

EQUALITY IMPACT ASSESSMENT

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

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

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

Stage 1 – Screening

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

Stage 2 – Full Equality Impact Assessment

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

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

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

1. Responsibility for the Equality Impact Assessment	
Name of proposal	Temporary suspension of Choice Based Lettings
Service area	Housing, Regeneration and Planning
Officer completing assessment	Martin Gulliver
Equalities/ HR Advisor	Emma Carroll/ Hugh Smith
Meeting date	7 April 2020
Director/Assistant Director	Alan Benson, Assistant Director of Housing

2. Summary of the proposal

Due to the impact of the Covid-19 virus, government guidance to minimise social contact, and the virus’ impact on staffing levels, it is proposed to temporarily suspend Choice Based Lettings as a means of allocating Council tenancies and replace this by direct offers.

Choice Based Lettings allows applicants to choose their own home and empowers those applicants willing and able to exercise this choice. However, the Choice Based Lettings system arguably disadvantages some on the basis that while it seeks to provide more choice and control over key life decisions for the many, for the more vulnerable, less proactive and less able to compromise, it can have negative consequences . These disadvantaged households would be over-represented among protected groups and so these groups may benefit from its temporary replacement by direct lets.

This decision will affect applicants on the housing register who

- Are allocated these properties without a choice to bid for them
- Would have been successful in bidding for these properties

Given the urgency to implement the temporary suspension of Choice Based Lettings, this decision will be taken by a Cabinet Member signing.

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?

Protected group	Service users	Staff
Sex	Data from the housing register	<i>This policy only impacts on staff insofar as they are applicants on the housing register and when they have been offered, or would have been offered, a property during this temporary suspension.</i>
Gender Reassignment	Equalities and Human Rights Commission	
Age	Data from the housing register	
Disability	Data from the housing register	
Race & Ethnicity	Data from the housing register	
Sexual Orientation	ONS Population estimates	
Religion or Belief (or No Belief)	Data from the housing register	
Pregnancy & Maternity	Data from the housing register	
Marriage and Civil Partnership	Data from the housing register	

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?

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.

Sex

Sex	Band A	Band B
Female	62%	76%
Male	38%	24%
Total	100%	100%

This data shows that female headed households are over-represented among both Band A and Band B households.

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 transgender.

Age

Age group	Band A	Band B
15-19	3%	0%
20-24	11%	3%
25-29	5%	10%
30-34	4%	16%
35-39	6%	18%
40-44	5%	18%
45-49	9%	15%
50-54	12%	10%
55-59	16%	6%
60-64	9%	2%
65-69	7%	1%
70-74	5%	0%
75-79	3%	0%
80-84	3%	0%
85-89	1%	0%
90 and over	0%	0%
Total	100%	100%

The data shows that older people are over-represented in Band A and younger households in Band B, relative to all households on the housing register.

Among Band A households, there are a considerable number of who are

- Either existing tenants who have band A status while awaiting a move from an estate renewal scheme, or who are under-occupiers. Both these groups have a higher proportion of older households relative to the housing register as a whole.
- Care leavers – who are relatively young and represent most of those in the under 24 years of age in Band A

In contrast, Band B is mostly comprised of households in temporary accommodation, among whom a significant proportion are younger families.

Disability

Disability	Band A	Band B
Disabled	33%	12%
No disability	67%	88%

Total	100%	100%
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This data shows that there is a high percentage of households with disability in Band A. Band A is largely made up of households who are either existing tenants who have Band A status while awaiting a move from an estate renewal scheme, or who are under-occupiers. Both these groups have a higher proportion of older households who in turn are more likely to have disabilities. The data also shows a relatively low percentage in Band B.

