

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

Name of proposal:	Stapleford North Rehousing & Demolition
Service Area:	Housing, Regeneration and Planning.
Officer Completing Assessment:	Sarah Lovell
Equalities/HR Advisor:	Jim Pomery / Elliot Sinnhuber
Cabinet meeting date (if applicable):	[] June 2022
Director/Assistant Director	Peter O'Brien

2. Executive summary

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

- The policy proposal, its aims and objectives, the decision in consideration. Please focus on **the change** that will result from this decision.
- Results of the analysis: positive and negative equality impacts

- Mitigations that will be taken to minimise negative equality impacts (if relevant)
- Next steps (this may be future consultation or stages of the project)

This EqIA was originally used to inform a consultation with residents and was further updated to inform a final decision recommended for Cabinet in September 2021. It has since been updated to reflect the outcome of the Broadwater Farm resident ballot and to be appended to the June 2022 Cabinet report recommending the demolition and rehousing of Stapleford North (flats 25-36, 61-72).

Background:

In 2018, the decision was taken to demolish the Tangmere and Northolt blocks on Broadwater Farm Estate in North Tottenham due to structural faults. Since then, the Council has been working in partnership with residents and wider stakeholders on designs for new homes. It has become apparent that one small block on the estate, the Stapleford North block, is likely to experience very significant levels of disruption over a prolonged period due to its location.

In July 2021, Cabinet approved a consultation with residents in the 24 1-bedroom properties in Stapleford North wing block on Broadwater Farm about the future of their block. The residents were presented with two options:

- Option 1 – Refurbishment of the block. In this option the Stapleford North block would have the strengthening and refurbishment works completed to it. The majority of the 24 residents would be able to stay in situ, however residents were informed that it is likely to be necessary to temporarily relocate some of the households on the edge of the blocks whilst this work is completed.
- Option 2 – In this option the Stapleford North block would be demolished and new homes would be built. Residents would be rehoused under the existing Broadwater Farm Rehousing and Payments Policy, which gives residents the right-to return to new homes on the estate once they have been completed.

Consultation & decision-making path:

The consultation ran from 26th July 2021 to 26th August 2021. The council put in place a series of measures to ensure that all of the affected residents were able to participate fully in the consultation. This is so that all residents, regardless of their background, first language, or individual needs, were able to understand and respond to the consultation and receive all of the information and support that they need. Measures included extensive 1-1 engagement with the residents of the affected properties. This included several attempts to knock on doors and call each resident. It also included making sure translations, accessible versions, and independent support was available.

A majority of respondents chose option 2 (13 compared to 8 for option 1). A report was considered by Cabinet on 14th September 2021 recommending for the demolition of Stapleford North to be included in the 'preferred design scenario' which residents were asked to vote on in an estate wide ballot between 11th February and 7th March 2022. The ballot finished with 85% of voters supporting the proposals, on a turnout of 55%. As Cabinet agreed to approve option 2 being included in the 'preferred design scenario' and residents have now agreed to this 'preferred design scenario' through the ballot, this updated EqlA only considers the impact of option 2 (demolition and replacement homes).

Equalities Impact and Mitigations

It was originally believed that the block contained 19 secure Council tenants, 4 leaseholders, and 1 tenant in temporary accommodation. Upon beginning the consultation, officers became aware that the block actually consisted of 17 secure tenants, 4 leaseholders, 2 unauthorised occupants, and 1 vacant property. The residents in this block are disproportionately from older age groups, BAME backgrounds, and lower socio-economic households.

Following the decision taken in September 2021 and the resident ballot, all residents in this block will face short-term disruption but will be positively impacted in the long-term as they would be living in safer properties, and secure tenants will be placed in Band A for rehousing and will also have a Right to Return to brand new council homes on the estate. Specific mitigations, such as those provided within the Broadwater Farm Rehousing and Payments Policy and as set out in this EqlA, will be put in place to mitigate the potential negative impacts on those with protected characteristics. Further to this, there will be wider benefits to the whole Broadwater Farm community – who are disproportionately (compared to borough averages) from BAME backgrounds, older sections of the population, and lower socio-economic backgrounds.

