

## Equality Impact Assessment (EQIA)

The Equality Impact Assessment (EQIA) form is a template for analysing a policy or proposed decision for its potential effects on residents with protected characteristics covered by the Equality Act 2010.

The council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not

The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

Although it is not enforced in legislation as a protected characteristic, Haringey Council recognises the profound and far-reaching impacts of socioeconomic disadvantage treats socioeconomic status as a local protected characteristic.

### 1. Responsibility for the Equality Impact Assessment

<b>Name of proposal:</b>	<b>Draft Housing Strategy 2022-2027</b>
<b>Service Area:</b>	<b>Housing</b>
<b>Officer Completing Assessment:</b>	<b>Hannah Adler / Marc Lancaster</b>
<b>Equalities/HR Advisor:</b>	<b>Jim Pomeroy</b>
<b>Cabinet meeting date (if applicable):</b>	<b>8 March 2022</b>
<b>Director/Assistant Director</b>	<b>David Joyce / Robbie Erbmann</b>

### 2. Executive summary

Please complete this section *after* completing the rest of the form and summarise:

*The proposal is for a new Housing Strategy for Haringey, to run from 2022-2027. The Housing Strategy is a wide-ranging document which covers a number of housing issues and sets out the Council's approach to addressing these issues.*

*The strategy comprises 4 strategic objectives, covering the following areas:*

- Delivering the new homes Haringey needs*
- Improving housing quality and resident services in the social housing sector*
- Improving the quality of the private rented sector*
- Preventing and alleviating homelessness*

*The proposals under each of these objectives are set out below. However, this is a draft strategy, and the next stage is a period of consultation and engagement with residents and stakeholders. Following this, and based on responses to the consultation, a final strategy will be prepared.*

### *1) New homes*

- a. Firstly, the Strategy sets out an overall target of 1592 new homes per year. This is in accordance with the Mayor of London's London Plan.*
- b. Secondly, the Strategy notes the preferred types of affordable housing in Haringey, based on a Strategic Housing Market Assessment. There is a strong preference for affordable housing to be developed as housing for affordable rent, not affordable sale. Within this, there is a strong preference for homes at social rent, as opposed to other forms of affordable rented housing.*
- c. Thirdly, the Strategy sets out the required mix in terms of house size. The preferred mix for social rented housing considers both the longer-term needs of the borough alongside the shorter-term needs identified from the Council's housing register. The required mix for intermediate rented housing and for intermediate home ownership is also set out.*
- d. Fourthly, the Strategy commits to continuing with a major new Council Housing Delivery Programme.*

### *2) Social rented sector*

- a. The Strategy commits to wide ranging improvements in the social rented sector.*
- b. For the Council's own homes, tenants and leaseholders, this includes commitments to major works and to bringing all homes up to decent homes standard, to improving services to tenants, and to the greater involvement of residents in decision making. It also sets out the Council's intention to bring housing management services back in-house and to take this opportunity to better integrate services.*
- c. The Strategy also commits to continued close working with other registered providers of social housing in Haringey, to ensure improvements across the whole sector.*

### *3) Private rented sector*

- a. The Strategy commits to improving the private rented sector and providing support to tenants in the private rented sector in three ways.*

*Firstly, the Strategy commits to the continuation of existing licensing schemes and to the implementation of new licensing schemes and to measures that will support landlords to understand and meet their responsibilities.*

- b. Secondly, the Strategy commits the Council to using its enforcement powers to take action where landlords are failing to meet standards, and to bring empty homes into use where possible.*
- c. Finally, the Strategy commits to providing a broad range of support to tenants in the private rented sector – both through its own services as well as by signposting to partners in the borough. It also commits to communicating private tenants' rights and responsibilities more clearly.*

