profile <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</a>	No impact
Race & Ethnicity	Haringey Equalities Profile <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</a> TfL Roads Taskforce Technical note 12: <a href="http://content.tfl.gov.uk/technical-note-12-how-many-cars-are-there-in-london.pdf">http://content.tfl.gov.uk/technical-note-12-how-many-cars-are-there-in-london.pdf</a>	No impact
Sexual Orientation	Haringey Equalities Profile <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</a>	No impact
Religion or Belief (or No Belief)	Haringey Equalities Profile <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</a>	No impact
Pregnancy & Maternity	Census 2011 TfL Roads Taskforce Technical note 12: <a href="http://content.tfl.gov.uk/technical-note-12-how-many-cars-are-there-in-london.pdf">http://content.tfl.gov.uk/technical-note-12-how-many-cars-are-there-in-london.pdf</a>	No impact
Marriage and Civil Partnership	Haringey Equalities Profile <a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf</a>	No impact

**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?**

**Those proposals do not impact on staff.**



Those proposals will benefit all road users by ensuring safe streets and by allowing residents to park near their homes. The CPZ programme will extend into the West of the borough. This represents bringing about a balance, as there is already extensive coverage in the East of the borough. As the parking surplus contributes towards the cost of concessionary travel, it could be argued the East has subsidised concessionary travel provision in the west of the borough.

Equalities monitoring data is not available for those who reside within the borough who keep and use a vehicle. Ward level data from sources such as the Office for National Statistics and the Census 2011 are used for the purpose of evaluating the impact on different equalities groups.

#### **Sex**

- Women make up 50.5% of Haringey's population.
- Women make up a significantly higher proportion of residents in Alexandra and Fortis Green wards.
- Car ownership is more common in Fortis Green and Alexandra wards than the borough and London averages
- Car ownership is higher amongst men than women (46 per cent compared to 34 per cent)

#### **Gender Reassignment**

- This data is not held at a borough level. The Equality and Human Rights Commission estimate that there is between 300,000-500,000 transgender people in the UK

#### **Age**

- Haringey has a relatively young population - a quarter of the population is under the age of 20.
- Alexandra and Fortis Green wards feature larger proportions of residents aged over 45 than the borough average, but smaller proportions of residents aged 20-44.
- Tottenham Green ward features a larger proportion of residents aged 20-44 than the borough average.
- Car ownership is more common in Fortis Green and Alexandra wards than the borough and London averages
- Personal car ownership increases with age to a peak of 58 per cent amongst 55-59 year olds, after which it declines again

#### **Disability**

- This shows that 14% of residents have a long term health problem that limits their day to day activity, lower than England but in line with London.
- Residents with long-term health conditions and disabilities are overrepresented among the populations of Seven Sisters and Tottenham Green.

#### **Race and Ethnicity**

- Haringey is the 5th most ethnically diverse borough in the country. Over 65% of residents come from non-White British communities, compared to 20% in England, and 55% for London.
- BAME communities are overrepresented in Tottenham Green and Seven Sisters wards relative to the borough, London, and England populations.
- Car ownership is most common among White London residents

#### **Sexual Orientation**

- 3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013 (ONS Integrated Household Survey). In Haringey this equates to 6,491 residents.

#### **Religion**

- 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%).

- There are larger proportions of Jewish residents in Seven Sisters and Fortis Green wards relative to the population of Haringey.
- There are larger proportions of Muslim residents in Seven Sisters and Tottenham Green wards relative to the population of Haringey
- Car ownership is more common in Fortis Green ward than the borough and London averages

#### **Pregnancy and Maternity**

- Haringey has a higher birth rate compared to London and England. As Seven Sisters and Tottenham Green ward have higher numbers of 0-4 year olds than the borough average, it is likely that the birth rate is higher in these wards and that there are correspondingly high numbers of pregnant women and mothers of young children.
- London residents are more likely to own a car if there is a child in the household.

#### **Marriage and Civil Partnership**

- Haringey has a higher proportion of couples in a registered same sex civil partnership than England and London. 0.6% (or 1,191 residents), compared to 0.2% for England and 0.4% for London.

#### **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 provide a brief outline of:*

- *How you intend to consult with those affected by your proposal including those that share the protected characteristics*

Further information on consultation is contained within accompanying EqIA guidance (part 9)

All traffic and parking restrictions are subject to informal and statutory consultation prior to introduction. They are only implemented where there is community support and no major objections from any consultees.

#### **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?*

Existing restrictions that will be subject to enforcement were subject to consultation prior to introduction and supported by consultees. The proposed CPZ programme will be subject to full consultation prior to any measures being introduced on the road network.

#### **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 (part 10)

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

Women may be overrepresented among those affected by the proposal because women are overrepresented in the populations of Alexandra and Fortis Green, where car ownership is more common than in the rest of Haringey and in London. However, London-wide data indicates that car ownership is more common among men than women. We do not hold data that would indicate that women will be more likely to pay for parking permits in the new CPZs than men. However, as many women are the main carers of children and consequently need to park as near as possible to their homes, there will be more positive impact for women from the new CPZs.

Positive	x	Negative		Neutral impact		Unknown Impact	
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**2. Gender reassignment** (Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)

The Council does not have data based on this protected characteristic. The Council does not envisage the CPZ will have a disproportionate impact on this particular protected characteristic.

Positive		Negative		Neutral impact		Unknown Impact	X
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**3. Age** (Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)

Older people are more likely to own cars and are overrepresented among the populations of Alexandra and Fortis Green wards. It is therefore likely that older residents will be overrepresented among those paying for parking permits in the new CPZs, relative to the population of Haringey. However, enforcement activity will ensure that older residents are able to park near their homes and residents aged 65+ will benefit from concessionary discounts on visitors parking permits.

The introduction of CPZs and appropriate enforcement will support modal change, reducing car ownership where individuals choose to walk and cycle or use public transport. These residents will experience improved quality of life through associated health benefits. There are facilities, such as car clubs available to support a move from car ownership, for those who may still require the occasional use of a vehicle.

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

Residents with disabilities will be eligible for blue badges and so will not be negatively impacted by requirements to pay for parking permits in new CPZs. People with disabilities living in the new CPZs will find it easier to park near their homes.

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

BAME households are over-represented in two wards affected by the new CPZs and under-represented in two wards affected by the new CPZs. BAME households in London are less likely to own cars than White households according to TfL data. We do not hold data that would indicate that BAME households will be more likely to pay for parking permits in the new CPZs than White households overall. However, the requirement to pay for a permit may disproportionately impact eligible BAME households, who tend to be on lower incomes than white households in Haringey.

All residents living in the new CPZs will find it easier to park near their homes.

