

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	Amendments to Housing Allocations Policy – Neighbourhood Moves Scheme
Service area	Housing
Officer completing assessment	Martin Gulliver
Equalities/ HR Advisor	Hugh Smith
Cabinet meeting date (if applicable)	15 September 2020
Director/Assistant Director	Robbie Erbmman

2. Summary of the proposal

The proposal seeks approval to consult on an amendment to the Housing Allocations Policy which would give priority for any newly built homes to those displaced by the new homes and nearby secure tenants. The over-arching principle of this policy is to ensure community cohesion and address over-crowding.

The amendments seek to maintain community cohesion by giving priority to local tenants displaced by estate renewal, allowing them to remain in the area, and to prioritise other secure tenants in the local area to ensure that the local community benefits from the new scheme.

The amendments also seek to address over-crowding both indirectly – by encouraging under-occupiers to release family homes – and directly by prioritising those who are over-crowded.

These amendments also support the Council's commitment of a Right to Return for tenants displaced by estate renewal. Without this amendment, an individual Local Lettings Plan would need to be sought for each new build where tenants are displaced. This policy would give these displaced tenants priority for the new homes.

The key stakeholders affected are existing secure tenants, who will have an improved chance of addressing their over-crowding, and those on the housing register who will have greater supply of family homes if the new buildings are taken up by under-occupying households. Those on the housing register will have a reduced chance of a newly built homes but this will be offset by access to the homes released by the successful local households.

These amendments will be subject to consultation and approval is sought to consult on the proposed policy with the final amendments to be approved by Cabinet at a later meeting.

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 or an existing secure tenant.</i>
Gender Reassignment	No data held	
Age	Data from the housing register	
Disability	Data from the housing register	
Race & Ethnicity	Data from the housing register	
Sexual Orientation	Data from the housing register	
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?

This policy will affect existing tenants on estate renewal schemes by giving them additional options for rehousing. The policy will also affect existing tenants in the local area especially those who are over-crowded as these households will currently have a low priority for new homes. As many of these households will have children, they will also benefit from a local nearby move.

The policy will also affect those on the Housing Register who will have a lower priority for these new homes but with an increased supply created by the properties vacated by local tenants moving into the new homes. This group will also be affected as the final mix of homes available will depend on the relative take up these new homes by households who are under-occupying or those who are over-crowded.

The relative demographics of these two groups are shown below and are relatively similar in most areas with the exception of age and disability – with existing tenants generally being older than those on the housing register and with a corresponding higher level of disability.

The following data compares data collected in January 2020 and compares existing secure tenants and the head of households on the entire housing register.

Sex

Sex	Housing Register	Council tenants	Difference
Female	63%	64%	1%
Male	37%	36%	-1%

The above table shows that there is a similar rate of over-representation of females among both existing Council tenants and those on the Housing Register.

Gender re-assignment

The Council does not hold data on Gender Reassignment for either of these two groups. If any people affected by the decision are members of this protected group, the Council will ensure that the decision does not result in any direct or indirect discrimination.

Age

Age	Housing Register	Council tenants	Difference
19 and under	Less than 1%	Less than 1%	Less than 1%
20-29	3%	20%	-17%
30-39	10%	33%	-23%
40-49	19%	25%	-6%
50-59	29%	15%	14%
60-69	19%	6%	13%

70 and over	19%	2%	17%
Unknown	Less than 1%	-	Less than 1%

This data shows that those on the Housing Register are generally younger than existing tenants, with nearly 40% of tenants being of 60 years of age or older compared to around 8% of those on the Housing Register.

Disability

Disability	Housing Register	Council tenants	Difference
N	93%	77%	16%
Y	7%	23%	-16%

The above data shows a significant difference in disability rates between these two groups with existing Council tenants being significantly more likely to report a disability. This statistic correlates to the difference in ages described above.