#### *4) Preventing and alleviating homelessness*

- a. The Strategy commits to continuing the Council's work preventing homelessness as far as possible, by intervening early and working with residents to resolve issues which could lead to homelessness.*
- b. The Strategy sets out the Council's preferred accommodation options to prevent households becoming homeless, or to use as temporary accommodation for households who are homeless. It also commits to broader support for households living in temporary accommodation.*
- c. The Strategy sets out the Council's commitment to supporting people who are, or are at risk of, sleeping rough.*
- d. The Strategy sets out high level principles for a new housing allocations policy (a separate policy document which will be agreed by Cabinet and accompanied by an EQIA).*

*The overarching aim of the housing strategy is to ensure that all Haringey residents have a safe, stable and secure home. To that end, it is a strategy which concerns all residents in the borough. However, different strategic approaches will be taken for different groups of residents, who can broadly be grouped according to their housing tenure.*

*The first strategic objective concerns the new homes to be delivered in the borough over the next 5-year period. While the overall number of new homes is set out in the London Plan, with the Local Plan setting out where these homes will be built – and the expected percentage of affordable housing in new development – the Housing Strategy specifically:*

- Sets out a clear preference for social rented housing over other kinds of affordable housing, while making it clear that all affordable housing is welcomed. This means there is a preference for social housing over other forms of affordable rented housing (e.g. intermediate rent) as well as affordable home ownership (e.g. shared ownership or first homes). This means that the Strategy is prioritising the needs of those who need social rented housing over those*

*who need other forms of affordable housing. This decision is taken on the basis of clear evidence from the Strategic Housing Market Assessment, but needs to be noted and considered.*

- Sets out the desired breakdown of affordable homes of various types by bedroom size. There is an emphasis on providing more family sized social rented homes (which means fewer 1-bedroom homes). This is based on an analysis of existing supply and existing and projected need.*
- In the affordable home ownership sector, there is an emphasis on more 1-bed homes because larger affordable homes for ownership become unaffordable to those who are eligible for them. This means that some households who do not qualify or are not a priority for social housing but will struggle to buy market housing may be disadvantaged. However, this is to a great extent due to the high cost of affordable home ownership for larger homes.*

*With regard to the second strategic objective, the broad aims are around improving the quality of housing the council owns, as well as the services provided to tenants and leaseholders. These will benefit council tenants and leaseholders. There is also a commitment to work to improve the social housing sector as a whole, which will benefit all social tenants in the borough. The commitments to tenants of other social landlords are less wide-ranging than to council tenants since the Council has the powers and resources to improve its own stock.*

*With regard to the third strategic objective, the broad aims are firstly to improve the quality of housing in the private rented sector in the borough by providing guidance and support to private landlords and by using the full range of the Council's powers to license and enforce standards, and secondly to provide more support to residents in this sector. These objectives are designed to benefit people living in the private rented sector.*

*With regard to the fourth strategic objective, the broad aims are around preventing people from becoming homeless by providing them with early and targeted support, ensuring that people who become homeless and are in priority need are provided with accommodation to suit their needs and broader wrap-around support, supporting those at risk of rough sleeping, and setting out broad principles for a new housing allocations policy. These objectives are designed to support some of the borough's most vulnerable people – those who are already homeless or at risk of becoming so, and those who are sleeping rough or at risk of sleeping rough. With regard to the last objective, the Council's housing allocations policy sets out who is prioritised for social housing. This is an important policy with important equalities' considerations, and when the new policy is brought forward (initially for consultation) it will be accompanied by a full equalities' impact assessment.*

*The Housing Strategy can therefore be understood as prioritising the needs of the following groups of residents:*

- Those who need social rented housing; i.e. those who are currently on the housing register*

- Those who already live in social rented housing
- Those who live in the private rented sector
- Those who are homeless, and at risk of homelessness
- Those who are rough sleeping, or at risk of rough sleeping

*By stating a clear preference for social rented housing over other types of affordable housing, in particular affordable home ownership, the Housing Strategy has prioritised the needs of those who need social rented housing over those who are not prioritised for social rented housing but cannot afford market housing. This group is most likely to live in the private rented sector, so by striving to improve this sector the Housing Strategy addresses their immediate housing situation rather than that which they aspire to. It is worth noting that planning policy requires a percentage of homes to be delivered as intermediate housing so this will still be provided. And it is likely that a majority of the new homes built in the borough will be for private sale which will support some, but not all, aspiring homeowners.*

*With regard to the needs of existing owner-occupiers, with or without mortgages, the housing strategy does not propose any new policies. This is primarily due to the lack of levers or powers the Council can exercise in this area, and the fact that this group already live in secure housing which they are likely to be able to afford.*

### **3. Consultation and engagement**

3a. 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?

