

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	Selective Property Licensing
Service area	Community Safety and Enforcement
Officer completing assessment	Lynn Sellar
Equalities/ HR Advisor	Hugh Smith
Cabinet meeting date (if applicable)	TBC
Director/Assistant Director	Stephen McDonnell Director Eubert Malcom AD

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*

Selective licensing is a tool that local Authorities can use to tackle issues within the private housing sector which is affecting them locally. A designation may be made to combat problems in an area experiencing Low housing demand, High Anti-social behaviour, poor property conditions, population churn, a high level of deprivation or high levels of crime. The proposed scheme will make it a legal requirement for owners of privately rented homes to licence those premises with the Council. The aim of the scheme is to ensure the private rented market offers good quality, safe housing for our tenants and to also ensure that these properties are well managed so that it doesn't impact on tenants and the local community alike.

At present research has been undertaken to evidence our need for a licensing scheme using data and information available to us about Haringey Borough, its residents, the effect the private rented market is having on our residents and the impact that poorly managed property has on Council services. The Licensing of Houses in Multiple Occupation (HMO) accommodation already exist within the borough.

The scheme will involve those persons responsible for single household privately rented properties to licence with the Council. The aim of the scheme is to improve living conditions for tenants and ensure the property is effectively managed. Key stakeholders will be ;-

- Tenants
- Landlords/letting agents
- Wider residents

The proposed scheme will require Consultation, Cabinet approval and approval from Secretary of State.

3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?

Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis. Please include any gaps and how you will address these

This could include, for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national. For restructures, please complete the restructure EqIA which is available on the HR pages.

Protected group	Service users	Staff
Sex	<i>Equalities Profile of Haringey – 2013 Mid Year estimates:</i> http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf	
Gender Reassignment	<i>Borough wide profile not available</i>	
Age	<i>Equalities Profile of Haringey – 2013 Mid Year estimates:</i> http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf	
Disability	<i>Equalities Profile of Haringey – 2013 Mid Year estimates:</i> http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf	
Race & Ethnicity	<i>Equalities Profile of Haringey – 2013 Mid Year estimates:</i> http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf	
Sexual Orientation	<i>Borough wide profile not available</i>	
Religion or Belief (or No Belief)	<i>Equalities Profile of Haringey – 2013 Mid Year estimates:</i> http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf	
Pregnancy & Maternity	<i>Borough wide profile not available</i>	
Marriage and Civil Partnership	<i>Equalities Profile of Haringey – 2013 Mid Year estimates:</i> http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf	

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.

Our research and data analysis has indicated that a Selective licensing scheme is required within predominantly the east of Haringey borough and is likely to cover at least 12 of the 19 wards in Haringey.

The scheme is legally only allowed to target privately rented homes and it is our proposal to include within this designation only those occupied by single households as other licensing scheme cover those privately rented homes which are multiply occupied.

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

Generally, the effect of property licensing is to formalise the lightly regulated private rented housing market by imposing an increased regulatory framework to force obligations on landlords / licence holders. It should lead to better quality accommodation and greater community stability for groups who are unable to access social housing or homeownership.

Property Licensing can therefore assist with community cohesion and tackle exclusion. Better managed private sector dwellings also improve the quality of life of many other Haringey residents, as they are often indirectly affected by low level neighbourhood anti-social behaviour such as fly tipping and noise.

Haringey is an exceptionally diverse and fast-changing borough.

Haringey has a population of 254,900 according to the 2011 National Census made up of 101,955 households. The number of households in Haringey has continued to increase since 2011.

The borough ranks as one of the most deprived in the country with pockets of severe deprivation in the east. Haringey is the 84th most deprived borough in England (based on those with the highest proportion of LSOAs that fall within the 10 per cent most deprived in England)

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

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

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

Age

Haringey has a relatively young population with a quarter of the population under the age of 20, and 91% of the population aged under 65 (89% London and 83% England). 38% of the borough's population is aged 25-39, which is higher than the London level. The Borough has a higher proportion of young adults and a smaller proportion of older

people than in the rest of London. There are more children living in the East of our borough than in the west both in absolute terms and as a proportion of the population.

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

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

We do not have data on the age profile of landlords in Haringey. In the operation of this scheme we will take steps to monitor the extent to which affected landlords share the protected characteristics, including the extent to which older people are represented among landlords.

Disability

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

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

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

We do not have data on landlords in Haringey. In the operation of this scheme we will take steps to monitor the extent to which affected landlords share the protected characteristics, including the extent to which individuals with disabilities are represented among landlords.

Gender reassignment

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

Pregnancy and maternity

The number of children born to Haringey residents has been increasing year on year since 2002 in line with the London and England trend. The birth rate (births per 1000 of the population) in Haringey has been consistently higher than London in this period until 2008 and is now level with London. In 2012 there were 4,209 births in Haringey.

