

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	Love Lane Leaseholder Offer
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

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 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.

Figure 1 – tenure mix on Love Lane Estate

Tenure	No. of tenants December 2019	% of estate
Secure tenants	47	16
Non-secure tenants	195	66
Leaseholders	55	18

The Council is developing a specific offer (the “Leaseholder Offer”) for leaseholders, which develops the commitments set out in the Love Lane Leaseholder Guide, agreed by Cabinet in 2014. The offer includes details on rehousing options and compensation. The Estate Renewal Rehousing and Payments Policy (ERRPP), agreed by Cabinet in 2017, combined with the commitments set out in the Leaseholder Guide, form the baseline to this offer. An EqlA was completed for the ERRPP policy and can be found at the following link

<http://minutes.harinet.haringey.gov.uk/documents/s96881/FINAL%20Appendix%201%20EqlA.pdf>

This EqlA will assess where the Leaseholder Offer deviates from the ERRPP. There is a series of enhancements in the Leaseholder Offer, aimed to ensure compliance with the earlier commitments of the Leaseholder Guide, summarised as follows:

- Enhanced equity loan terms – preferable loan arrangements of up to 75% of the value of a new home in High Road West, subject to the financial need of the leaseholder, so that this is a more affordable option
- The leasehold swap – a rehousing option which offers the opportunity for a resident leaseholder to buy and own the leasehold of a Council-owned property of equivalent value
- The opportunity for family members to buy the outstanding balance of the Council’s equity loan if paid within a 12 month ‘grace’ period
- Offer of appointing a single joint expert to resolve disputes if there is a difference in property valuation between the Council and the leaseholder’s valuers

- Repayment of ‘Decent Homes’ costs where the leaseholder had not benefitted from the full life of the improvement works

The Leaseholder Offer also includes a more restrictive definition of a resident leaseholder for the purposes of re-housing options (rather than payments), which is in line with that described in the 2014 Leaseholder Guide. This requires a leaseholder to have lived in their home continuously since 16th December 2014 (the date of which Cabinet approved the HRW masterplan) to qualify as a resident leaseholder in this context, and therefore to benefit from the re-housing options set out in both the ERRPP and the Leaseholder Offer. This is to prevent buy-to-let landlords from moving into their property on the Love Lane Estate and benefiting from the offer, at the expense of existing local residents. The impact of this will also be considered as part of this assessment.

The key stakeholder group impacted by this proposal are leaseholders on the Love Lane Estate, including resident and non-resident leaseholders.

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	Census data. Council held housing data.	This policy statement only impacts on staff insofar as they may be Haringey residents.
Gender Reassignment	Equalities and Human Rights commission. Borough Plan EqIA data.	
Age	Census data. Council held housing data. Borough Plan EqIA data.	
Disability	Census data. Council held housing data. Borough Plan EqIA data.	
Race & Ethnicity	Census data. Council held housing data. Borough Plan EqIA data.	
Sexual Orientation	ONS Population Estimates	
Religion or Belief (or No Belief)	n/a	
Pregnancy & Maternity	n/a	
Marriage and Civil Partnership	n/a	

Consultation was previously undertaken on an earlier version of this proposal between 15th January and 9th February 2018, which provided some demographic information regarding leaseholders on the Love Lane Estate at that time. Demographic information was not forthcoming from a number of the respondents and so sample sizes are small – a total of 36 resident leaseholders and 3 non-resident leaseholders on the Love Lane Estate responded.

The resident feedback provided through this consultation informed the development of the draft Leaseholder Offer, helping to ensure it has a clear basis for optimising resident choice.

Information from the consultation is cross-referenced with the ward (Northumberland Park) profile data sourced from the 2011 Census key statistics. This is in order to reflect the household population, as opposed to solely the information related to the respondent of the consultation.

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.

Sex

The 2018 consultation results indicated an approximately even split between men and women. This reflects the broader demographics in Northumberland Park, which is made up of 49.8% male and 50.2% female. There are more women than men in Council homes and this may be reflected in the leaseholder population on the Love Lane Estate. The Council will seek to collect data relating to the sex profile of leaseholders in the course of the consultation.