The introduction of CPZs and appropriate enforcement will support modal change, reducing car ownership where individuals choose to walk and cycle or use public transport. These residents will experience improved quality of life through associated health benefits. There are facilities, such as car clubs available to support a move from car ownership, for those who may still require the occasional use of a vehicle.

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

It is anticipated that the impact of these recommendations on people who identify as LGB will be the same as for people who do not share this protected characteristic.

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

Ward-level data indicates that Muslim and Jewish residents may be more likely than average to be required to pay for parking permits in new CPZs. However, Muslim and Jewish residents living in the new CPZs will also find it easier to park near their homes.

The introduction of CPZs and appropriate enforcement will support modal change, reducing car ownership where individuals choose to walk and cycle or use public transport. These residents will experience improved quality of life through associated health benefits. There are facilities, such as car clubs available to support a move from car ownership, for those who may still require the occasional use of a vehicle.

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

We do not hold data that would indicate that women will be more likely to pay for parking permits in the new CPZs than men.

Pregnant women and women with babies younger than 6 months old are more likely to be reliant on cars for travel. Safer roads and easier access to a parking space near their home resulting from the CPZs represent a positive impact.

Positive	x	Negative		Neutral impact		Unknown Impact	
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**9. Marriage and Civil Partnership** *(Consideration is only needed to ensure there is no discrimination between people in a marriage and people in a civil partnership)*

It is anticipated that the impact of these recommendations on people in a civil partnership will be the same as for 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**

Groups with protected characteristics who may be disproportionately affected by the proposal include:

- Older BAME residents
- Older residents from minority religious groups
- BAME residents from minority religious groups

However, the over-representation of these groups among those affected by the proposal is a probability and not a certainty as we do not hold borough-level or ward-level data on car ownership with respect to protected characteristics.

**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?
- Will the proposal help to foster good relations between groups who share a protected characteristic and those who do not?

The proposal is unlikely to result in direct or indirect discrimination for any group that shares the protected characteristics. Although the need to purchase parking permits may impact on households with lower income levels, among whom those with protected characteristics tend to be overrepresented, the cost of a parking permit will be low relative to the overall cost of keeping and using a car. In addition parking controls are only introduced where there is support from the community, as set out in Section 4.

**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 (part 11)

Outcome	Y/N
<b>No major change:</b> the EIA demonstrates the policy is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken.	Y
<b>Adjust the policy:</b> the EIA identifies potential problems or missed opportunities. Adjust the policy to remove barriers or better promote equality. Clearly <u>set out below</u> the key adjustments you plan to make to the policy.	N
<b>Continue the policy:</b> the EIA identifies the potential for adverse impact or missed opportunities to promote equality. Clearly <u>set out below</u> the <b>justifications for continuing</b> with it. For the most important relevant policies, <b>compelling reasons</b> will be needed.	N
<b>Stop and remove the policy:</b> the policy shows actual or potential unlawful discrimination. It must be stopped and removed or changed.	N

**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	Action	Lead officer	Timescale
N/A			

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

The impact will be monitored through feedback from residents, Ward Councillors and other representative groups.

**7. Authorisation**

EIA approved by .....	Date
(Assistant Director/ Director)	.....

**8. Publication**

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

## PL11 – Flexible Police Resourcing

### 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 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>	Flexible Police Resourcing
<b>Service area</b>	Environment and Neighbourhoods
<b>Officer completing assessment</b>	Hugh Smith
<b>Equalities/ HR Advisor</b>	Hugh Smith
<b>Cabinet meeting date (if applicable)</b>	12 February 2019
<b>Director/Assistant Director</b>	Stephen McDonnell, Director for Environment and Neighbourhoods

## 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 cease funding (£200k) for the police partnership team, which consists of one sergeant and five PCs. The current funding for the team enables the tasking of police officers along with LBH enforcement officers to crime/ASB hotspots in Haringey. The proposal will mean reduced capacity to task officers to tackle ASB and criminality, reduced capacity to work in partnership to tackle localised issues, and potential for reputational damage from the community following withdrawal of officers.

The key stakeholders who may be affected are Haringey residents, particularly those living in areas with higher levels of crime/ASB, and those with lower perceptions of safety in their local area.

The proposal is part of the Medium-Term Financial Strategy due for consideration at Cabinet in February 2019.

## 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	Police crime reports, third party reporting, 2011 census, Haringey Community Safety Partnership Strategic Assessment, Haringey Residents Survey.	N/A
Gender Reassignment	Police crime reports, third party reporting, 2011 census, Haringey Community Safety Partnership Strategic Assessment, Haringey Residents Survey.	N/A



Age	Police crime reports, third party reporting, 2011 census, Haringey Community Safety Partnership Strategic Assessment, Haringey Residents Survey.	N/A
Disability	Police crime reports, third party reporting, 2011 census, Haringey Community Safety Partnership Strategic Assessment, Haringey Residents Survey.	N/A
Race & Ethnicity	Police crime reports, third party reporting, 2011 census, Haringey Community Safety Partnership Strategic Assessment, Haringey Residents Survey.	N/A
Sexual Orientation	Police crime reports, third party reporting, resident consultation, 2011 census, ONS Integrated Household Survey	N/A
Religion or Belief (or No Belief)	Police crime reports, third party reporting, 2011 census, Haringey Community Safety Partnership Strategic Assessment, Haringey Residents Survey.	N/A
Pregnancy & Maternity	Police crime reports, third party reporting, 2011 census, Haringey Community Safety Partnership Strategic Assessment, Haringey Residents Survey, NHS.	N/A
Marriage and Civil Partnership	Police crime reports, third party reporting, 2011 census, Haringey Community Safety Partnership Strategic Assessment, Haringey Residents Survey.	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 proposal has implications for individuals and groups who are more likely to be victims of crime or have higher levels of fear of crime/lower perceptions of safety in their local area.

#### Sex

There is a relatively equal gender split in Haringey, just over half of the population is female (50.5%), in line with England and London.

Women comprise 47% of victims of all crime in Haringey and 17% of suspects, indicating underrepresentation relative to the borough population. However:

- Women comprise the vast majority of victims of sexual offences, of which there were 642 in Haringey in the year to February 2018, with offences spread through the entire borough but clustering towards the East
- Women comprise the majority of victims of domestic violence, of whom there were 1,017 in the year to February 2018
- Women comprise the totality of victims of female genital mutilation (FGM).

Fear of crime is higher among women than among men. The Haringey Residents Survey found that 19% of women felt unsafe when outside in their local area after dark, compared to 11% of men.