Lone parents, of whom the vast majority are women, are over-represented in the private rented sector and notably in properties which are in poorer condition relative to the population of Haringey as a whole.

Race and Ethnicity

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

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

We do not have data on the racial profile of landlords in Haringey. In the operation of this scheme we will take steps to monitor the extent to which affected landlords share the protected characteristics, including the extent to which BAME groups are represented among landlords.

Religion and belief

Haringey is one of the most religiously diverse places in the UK. The most common religion was Christianity, accounting for 45% of residents, less than London (48.4%) and less than England (59.4%). The next most common religions were Islam (14.3%) – higher than London (12.3%) - and Judaism (3%). Haringey had a lower percentage of residents who were Hindu (1.8%) and Sikh (0.3%) than London (5.0% and 1.5%, respectively). A quarter of Haringey residents stated that they did not have a religion, higher than London (20.7%).

We do not have local data regarding the representation of this protected group in the private rented sector. However, we know that recent and second-generation migrants in the UK are likely to live in the private rented sector rather than social or privately-owned housing. It is likely that a significant proportion of these individuals will be members of minority faith groups and are therefore represented among private rented sector tenants.

We do not have data on the religious/faith profile of landlords in Haringey. In the operation of this scheme we will take steps to monitor the extent to which affected landlords share the protected characteristics, including the extent to which faith groups are represented among landlords.

Sex

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

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

Sexual orientation

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

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

Marriage and Civil partnership.

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

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

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

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

People in marriages and people in civil partnerships will be treated the same in all aspects of the proposed 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 EqlA guidance

It is a statutory requirement for relevant stakeholders to be consulted as part of the Selective Licensing approval process.

The consultation period will be a minimum of 12 weeks, our approach will be to use an external company to undertake our consultation engagement and for the results to be independently evaluated by this third party to ensure compliance.

It is envisaged that a wide range of consultation techniques will be used to ensure that all sections of the community have an opportunity to take part. This includes:

- Email to landlords/Letting Agents operating in Haringey Council.
- Hand delivered letters to every household within the proposed designation area.
- Letters hand delivered to identified private sector properties in the borough.
- Leaflets, Posters and paper questionnaires distributed to Libraries.
- Information available on the Council's, web site.
- Officers attending the Borough Wide Neighbourhood Watch Meeting and local Neighbourhood Watch meetings.
- Details of the consultation emailed to all London Boroughs to share with their landlord' forums/letting agents.
- Press release by third parties, radio, local Journals and the press have been used in the past,
- Stakeholder engagement with organisations and groups such as :-
 - Bridge Renewal Trust
 - HFH Resident' Associations
 - Neighbourhood Watch representatives.
 - Landlords/agents
 - Met Police
 - London fire Authority

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?

None has yet been undertaken.

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

Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.

Further information on assessing impact on different groups is contained within accompanying EqIA guidance

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

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

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

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

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

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

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

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

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

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

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

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

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

We know from the 2011 census that Haringey is the 5th most diverse borough in the country. 65% of residents come from non-white British communities. In summary 45% of the population was born outside of Britain. The main nationalities of non-UK-born residents are Polish, Turkish, Jamaican, Irish, Ghanaian and Somalian.

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

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

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

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

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

Haringey is one of the most religiously diverse places in the UK. At the time of the 2011 census the most common religion in Haringey was Christianity, accounting for 45% of residents, this is less than London. The next most common faith is Islam (14.3%) and Judaism (3%). Hindu and Sikh faiths are under-represented in Haringey compared to London. As we know the PRS is the most likely tenure for new communities and will therefore provide housing for a large diverse population it is very likely that different faith groups will be represented. Licensing will improve the condition of private rented housing and will therefore have a positive impact for households from religious minorities.

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

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

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

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

People who are in a civil partnership will be treated the same as people who are married.

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

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

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

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

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

- **Could the proposal result in any direct/indirect discrimination for any group that shares the relevant protected characteristics?**
- **Will the proposal help to advance equality of opportunity between groups who share a relevant protected characteristic and those who do not?**

This includes:

- a) **Remove or minimise disadvantage suffered by persons protected under the Equality Act**
- b) **Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups**

c) Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low

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

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

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

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

The proposal will help to foster good relations between individuals and groups who share protected characteristics and those who do not by improving accommodation standards and fostering greater community stability for groups who are unable to access social housing or homeownership. Better managed private sector dwellings also improve the quality of life of many other Haringey residents, as they are often indirectly affected by low level neighbourhood anti-social behaviour such as fly tipping and noise

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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	N
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.	N

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

Impact and which relevant protected characteristics are impacted?	Action	Lead officer	Timescale
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 following measures will help to monitor the equalities impact of the proposal:

- A full consultation with wide range of stakeholders
- Assessment of any impact and feedback
- Revising this EQIA based on consultation results
- Use of Haringey's equalities monitoring form in the operation of the scheme and analysis of completed forms

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.