*Consultation and engagement will significantly inform the final Housing Strategy and allow us to assess and if necessary further mitigate its impact on protected groups of residents.*

*The Housing Strategy will be subject to a statutory consultation as well as more in-depth engagement and participation with residents. Data on consultees and on residents engaging and participating in strategy development will be collected and considered as part of responses to the consultation and broader engagement and participation. The Council's Equality Monitoring guidance will be followed.*

3b. 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

*Tbc – following consultation*

### **4. Data and Impact Analysis**



**Please consider how the proposed change will affect people with protected characteristics.**

## **4a. Age**

### **Data**

#### **Borough Profile<sup>1</sup>**

56,718: 0-17 (21%)

72,807: 18-34 (27%)

68,257: 35-49 (25%)

44,807: 50-64 (17%)

28,632: 65+ (11%)

**What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?**

*A combination of council-held data, the census and studies showing national and regional trends.*

### **Detail the findings of the data.**

*13.5% of homeowners are aged 65 or over – more than the borough average population and more than live in any other tenure<sup>2</sup>. This matches more recent data showing that while London's home ownership rate has fallen in recent decades, there are stark differences in the trends for different age groups. Home ownership has fallen for all age groups other than the over 65s, and most sharply for people aged under 35: in 1990, 25% of households in London headed by someone aged 16-24 and 57% of households headed by someone aged 25-34 owned their home. However, by 2019 these figures had fallen to 5% and 29% respectively.<sup>3</sup>*

*60% of private renters are aged between 25 and 49 – far more than the population in general (46.1%), and significantly more than in any other tenure.<sup>4</sup>*

*Just 2.2% of private renters are aged over 65 and 5.4% are aged between 50 and 64<sup>5</sup>. More recent London-wide data shows that while private renters still tend to be younger, there has been an increase over the last decade in the number older private renters, with 10% now aged between 55 and 64.<sup>6</sup>*

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<sup>1</sup> Source: State of the Borough

<sup>2</sup> 2011 Census

<sup>3</sup> Housing in London 2020 The evidence base for the London Housing Strategy – GLA

<sup>4</sup> 2011 Census

<sup>5</sup> 2011 Census

<sup>6</sup> English Housing Survey 2019-20

*9.7% of social renters are aged 65 or over, a slightly higher rate than for the population (8.6%).<sup>7</sup>*

*Haringey Council tenants are much older than the borough in general, with 69% aged over 50, 40% aged over 60, and 20% aged over 70.<sup>8</sup>*

*76% of households on the housing register are aged under 50. However, 30% of those in the most urgent need are aged over 60 years.<sup>9</sup>*

## **Impacts**

*Older people are far more likely to be homeowners than younger people. It is arguable that younger people aspiring to homeownership but unable to afford market prices are not supported in this by the housing strategy, since the housing strategy states an explicit preference for social rented housing over affordable home ownership. However, affordable home ownership will still be delivered in Haringey; and the challenges of home-ownership for younger people need to be addressed nationally. Additionally, delivering new social housing benefits the 76% of households on the housing register who are aged under 50.*

*Younger people are more likely to live in the private rented sector, although the number of older people in the private rented sector is also growing. By seeking to improve conditions in the private rented sector, the housing strategy will benefit people across all age groups.*

*Older people are disproportionately represented among council tenants. By seeking to improve the condition of council owned stock, as well as services provided to council tenants, this group will be supported by the housing strategy. By increasing the housing stock, younger families will be given more opportunity to move into a suitably sized and affordable home.*

*There is therefore both a positive and negative impact on people who share this protected characteristic.*

## **4b. Disability<sup>10</sup>**

### **Data**

#### **Borough Profile <sup>11</sup>**

4,500 people have a serious physical disability in Haringey.