Census data indicates that 94% of single parent households in Haringey are led by women.

Gender Reassignment

The 2018 consultation identified fewer than five respondents as 'other' in relation to gender. 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.

Age

Figure 2. Data on age groups from 2018 consultation

Age	Percentage
30-40	13%
40-50	7%
50-60	13%
60-70	20%
70-80	13%
80+	13%
Prefer not to say	20%
Grand Total	100%

This data indicates that over 45% of the respondents were over 60 years old. In the wider Northumberland Park population, around 11% of residents are 60 years old or over. While the consultation recorded data on ‘the head of the family’, and this may be expected to result in an older profile relative to the wider population, this indicates a proportionately older population amongst the leaseholders on the Love Lane Estate, reflecting the wider trend for older people in Council homes. The proposals in the Leaseholder Offer will be required to reflect the fact that this demographic is overrepresented among those affected.

It should be recognised that Northumberland Park ward has a larger than average proportion of under-19 year olds at almost 33% (the second highest in Haringey). Further data obtained during consultation will need to identify whether this trend is also reflected in the households of resident leaseholders.

Disability

Consultation data indicates a high level of leaseholders with disability with 23% indicating that they have a physical disability and the same percentage indicating that they ‘prefer not to say’. This 23% figure is higher than the ward profile - in Northumberland Park, 16.7% of residents are recorded as having limitations to their activities, which is in turn higher than the Haringey and London average. This reflects a wider trend of people with disabilities being overrepresented among people in council homes. This may reflect the older age profile of leaseholders on Love Lane, noted above, but it might also relate to working age people who may have their ability to work limited by their disability. The Borough Plan EqIA (accessible here: http://www.minutes.haringey.gov.uk/documents/s107023/Borough%20Plan%20EQIA_FINAL.pdf) sets out how, in Haringey, individuals with disabilities are less likely than individuals without disabilities to be in employment (44% vs 69%) and are likely to be earning less (a 13% pay gap for men with disabilities and a 7% pay gap for women with disabilities).

Race / Ethnicity

Figure 4. Data on race / ethnicity from 2018 consultation

Ethnicity	Percentage
Asian/Asian British- Bangladeshi	7%
Black/African/Caribbean/Black British- African	20%
Black/African/Caribbean/Black British- Other	7%
Prefer not to say	7%
White - English, Welsh, Scottish, N.Irish, British	20%
White and Asian	7%
White- other	33%
Grand Total	100%

Figure 5. Data on languages spoken from 2018 consultation

Language	Percentage
English	50%
Polish	8%
Prefer not to say	8%
Turkish	25%
Yoruba	8%
Grand Total	100%

This data indicates that a high proportion of leaseholders are of Turkish ethnicity (25%), corresponding closely to the proportion of the ‘white – other’ category (33%). Other prevalent ethnicities include black people (27%) and white groups, excluding the ‘other’ category previously referenced (27%).

In Northumberland Park, the population includes 40% black people which indicates that this group are underrepresented amongst leaseholders.

The Borough Plan EqIA (accessible here:

http://www.minutes.haringey.gov.uk/documents/s107023/ Borough%20Plan%20EQIA_FINAL.pdf) sets out how people from BAME groups face a number of inequalities,

including related to housing, health, education, and employment. It highlights that:

- BAME individuals in Haringey are proportionately more likely to be claiming out-of-work benefits than White British Haringey residents
- BAME households are less likely than White British households to include someone earning the London Living Wage.

Sexual Orientation

No data was collected from the 2018 consultation relating to this protected characteristic. 3.6% of residents in Haringey identify as Gay, Lesbian, Bisexual or another non-Heterosexual sexuality. If this is extended to the leaseholders on the Love Lane Estate, this would comprise around two leaseholders.

Religion / Belief

Figure 6. Data on religion / belief from 2018 consultation

Religion	Percentage
Christian	16%
Muslim	3%
No religion	6%
Not Known	71%
Prefer not to say	3%
Grand Total	100%

The data collected from the 2018 consultation is limited related to this protected characteristic, as this is unknown for 71% of respondents. The Northumberland Park ward has a comparatively high proportion of Christians (51%), higher than Haringey and London. There is also a larger Muslim population (24%) than the rest of Haringey, London and national averages.