#### Gender Reassignment

Some groups are specifically targeted as victims of crime on the basis of prejudice relating to gender reassignment. The council does not have local data regarding victimisation based on this

protected characteristic or the level of fear of crime among individuals who identify as a different gender to the one they were assigned at birth. However, we will try to ensure that discrimination, harassment and victimisation based upon this group is tackled.

### 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).

The largest age group of victims were between 25 and 34 years, forming 28% of all victims (13% female, 15% male). 35 to 44 year olds were the second largest group, followed by 16 to 24 year olds. Younger residents appear to be overrepresented among victims of crime.

Young people are known to be disproportionately impacted by certain forms of crime.

- During 2017-18, 137 reports were recorded by the Metropolitan Police in Haringey with a Child Sexual Exploitation (CSE) flag. The peak age of victims was 14 to 15 years, with a number of victims also aged 16.
- There were 347 victims of serious youth violence in Haringey in the year to September 2018. This consists of a combination of robbery and violence, with victims aged 10 to 19. The age profile of SYV suspects, according to reports to police, show that the highest proportion of offenders are aged between 15 and 18, with particular peaks at ages 16 and 18.
- In 2017/18 there were 83 knife injury victims in Haringey aged under 25.
- Young people are known to be vulnerable to recruitment into and exploitation within County Lines operations

Fear of crime is disproportionately high among older people. The Haringey Residents Survey found that 55% of residents aged 75+ felt safe outside in their local area after dark, compared to an overall borough average of 69%.

### Disability

There is no universal definition of disability. Here we use the Census data on long term health problem or disability and self-reported health as a proxies. This shows that 14% of residents have a long term health problem that limits their day to day activity, lower than England but in line with London.

Some individuals are specifically targeted as victims of crime on the basis of prejudice relating to disability. In the year to December 2017 Haringey recorded 14 instances of disability hate crime. Moreover, individuals with long-term conditions and disabilities are known to be more vulnerable to exploitation within County lines operations.

Fear of crime is higher among residents with long-term illnesses and disabilities. Perceptions of safety after dark for these Haringey residents stand at 49% compared to the Haringey average of 69%.

### Race and Ethnicity

Haringey is the 5th most ethnically diverse borough in the country. Over 65% of residents come from non-White British communities, compared to 20% in England and 55% in London.

According to police categorisations, the most common ethnicity of victims is White North European (IC1), forming 46% of all victims. This is followed by Black (IC3) victims (27%) and White South European (IC2) (16%). This indicates that Black residents are over-represented among victims, relative to the proportion of Black Haringey residents (19%). Some groups are specifically targeted as victims of crime on the basis of prejudice relating to race. In the year to December 2017, Haringey recorded 675 instances of racist and religious hate crime.

During 2017-18, 137 reports were recorded by the Metropolitan Police in Haringey with Crime in Haringey is more prevalent in local areas with higher BAME populations. Notably, relatively high levels of offences have been recorded in Noel Park, Northumberland Park,

Tottenham Hale, Tottenham Green, and Bruce Grove wards, in which BAME residents form a larger proportion of the population relative to the Haringey and London averages.

Fear of crime is highest among residents from White Other, Asian, and Black communities, with perceptions of safety after dark ranging from 62 to 64% compared to a Haringey average of 69%.

Overall satisfaction within the BAME community with the service provided by the police stands at 71%. This compares to 73% for the white community in Haringey.

#### Sexual Orientation

3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013. In Haringey this equates to 6,491 residents.

Some groups are specifically targeted as victims of crime on the basis of prejudice relating to sexual orientation. In the year to December 2017, Haringey recorded 94 instances of homophobic hate crime

#### 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%).

Some groups are specifically targeted as victims of crime on the basis of prejudice relating to religion. In the year to December 2017, Haringey recorded 675 instances of racist and religious hate crime. 37 instances were recorded as anti-Semitic hate crime and 52 were recorded as islamophobic hate crime

Fear of crime is higher among religious minority groups than the Haringey average. 53% of Muslim residents, and 64% of Jewish and Hindu residents feel safe outside in their local area after dark, compared to a borough average of 69%.

#### Pregnancy and Maternity

The council does not have local data regarding victimisation based on this protected characteristic or the level of fear of crime among individuals who are pregnant or care for small children. NHS guidance notes that pregnancy can be a trigger for domestic abuse, and existing abuse may get worse during pregnancy or after giving birth. However, we will try to ensure that discrimination, harassment and victimisation based upon this group is tackled.

#### Marriage and Civil Partnership

Haringey has a higher proportion of couples in a registered same sex civil partnership than England and London. 0.6% (or 1,191 residents), compared to 0.2% for England and 0.4% for London.

The council does not have local data regarding levels of victimisation or fear of crime among individuals who are married or in a civil partnership. However, we will try to ensure that discrimination, harassment and victimisation based upon this group is tackled.

**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**

The assessment of the impact is informed by:

- The Haringey Residents Survey 2018
- MOPAC survey data
- An extensive range of partnership events and community forums on matters relating to community safety

**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 Haringey Residents Survey found that:

- 69% of Haringey residents feel safe outside in their local area after dark
- Women are less likely than men to feel safe outside in their local area after dark
- Residents aged 75+ are least likely to feel safe outside in their local area after dark
- Muslim, Jewish, Hindu, and Buddhist residents are less likely to feel safe outside in their local area after dark
- Residents who define as White Other, Asian, and Black are least likely to feel safe outside in their local area after dark
- Residents with disabilities are less likely to feel safe outside in their local area after dark

Data from the MOPAC Public Voice Dashboard indicates that, across London:

- Those with disabilities are less likely to be satisfied with the police service in their local area
- Black and Mixed Ethnicity residents are less likely to be satisfied with the police service in their local area
- LGBT residents are less likely to be satisfied with the police service in their local area

Partnership events and community forums have identified particular vulnerabilities to victimisation among:

- Women and girls
- Young people
- BAME communities
- Members of minority religious groups

These findings will be considered in arrangements to monitor the impact of the proposal and in the design of mitigating actions.

**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

Our data analysis indicates that women and girls are over-represented among victims of certain forms of crime, including sexual offences, CSE, FGM, and domestic abuse. Our data analysis also indicates that women are disproportionately affected by fear of crime.

The proposal will withdraw policing resources that may otherwise help to reduce or prevent these forms of crime, and will mean that the Council will not be able to task the partnership team to tackle these forms of crime. The proposal can therefore be anticipated to have a negative impact. The Council will pursue alternative means of tackling violence against women and girls in all its forms, as set out in the Violence against Women and Girls strategy (2016) and the Community Safety Strategy (2019-23).