19,500 aged 16-64 have a physical disability this equates to approximately 10% of the population aged 16-64.

1,090 people living with a learning disability in Haringey.

4,400 people have been diagnosed with severe mental illness in Haringey.

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<sup>7</sup> 2011 Census

<sup>8</sup> HfH data

<sup>9</sup> HfH data

<sup>10</sup> In the Equality Act a disability means a physical or a mental condition which has a substantial and long-term impact on your ability to do normal day to day activities.

<sup>11</sup> Source: 2011 Census

## **What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?**

*A combination of council-held data, the census and studies showing national and regional trends.*

### **Detail the findings of the data**

*12.8% of Haringey homeowners are limited in their day-to-day activities by disability or serious illness compared to 13.7% of the Haringey population. 46.2% of disabled homeowners are aged under 65.<sup>12</sup>*

*Only 7.6% of private renters are limited in their day-to-day activities by disability or serious illness compared to 13.7% of the Haringey population.<sup>13</sup>*

*23.0% of social renters are limited in their day-to-day activities by disability or serious illness – far more than the 13.7% of Haringey population. 72% of social renters affected by disability or serious illness are aged under 65.<sup>14</sup>*

*33% of Council tenants have a disability. 32% of those in the most urgent need on the housing register have a disability.<sup>15</sup>*

### **Impacts**

*Social tenants, and in particular council tenants, are more likely to be limited in their day-to-day activities by a disability or illness. The housing strategy seeks to address this in two key ways: firstly, by seeking to improve the condition of council owned stock and services provided to council tenants; secondly by taking a needs-based approach to the delivery of new council housing to ensure that new housing meets the needs of those on the housing register with a disability, as well as by ensuring that supported housing is delivered as part of the overall supply of new housing in the borough.*

*The proposed strategy will have both a positive and a neutral impact on people who have a disability, depending on housing tenure.*

## **4c. Gender Reassignment<sup>16</sup>**

### **Data**

#### **Borough Profile**

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<sup>12</sup> 2011 Census

<sup>13</sup> 2011 Census

<sup>14</sup> 2011 Census

<sup>15</sup> Homes for Haringey data

<sup>16</sup> Under the legal definition, a transgender person has the protected characteristic of gender reassignment if they are undergoing, have undergone, or are proposing to undergo gender reassignment. To be protected from gender reassignment discrimination, an individual does not need to have undergone any specific treatment or surgery to change from one's birth sex to one's preferred gender. This is because changing one's physiological or other gender attributes is a personal process rather than a medical one.



There is no robust data at Borough level on our Trans population, however the central government estimates that there are approximately 200,000-500,000 Trans people in the UK. Assuming an average representation, this would mean between 800 and 2000 Haringey residents are Trans.<sup>17</sup>

### **Detail the findings of the data.**

*As noted above, we have no further data with regard to gender reassignment. We do know that 25% of young people who are rough sleeping are LGBT.*

### **Impacts**

*The housing strategy's aim is that everyone in Haringey has a safe, stable and secure home; including residents who identify as trans. Additionally, the strategy has as a fundamental principle co-producing services and policy with residents, including residents who are often unrepresented in consultation and engagement exercises.*

*By seeking to improve support to people who are, or are at risk of, rough sleeping, the housing strategy should have a positive impact on this group in which LGBT people are overrepresented.*

*The proposed strategy will have both a positive and a neutral impact on people who are trans.*

## **4d. Marriage and Civil Partnership**

*The housing strategy makes no distinction between those who are married and those who are in a civil partnership so there is no likelihood of either married couples or couples in a civil partnership being disproportionately affected.*

## **4e. Pregnancy and Maternity**

### **Data**

#### **Borough Profile <sup>18</sup>**

Live Births in Haringey 2019: 3646

**What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?**

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<sup>17</sup> Trans is an umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth.