Pregnancy / Maternity

Figure 7. Data on pregnancy / maternity from 2018 consultation

Pregnancy	Percentage
no	88%
Prefer not to say	13%
Grand Total	100%

The data from the 2018 consultation is inconclusive regarding presence of pregnant women as part of the leaseholder group, as the survey group was small and no leaseholders identified as pregnant. Clearly this can change during the lifetime of the Leaseholder Offer.

It is known that Northumberland Park has the highest birth rate, at 83 births per 1,000 women aged 15 to 44. However, the available dataset suggests a skew towards an older population amongst leaseholders, which may indicate that the number of pregnant women or households with a young child is lower than the wider demographics in the ward. This will need to be further investigated in the upcoming consultation.

Marriage and Civil Partnership

Figure 8. Data on marital status from 2018 consultation

Marital status	Percentage
Divorced or legally dissolved from a civil partnership	22%
Married or in a civil partnership	22%
Never married and never registered a civil partnership	22%
Prefer not to say	11%
Separated but still legally married or in a civil partnership	11%
Windowed or surviving partner from a civil partnership	11%

This policy does not impact on marital status, as a partner or spouse is considered to be any partner living in the property as long as certain conditions are met. All decisions that affect the population of the Love Lane Estate will ensure all couples in a civil partnership are treated exactly the same as couples in a marriage.

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 Leaseholder Offer, the Council will be carrying out a six-week consultation to seek the views of all leaseholders on the Love Lane Estate potentially affected by this policy. The consultation is scheduled to take place in May 2020.

The consultation will include letters to all leaseholders and drop-in sessions at the Grange Community Centre, adjacent to the estate. The High Road West Rehousing Team and the Independent Tenant and Leaseholder Advisor (ITLA) will be available to discuss the proposals with stakeholders. A translator will be available for stakeholders for whom English is not their first language.

The consultation materials will include an equality monitoring form to help increase the sample number and allow a more detailed analysis, which will be used to update this EqIA.

The consultation will specifically need to identify the demographics of any leaseholders on the Love Lane Estate who have not lived there continuously since 16th December 2014, and therefore would not fall under the more restrictive definition of a resident leaseholder.

A further Cabinet decision will be sought to approve the final HRW Leaseholder Offer following consultation. The final EqIA will be appended to that report, which will incorporate the additional equality data and any amendments.

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 equalities 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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Enhanced equity loan offer - This policy will make the equity loan more affordable for resident leaseholders, which will help homeowners on lower incomes including single parent households. The policy supports women to remain in the local area if they wish, and to maintain the support networks which may be in place including established relationships with their neighbours for childcare, and living close to family members who provide them with care and support their families.

Leasehold swap - Alternatively, this policy will enable resident leaseholders to choose to swap their property with another Council-owned property in the borough (of same size or smaller and of similar value). This may benefit women who want the continuity of the Council as the freeholder for their property and would prefer to purchase a property from the Council (with a clearly defined process for the acquisitions / sale process) rather than on the open market. It also provides another option to remain in the local area, with the benefits set out in the previous paragraph.

Appointment of a single joint expert for resolving disputes - This policy enables all leaseholders to obtain their own independent valuation and offers an additional option to resolve disputes if there is a difference in valuations of the leasehold property, with reasonable costs covered by the Council. This may help women in particular, who may feel vulnerable to financial exploitation and would benefit from additional reassurance that they are being treated fairly.

2. Gender reassignment

Positive		Negative		Neutral impact		Unknown Impact	X
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The policy supports resident leaseholders in accessing high quality replacement homes, providing the opportunity for existing residents to live in the High Road West scheme, which aims to make a safer neighbourhood for all residents. This would support the needs of this protected group.

As limited data is available, the Council does not hold sufficient information to analyse the impact on this group. We will consult and monitor the implementation of the offer to identify and address any inequalities.

3. Age

Positive	x	Negative		Neutral impact		Unknown Impact	
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The policy supports resident leaseholders, among whom older people are overrepresented, in accessing high quality replacement homes, providing the opportunity for existing residents to live in the High Road West scheme. The scheme aims to make a safer neighbourhood for all residents which is designed to benefit all age groups, for example through the provision of a community park, a range of leisure activities, a library and learning centre, conversion of a property for use as a nursery and additional training and employment opportunities.