Positive		Negative	X	Neutral impact		Unknown Impact	
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### 2. Gender reassignment

Individuals who share this protected characteristic are more likely than average to be victims of hate crime. We do not have data on transphobic hate crime and so it will not be possible to accurately measure the impact of the proposal. However, it is reasonable to anticipate that withdrawal of policing resources is likely to reduce the capacity of the partnership to tackle hate crime. The Council will pursue alternative means of tackling hate crime, in particular through delivery of the Prevent duty and through its public sector equality duty to foster good relations between communities.

Positive		Negative	X	Neutral impact		Unknown Impact	
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### 3. Age

Our data analysis and engagement activity indicates that young people are disproportionately represented among victims and suspects of certain forms of crime, most notably violent crime. Our data analysis also indicates that fear of crime is disproportionately felt by older people.

The proposal will withdraw policing resources that may otherwise help to prevent these forms of crime and increase perceptions of community safety. It is therefore reasonable to anticipate that the proposal will have a negative impact in this respect. The Council and the wider partnership will pursue alternative means of reducing violent crime and increasing perceptions of community safety, most notably through a Young People at Risk strategy and through activity under the auspices of the Community Safety Strategy 2019-23 to increase public confidence.

Positive		Negative	X	Neutral impact		Unknown Impact	
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### 4. Disability

Individuals with disabilities are known to be victims of hate crime at a higher rate than the borough average and are less likely to feel safe in their local area. Individuals with disabilities are also known to have less confidence in the police service in their local area.

Withdrawal of policing resources is likely to reduce the capacity of the partnership to tackle hate crime. The Council and the wider partnership will pursue alternative means of tackling hate crime, in particular through delivery of the Prevent duty and through its public sector equality duty to foster good relations between communities.

The proposal is also likely to negatively impact public perceptions of safety, which is likely to be disproportionately felt by individuals who share this protected characteristic. The Council and the wider partnership will pursue alternative means of increasing perceptions of safety through activity under the auspices of the Community Safety Strategy 2019-23 to increase public confidence.

Positive		Negative	X	Neutral impact		Unknown Impact	
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## 5. Race and ethnicity

Our data analysis indicates that BAME individuals are over-represented among victims of crime in Haringey as well as the residents of communities most affected by crime and anti-social behaviour. Young black people are also known to be particularly over-represented among victims of violent crime and exploitation.

The proposal will withdraw policing resources that may otherwise help to reduce or prevent these forms of crime, and will mean that the Council will not be able to task the partnership team to tackle these forms of crime. The proposal can therefore be anticipated to have a negative impact. The Council will pursue alternative means of tackling these forms of crime through activity under the auspices of the Community Safety Strategy (2019-23).

BAME individuals and groups are also more likely than the borough average to be victims of hate crime. Withdrawal of policing resources is likely to reduce the capacity of the partnership to tackle hate crime. The Council and the wider partnership will pursue alternative means of tackling hate crime, in particular through delivery of the Prevent duty and through its public sector equality duty to foster good relations between communities.

BAME individuals are also known to have lower perceptions of safety in their local area and lower levels of confidence in the police service. The proposal is also likely to negatively impact public perceptions of safety, which is likely to be disproportionately felt by individuals who share this protected characteristic. The Council and the wider partnership will pursue alternative means of increasing perceptions of safety through activity under the auspices of the Community Safety Strategy 2019-23 to increase public confidence.

Positive		Negative	X	Neutral impact		Unknown Impact	
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## 6. Sexual orientation

Individuals who identify as LGBT are known to be victims of hate crime at a higher rate than the borough average. These individuals are also known to have less confidence in the police service in their local area.

Withdrawal of policing resources is likely to reduce the capacity of the partnership to tackle hate crime. The Council and the wider partnership will pursue alternative means of tackling hate crime, in particular through delivery of the Prevent duty and through its public sector equality duty to foster good relations between communities.

The proposal is also likely to negatively impact public perceptions of safety, which is likely to be disproportionately felt by individuals who share this protected characteristic. The Council and the wider partnership will pursue alternative means of increasing perceptions of safety through activity under the auspices of the Community Safety Strategy 2019-23 to increase public confidence.

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

Individuals from minority religious groups are known to be victims of hate crime at a higher rate than the borough average and are less likely to feel safe in their local area..

Withdrawal of policing resources is likely to reduce the capacity of the partnership to tackle hate crime. The Council and the wider partnership will pursue alternative means of tackling hate crime, in particular through delivery of the Prevent duty and through its public sector equality duty to foster good relations between communities.

The proposal is also likely to negatively impact public perceptions of safety, which is likely to be disproportionately felt by individuals who share this protected characteristic. The Council and the wider partnership will pursue alternative means of increasing perceptions of safety through activity under the auspices of the Community Safety Strategy 2019-23 to increase public confidence.

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

As set out in the section on Sex above, women and girls are over-represented among victims of certain forms of crime and are disproportionately affected by fear of crime. It is notable that pregnancy and maternity increase women’s risk of being victims of violence.

The proposal will withdraw policing resources that may otherwise help to reduce or prevent the various forms of violence against women and girls, and will mean that the Council will not be able to task the partnership team to tackle these forms of crime. The proposal can therefore be anticipated to have a negative impact. The Council will pursue alternative means of tackling violence against women and girls in all its forms, as set out in the Violence against Women and Girls strategy (2016) and the Community Safety Strategy (2019-23).

Positive		Negative	X	Neutral impact		Unknown Impact	
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**9. Marriage and Civil Partnership** *(Consideration is only needed to ensure there is no discrimination between people in a marriage and people in a civil partnership)*

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**

Particular groups who have been identified as being more vulnerable to becoming victims of crime include:

- Young black men (violent crime)
- Young women (CSE, FGM, sexual offences, and other forms of exploitation)
- BAME individuals from minority religious communities (hate crime)

Particular groups who have been identified as having a disproportionately high fear of crime include:

- Older women
- BAME women

- Women with disabilities
- BAME individuals from minority religious communities
- Women from minority religious communities
- Older people from minority religious communities
- Older people with disabilities
- BAME individuals with disabilities

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:

- m) Remove or minimise disadvantage suffered by persons protected under the Equality Act
- n) Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups
- o) 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?

- It is possible that the proposal will result in indirect discrimination for groups that share the relevant protected characteristics of age, sex, disability, race/ethnicity, religion/belief, sexual orientation, and/or pregnancy and maternity. These groups are all either overrepresented among victims of crime or more likely to have low perceptions of safety in their local area. The proposal may increase these disproportionalities. In order to mitigate this potential the Council and the wider partnership will undertake activity through the Community Safety Strategy 2019-23 to reduce victimisation and increase public confidence.
- The proposal does not take steps to advance equality of opportunity or to foster good relations between 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 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	N
<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.	N

**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
Fair of crime	Community Safety strategy	Eubert Malcolm	4 years
Prevent duty	Community Safety strategy	Eubert Malcolm	4 years
Radicalisation & Hate Crime	Community Safety strategy	Eubert Malcolm	4 years
Serious youth Violence	Youth at risk strategy	Eubert Malcolm	10 years

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.

