

## EQUALITY IMPACT ASSESSMENT

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

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity for those with ‘protected characteristics’ and those without them
- Fostering good relations between those with ‘protected characteristics’ and those without them.

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

### Stage 1 – Screening

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

### Stage 2 – Full Equality Impact Assessment

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

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

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

#### 1. Responsibility for the Equality Impact Assessment

Name of proposal	High Road West Local Lettings Policy (LLP)
Service area	Regeneration & Economic Development
Officer completing assessment	Scott Mundy
Equalities/ HR Advisor	Melissa Nalubwama-Mukasa
Cabinet meeting date (if applicable)	July 2021
Director/Assistant Director	Robbie Erbmman

## 2. Summary of the proposal

### Proposal

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

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

The existing 297 homes currently on the estate will be replaced by 500 new Council-owned homes at council rent, in addition to a variety of other new homes and other benefits including new jobs and employment space, green and open spaces and improved community facilities.

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

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

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

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

Figure 1 – change in tenure mix on Love Lane Estate

Tenure	No. of tenants December 2014	% of estate	No. of tenants April 2021	% of estate
Secure tenants	193	65	44	15
Non-secure tenants	19	6	197	68
Leaseholders	85	29	50	17

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

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

### **Resident Ballot**

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

In advance of the ballot, the Council's Cabinet will approve a "Landlord Offer" which will set out the offer to each group of residents in the event of the regeneration scheme progressing, which will include details on rehousing and compensation. The publication of the Landlord Offer and resident ballot are both due to take place in June and July 2021.

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

### **Stakeholders**

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

#### **Secure tenants on the Love Lane Estate**

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

The commencement of rehousing was agreed by Cabinet on 16<sup>th</sup> December 2015. An EqlA was appended to the Cabinet report, which sets out the equality impact of secure tenants receiving Band A rehousing priority. This EqlA can be accessed here:  
<http://www.minutes.haringey.gov.uk/documents/s82602/Appendix%203-%20EqlA.pdf>

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

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

Licensees placed in temporary accommodation on the Love Lane Estate currently have Band B or Band C priority for rehousing. Under normal circumstances, when these individuals would receive a secure tenancy would be determined by Haringey's Housing

Allocations Policy 2015. In this instance, an applicant's priority is based on their Housing Needs Banding – A, B or C –as well as when the tenant first applied and when their banding priority started.

The draft LLP proposed that in addition to secure tenants, the Council prioritises eligible non-secure tenants in temporary accommodation on the Love Lane Estate for new homes in High Road West. For non-secure tenants in temporary accommodation to be eligible, the lead applicant would need to have been accepted as homeless by the Council and have lived in the masterplan area for at least 12 months prior to the publication of the Council's Landlord Offer document.

In the final LLP, this duration has been reduced from 12 months to 6 months prior to the publication of the Landlord Offer (scheduled for June 2021). This is in response to engagement with residents and means that the very small number of non-secure tenants on the Love Lane Estate (less than 10) who were not eligible under the criteria in the draft policy terms would be made eligible.

#### Applicants on the Housing Register

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

#### Assessment

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

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

Comparisons between Licensees in Temporary Accommodation on Love Lane Estate and those currently with Band A priority on the housing register have not been made within this EqIA. This is because, after further assessment of the current list of applicants with Band A priority (dated April 2021), it was concluded that this group would not be significantly impacted by the LLP. This is due to the following:

- Average waiting times for Band A tenants (2016-2017), depending on size of the household, vary from 11 months to 18 months. As a result, current Band A tenants should have moved off the housing register by the first letting of the new homes, and the demographics of this group may change as a result. In comparison, waiting times for Band B tenants vary from 2 years to 12 years.
- The majority of applicants with Band A rehousing priority require 1 bedroom properties (over 60%). In contrast, the vast majority of non-secure tenants on Love

Lane require properties with 2 bedrooms or more (97%) and therefore their prioritisation will not impact the majority of Band A applicants.

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

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

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

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

The data used within this EqIA was obtained from the Council's housing register database in April 2021. The housing register is updated on a regular basis and therefore this data is deemed to be an accurate representation of the makeup of licensees at this time.