Enhanced equity loan offer - This policy will make the equity loan more affordable for resident leaseholders, which will help homeowners on lower incomes including older people. It would also help people who may find it more difficult to obtain a mortgage, which can be the case for older people. The policy supports older people to remain in the local area if they wish and maintain the support networks which may be in place including established relationships with their neighbours and living close to family members who provide them with care and support.

Leasehold swap - Alternatively, this policy will enable resident leaseholders to choose to swap their property with another Council-owned property in the borough (of same size or smaller and of similar value). This may benefit older people who want the continuity of the Council as the freeholder for their property and would prefer to purchase a property from the Council (with a clearly defined process for the acquisitions / sale process) rather than on the open market. This group may not have experience in purchasing a property on the open market if they had exercised their right to buy to obtain their leasehold, and therefore may find it difficult enter into this for the first time. It also provides another option to remain in the local area, with the benefits set out in the previous paragraph.

Appointment of a single joint expert for resolving disputes - This policy enables all leaseholders to obtain their own independent valuation, and includes an additional option to resolve disputes if there is a difference in valuations of the leasehold property, with reasonable costs covered by the Council. This may help older people in particular who may feel vulnerable to financial exploitation and would benefit from additional reassurance that they are being treated fairly.

Succession rights – 12 month ‘grace period’ on equity loan – This policy is supportive of adult children and family members living with resident leaseholders through provisions of a 12-month grace period in the event of the death of the leaseholder. This will maintain the stability of the home for family members while the affairs of the leaseholder are settled.

4. Disability

Positive	x	Negative		Neutral impact		Unknown Impact	
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Enhanced equity loan offer - The policy will make the equity loan more affordable, which will have a positive impact on disabled people, who are more likely to live on lower and/or fixed incomes. It will also have a positive impact for people with disabilities who wish to stay in the local area and move into a new, high-quality home which is adapted for their needs. High Road West will provide wheelchair accessible homes and other lifetime homes, in a safe and accessible environment which will benefit those with disabilities.

Leasehold swap – It is expected that there will be limited Council homes available which are adapted for households with disabilities, and therefore the impact of this particular proposal is likely to be minimal.

Appointment of a single joint expert for resolving disputes - This policy enables all leaseholders to obtain their own independent valuation, and includes an additional option to resolve disputes if there is a difference in valuations of the leasehold property, with reasonable costs covered by the Council. This may help disabled people in particular who may feel vulnerable to financial exploitation and would benefit from additional reassurance that they are being treated fairly.

5. Race and ethnicity

Positive	x	Negative		Neutral impact		Unknown Impact	
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Enhanced equity loan offer - This policy will make the equity loan more affordable, particularly for BAME households who experience economic inequalities as set out in section 3. Data analysis in section 3 shows that there is a substantial proportion of BAME communities amongst leaseholders and in Northumberland Park. The decision to support existing resident leaseholders to buy homes within the regenerated estate by offering them affordable home ownership will help these homeowners. The policy supports BAME people to remain in the local area if they wish and maintain the support networks which may be in place.

Leasehold swap - Alternatively, this policy will enable resident leaseholders to choose to swap their property with another Council-owned property in the borough (of same size or smaller and of similar value). This would also support the benefits set out above.

Appointment of a single joint expert for resolving disputes - This policy enables all leaseholders to obtain their own independent valuation, and includes an additional option to resolve disputes if there is a difference in valuations of the leasehold property, with reasonable costs covered by the Council. This may help BAME people who may feel vulnerable to financial exploitation and would benefit from additional reassurance that they are being treated fairly. Leaseholders who speak languages other than English will also be supported through translation services on request and the Council will aim

to ensure that non-English speaking residents will have access to the required services and information.

6. Sexual orientation

Positive		Negative		Neutral impact		Unknown Impact	X
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Delivery of the leaseholder offer, providing good quality replacement homes for the resident leaseholders, provides the opportunity for existing residents to live in the High Road West scheme, which is aimed at making a safer neighbourhood for all residents. This would support the needs of people in the LGBTQ+ community.