<sup>18</sup> Births by Borough (ONS)

*A combination of council-held data, the census and studies showing national and regional trends.*

### **Detail the findings of the data.**

*2% of households moving into social housing in London included a pregnant woman<sup>19</sup>. The Labour Force Survey for the same year (2019-20) does not report the proportion of all households in London that include a pregnant woman, but it does say that 3% of households have one or more children aged under 12 months.*

*The share of households with children has varied little for households that own their home outright (from 13% in 2004, to 14% in 2020) and has risen for households that are buying with a mortgage (from 44% in 2012 to 51% in 2020).<sup>20</sup>*

*31% private renting households in London include children, up from one in five in 2004.<sup>21</sup>*

*The share of households with children in Haringey has fallen slightly for social renting households (from 43% to 38%) in 2020).<sup>22</sup>*

### **Impacts**

*The housing strategy seeks to provide housing for Haringey's families, in particular by increasing the percentage of social rented homes delivered as larger homes.*

*The housing strategy sets the breakdown of affordable home ownership towards one-bedroom homes. This is because larger homes for ownership become too expensive for qualifying households to buy. This could have a negative impact on some people who are pregnant or with young children who cannot afford market housing.*

*It also seeks to improve conditions in the private rented sector in general, a sector housing a growing number of households with children.*

*The proposed strategy will have both a mostly positive impact on people who are pregnant or who have young children, although a potentially negative impact on those who aspire to affordable home ownership.*

## **4f. Race**

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<sup>19</sup> CORE lettings data, MHCLG 2019

<sup>20</sup> Labour Force Survey household data, 2020

<sup>21</sup> Housing in London 2020 The evidence base for the London Housing Strategy – GLA

<sup>22</sup> Labour Force Survey household data, 2020

## Data

### Borough Profile <sup>23</sup>

Arab: **0.9%**

Any other ethnic group: 3.9%

Asian: **9.5%**

Bangladeshi: 1.7%

Chinese: 1.5%

Indian: 2.3%

Pakistani: 0.8%

Other Asian: 3.2%

Black: **18.7%**

African: 9.0%

Caribbean: 7.1%

Other Black: 2.6%

Mixed: **6.5%**

White and Asian: 1.5%

White and Black African: 1.0%

White and Black Caribbean: 1.9%

Other Mixed: 2.1%

White: **60.5% in total**

English/Welsh/Scottish/Norther Irish/British: 34.7%

Irish: 2.7%

Gypsy or Irish Traveller: 0.1%

Other White: 23%

### **What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?**

*A combination of council-held data, the census and studies showing national and regional trends.*

### **Detail the findings of the data**

*72.3% of homeowners in Haringey are white. This includes 51.4% who are white British, 4.6% white Irish, and 16.2% who are white and not British. 52.9% of white British household heads in Haringey own their own home. <sup>24</sup>*

*27.7% of homeowners are from a BAME group - 12.3% of homeowners are Black, 9.8% are Asian, 2.9% are mixed and 2.8% are another BAME ethnicity.*

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<sup>23</sup> Source: 2011 Census

<sup>24</sup> Census 2011

*48.6% of Asian household heads in Haringey own a home, 29.4% of multiple or mixed ethnicity, 27.3% of a Black ethnicity, and 25.8% of another BAME ethnicity.*

*People who are white and not British are significantly over-represented in Haringey's private rented sector, where they form the largest group: 34.7% of private renters define as white other (compared to 26.3% of the Haringey population), 33.5% as white British, and 2.7% as white Irish. 51.3% of household heads who define as white other in Haringey rent privately, 28.2% of white British, and 22.7% of white Irish.*

