

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	High Road West Local Lettings Policy (LLP)
Service area	Regeneration & Economic Development
Officer completing assessment	Scott Mundy
Equalities/ HR Advisor	Hugh Smith
Cabinet meeting date (if applicable)	March 2020
Director/Assistant Director	Dan Hawthorn

2. Summary of the proposal

Proposal

The draft High Road West (“HRW”) Local Lettings Policy (“LLP”) sets out how the Council proposes to prioritise secure tenants and non-secure tenants in temporary accommodation living on the Love Lane Estate for the new social rent homes which are due to be delivered as part of the High Road West Scheme.

The High Road West Scheme will involve the comprehensive regeneration of the area, which will require the phased demolition of all existing Council-owned homes on the Love Lane Estate.

The aspiration is to replace the 297 homes currently on the estate with around 500 new Council-owned homes, as well as approximately 500 further affordable homes which will include products such as Shared Ownership and London Living Rent.

Haringey’s Housing Allocations Policy 2015 determines which applicants on the Housing Register should be prioritised for Council housing. In normal circumstances, an applicant’s priority is based on their Housing Needs Banding – A, B or C –as well as when the tenant first applied and when their banding priority started.

However, in exceptional circumstances Haringey Council and its partners may decide to allocate properties on a different basis to that defined in the Housing Allocations Policy. This can be done through a Local Lettings Policy. A Local Lettings Policy can be used to achieve a variety of policy objectives, such as protecting existing stable communities.

The Council has made a long-standing commitment to secure Council tenants regarding their future rehousing options, and their offer of a new secure Council tenancy within High Road West if they choose.

As some tenants and leaseholders have chosen to relocate since the approval of the masterplan, there is now a substantial number of non-secure Council tenants living in temporary accommodation on the Love Lane Estate, many of whom have lived on the Estate for over five years, have established links and have settled in their community.

Figure 1 – change in tenure mix on Love Lane Estate

Tenure	No. of tenants December 2014	% of estate	No. of tenants December 2019	% of estate
Secure tenants	193	65	47	16
Non-secure tenants	19	6	195	66
Leaseholders	85	29	55	18

In order to provide housing stability and maintain the existing community on Love Lane, the Council is proposing to prioritise eligible non-secure tenants in temporary

accommodation on the Love Lane Estate for new homes in High Road West. Secure tenants on the Love Lane Estate will maintain their existing priority.

Resident Ballot

In July 2018, the Mayor of London announced that any landlord seeking Greater London Authority funding for an estate regeneration project, which involves the demolition of social homes, must demonstrate that they have secured resident support for their proposals through a ballot. The delivery of the High Road West scheme is therefore subject to a 'yes' outcome in a resident ballot, where the majority of residents on Love Lane Estate vote for the Regeneration scheme to go ahead.

In advance of the ballot, the Council's Cabinet will approve a "Landlord Offer" which will set out the offer to each group of residents in the event of the regeneration scheme progressing, which will include details on rehousing and compensation.

In the event that there is a negative ballot, or if for any other reason the Council does not proceed with High Road West, after a period of time secure tenants on the Love Lane Estate will have their Band A decant status removed. These tenants will remain in their current home. The remainder of homes owned by the Council would be brought back into use as Council housing, which would be let in line with the Council's existing Housing Allocations Policy. Non-secure tenants living in temporary accommodation on the Love Lane Estate would most likely be rehoused elsewhere.

Stakeholders

The key stakeholders that may be impacted by the LLP are outlined below.

Secure tenants on the Love Lane Estate

The draft LLP proposes that Council secure tenants will be eligible to be rehoused in new Council housing built within the High Road West regeneration scheme. They already have Band A rehousing priority under the Housing Allocations Policy 2015.

The commencement of rehousing was agreed by Cabinet on 16th December 2015. An EqIA was appended to the Cabinet report, which sets out the equality impact of secure tenants receiving Band A rehousing priority. This EqIA can be accessed here:

<http://www.minutes.haringey.gov.uk/documents/s82602/Appendix%203-%20EqIA.pdf>

This EqIA will therefore not assess the impact of Council secure tenants being eligible for rehousing within the scheme, since the impact on other groups is the same as that resulting from Band A rehousing priority.