As limited data is available, the Council does not hold sufficient information to analyse the impact on this group. We will consult and monitor the implementation of the offer to identify and address any inequalities.

7. Religion or belief (or no belief)

Positive	x	Negative		Neutral impact		Unknown Impact	
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Delivery of the leaseholder offer, providing good quality replacement homes for the resident leaseholders, provides the opportunity for existing residents to live in the High Road West scheme, which is aimed at making a safer neighbourhood for all residents. This would support the needs of people who identify with any particular religion or faith group.

Enhanced equity loan offer - This policy will make the equity loan more affordable for resident leaseholders, which will help homeowners on lower incomes. This policy supports people with religious beliefs to remain in the local area if they wish and maintain the support networks which may be in place. There may be for example places of worship or religious community facilities available to people living locally.

Leasehold swap - Alternatively, this policy will enable resident leaseholders to choose to swap their property with another Council-owned property in the borough (of same size or smaller and of similar value). This would also support people with religious beliefs to remain in the local area if they wish or to move to a location where they have access to a place of worship.

8. Pregnancy and maternity

Positive	x	Negative		Neutral impact		Unknown Impact	
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The High Road West scheme provides a number of features which support resident leaseholder families with children, including delivery of a community park, a range of leisure activities and conversion of a property for use as a nursery. While data analysis suggests that the number of households with pregnant women or young children is

likely to be low (to be further investigated in consultation), this group is likely to be positively impacted by the decision.

Enhanced equity loan offer - This policy will make the equity loan more affordable for resident leaseholders, which will help homeowners on lower incomes. The policy supports pregnant women to remain in the local area if they wish and maintain the support networks which may be in place. These groups may rely on family members and friends living locally to provide care and support, or attend local community groups and health services.

Leasehold swap - Alternatively, this policy will enable resident leaseholders to choose to swap their property with another Council-owned property in the borough (of same size or smaller and of similar value). This may benefit pregnant women who may feel vulnerable, and would prefer the continuity of the Council as the freeholder for their property and to purchase a property from the Council (with a clearly defined process for the acquisitions / sale process) rather than on the open market. It also provides another option to remain in the local area, with the benefits set out above.

Appointment of a single joint expert for resolving disputes - This policy enables all leaseholders to obtain their own independent valuation, and includes an additional option to resolve disputes if there is a difference in valuations of the leasehold property, with reasonable costs covered by the Council. This may help pregnant women in particular who may feel vulnerable to financial exploitation and would benefit from additional reassurance that they are being treated fairly.

Succession rights – 12 month ‘grace period’ on equity loan – This policy is supportive of young children through provisions of a 12-month grace period for family members / beneficiaries in the event of the death of the leaseholder. This will maintain the stability of the home for family members while the affairs of the leaseholder are settled.

9. Marriage and Civil Partnership

Positive		Negative		Neutral impact	x	Unknown Impact	
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This policy statement will have no impact with regard to this protected characteristic. Married people and people in civil partnerships will be treated exactly the same in all aspects of the scheme.

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

The policy is likely to have a positive impact on older BAME people, older people with disabilities, and BAME people with disabilities. The proposal will support these groups who may feel particularly vulnerable in purchasing a home on the open market, by providing more affordable rehousing options and transparency in the homebuying process. It also provides greater certainty for their family members through the 12 month ‘grace-period’ on the equity loan.

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

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

The overall impact of the policy on for the Public Sector Equality Duty is positive as the policy makes the existing borough-wide rehousing options more affordable for resident leaseholders. People in protected characteristics are more likely to be subject to discrimination in terms of housing and employment and as such, are more likely to have less access to finance. This can affect their ability to access favourable mortgage terms in order to access a suitable new home.

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 EqIA guidance

Outcome	Y/N
No major change to the proposal: 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
Adjust the proposal: 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	

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 Council will monitor the rehousing outcomes of all leaseholders on the Love Lane Estate and take appropriate measures to address any inequalities that may arise as identified.

7. Authorisation

EqIA approved by Dan Hawthorn (Director)	Date: 28/02/2020
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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.