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

The data on non-secure tenants currently living on the Love Lane Estate is also representative of the present time. The number of eligible non-secure tenants may decrease, for example, if any of these residents are offered a secure tenancy in a Council property off the Love Lane Estate prior to the properties being required for the delivery of High Road West. In this scenario, the tenant would no longer be eligible for a new home as part of the scheme. The number of eligible non-secure tenants is not expected

to increase, as any tenants who move to the estate in future will not have fulfilled the eligibility criteria (that is, by not having lived on the Estate for 6 months prior to the publication of the Landlord Offer).

**Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?**

*Explain how you will overcome this within the proposal.*

### **Sex**

<b>Gender</b>	<b>Non-secure tenants on LLE</b>		<b>Housing Register Band B</b>	
	<b>%</b>	<b>Count</b>	<b>%</b>	<b>Count</b>
Female	78%	146	76%	2331
Male	22%	41	24%	748
Other	0%	0	<1%	<5
<b>Grand Total</b>	<b>100%</b>	<b>187</b>	<b>100%</b>	<b>3081</b>

This data shows that there is a 2% higher percentage of female non-secure tenants at Love Lane Estate in comparison with the average profile of licensees with Band B rehousing priority on the housing register.

<b>Marital Status</b>	<b>Non-secure tenants on LLE</b>		<b>Housing Register Band B</b>	
	<b>%</b>	<b>Count</b>	<b>%</b>	<b>Count</b>
Civil Partner	0%	0	1%	39
Divorced	8%	15	4%	115
Living with partner	<2%	<5	1%	44
Married	32%	59	31%	970
Separated	0%	0	1%	25
Single	55%	103	56%	1724
Unknown	5%	9	5%	160
Widowed	0%	0	<1%	<5
<b>Grand Total</b>	<b>100%</b>	<b>187</b>	<b>100%</b>	<b>3081</b>

It is also noteworthy that there is 3% higher number of single parent households on the Love Lane Estate in comparison to the Band B licensees. In Haringey, 94% of single parent households are led by women.

### **Gender reassignment**

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

## Age

Age group	Non-secure tenants on LLE		Housing Register Band B	
	%	Count	%	Count
15-19	0%	0	<1%	<5
20-24	<2%	<5	2%	68
25-29	10%	19	9%	273
30-34	24%	45	16%	488
35-39	14%	26	17%	538
40-44	15%	28	18%	561
45-49	13%	25	15%	454
50-54	12%	23	11%	351
55-59	6%	11	6%	194
60-64	3%	5	3%	92
65-69	0%	0	1%	28
70-74	0%	0	0%	14
75-79	<2%	<5	0%	8
80-84	0%	0	0%	5
85-89	0%	0	<1%	<5
90 and over	0%	0	<1%	<5
<b>Grand Total</b>	<b>100%</b>	<b>187</b>	<b>100%</b>	<b>3081</b>

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

There is a higher percentage of the 25-29 (by 1%), 30-34 (by 8%) and 50-54 (by 1%) age groups amongst Love Lane non-secure tenants. There is a lower percentage of the 35-39 (by 3%), 40-44 (by 3%), 45-49 (by 2%) and 50-54 (by 1%) age groups. The 25-29 and 30-34 age groups are more likely to have growing families, and therefore the decision may have a proportionately higher impact on these age groups as well as on children. We can therefore conclude that the Love Lane non-secure tenants have a slightly younger age profile in comparison to licensees with Band B rehousing priority on the housing register.

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

## Disability

Disabled	Non-secure tenants on LLE		Housing Register Band B	
	%	Count	%	Count
N	93%	174	88%	2715
Y	7%	13	12%	366
<b>Grand Total</b>	<b>100%</b>	<b>187</b>	<b>100%</b>	<b>3081</b>

This data shows that there is a 5% lower percentage of households with disability on the Love Lane Estate in comparison with licensees with Band B rehousing priority on the housing register and therefore disabled persons are comparatively overrepresented in the group potentially negatively affected by the LLP. This is considered further below.