*People from BAME backgrounds are under-represented in Haringey's private rented sector: 29.1% of private renters are BAME compared to 34.5% of the household population. The 2011 private renting population included 4.1% who define as mixed/multiple ethnic groups, 7.3% as Asian/Asian British, and 12.5% as Black/African/Caribbean/Black British. The only BAME group over-represented in the private rented sector defines their ethnicity as other than Black, mixed, or Asian – 6.4% of private renters belong to this group while making up just 4.3% of the population.<sup>25</sup>*

*Haringey Council tenants are disproportionately from BAME backgrounds. A third identify as Black. Council tenants who are young, Black, Bangladeshi, or women are much more likely to live in overcrowded households. 60% of severely overcrowded households are Black.<sup>26</sup>*

*4% Of Council tenants are White Kurdish, 6% White Turkish, 3% White Turkish Cypriot, and 1% White Greek Cypriot. 19% are white British.<sup>27</sup>*

*Just 10% of households on the housing register are white British. 62% are BAME.<sup>28</sup>*

*61% of households in temporary accommodation are from BAME groups. 43% of residents accepted as statutory homeless are black.<sup>29</sup>*

*25% of people experiencing rough sleeping in Haringey are Black, 19% are white British, and 42% white and not British.<sup>30</sup>*

## **Impacts**

*The housing strategy will have a positive impact on those living in council housing, who are disproportionately from BAME backgrounds.*

*Delivering more council housing will benefit those on the housing register, on which black households are very overrepresented.*

*Delivering more family sized housing will benefit overcrowded council tenants, who are more likely to be Black or Bangladeshi.*

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<sup>25</sup> Census 2011

<sup>26</sup> HfH data

<sup>27</sup> HfH data

<sup>28</sup> HfH data

<sup>29</sup> HfH data

<sup>30</sup> State of the borough

*People who are white and not British are significantly over-represented in Haringey's private rented sector, so improving this sector will benefit this group.*

*The proposed strategy will have both a positive and a neutral impact on people who share a protected characteristic related to race.*

## **4g. Religion or belief**

### **Data**

#### **Borough Profile <sup>31</sup>**

Christian: 45%

Buddhist: 1.1%

Hindu: 1.9%

Jewish: 3%

Muslim: 14.2%

No religion: 25.2%

Other religion: 0.5%

Religion not stated: 8.9%

Sikh: 0.3%

**What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?**

*Census data <sup>32</sup>*

### **Detail the findings of the data**

*46.9% responding to the census question identified as Christian, 27.1% stated that they had no religion, 11.2% as Muslim, 2.4% as Jewish, 1.6% as Hindu, 1.2% as Buddhist, and 0.3% as Sikh.*

*Significantly higher proportions of people identifying their religion as Jewish (4.1% of homeowners) and Hindu (2.4%) own their own home compared to their overall share of the borough's population. Muslims are significantly less likely than other religious groups to own their home.*

*People with no religion are more likely to rent privately – 31.2% of private renters say they have no religion compared to 25.2% of the borough as a whole. Apart from Buddhists, who are slightly more likely to rent privately than to live in other tenures, all religious groups are under-represented in the private rented sector.*

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<sup>31</sup> Source: 2011 Census

<sup>32</sup> Source: 2011 Census



*Muslims are much more likely to rent from a social landlord – 19.6% of social renters identify as Muslim, compared to 14.2% of the borough as a whole. Christians are a little more likely to rent from a social landlord – 53.1% of social renters give their religion as Christianity.*

## **Impacts**

*The proposed strategy will have a mostly neutral impact on people who share a protected characteristic related to religion and a positive impact given the increased likelihood of people who are Muslim renting from a social landlord.*

## **4h. Sex**

### **Data**

#### **Borough profile <sup>33</sup>**

Females: (50.5%)

Males: (49.5%)

#### **What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?**

*A combination of council-held data and the census.*

#### **Detail the findings of the data**

*Women and girls are slightly more likely to live in owner-occupied homes than men or boys – while they make up 50.5% of the population, they make up 51.2% of residents in owner-occupied homes. <sup>34</sup>*