The authority will rely on general policing resources, to have an impact on placed based fair of crime and serious youth violence.

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

We will monitor the impact of the proposal through our annual strategic assessment and resident consultation, including surveys and public engagement activity.

**7. Authorisation**

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

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

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

## PC2 - Reduce operational costs

### EQUALITY IMPACT ASSESSMENT

The **Equality Act 2010** places a '**General Duty**' on all public bodies to have '**due regard**' to the need to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity for those with 'protected characteristics' and those without them
- Fostering good relations between those with 'protected characteristics' and those without them.

In addition the Council complies with the Marriage (same sex couples) Act 2013.

#### Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on 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>	Commission gypsy and traveller support and reduce operational costs
<b>Service area</b>	Children and Young People's Service
<b>Officer completing assessment</b>	Jennifer Sergeant

<b>Equalities/ HR Advisor</b>	
<b>Cabinet meeting date (if applicable)</b>	February 2019
<b>Director/Assistant Director</b>	AD Early Help and Prevention, Youth Justice and SEND

## 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 creation of a dedicated resource of a Gypsy, Roma and Traveller GRT specialist practitioner post in CYPS, located in the Targeted Response Team.

The focus of work for this role and resource for GRT families specifically to provide:

- culturally appropriate interventions support GRT families achieve good outcomes for children and young people
- provide ,advice, and guidance to SW's in their work with GRT families
- advice and guidance and signposting of GRT families to appropriate services for support
- Facilitate GRT families and young people access to hard to reach services including education and health provision.
- Training and support to practitioners on best practice in working with the GRT community and families

Commissioning of a GRT advocacy Service contract of a GRT advocacy service, for access and use by any GRT individuals or families in contact with wider council department

## 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 JSNA ONS Haringey Child Health Profile 2017	N/A
Gender Reassignment	EHRC	N/A
Age	2011 census JSNA ONS Haringey Child Health Profile 2017	N/A

Disability	2011 census JSNA ONS Haringey Child Health Profile 2017	N/ A
Race & Ethnicity	2011 census JSNA ONS Haringey Child Health Profile 2017 MOPAC & ONS March 2015 Crime Survey 2013 LBOH Gypsy, Roma and Traveller Communities Needs Assessment <a href="https://www.equalityhumanrights.com/sites/default/files/research_report_12inequalities_experienced_by_gypsy_and_traveller_communities_a_review.pdf">https://www.equalityhumanrights.com/sites/default/files/research_report_12inequalities_experienced_by_gypsy_and_traveller_communities_a_review.pdf</a>	N/ A
Sexual Orientation	ONS 2016 House of Commons Library	N/ A
Religion or Belief (or No Belief)	ONS IMD	N/ A
Pregnancy & Maternity	Census 2011 ONS	N/ A
Marriage and Civil Partnership	ONS IMD	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.*

National and borough level statistics on ethnicity were published in December 2012. The total number of 'White: Gypsy or Irish Travellers' in England and Wales is recorded as 57,680, for Haringey the figure is just 370. The chart below shows our position (6<sup>th</sup> highest) in relation to the other London boroughs.

Haringey's Child Poverty Needs Assessment<sup>xiv</sup> published in 2010 also identified key issues affecting Roma and Irish Traveller communities including;

Potentially higher levels of mental health difficulties caused by psychological and cultural aversion to living in housing

Prejudice and racism from housed neighbours, the mainstream job market and at school

Overcrowded households Youth offending

High prevalence of Hepatitis B

Teenage pregnancy

Communication difficulties

Low educational attainment

Low levels of school attendance

Early marriage culture

**Key gaps in data:**

Housing

Health and Mental Health

- Substance abuse
- Youth Offending and Prison
- Child benefits & benefit take up
- Employment, unemployment and job training
- Connexions

### **Age - Young People**

The Borough has an increasingly young demographic: Children and Young People under the age of 20 make up 24.4% of the population of Haringey. Currently this sector of the population in the GRT community is relatively smaller in comparison

**Health:** 37.8% of children in Year 6 in Haringey are overweight or obese, above the England average of 33.2%. Of particular concern is the variation between different areas of Haringey: children in the most deprived parts of the borough are two and a half times more likely to be overweight or obese compared to those in the most affluent parts.

**Socio-Economic Deprivation:** The level of child poverty in Haringey is worse than the England average with 26.1% of children aged under 16 years living in poverty.

### **Sex, Girls and Young Women:**

49% of the 8-19 year old population of Haringey are female; 50.5% of Haringey residents are female.

### **Young People undergoing Gender Reassignment:**

A surveillance study examining the incidence and clinical presentation of Gender Dysphoria in children and adolescents aged 4 to 15 years suggests an incidence of 1.6 per 100,000 in the UK. A significant limitation of this surveillance study is that it only captured data for those presenting between their 4th and 16th birthdays - meaning that it is not possible to comment on the incidence of gender dysphoria among 16 and 17 year olds, which referral trends to the service suggest have significantly increased the overall incidence rate. This figure only reflects those who presented to NHS paediatric or psychological services and not those who have chosen not to, or who have been unable to access this care. The figure does not reflect the total number who may have accessed their GP regarding their gender dysphoria, or include those who have elected to seek private support.

### **Disabilities**

Census 2011 data indicates that 14% of the population of Haringey have their day-to-day activities limited a little or a lot due to a disability or long-term health condition

### **Young People with Disabilities:**

Census 2011 data indicates that 4% of the under-24 population in Haringey have their day-to-day activities limited a little or a lot due to a disability or long-term health condition.

### **Black and Minority Ethnic Communities:**

Census 2011 data indicates that 65% of the population of Haringey are from BME communities which includes the GRT community

### **Young People who identify as Black and Minority Ethnic:**

Census 2011 data indicates that BME communities form 80.3% of Haringey's school children.

### **LGBT Parents**

A House of Commons Library briefing paper on Common Law Marriage estimates that in the UK in 2013 there were around 20,000 dependent children living in same-sex couple families. As of 14 December 2017, there had been 2,807 reported adoptions by LGBT people in Great Britain.

**Lesbian, Gay and bisexual young people:**

Office for National Statistics data indicates that at a national level young people are more likely to identify as LGB than the population as a whole. Within the 16 to 24 year old category 3.3% identify as LGB, compared to 1.7% of the general population. The data also indicates that London has a higher proportion of residents identifying as LGB than the national population.