### Race and ethnicity

Race/ethnicity	Non-secure tenants on LLE		Housing Register Band B	
	%	Count	%	Count
Black: African, Caribbean, British	51%	95	43%	1339
Asian: British, Chinese, Bangladeshi, East African, Pakistani, Indian	4%	8	6%	191
Mixed: Asian, Black, White, Other	4%	8	4%	136
Other: Asian, Black, White, European	21%	40	23%	698
Traveller / Irish Traveller	0%	0	<1%	15
White: British, Turkish, Irish, Kurdish, Greek Cypriot, Turkish Cypriot	16%	29	16%	504
Unknown: Refused or no response	4%	7	6%	198
<b>Grand Total</b>	<b>100%</b>	<b>187</b>	<b>100%</b>	<b>3081</b>

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

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

### Sexual orientation

3.6% of residents in Haringey identify as Gay, Lesbian, Bisexual or another non-Heterosexual sexuality. This information is held for only 5% of non-secure tenants at Love Lane and 11% of licensees with Band B rehousing priority on the housing register. The Council does not envisage the HRW LLP will have a disproportionate impact on this protected characteristic.

### Religion or belief (or no belief)



Religion / Faith	Non-secure tenants on LLE		Housing Register Band B	
	%	Count	%	Count
Buddhist	0%	0	<1%	<5
Christian	<2%	<5	3%	80
Muslim	<2%	<5	2%	57
No Religion	0%	0	<1%	10
Other	0%	0	<1%	<5
Prefer not to say	0%	0	<1%	5
Roman Catholic	0%	0	<1%	<5
Unknown	98%	183	95%	2925
<b>Grand Total</b>	<b>100%</b>	<b>187</b>	<b>100%</b>	<b>3081</b>

The available housing register data includes very low reporting rates for religion / belief. It is therefore not possible to assess whether the HRW LLP will have a disproportionate impact on any specific faith group.

#### Pregnancy / maternity

Pregnancy/maternity	Non-secure tenants on LLE		Housing Register Band B	
	%	Count	%	Count
N	99%	180-185	99%	3053
Y	1%	1-5	1%	28
<b>Grand Total</b>	<b>100%</b>	<b>187</b>	<b>100%</b>	<b>3081</b>

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

#### Marriage and civil partnership

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

**4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?**

*Please outline which groups you may target and how you will have targeted them*

**Further information on consultation is contained within accompanying EqIA guidance**

Following a Cabinet decision to approve the recommendation to consult on the draft LLP in March 2020, the Council carried out a six-week consultation between 5 February and 19 March 2021. This sought the views of:

- Secure tenants in the masterplan area (including Love Lane Estate);
- Non-secure tenants in the masterplan area (including Love Lane Estate); and
- Households on the housing register and not living in the masterplan area.

The consultation was designed to use a range of methods to maximise participation, ensure equal access across demographics and tenures, and overcome issues of digital exclusion. Further details can be found in the Consultation & Engagement report, see Appendix 1 of the Cabinet decision for May 2021. This included:

- Letters and hard copies of consultation and engagement materials were sent to all affected households on Love Lane Estate (241). Translated copies were sent on request to 21 households, across seven languages.
- Emails or letters were sent to all households on the wider housing register (11,556 households) informing them of the consultation and providing information on how to respond. Hard copies of the policy documents available on request, which were sent to 53 households.
- The High Road West engagement team attempted to speak to every resident living in the masterplan area, and successfully spoke to 155 secure and non-secure tenants by phone at least once, 64% of the total number. Officers also spoke to 103 residents on the wider housing register. Residents had the option of having a translator also take part in the call.
- Respondents could submit feedback by post or online poll, or provide informal feedback through phone calls and email.
- A dedicated consultation page was in place on the council's High Road West website, and promotion of the consultation and engagement activities on the council's social media channels.
- Three online Q&A events took place on the LLP as an alternative to in-person events due to covid-19 restrictions. This included dedicated sessions for each consultee group. These were available to watch back after the broadcast date.
- An infographic video ([link](#)) was produced to explain the draft Local Lettings Policy for both Love Lane tenants and those on the wider housing register.

The consultation materials included an equality monitoring form to enable the Council to understand the profile of respondents and fully understand any equalities-related issues that may arise from the HRW LLP.

**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?*

A total of 164 responses were received to the consultation, including 53 from non-secure tenants in the masterplan area, 8 from secure tenants in the masterplan area, and 103 from households on the wider housing register.