Non-secure tenants in temporary accommodation on the Love Lane Estate

Licensees placed in temporary accommodation on the Love Lane Estate currently have Band B or Band C priority for rehousing. Under normal circumstances, when these individuals would receive a secure tenancy would be determined by Haringey's Housing Allocations Policy 2015. In this instance, an applicant's priority is based on their Housing

Needs Banding – A, B or C –as well as when the tenant first applied and when their banding priority started.

The LLP proposes that in addition to secure tenants, the Council prioritises eligible non-secure tenants in temporary accommodation on the Love Lane Estate for new homes in High Road West. For non-secure tenants in temporary accommodation to be eligible, the preferred option is that the lead applicant will need to have been accepted as homeless by the Council and have lived on the Love Lane Estate for at least 12 months prior to the publication of the Council’s Landlord Offer document. The publication date of the Landlord Offer is currently scheduled for September 2020.

Applicants on the Housing Register

Individuals who are on the Council’s housing register but are not currently living on Love Lane Estate may be impacted by the LLP, as the broad effect of the LLP is to re-prioritise licensees in temporary accommodation to Band A. As a result, residents on Love Lane Estate would be prioritised over others on the housing register who previously had a higher banding and/or have been on the housing register for a longer period of time.

Assessment

This EqIA analyses the impact of the adoption of the draft LLP whereby the majority of non-secure tenants in temporary accommodation on the Love Lane Estate are eligible to be rehoused in Council housing built as part of the High Road West regeneration scheme.

To carry out this assessment, the protected characteristics held by non-secure tenants in temporary accommodation on the Love Lane Estate will be compared with individuals with Band B rehousing priority on the Council’s housing register.

Comparisons between Licensees in Temporary Accommodation on Love Lane Estate and those currently with Band A priority on the housing register have not been made within this EqIA. This is because, after further assessment of the current list of applicants with Band A priority (dated January 2020), it was concluded that this group would not be significantly impacted by the LLP. This is due to the following:

- Average waiting times for Band A tenants (2016-2017), depending on size of the household, vary from 11 months to 18 months. As a result, current Band A tenants should have moved off the housing register by the first letting of the new homes, and the demographics of this group may change as a result. In comparison, waiting times for Band B tenants vary from 2 years to 12 years.
- The majority of applicants with Band A rehousing priority require 1 bedroom properties (70%). In contrast, the vast majority of non-secure tenants on Love Lane require properties with 2 bedrooms or more (97%) and therefore their prioritisation will not impact the majority of Band A applicants.

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 EqlA which is available on the HR pages.

Protected group	Service users	Staff
Sex	Council held housing data Census 2011	This policy statement only impacts on staff insofar as they may be Haringey residents.
Gender Reassignment	Equalities and Human Rights Commission	
Age	Council held housing data	
Disability	Council held housing data	
Race & Ethnicity	Council held housing data	
Sexual Orientation	ONS Population Estimates	
Religion or Belief (or No Belief)	Council held housing data	
Pregnancy & Maternity	Council held housing data	
Marriage and Civil Partnership	Data not available	

The data used within this EqlA was obtained from the Council’s housing register database on 7th January 2020. The housing register is updated on a regular basis and therefore this data is deemed to be an accurate representation of the makeup of licensees at this time.

The first new Council homes at High Road West are not due to be completed until 2023 at the earliest. The Local Lettings Policy will not apply until the letting of the new homes take place. The composition of Band B on the housing register will be different at this time. It is not possible to accurately predict the detail of this future composition, though it is not expected that the overall demographics for each protected characteristic will vary considerably in comparison to the present data.

The data on non-secure tenants currently living on the Love Lane Estate is also representative of the present time. The number of eligible non-secure tenants may decrease, for example, if any of these residents are offered a secure tenancy in a Council property off the Love Lane Estate prior to the properties being required for the delivery of High Road West. In this scenario, the tenant would no longer be eligible for a new home as part of the scheme. The number of eligible non-secure tenants is not expected to increase, as any tenants who move to the estate in future will not have fulfilled the eligibility criteria (that is, by not having lived on the Estate for 12 months prior to the publication of the Landlord Offer).