**Religion and Belief**

The Census 2011 show 45% of Haringey residents were Christian, slightly less than 48.4% in London overall. Second most common religion stated was Muslim (14.2%) followed by Jewish (3%) and Hindu (1.8%).

**Minority Religions and Beliefs:**

Census 2011 data indicates that 42% of 8-19 year-olds in Haringey are Christian, 23% are Muslim, 4% are Jewish, 1% are Buddhist, 1% are Hindu, fewer than 1% are Sikh, and 19% have no religion.

**Young women who are pregnant or have recently given birth:**

ONS data on under 18 conception rates in the year to September show an under-18 conception rate in Haringey 2016 of 20.3 per 1000 compared to the rate for London (17.9 per 1000) and for England and Wales (19.3 per 1000).

**Lone Parents**

In 2011 there were 10,647 lone parent households with dependent children. 92.7% of these were led by women. 7.7% of women in Haringey were lone parents in 2011.

**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

In order to ensure the communities involved and participation for understanding of the proposed provision, the Council will consult formally with residents, including families and young people, on the option of the advocacy contract as additional provision of services offered in the borough.

The council will work with the National Traveller organisations for their collaboration and participation in consultation with the community. The council is in process of establishing a partnership forum with key national GRT organisations as key stakeholders for ongoing engagement and feedback of provision for Haringey Council awareness of the needs and wishes of the community, and how we continue to shape our offer to the community to meet their identified needs and ensure that in addressing there needs that they are culturally appropriate..

**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?*

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

The Council is committed to addressing the wide ranging needs of all young people in the community and ensuring there is an offer to meet these, in addition to signposting and supporting engagement with other facilities and services in the communities.

Positive	x	Negative		Neutral impact		Unknown Impact	
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**2. Gender reassignment** *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

We do not have local data regarding this children and young people with gender dysphoria in the GRT community. We do not think there will be specific impacts for this protected group: Haringey provision will ensure that this group will not be subjected to discrimination, harassment and victimisation due to their protected characteristic. If any inequity in treatment is identified, LBOH will take steps to rectify this and meet their needs.

Positive		Negative		Neutral impact	x	Unknown Impact	
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**2. Age** *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

There will be an opportunity for local young people and their families to engage in services that are hard for their engagement through the proposed provision of dedicated worker and availability of advocacy. However, the Council is committed to addressing the wide ranging needs of young people at risk and ensuring there is a comprehensive offer to meet these.

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

There will be an opportunity in going ahead with the project reducing some negative impacts for local young people and their families. However, the Council is committed to addressing the wide ranging needs of children, young people and families in need of support and ensuring there is a provision available as an offer to meet these.

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

There will be an opportunity in going ahead with the project to challenge and overcome some of the barriers for the community access to services. However, the Council is committed to addressing the wide ranging needs of young people at risk and ensuring there is a comprehensive offer to meet these.

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

We do not have local data regarding this protected characteristic.

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

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

The proposal will have a positive impact on parents through supporting families to engage with provision of health and wellbeing support services, including for young people sexual health advice and guidance, subject to the outcomes of engagement and co-production with the community and an assessment of local need and demand.

There is a risk that pregnant young women may not engage with Health services if the activities and services are not sufficiently accessible. LBOH will work with stakeholders to co-produce an offer that will take into account the needs of pregnant young women as well as young women with newborn babies and children.

Positive	x	Negative		Neutral impact		Unknown Impact	
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**9. Marriage and Civil Partnership** *(Consideration is only needed to ensure there is no discrimination between people in a marriage and people in a civil partnership)*

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**

**Traveller Roma and Gypsy**

The proposal will benefit BME young people by providing culturally appropriate, affordable, and accessible activities and delivering associated positive health and wellbeing and educational outcomes.

**Minority Religions and Beliefs**

Minority Religions and Beliefs are over-represented among young people in Haringey. The proposal will positively impact these young people by providing culturally appropriate, affordable and accessible activities and delivering associated positive health and wellbeing and educational outcomes.

### **Disabled Young People**

The proposal will positively impact young people with disabilities by providing support and signposting to accessible activities and delivering associated positive health and wellbeing and educational outcomes.

An action plan to ensure that these protected groups are engaged and benefit is enclosed in section 6b of this EqIA.

### **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:
  - p) **Remove or minimise disadvantage suffered by persons protected under the Equality Act**
  - q) **Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups**
  - r) **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 proposal will not result in any direct or indirect discrimination for any group that shares the protected characteristics.

The proposal will help to advance equality of opportunity between groups who share a protected characteristic and those who do not, by enabling young people's needs for safe places to go, a range of affordable and accessible activities, and health and wellbeing support to be met. BME communities and minority religions and faith groups are over-represented among this age group and so will be over-represented among those whose needs will be met.

The proposal will help foster good relations between communities by ensuring available and easily accessible provision for children, young people and their families, including those with disabilities.

### **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
<b>No major change to the proposal:</b> 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>	Y
<b>Adjust the proposal:</b> 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	N
<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.	N

**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
<p>There is a risk that insufficient engagement and consultation with the Gypsy Roma and Traveller communities across Haringey could mean the offer have a potential negative impact on those with protected characteristics</p> <p>Age; Disability; Race; Religion or belief; Sex; Sexual orientation; Pregnancy and maternity</p>	<p>Large-scale, collaborative consultation and co-production activity together with National Traveller organisations with the GRT community from areas across the borough, to include protected groups by targeting:</p> <ul style="list-style-type: none"> <li>- disabled children and young people and carers;</li> <li>- community groups for LGB children and young people;</li> <li>- Girls and young women</li> <li>- Adolescent pregnant women and mothers</li> </ul> <p>Pay due regard to consultation responses in the design of the provision of the</p>	<p>Director for Children's Services &amp; Assistant Director for Early Help and Prevention</p>	<p>Commence March/April 2019</p>

	advocacy contract and the provision for the specialist worker proposed for support to GRT children and families.		
<p>There is a risk that insufficient engagement with existing service users and wider organisations representative of the community including within the voluntary and community sector, that could result in services not being sufficiently responsive to the needs of the GRT families, children and young people.</p> <p>This would mean a lesser and less meaningful offer for GRT Families, children and young people – particularly those who identify with more than one protected characteristic who have most to gain from an enhanced offer. It would also potentially enhance existing relationships between the communities and other services locally, which may be more likely to be run by GRT communities due to the nature of the voluntary community sector in Haringey</p> <p>Age; Disability; Race; Religion or Belief; Sex; Sexual Orientation; Pregnancy and Maternity</p>	Meaningful engagement with providers of services for young people across the borough, to ensure that the provision forms part of an integrated, complementary, cross-borough offer for the GRT community	Director for Children's Services & Assistant Director for Early Help and Prevention	Commence Mach/April 2019
Insufficient take up of provision by the community , among whom young people with protected characteristics	We will deploy dedicated worker to ensure that protected groups, particularly from the community have readily available access to information, support advice and guidance.	Director for Children's Services & Assistant Director for Early Help	From April 2019

<p>are likely to be overrepresented.</p> <p>Age; Disability; Race; Religion or Belief; Sex; Sexual Orientation; Pregnancy and Maternity</p>	<p>Action will be taken to address barriers to hard to engage service – for example, where travel is identified as a barrier for a protected group. The provision will cover arrangements to overcome this.</p>	<p>and Prevention</p>	
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**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.**

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

The Assistant Director for Early Help and Prevention will have ultimate responsibility for ensuring all consultation and engagement activities set out in section 6b are undertaken.