Ethnic Origin

Ethnic origin	Housing Register	Council tenants	Difference
Any Other Ethnic Group	10%	7%	3%
Bangladeshi/UK Bangladeshi	2%	1%	1%
Black African	20%	16%	14%
Black British	9%	3%	6%
Black Caribbean	10%	14%	4%
Black Caribbean and White	2%	1%	1%
British Asian	1%	Less than 1%	1%
Chinese	1%	Less than 1%	1%
East African Asian	Less than 1%	Less than 1%	Less than 1%
Gypsy	Less than 1%	Less than 1%	Less than 1%
Indian or UK Indian	1%	1%	1%
Irish Traveller	Less than 1%	Less than 1%	Less than 1%
Mixed Asian and White	Less than 1%	Less than 1%	Less than 1%
Mixed Black	Less than 1%	Less than 1%	Less than 1%
Mixed Black African/White	1%	Less than 1%	1%
Mixed Other	2%	1%	1%
No Response	Less than 1%	4%	3%
Other Asian	1%	2%	1%
Other Black	1%	1%	-
Other Ethnic Group Arab	Less than 1%	Less than 1%	Less than 1%
Other White	4%	2%	2%
Other White European	11%	4%	7%
Pakistani / UK Pakistani	Less than 1%	Less than 1%	Less than 1%
Refused	4%	2%	2%
Traveller	Less than 1%	Less than 1%	Less than 1%
Unknown (data take on)	1%	6%	-5%
White British	10%	18%	8%
White Greek Cypriot	1%	1%	-
White Irish	1%	3%	-2%

White Kurdish	1%	4%	-3%
White Turkish	3%	5%	-2%
White Turkish Cypriot	1%	3%	2%
(blank)	Less than 1%	Less than 1%	Less than 1%

These statistics show that there is a higher proportion of black households among those on the Housing Register compared to existing tenants.

Sexual Orientation

Sexual Orientation	Housing Register	Council tenants	Difference
Bisexual	Less than 1%	Less than 1%	Less than 1%
Gay Man	Less than 1%	Less than 1%	Less than 1%
Gay Woman / Lesbian	Less than 1%	Less than 1%	Less than 1%
Gay Woman/Lesbian	Less than 1%	Less than 1%	Less than 1%
Heterosexual	5%	2%	3%
Other	Less than 1%	Less than 1%	Less than 1%
Prefer not to say	Less than 1%	Less than 1%	Less than 1%
Unknown	94%	98%	-4%

This data shows a significant difference in sexuality between these two groups with those on the Housing Register twice as likely to declare a themselves as Heterosexual. However, caution should be exercised over this characteristic as it is significantly under-reported particularly for existing tenants.

Religion

Religion	Housing Register	Council tenants	Difference
Buddhist	Less than 1%	Less than 1%	Less than 1%
Christian	2%	14%	-12%
Greek Orthodox	Less than 1%	Less than 1%	Less than 1%
Hindu	Less than 1%	Less than 1%	Less than 1%
Jehovah Witness	Less than 1%	Less than 1%	Less than 1%
Jewish	Less than 1%	Less than 1%	Less than 1%
Muslim	1%	8%	-7%
No Religion	Less than 1%	3%	-3%
No Response	Less than 1%	Less than 1%	Less than 1%
Other	Less than 1%	Less than 1%	Less than 1%
Prefer not to say	Less than 1%	1%	-1%
Rastafarian	Less than 1%	Less than 1%	Less than 1%
Roman Catholic	Less than 1%	Less than 1%	Less than 1%
Sikh	Less than 1%	Less than 1%	Less than 1%
Unknown	96%	72%	24%

This data shows a significant difference in the reported religions of these two groups with existing tenants significantly more likely to declare a religion. However, caution should be exercised over this characteristic as it is significantly under-reported particularly for those on the Housing Register.

Pregnancy and Maternity

Just under 1.5% of households on the Housing Register are pregnant and a further 1% in maternity. However, the status of current Council tenants is generally unknown unless they have submitted an application to the Housing Register.