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.

Sex

Gender	Non-secure tenants on LLE		Housing Register Band B	
	%	Count	%	Count
Female	79%	146	76%	2397
Male	21%	39	24%	771
Grand Total	100%	185	100%	3168

This data shows that there is a 3% higher percentage of female non-secure tenants at Love Lane Estate in comparison with the average profile of licensees with Band B rehousing priority on the housing register.

Marital Status	Non-secure tenants on LLE		Housing Register Band B	
	%	Count	%	Count
Civil Partner	1%	<5	1%	46
Co-habiting	0%	0	0%	5
Divorced	6%	12	4%	123
Living with partner	1%	<5	1%	32
Married	30%	56	33%	1045
Separated	0%	0	1%	23
Single	58%	108	56%	1773
Unknown	3%	6	4%	116
Widowed	0%	0	0%	5
Grand Total	100%	185	100%	3168

It is also noteworthy that there is 2% higher number of single parent households on the Love Lane Estate in comparison to the Band B licensees. In Haringey, 94% of single parent households are led by women.

Gender reassignment

There is limited Council or census data relating to this protected characteristic. It is estimated that there are between 200,000 to 500,000 in the UK who identify as being trans. Trans people are more likely to experience homelessness and face high levels of hate crime and discrimination in relation to issues such as securing housing and lower levels of pay. The Council does not envisage the HRW LLP will have a disproportionate impact on this protected characteristic.

Age

Age group	Non-secure tenants on LLE		Housing Register Band B	
	%	Count	%	Count
15-19	0%	0	<1%	<5
20-24	5%	9	3%	92
25-29	14%	25	10%	313
30-34	23%	43	16%	517
35-39	16%	29	18%	569
40-44	11%	21	18%	571
45-49	14%	26	15%	478
50-54	11%	21	10%	321
55-59	4%	8	6%	181
60-64	1%	2	2%	67
65-69	1%	1	1%	24
70-74	0%	0	<1%	12
75-79	0%	0	<1%	11
80-84	0%	0	<1%	5
85-89	0%	0	<1%	<5
90 and over	0%	0	<1%	<5
Grand Total	100%	185	100%	3168

The data shows some differences between the age group composition of non-secure tenant households on the Love Lane Estate in comparison with licensees with Band B rehousing priority on the housing register. It should be noted that the minimum age to join the housing register is 16, and therefore children (who may form part of these households) are not represented in these statistics.

There is a higher percentage of the 25-29 (by 4%) and the 30-34 age groups (by 7%) amongst Love Lane non-secure tenants. There is a lower percentage of the 40-44 (by 7%) and the 55-59 age groups (by 2%). The 25-29 and 30-34 age groups are more likely to have growing families, and therefore the decision may have a proportionately higher impact on these age groups as well as on children. We can therefore conclude that the Love Lane non-secure tenants have a slightly younger age profile in comparison to licensees with Band B rehousing priority on the housing register.

There is no significant difference between the percentage of elderly households, and therefore it is unlikely that this group will be overrepresented among those impacted by the decision.

Disability

Disabled	Non-secure tenants on LLE		Housing Register Band B	
	%	Count	%	Count
N	94%	173	88%	2784
Y	6%	12	12%	384
Grand Total	100%	185	100%	3168

This data shows that there is a 6% lower percentage of households with disability on the Love Lane Estate in comparison with licensees with Band B rehousing priority on

the housing register and therefore disabled persons are comparatively overrepresented in the group potentially negatively affected by the LLP. This is considered further below.

Race and ethnicity

Race/ethnicity	Non-secure tenants on LLE		Housing Register Band B	
	%	Count	%	Count
Black: African, Caribbean, British	54%	100	46%	1453
Asian: British, Chinese, Bangladeshi, East African, Pakistani, Indian	4%	8	6%	202
Mixed: Asian, Black, White, Other	2%	<5	3%	90
Other: Asian, Black, White, European	23%	43	23%	739
Traveller / Irish Traveller	0%	0	<1%	15
White: British, Turkish, Irish, Kurdish, Greek Cypriot, Turkish Cypriot	15%	27	16%	522
Unknown: Refused or no response	2%	<5	5%	147
Grand Total	100%	185	100%	3168

This data shows that overall the racial and ethnic distribution is similar when comparing non-secure tenants at Love Lane and licensees with Band B rehousing priority on the housing register.