CYPS will have responsibility for monitoring the membership of the provision to ensure that children and young people with other protected characteristics benefit as much as children and young people without other protected characteristics. The Assistant Director for Early Help and Prevention will ensure that the provision address this through routine reporting and monitoring of locally collected statistics including: memberships; attendance; use of facilities and outcomes, reporting to the Children’s Improvement Board. An monthly I report will provide detailed breakdown of all aspects of outcomes, and related demographic information and equalities data.

**7. Authorisation**

EqlA approved by .....  
(Assistant Director/ Director)

**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.



**Equality Impact Assessment**

<b>Name of Project</b>	SEND Travel Service Review	<b>Cabinet meeting date</b> <i>if applicable</i>	
<b>Service area responsible</b>	Children and Young People Service		
<b>Name of completing officer</b>	Vikki Monk-Meyer	<b>Date EqIA created</b>	January 2019
<b>Approved by Director / Assistant Director</b>		<b>Date of approval</b>	

The Equality Act 2010 places a ‘**General Duty**’ on all public bodies to have ‘**due regard**’ to:

- **Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act**
- **Advancing equality of opportunity between those with relevant ‘protected characteristics’ and those without them - Fostering good relations between those with relevant ‘protected characteristics’ and those without them.** In addition the Council complies with the Marriage (Same Sex Couples) Act 2013.

Haringey Council also has a ‘**Specific Duty**’ to publish information about people affected by our policies and practices.

**All assessments must be published on the Haringey equalities web pages. All Cabinet papers MUST include a link to the web page where this assessment will be published.**

This Equality Impact Assessment provides evidence for meeting the Council’s commitment to equality and the responsibilities outlined above, for more information about the Council’s commitment to equality please visit the Council’s website.

<b>Stage 1 – Names of those involved in preparing the EqIA</b>	
1. Project Lead - Vikki Monk-Meyer	
2. Equalities / HR - Ben Ritchie	
3. Legal Adviser (where necessary) Ed Jankowski	

**Stage 2 - Description of proposal including the relevance of the proposal to the general equality duties and protected groups. Also carry out your preliminary screening** (Use the questions in the Step by Step Guide (The screening process) and document your reasoning for deciding whether or not a full EqIA is required. If a full EqIA is required move on to Stage 3.

The Council currently funds supported travel arrangements for over 500 children and young people needing assistance to travel to their educational establishment. The Council also currently provides supported travel to around 150 adults who need assistance in travelling to adult care services.

Supported travel arrangements can include (i) Haringey’s in-house transport service, (ii) commissioned transport services from external providers, (iii) provision of an escort, and (iv) support with travel arrangements on public transport.

The Council has a statutory requirement to have a Sustainable Modes of Travel Strategy and a Transport Policy Statement in place.

Nationally safe and efficient school transport and travel is a primary need for families of children with SEND. Locally we offer transport for children in line with our travel policy which includes the aspirations to promote independence as far as possible, whilst ensuring children can attend to school in a timely way. The transport service has worked hard to implement new initiatives to support these aspirations, including travel buddies and independent travel training. As with many boroughs, the transport service is high cost for the number of children being transported. Currently 525 children and young people receive the service. The demand on the service are increasing in line with our new statutory duties to transport young people if they remain in education, which means a new cohort are being transported who are between the ages of 19 and 25 years. The combination of the above has placed additional strain on the current service provision and budget, resulting in both an overspend and also increased parental dissatisfaction.



We propose to review the transport service in terms of application of the policy, ways of communicating with parents, route planning and use of support staff (escorts) with a view to increasing the efficiency and increasing satisfaction whilst addressing the overspend. Work needs to be done in collaboration with parents and also other boroughs, in order to see if routes can be merged across borough boundaries. We have approached a provider of software and transport planning who is working with neighbouring boroughs who could help us review our local services.

The Policy is intended to provide clarity for service users and their parents and carers as to the circumstances when access to supported travel will be considered, and to ensure that those with particular and significant needs are appropriately supported.

The Travel Policy outlines how the Council will move towards a more consistent and equitable way of supporting people in the provision of Council funded travel. It is set out in two main sections: Children and Young people (0 to 18 years) (including continuing learners who started their programme of learning before their 19<sup>th</sup> birthday) and Adults with Learning Disabilities and Disabilities (with the exception of adults aged 18 to 24 with a special educational need and/or disability who are in education or training (18 and older +).

We have looked at an EQIA and found that the review will have no negative impacts on the families and children, and any recommendations for changes will be taken to the appropriate decision making bodies, including multi agency groups such as the SEND reforms group where parents are represented who can seek feedback from users of the service to help successful shape any proposed changes.

References in this document to “parents” is to parents, carers or legal guardians

#### Key Stakeholders

- Those who have a special educational need and/or disability (SEND) and require travel assistance to access school or other educational services □ Users of adult social care that require supported transport to access care settings
- Parents of those children and young people with SEND or carers of those eligible for adult social care
- Residential homes/supported living

The Travel Policy and Transport Service Review intends to advance equality of opportunity by promoting independence and ensuring that all those who have a need for travel assistance are able to access the educational establishment or care service that meets their needs.