*Women and girls are less likely to live in Haringey's private rented sector than men or boys – while they make up 50.5% of the population, they make up 47% of residents in the private rented sector. <sup>35</sup>*

*Women and girls are more likely to live in Haringey's social rented sector than men or boys – they make up 54% of residents in the social rented sector. <sup>36</sup>*

*64% of people holding a Council tenancy are women. 63% of households on the housing register are comprised of, or are headed by, women. <sup>37</sup>.*

*11,285 households are waiting for social housing on the housing register. Two thirds of them are households headed by women. <sup>38</sup>.*

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<sup>33</sup> Source: 2011 Census

<sup>34</sup> 2011 census

<sup>35</sup> 2011 census

<sup>36</sup> 2011 census

<sup>37</sup> HfH data

<sup>38</sup> HfH data

*In Haringey, only 15% of people experiencing rough sleeping were women. The average age of death for women who experience rough sleeping is 42 years; for men it is 44.<sup>39</sup>*

## **Impacts**

*Women are overrepresented in the social housing sector and particularly the council housing sector. They are also overrepresented on the housing register. By seeking to improve social and in particular council housing in the borough; and by delivering new council homes to let to households on the housing register, the housing strategy should have a broadly positive impact on this group of women.*

*Fewer men live in the social housing sector and fewer men are on the housing register, meaning that this group are less likely to benefit from the delivery of new Council housing.*

## **4i. Sexual Orientation**

Data

### **Borough profile <sup>40</sup>**

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

### **What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?**

*We do not have reliable data on sexuality by tenure.*

*We do know that 25% of young people who are rough sleeping are LGBT.*

## **Impacts**

*The housing strategy's aim is that everyone in Haringey has a safe, stable and secure home; including residents who identify as lesbian, gay and bisexual. Additionally, the strategy has as a fundamental principle co-producing services and policy with residents, including residents who are often unrepresented in consultation and engagement exercises. By seeking to improve support to people who are, or are at risk of, rough sleeping, the housing strategy should have a positive impact on this group in which LGBT people are overrepresented.*

## **4j. Socioeconomic Status (local)**

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<sup>39</sup> State of the Borough

<sup>40</sup> Source: ONS Integrated Household Survey

## Data

### Borough profile

#### Income<sup>41</sup>

Haringey is the 4th most deprived in London as measured by the IMD score 2019 (where 1 = most deprived). The most deprived LSOAs (Lower Super Output Areas or small neighbourhood areas) are more heavily concentrated in the east of the borough.

22.4% of the population in Haringey aged 16-65 receive Universal Credit as of March 2021.

29% of employee jobs in the borough are paid less than the London Living Wage. The average wage of someone working in Haringey is £30,452 per year and the average resident wage (including people who travel out of the borough for work) is £35,769 per year.

#### Educational Attainment<sup>42</sup>

While Haringey's proportion of students attaining grade 5 or above in English and Mathematics GCSEs is higher than the national average, it performs worse than London.

5.5% of Haringey residents have no qualifications.

### What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

*A combination of council-held data, the census and studies showing national and regional trends.*

### Detail the findings of the data

*The average price for a home in Haringey is £585,338 – more than the London average<sup>43</sup> and 16 times the median Haringey salary. The median income for employees living in the borough is £36,561. <sup>44</sup>*

*London's private renters reflect the income distribution of the wider population. 58% of private tenants are in the top two fifths of the national household income distribution and 14% are in the bottom fifth. A quarter of private renters nationally said they found it difficult to afford their rent. <sup>45</sup>*

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<sup>41</sup> Source: Annual Survey of Hours and Earnings, ONS, 2019

<sup>42</sup> Source: Annual Population Survey 2019 (via nomis)

<sup>43</sup> Land Registry Data - UK House Price Index. January 2022

<sup>44</sup> ONS annual survey of hours and earnings - resident analysis 2021 (via NOMIS Labour Market Profile)

<sup>45</sup> EHS 2019-20

*In 2019-20, 60% of private renters reported having no savings. Nearly half of private renters do not expect to ever own a home. <sup>46</sup>*