The notable difference is the higher proportion of black households (by 8%) on the Love Lane Estate. This increase corresponds with marginally higher percentages of Asian (by 2%), white (1%) and mixed (1%) households in the Band B rehousing priority, as well as a 3% higher proportion of licensees for whom their racial and ethnic characteristics are unknown. Black residents are therefore likely to be overrepresented among those positively affected, relative to Band B households.

Sexual orientation

3.6% of residents in Haringey identify as Gay, Lesbian, Bisexual or another non-Heterosexual sexuality. This information is held for 5% or less of non-secure tenants at Love Lane and licensees with Band B rehousing priority on the housing register. The Council does not envisage the HRW LLP will have a disproportionate impact on this protected characteristic.

Religion or belief (or no belief)

Religion / Faith	Non-secure tenants on LLE		Housing Register Band B	
	%	Count	%	Count
Buddhist	0%	0	0%	1
Christian	<2%	<5	2%	76
Muslim	<2%	<5	2%	58
No Religion	0	0	<1%	7
Other	0	0	<1%	<5
Prefer not to say	0	0	<1%	<5
Roman Catholic	0	0	<1%	<5
Unknown	97%	179	95%	3017
Grand Total	100%	185	100%	3168

The available housing register data includes very low reporting rates for religion / belief. It is therefore not possible to assess whether the HRW LLP will have a disproportionate impact on any specific faith group. This will need to be further investigated in consultation. Measures will be taken to record the religious or faith group of respondents.

Pregnancy / maternity

Pregnancy/maternity	Non-secure tenants on LLE		Housing Register Band B	
	%	Count	%	Count
N	99%	180-185	98%	3112
Y	1%	1-5	2%	51
Grand Total	100%	185	100%	3163

The data indicates that the demographics related to this protected characteristic are very similar when comparing non-secure tenants on Love Lane and licensees with Band B rehousing priority on the housing register. Clearly this can also change during the lifetime of the LLP. The available information does not provide data on households with a child under a year old. This will be further investigated in the consultation.

Marriage and civil partnership

The Council does not have data based on this protected characteristic. The Council does not envisage the HRW LLP will have a differential impact on either married people or people in civil partnerships. People in marriages and people in civil partnerships will be treated the same in all aspects of the scheme.

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

Following a Cabinet decision to approve the recommendation to consult on this draft LLP, the Council will be carrying out a six-week consultation to seek the views of all applicants on the housing register potentially affected by this policy. This includes non-secure tenants in temporary accommodation in other parts of the borough. The consultation is scheduled to take place in May 2020.

As part of the consultation process, the following activities will be carried out:

- All non-secure tenants in temporary accommodation and secure tenants on the Love Lane Estate will receive a consultation pack in the post
- All applicants on the housing register will be electronically notified of the consultation
- Drop-in sessions will take place at the Grange Community Centre on White Hart Lane for any stakeholders who wish to discuss the proposals. Officers from the

High Road West Rehousing team and the Housing Strategy team will be available to talk through the documents and collect any feedback

- An Engagement Officer will be available for one-to-one meetings or phone calls. A translator will be available for both this and the drop-in sessions above for stakeholders for whom English is not their first language

The consultation materials will include a question related to the eligibility criteria for non-secure tenants and consult on two alternative options alongside the Council's preferred option.