### Stage 4 – Scoping Exercise - Service data used in this Equality Impact Assessment This section to be completed where there is a change to the service provided

Data Source	What does this data include?
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List of those currently using supported travel services in Haringey	<p>Age break down of children and young people accessing supported travel:</p> <ul style="list-style-type: none"> <li>• 5- 9 year olds 19%</li> <li>• 10- 14 year olds 36%</li> <li>• 15 – 18 year olds 30%</li> <li>• 19 -25 year olds 15%</li> </ul> <p>List of those using SEND transport</p> <ul style="list-style-type: none"> <li>• Learning disabilities /Autistic 31%</li> <li>• Wheel chair user 13%</li> <li>• Cerebral palsy 7%</li> <li>• Down Syndrome 4%</li> <li>• Blind/visually impaired 4%</li> <li>• Various other disabilities 41%</li> </ul>
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	<p>List of those using Transport accessing adult social Care</p> <ul style="list-style-type: none"> <li>• Learning disabilities 71.5%</li> <li>• Dementia 28.5%</li> </ul>
Haringey Joint Strategic Needs Assessment	<p><a href="http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment/health-mothers-children-and-youngpeople/disabled-children-and-young-people">http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment/health-mothers-children-and-youngpeople/disabled-children-and-young-people</a> <a href="http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment/adults-and-older-people/dementia">http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment/adults-and-older-people/dementia</a></p> <p><a href="http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment/adults-and-older-people/jsna-learningdisabilities">http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment/adults-and-older-people/jsna-learningdisabilities</a></p>

<p><b>Stage 5a – Considering the above information, what impact will this proposal have on the following groups in terms of impact on residents and service delivery: Positive and negative impacts identified will need to form part of your action plan.</b></p>				
	Positive	Negative	Details	None – why?

<b>Sex</b>			The Transport Service Review is deemed to have no adverse impact on gender, as the policy is needs based and applies equally irrespective of sex.	X
<b>Gender Reassignment</b>			The Transport Service Review is deemed to have no adverse impact for residents who have undertaken gender reassignment, as the policy is based on needs and applies equally irrespective of gender characteristics. There is no indication that residents who have undertaken gender reassignment are treated differently under the terms of this policy or are disadvantaged compared to other groups by this policy, although we will continue to keep this under review.	X
<b>Age</b>	X		The Travel Policy and Transport Service applies differently to children and young people who are in education from adults aged 18 or above eligible for Adult Social Care. This is because of the statutory duty on the Council to ensure that all children and young people can access education locally, and to ensure that complex disabilities or other factors do not present a barrier to this. For adults, the Council's Travel Policy is there to assist those adults who cannot independently travel to adult care services.	

<b>Disability</b>	X		The Transport Service Review is deemed to have a positive impact upon residents with disabilities as it ensures that they are able to access schools/services which meet their needs and are not discriminated against by being unable to access them due to not being able to get there.	
<b>Race &amp; Ethnicity</b>			The Transport Service Review is deemed to have no impact on residents of different races and ethnicity as the policy is based on needs and applies equally irrespective of ethnicity. There is no indication that residents of different races and ethnicity are treated differently under the terms of this policy or are disadvantaged compared to other groups by this policy, although we will continue to keep this under review.	X
<b>Sexual Orientation</b>			The Transport Service Review is deemed to have no impact on residents of different sexual orientations, as the policy is based on needs and applies equally irrespective of sexual orientation. There is no indication that residents of different sexual orientation are treated differently under the terms of this policy or are disadvantaged compared to other groups by this policy, although we will continue to keep this under review.	X

<b>Religion or Belief (or No Belief)</b>	X		The Transport Service Review takes into consideration children, young people and parent's choice to apply for admission to a particular faith school, even if this is not the closest school to them by travel distance. This will ensure that those children and young people who want to attend a faith school because of their religion/beliefs are not indirectly prevented from doing so because of proximity restrictions on travel support.	
<b>Pregnancy &amp; Maternity</b>			The Transport Service Review is deemed to have no impact on residents who are pregnant or on maternity, as the policy is based on needs and applies equally irrespective of pregnancy/maternity. There is no indication that residents who are pregnant are treated differently under the terms of this policy or are disadvantaged compared to other groups by this policy, although we will continue to keep this under review.	X
<b>Marriage and Civil Partnership (note this only applies in relation to eliminating unlawful discrimination (limb 1))</b>			The Transport Service Review is deemed to have no impact on residents who are married or in civil partnerships, as the policy is based on needs and applies equally irrespective of marital status. There is no indication that residents who are married or in civil partnerships are treated differently under the terms of this policy or are disadvantaged compared to	X

			other groups by this policy, although we will continue to keep this under review.	
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Stage 6 - Initial Impact analysis	Actions to mitigate, advance equality or fill gaps in information
<p>The service review will not result in any direct or indirect discrimination to any of the protected groups.</p> <p>In particular, the review will help to advance equality of opportunity between those with disabilities and those without by continuing to ensure that those with disabilities are able to access services that they would otherwise be unable to access without travel assistance.</p>	<p><b>Managing any future transition to alternative travel options</b></p> <p>There may be a risk of disruption if alternative travel options are not fully established before potential future changes to in-house travel services. We will therefore ensure alternative travel options are identified and fully phased in <b>before</b> changing any of the current in-house supported travel services. We are actively engaging with the market around identifying broader range of transport options</p> <p><b>1) Factoring in the individual circumstances of carers and families</b></p> <p>We will ensure that carers and families' situations will be an active part of the assessment around travel assistance</p> <p>We will also take into account families' financial situation when making future travel decisions. We will ensure that we do not charge groups who can't afford but require travel assistance</p> <p><b>2) Appeals process</b></p> <p>The new Travel Policy also introduces an objective <b>appeals process</b> for both children and young people and adults so that a travel decision can be challenged if service users or their carers believe it has been wrongly made.</p> <p><b>3) Information, advice and guidance (IAG) around travel options.</b></p> <p>The IAG service will be able to signpost to travel options. This will be through:</p> <ul style="list-style-type: none"> <li>• IAG Drop in</li> <li>• IAG Pop ups</li> <li>• IAG Outreach</li> </ul> <p><b>4) Safeguarding duties and ensuring risk assessment process is adequate</b></p> <p><b>5) We will ensure there are high standards governing travel risk assessments. We will ensure that those carrying out the assessments have the rights skills and experience. We will also monitor the consistency of the assessment approach taken</b></p> <p><b>6) Monitoring and evaluation</b></p> <p>Travel assistance will be monitored to ensure that there is enough capacity in the market to meet the demand. This will be done by the service as a matter of course and will also be monitored annually to</p>

	<p>ensure that all protected group where eligible are receiving travel assistance and that there is no inconsistency in who receives this support.</p>
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**Stage 7 - Consultation and follow up data from actions set above**



<b>Data Source (include link where published)</b>	<b>What does this data include?</b>
Consultation with key stakeholders will be part of the review.	

**Stage 8 - Final impact analysis**  
A final analysis of the impact of the review and recommendations will be completed.

**Stage 9 - Equality Impact Assessment Review Log**

Review approved by Director / Assistant Director	Gill Gibson	Date of review	25/01/2019
Review approved by Director / Assistant Director		Date of review	

**Stage 10 – Publication**  
Ensure the completed EqIA is published in accordance with the Council's policy.