Marital Status

Marital Status	Housing Register	Council tenants	Difference
Civil Partner	1%	Less than 1%	1%
Co-habiting	Less than 1%	Less than 1%	Less than 1%
Divorced	6%	2%	4%
Living with partner	2%	Less than 1%	2%
Married	25%	29%	-3%
Separated	Less than 1%	Less than 1%	Less than 1%
Single	64%	41%	23%
Unknown	2%	27%	-25%
Widowed	Less than 1%	1%	-1%

This data shows that there are higher proportion of divorced and single people on the housing register. However, it should be noted that though this characteristic is known for almost all households on the housing register, the current marital status is unknown for just over a quarter of tenants.

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?

A full consultation will be carried out following approval to consult

Where the Council holds emails, consultation will be undertaken by emails to all secure tenants and households. Where an email is not held, a letter will be sent to the remaining households

Consultation events may be limited by Covid-19 restrictions but where possible, will include drop-in events in Wood Green and Tottenham.

Consultation documents will be made available in large print and translated where requested.

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

To be completed following consultation

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	Y	Negative		Neutral impact		Unknown Impact	
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These amendments are likely to have a positive impact to females who are over-represented among tenants. The amendment will help those over-crowded secure tenants by raising their chances of being moved to suitable accommodation. The amendment will also benefit larger households but releasing additional family homes by rehousing under-occupying households.

2. Gender reassignment

Positive		Negative		Neutral impact		Unknown Impact	Y
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While this policy is generally positive to most households, the Council does not hold sufficient data on gender reassignment to fully to assess the impact on this group. We will make efforts to prevent any inequalities from occurring and address any that do.

3. Age

Positive	Y	Negative		Neutral impact		Unknown Impact	
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These amendments are likely to have a positive impact to over-occupiers who are over-represented among older tenants whose children have left the family home. These amendments will allow them to remain in the local area and retaining local connections. With nearly 40% of tenants being of 60 years of age or older, this will offer a significant benefit to tenants with this protected characteristic.

4. Disability

Positive	Y	Negative		Neutral impact		Unknown Impact	
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Adapted homes will only be offered to those who have need for them and so the number of adapted homes offered to those with disabilities will remain the same. These amendments are likely to have a positive impact on nearby tenants whose home is currently unsuitable and require a move. This will also allow them to remain local to their current support network. With 23% of tenants reporting a disability, this scheme will offer a significant improvement for those tenants sharing this characteristic.

5. Race and ethnicity

Positive	Y	Negative		Neutral impact		Unknown Impact	
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These amendments are expected to have a positive impact on BAME minorities who are over-represented among tenants. It is also likely to benefit those who need to move but wish to remain in established communities.

6. Sexual orientation

Positive		Negative		Neutral impact		Unknown Impact	Y
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While this policy is generally positive to most households, the Council does not hold sufficient data on sexual orientation to fully to assess the impact on LGB people.

7. Religion or belief (or no belief)

Positive		Negative		Neutral impact		Unknown Impact	Y
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These amendments will allow those who are over-crowded with a realistic chance of moving locally and will benefit those who have ties to particular religious establishments. Although reporting rates are low, the available data suggests that tenants are more likely to declare a religion.

8. Pregnancy and maternity

Positive	Y	Negative		Neutral impact		Unknown Impact	
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These amendments are expected to have a positive impact on those who are new mothers as it is likely that their housing need will have increased on the birth of an additional child. The amendments will also increase the chances of moving to a larger property in the same area and so maintaining existing support networks.

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)*

Positive	Y	Negative		Neutral impact		Unknown Impact	
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This policy is generally positive to most households.

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

These amendments will affect black women who are over-represented in both groups, and within this grouping, older black women who are particularly over-represented

among tenants and younger women who are particularly over-represented among those on the Housing Register.

The amendments will also affect those who are both elderly and disabled and will support them to remain in the local area where they have established medical services and support networks.

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

This policy will benefit over-crowded households by increasing their chance of an appropriate sized home for existing tenants and allow them to remain in their community. The policy will also promote community cohesion by allowing local residents to benefit from new building.

6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?

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

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:

7. Authorisation

EqlA approved by
(Assistant Director/ Director)

Date
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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.