- Option 1 (preferred option) – Eligibility for non-secure tenants who were accepted as homeless by the Council AND have lived on the Love Lane Estate for at least 12 months prior to the publication of the Landlord's Offer document, and remain on the estate at the time of properties become available
- Option 2 (alternative option) – Eligibility for non-secure tenants who were accepted as homeless prior to 9th November 2012 (pre Localism Act of 2012), and have lived on the Love Lane Estate for at least 12 months prior to the publication of the Council's Landlord Offer documents and remain on the estate at the time of properties become available
- Option 3 (alternative option) – No additional priority for any non-secure tenants to be rehoused in new social homes built as part of the Scheme

The consultation materials will include an equality monitoring form to enable the Council to understand the profile of respondents and fully understand any equalities-related issues that may arise from the HRW LLP. The additional equality data and consultation responses will be considered and any necessary amendments to the EqIA will be made, in order to identify any additional impacts or mitigations required.

A further Cabinet decision will be sought to approve the final HRW LLP following consultation. An EqIA will be appended to that report, which will incorporate the additional equalities data, an analysis of consultation responses, and any amendments to the HRW LLP.

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?

Outcomes of the consultation will be analysed on completion alongside additional equality monitoring data.

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

Positive	X	Negative		Neutral impact		Unknown Impact	
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The data analysis in section 3 does not indicate that a particular sex group will be disproportionately impacted by the decision, as women make up the majority of both non-secure tenants on the Love Lane Estate and those licensees with Band B rehousing priority on the housing register.

There are specific benefits of the proposal for women living on the Love Lane Estate, through the security and stability of remaining in the same area. Single mothers may have support networks in place in the local area including established relationships with their neighbours for childcare, and live close to family members who provide them with care and support their families. They may benefit from local facilities aimed at parents, including single parent households and being close to existing work arrangements.

2. Gender reassignment

Positive		Negative		Neutral impact		Unknown Impact	X
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The Council does not have data based on this protected characteristic. The Council does not envisage the HRW LLP will have a disproportionate impact on this particular protected characteristic. The consultation on the HRW LLP will enable the Council to identify any specific impacts on individuals who share this protected characteristic and the EqIA that follows the consultation will note these if they are identified.

3. Age

Positive	X	Negative	X	Neutral impact		Unknown Impact	
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The data analysis in section 3 indicates that young adults (25-34) are more likely to be positively impacted by the proposals, and middle-aged adults (40-59) more likely to be impacted negatively.

As young adults are more likely to have children within their household, the decision may also positively impact children and young people. The proposal has specific benefits for young people living in non-secure tenancies on the Love Lane Estate, in that they can

benefit from their family’s established support networks in place in the local area, and potentially avoid having to move between schools or colleges.

The decision may negatively impact on elderly households in Band B, however as there is a small number of these households on the housing register, the impact is likely to be relatively small. For the few households of older people living in non-secure tenancies on the Love Lane Estate (3 households who are 60 or over), there is also a specific benefit. Older people may have support networks in place in the local area, including established relationships with their neighbours, and live close to family members who provide them with care and support. They will be familiar with the community facilities for older residents available locally. This policy will support these residents to remain in the local area and therefore retain these networks.

4. Disability

Positive		Negative		Neutral impact	X	Unknown Impact	
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The data analysis in section 3 shows that there is a lower proportion of households with a disability in non-secure tenancies on the Love Lane Estate in comparison with licensees with Band B rehousing priority on the housing register.

However, in practice it is not anticipated that households with disability will be disproportionately impacted by the proposals. The LLP states that where new homes are adapted or capable of adaptation for people with a disability or critical medical needs, such homes will be ring fenced to residents with those needs. Under the proposals, these would first be allocated to suitable non-secure tenants on the Love Lane Estate, and then to applicants on the housing register. Such homes will not be allocated to general needs applicants unless it is demonstrably the case that there are no households which include someone with a disability who wish to occupy them. It is expected that there will be around 50 adapted social homes available in High Road West. As the number of non-secure households with disability on Love Lane is relatively small (12), it is likely that a substantial number of adapted homes will be available for the wider housing register.

There are specific benefits of the proposal for disabled residents living in non-secure tenancies on the Love Lane Estate. A household with disabled members may have developed local support links with family, friends and neighbours. They may also take advantage of local facilities targeted to benefit disabled residents. The policy will support these residents to remain in the local area.