Race and ethnicity

Ethnic origin	Band A	Band B
Any Other Ethnic Group	8%	8%
Bangladeshi/UK Bangladeshi	1%	3%
Black African	13%	27%
Black British	10%	7%
Black Caribbean	15%	11%
Black Caribbean and White	2%	1%
British Asian	0%	1%
Chinese	1%	1%
East African Asian	0%	1%
Indian or UK Indian	1%	1%
Irish Traveller	0%	0%
Mixed Asian and White	1%	0%
Mixed Black	1%	0%
Mixed Black African/White	1%	1%
Mixed Other	1%	2%
No Response	2%	1%
Other Asian	1%	2%
Other Black	1%	1%
Other Ethnic Group Arab	0%	0%
Other White	2%	4%
Other White European	3%	9%
Pakistani / UK Pakistani	0%	1%
Refused	6%	2%
Traveller	0%	0%
Unknown (data take on)	4%	2%
White British	19%	7%
White Greek Cypriot	1%	0%
White Irish	3%	1%
White Kurdish	2%	2%
White Turkish	3%	4%
White Turkish Cypriot	1%	2%
Total	100%	100%

This data shows an over-representation among both Band A and Band B of Black households. Band B shows an over-representation of Black African households in particular. Band B households are less likely to be White British than Band A households.

Sexual orientation

Sexuality	Band A	Band B
Gay Woman/Lesbian	0%	0%
Heterosexual	4%	5%
Other	0%	0%
Unknown/prefer not to say	96%	95%
Total	100%	100%

3.6% of residents in Haringey identify as Gay, Lesbian, Bisexual or another non-Heterosexual sexuality. This information is held for 4-5% of households the housing register. It is therefore not possible to determine the proportion of people on the Housing Register who identify as LGB+

Religion or belief (or no belief)

Religion/faith	Band A	Band B
Buddhist	1%	0%
Christian	11%	2%
Hindu	0.4%	0%
Jehovah Witness	0.2%	0%
Muslim	5%	2%
No Religion	3%	0%
Unknown/prefer not to say	80%	95%
Total	100%	100%

The available Housing Register data indicates a very low reporting rate for religion / belief, and so it is not possible to accurately determine the proportions of people on the housing register who are members of religious or faith groups or who have no religion.

Pregnancy/maternity

Pregnancy/maternity	Band A	Band B
No	100%	98%
Yes	0%	2%
Total	100%	100%

The data indicates that a small number of households in Band B contain either pregnant women or children under the age of six months.

Marriage and civil partnership

Marital status	Band A	Band B
Civil Partner	0%	1%
Co-habiting	0%	0%
Divorced	5%	4%
Living with partner	1%	1%
Married	13%	33%

Separated	0%	1%	
Single	71%	56%	
Unknown	8%	4%	
Widowed	1%	0%	
Total	100%	100%	

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?

The urgency of this proposal means that there has been little time to consult prior to the decision. Applicants who are seeking rehousing through the Choice Based Lettings system will receive a message on the Home Connections site and via the Council and Homes for Haringey websites advising them explaining that the system has been suspended.

Housing Associations have been asked for comments on this proposal. However, because it does not affect nomination to their own stock there will be no impact on their own lets.

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

Consultation with applicants has not been undertaken prior to the decision due to the urgency and temporary nature of the proposal. Housing Associations have also been advised of this proposal but with a very short deadline as required by this urgent decision. No response has been received at the time of this document. Any responses that are received before the decision will be considered when the decision is made.

5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

1. Sex

Positive	X	Negative	X	Neutral impact		Unknown Impact	
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The data analysis indicates that a higher number of women than men will be affected by the decision. Women are therefore more likely to be among those benefiting from the decision, as they will be directly let accommodation, and also more likely to be among those who may be negatively affected by the decision because accommodation they would have otherwise bid for will have been directly let. However, the effect is likely to be small due to the temporary nature of the proposal.

2. Gender reassignment

Positive		Negative		Neutral impact	X	Unknown Impact	
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Transgender people are more likely to experience homelessness and face high levels of hate crime as well as discrimination in relation to issues such as securing housing and lower levels of pay. The Council does not envisage this temporary suspension will have a disproportionate impact on this protected characteristic.