*A fifth of private renters in Haringey - 7,800 households - are in receipt of Housing Benefit. <sup>47</sup>*

*Two thirds of Council and Housing Association tenants have a household income less than £20,000 a year. <sup>48</sup>*

*There are significant gaps in healthy life expectancy between populations in Haringey: the gap in healthy years of life between richest and poorest deciles is 15 years for men and 17 years for women.*

## **Impacts**

*By prioritising the new supply of the most affordable housing (social rented housing), the housing strategy supports the borough's poorest residents to access secure and safe housing.*

*By improving conditions in social housing, the housing strategy will improve the housing of some of the borough's poorest residents.*

*By improving conditions in the private rented sector, the housing strategy will improve housing conditions for some of the borough's poorer residents.*

## **5. Key Impacts Summary**

### **5a. Outline the key findings of your data analysis.**

*The housing strategy is a major strategy which will impact a large number of people in the borough. By improving conditions in social rented housing, in particular council housing, the strategy will have a positive impact on BAME residents, older residents, and women. By providing more social housing and in particular more family sized social housing, the strategy will also support these groups, as well as families with young children.*

*By not prioritising affordable home ownership, the strategy may have a negative impact on those who aspire to homeownership, who are more likely to be younger.*

### **5b. Intersectionality**

- Many proposals will predominantly impact individuals who have more than one protected characteristic, thereby transforming the impact of the decision.

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<sup>46</sup> EHS 2019-20

<sup>47</sup> Council data

<sup>48</sup> Housing in London 2020 The evidence base for the London Housing Strategy

- This section is about applying a systemic analysis to the impact of the decision and ensuring protected characteristics are not considered in isolation from the individuals who embody them.  
Please consider if there is an impact on one or more of the protected groups? Who are the groups and what is the impact?

*People in housing need and those living in social housing are disproportionately disadvantaged across multiple areas and have more than one protected characteristic, in particular in terms of race, socio-economic status, sex and disability. The Housing Strategy prioritises meeting the housing needs of these groups.*

### **5c. Data Gaps**

Based on your data are there any relevant groups who have not yet been consulted or engaged? Please explain how you will address this

*TBC following consultation*

## **6. Overall impact of the policy for the Public Sector Equality Duty**

Summarise the key implications of the decision for people with protected characteristics.

In your answer, please consider the following three questions:

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

*The Strategy will not result in identified direct or indirect discrimination for any group that shares the relevant protected characteristics.*

*By ensuring that housing inequalities are reduced the Strategy will help to advance equality of opportunity between groups who share a relevant protected characteristic and those who do not.*

*By improving housing conditions across the borough and ensuring that more people live in good quality and affordable homes, the Strategy will help to foster good relations between groups who share a relevant protected characteristic and those who do not.*



## 7. Amendments and mitigations

### 7a. What changes, if any, do you plan to make to your proposal because of the Equality Impact Assessment?

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

Please delete Y/N as applicable

**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. 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

### 7b. What specific actions do you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty?

Action: tbc following consultation

Lead officer: tbc following consultation

Timescale: tbc following consultation

Please outline any areas you have identified where negative impacts will happen because 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:

Tbc following consultation

## 7. Ongoing monitoring

Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented.

- Who will be responsible for the monitoring?
- What the type of data needed is and how often it will be analysed.
- When the policy will be reviewed and what evidence could trigger an early revision

- How to continue to involve relevant groups and communities in the implementation and monitoring of the policy?

*The next step is monitoring the outcome of consultation and engagement exercises, by the Council's housing strategy team.*

**Date of EQIA monitoring review:**

*TBC*

## **8. Authorisation**

EQIA approved by (Assistant Director/ Director)

**Robbie Erbmann**

Date

**25.2.22**

## **9. Publication**

Please ensure the completed EQIA is published in accordance with the Council's policy.

Please contact the Policy & Strategy Team for any feedback on the EQIA process.