The consultation put forward questions on two key proposals of the draft policy, which relate to the eligibility criteria for the new homes, and the priority order for new home lets. Of the total number of respondents, 65% were in favour of both proposals, including 89% of respondents who answered these questions. All three consultee groups were in favour of the proposals, which was consistent among all protected characteristic groups.

Respondents who were positive about the proposals referred to the benefits it would bring in protecting the stability of the existing community and networks, and in prioritising those who may be affected by disruption through the regeneration process.

In terms of protected characteristics, comments were made that priority should be given to specific housing needs and particularly health. This was referenced in comments from both tenants in the masterplan area and those on the wider housing register.

In terms of the former, the LLP states that where homes are adapted for people with a disability, such homes will be ringfenced to those specific residents, and will not be allocated to general needs applicants unless it is demonstrably the case that there are no households which include someone with a disability who wishes to occupy them. The Council also maintains the ability to depart from the policy in exceptional circumstances including in response to specific housing needs.

The LLP does not generally include provision for households on the wider housing register with specific housing needs to be prioritised over non-secure tenants on Love Lane (beyond the homes with specific adaptations as referenced above), however as set out in the following section, data analysis indicates that demographics are broadly similar when comparing Love Lane Estate tenants and those with Band B rehousing priority on the housing register.

**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 EqlA guidance

**1. Sex**

Positive	X	Negative		Neutral impact		Unknown Impact	
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The data analysis in section 3 does not indicate that a particular sex group will be disproportionately impacted by the decision, as women make up the majority of both

non-secure tenants on the Love Lane Estate and those licensees with Band B rehousing priority on the housing register.

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

## 2. Gender reassignment

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

## 3. Age

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

As young adults are more likely to have children within their household, the decision may also positively impact children and young people. The proposal has specific benefits for young people living in non-secure tenancies on the Love Lane Estate, in that they can benefit from their family's established support networks in place in the local area, and potentially avoid having to move between schools or colleges.

The decision may negatively impact on elderly households in Band B, however as there is a small number of these households on the housing register, the impact is likely to be relatively small. For the few households of older people living in non-secure tenancies on the Love Lane Estate (less than 10 households who are 60 or over), there is also a specific benefit. Older people may have support networks in place in the local area, including established relationships with their neighbours, and live close to family members who provide them with care and support. They will be familiar with the community facilities for older residents available locally. This policy will support these residents to remain in the local area and therefore retain these networks.

## 4. Disability

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

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

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

#### 5. Race and ethnicity

Positive	X	Negative		Neutral impact		Unknown Impact	
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The data analysis in section 3 indicates that the decision will have a disproportionate positive impact on black households, who will benefit more from the proposals. Black households make up 54% of those in non-secure tenancies on the Love Lane Estate, compared to 46% of households on Band B of the housing register. The proposal is therefore likely to result in greater housing stability for black households.

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

#### 6. Sexual orientation

Positive		Negative		Neutral impact		Unknown Impact	X
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The Council has limited data based on this protected characteristic. The Council does not envisage the HRW LLP will have a disproportionate impact on this particular

protected characteristic. The consultation on the HRW LLP will enable the Council to identify any specific impacts on individuals who share this protected characteristic and the EqIA that follows the consultation will note these if they are identified.

**7. Religion or belief (or no belief)**

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

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

**8. Pregnancy and maternity**

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

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

**9. Marriage and Civil Partnership**

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

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

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

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

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

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

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

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

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

Further information on responding to identified impacts is contained within accompanying EqlA guidance

Outcome	Y/N
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<p><b>No major change to the proposal:</b> 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></p>	Y
<p><b>Adjust the proposal:</b> 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</p>	
<p><b>Stop and remove the proposal:</b> the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.</p>	

**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:**

As the lettings of the new council homes take place, data on the protected characteristics of non-secure tenants prioritised for the new homes will be compared to updated demographics of applicants on the housing register with Band B priority. Any concerns on the equalities impact of this policy at the time of implementation will be considered to inform future Local Lettings Policies or any new Housing Allocations Policy in development.



### 7. Authorisation

EqlA approved by Robbie Erbmann  
(Director)



Date 26/04/2021

### 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.