3. Age

Positive		Negative		Neutral impact	X	Unknown Impact	
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The data analysis indicates that there are significant proportions of both older and younger people on the housing register, and that there are more older people in Band A and more younger people in Band B. However, the high proportion of older Band A applicants are either under-occupiers or on an estate renewal scheme and these households may not be prioritised during this period where there is no urgent need to move. However, vulnerable households within this group are likely to benefit from this proposal. The effect is likely to be small due to the temporary nature of the proposal.

4. Disability

Positive	X	Negative		Neutral impact		Unknown Impact	
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The data analysis indicates that people with disabilities will be overrepresented among those affected by the proposal. This is because a higher proportion of Band A households have members with disabilities, and because Band A households are more likely to be directly let accommodation, people with disabilities can be expected to benefit from the decision. Vulnerable households within this group are particularly likely to benefit from this proposal. However, the effect is likely to be small due to the temporary nature of the proposal.

This temporary proposal may increase the number of lets to clients needed specialist types of property as these will be targeted on those who need it.

5. Race and ethnicity

Positive	X	Negative	X	Neutral impact		Unknown Impact	
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BAME households are overrepresented on the housing register relative to the population of Haringey. Black households are notably overrepresented among Band A households. These households are among those who are most likely to benefit from direct lets. However, it is also notable that BAME households will be among those who will not be able to bid for accommodation that will have been directly let. Vulnerable households within this group are particularly likely to benefit from this proposal. The effect is likely to be small due to the temporary nature of the proposal.

6. Sexual orientation

Positive		Negative		Neutral impact	X	Unknown Impact	
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The Council does not envisage that this proposal to temporarily suspend Choice Based Lettings will have a disproportionate impact on this protected characteristic.

7. Religion or belief (or no belief)

Positive		Negative		Neutral impact	X	Unknown Impact	
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The Council does not envisage that this proposal to temporarily suspend Choice Based Lettings will have a disproportionately affect any religious or faith group.

8. Pregnancy and maternity

Positive		Negative		Neutral impact	X	Unknown Impact	
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The Council does not envisage that this proposal will have a disproportionate impact on this protected characteristic

9. Marriage and Civil Partnership

Positive		Negative		Neutral impact	X	Unknown Impact	
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The Council does not envisage this proposal will have a differential impact on either married people or people in civil partnerships.

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

Black women are over-represented in Band B. Within this group, those with the longest waiting times. may be affected by the temporary loss of choice over properties to bid for especially if their current accommodation is suitable and have no urgent need to move. Vulnerable households within this group are particularly likely to benefit from this proposal. Any impact will be minimal due to the temporary nature of this proposal and those affected will have the highest priority for properties when Choice Based Lettings can resume.

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

The proposal to temporarily suspend Choice Based Lettings will have a small impact on affected households, and households with the highest priority who would have selected homes and been successful will have the highest priority for properties after CBL resumes. The decision represents a measure to protect the health and wellbeing of all people in Council accommodation and on the housing register in the context of the Covid-19 pandemic.

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 relevant protected characteristics are impacted?	Action	Lead officer	Timescale
<i>Lost ability to bid for accommodation, impacting women, younger people, people with disabilities, and pregnant women</i>	<i>Resume choice-based lettings once social distancing measures are no longer required</i>	<i>Director of Housing, Regeneration and Planning</i>	<i>2020</i>

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.

Although there may be a reduction in lets to those on estate renewal schemes and under-occupiers who generally are older, these households will continue to have the highest priority once Choice Based Lettings resumes.

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

This is a temporary proposal which is designed to make sure that the few properties that become available will be allocated to those in the most urgent need. Monitoring will be undertaken as part of the usual analysis undertaken during the Annual Lettings Plan.

7. Authorisation

EqlA approved by ..  (Alan Benson, Assistant Director)	Date 3 April 2020
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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.