5. Race and ethnicity

Positive	X	Negative		Neutral impact		Unknown Impact	
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The data analysis in section 3 indicates that the decision will have a disproportionate positive impact on black households, who will benefit more from the proposals. Black households make up 54% of those in non-secure tenancies on the Love Lane Estate,

compared to 46% of households on Band B of the housing register. The proposal is therefore likely to result in greater housing stability for black households.

The proposal may have benefits for other ethnic and racial groups, who may have specific cultural ties to the area, such as through community facilities or local businesses that cater for the preferences of a particular race or ethnicity.

6. Sexual orientation

Positive		Negative		Neutral impact		Unknown Impact	X
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The Council has limited data based on this protected characteristic. The Council does not envisage the HRW LLP will have a disproportionate impact on this particular protected characteristic. The consultation on the HRW LLP will enable the Council to identify any specific impacts on individuals who share this protected characteristic and the EqIA that follows the consultation will note these if they are identified.

7. Religion or belief (or no belief)

Positive	x	Negative		Neutral impact		Unknown Impact	
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As stated in section 3, there are low reporting rates for religion / belief in the available data. It will be necessary through consultation to gather an improved dataset relating to this protected characteristic.

Should a substantial proportion of households on the Love Lane identify as a particular religious or belief group, then this proposal is likely to be overall beneficial for these groups. There may be places of worship or religious community facilities available to people living locally. This policy will support residents to remain in the local area and therefore retain these networks.

8. Pregnancy and maternity

Positive	X	Negative		Neutral impact		Unknown Impact	
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The data analysis in section 3 indicates that broadly there is a similar proportion of households between the two categories. More contemporary data will become available through consultation.

There is likely to be a benefit for any pregnant women and young parents affected by this proposal. These groups may rely on family members and friends living locally to provide care and support, or attend local community groups such as midwife services. This policy will support residents to remain in the local area and therefore retain these networks.

9. Marriage and Civil Partnership

Positive		Negative		Neutral impact	X	Unknown Impact	
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The Council has limited data based on this protected characteristic. The Council does not envisage the HRW LLP will have a disproportionate impact on this particular protected characteristic. People in marriages and people in civil partnerships will be treated the same in all aspects of the scheme.

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

This policy will have a disproportionately positive impact on young black women living in non-secure tenancies on the Love Lane Estate. The proposal will allow these tenants to remain in the area (if they wish) and retain established support networks.

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

- Could the proposal result in any direct/indirect discrimination for any group that shares the protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a protected characteristic and those who do not?
This includes:
 - a) Remove or minimise disadvantage suffered by persons protected under the Equality Act
 - b) Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups
 - c) Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low
- Will the proposal help to foster good relations between groups who share a protected characteristic and those who do not?

It is assessed that there will not be any direct discrimination for any group from the proposal, as the prioritisation of non-secure tenants on the Love Lane Estate over the wider housing register is not based on sharing any of the protected characteristics.

In relation to potential indirect discrimination, the data analysis in section 3 shows that the demographics are broadly similar when comparing Love Lane Estate tenants and those with Band B rehousing priority on the housing register. It indicates that the proposal however may be disproportionately impact certain groups. There is a slightly higher proportion of younger black households on the Love Lane Estate in comparison to those in Band B. The prioritisation of these households will have a greater benefit to this group, and accordingly have a slightly lesser impact on other racial / ethnic groups. From the data gathered in consultation, it will possible to more accurately determine whether the proposal will disproportionately impact any protected characteristic group.

Whilst there are some specific indirect impacts relating to discrimination, a key overall positive impact that the proposal has for the Public Sector Equality Duty is that it seeks to keep the existing community together thereby fostering good relations between groups who share a protected characteristic and those who do not. The proposal has a specific benefit for groups with protected characteristics across the equality strands, by supporting residents to remain in the local area and retain their networks.

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
No major change to the proposal: the EqlA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <u>If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them.</u>	Y
Adjust the proposal: the EqlA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below	
Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.	

6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty

Impact and which protected characteristics are impacted?	Action	Lead officer	Timescale
n/a			

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

n/a

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

The consultation will include measures to collect equality data in line with the Council's corporate equality monitoring policy.

7. Authorisation

EqlA approved by Dan Hawthorn
(Director)

Date 28/02/2020

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.