These proposals ensure that the residents of Stapleford North are given the same support that was given to residents of Tangmere and Northolt blocks, also situated on the Broadwater Farm estate. The equalities impact of the rehousing and demolition of these blocks has previously been assessed, and can be found within the background documents linked to this EQIA.

Relevant background documents:

- 1) **June 2018** - Approve consultation on demolition of Northolt and Tangmere: <https://www.minutes.haringey.gov.uk/ielIssueDetails.aspx?IId=62998&PlanId=0&Opt=3#AI58198>
- 2) **November 2018** - Approval of Demolition of Northolt and Tangmere: <https://www.minutes.haringey.gov.uk/ielIssueDetails.aspx?IId=63663&PlanId=0&Opt=3#AI58796>

- 3) **Oct 2020 - CPO:**
<https://www.minutes.haringey.gov.uk/ielIssueDetails.aspx?Ild=71378&PlanId=0&Opt=3#AI65938>
- 4) **July 2021 - Stapleford Consultation:**
<https://www.minutes.haringey.gov.uk/ielIssueDetails.aspx?Ild=76048&PlanId=0&Opt=3#AI69147>
- 5) **September 2021 - Stapleford Demolition:**
<https://www.minutes.haringey.gov.uk/ielIssueDetails.aspx?Ild=76699&PlanId=0&Opt=3#AI69733>

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?

The feedback received in the S105 consultation carried out in August 2021 was considered fully and presented back to Cabinet in September 2021 with a recommended course of action to include option 2 in the 'preferred design scenario' for Broadwater Farm. The results of the consultation informed the recommendation made to Cabinet, with the majority of respondents opting for option 2.

Following this, the demolition of Stapleford North (flats 25-36, 61-72) was included within the 'preferred design scenario' presented to residents in the Landlord Offer for the resident ballot. 1073 eligible residents received this information and 590 (55%) voted in the ballot. 85% of those who voted opted to support the proposals.

To enable all residents to participate in the S105 consultation and resident ballot, some key actions took place:

- All materials to residents contained a translation panel for residents to inform us if they need to receive this in a different language or accessible format (e.g., braille or large print). A translator was also made available upon request.
- Copies of the Landlord Offer and FAQ were translated into Turkish, Somali and Spanish for residents who were identified as needing this.
- Door-knocking took place on eighteen separate occasions to ensure all residents were aware of the information and had a chance to ask Council staff questions about the consultation and ballot.
- Follow up phone calls took place to check in on any residents that were unreachable at the door.

- Multiple options for responding to the consultation were given, including over the phone, online, attending a drop-in session, or completing and returning a consultation booklet.
- Multiple voting options were provided in the ballot, such as freepost, online and over the phone.
- Spanish, Turkish, and Somali interpreters were present at various engagement events and carried out outreach phone calls and door-knocking. Members of the team who spoke Bengali, Urdu and Portuguese were able to provide interpreting for residents who needed it.
- The information was set out on the Broadwater Farm section of the Council's website.
- A reminder leaflet was sent to all households 2 weeks before the end of the S105 consultation, reminding them of how to get involved and giving them contact details for our engagement officer and the Independent Tenant and Leaseholder Advisor.
- Several methods were used, including leaflets, texts and public events to ensure everybody had access to the information required to make an informed decision in the resident ballot.

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

The S105 consultation closed on 26th August 2021. We received 21 responses from the 24 households. Of these 21 responses, 8 chose option 1 (refurbish and retain) and 13 chose option 2 (demolish and replace). A full summary of the responses to the consultation was included as an appendix to the September 2021 Cabinet report. As a majority of responses opted for option 2, the Cabinet report recommended that this option was included in the 'preferred design scenario' to be presented to residents in the estate wide ballot.

The resident ballot closed on 7th March 2022. We received 590 votes, with 502 (85%) of these voting 'yes' for the proposals outlined within the Landlord Offer. Throughout this period, the team were able to further engage with the residents of Stapleford North and ensure that they were able to participate in the ballot.

4. Data and Impact Analysis

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

4a. Age

**Data
Borough Profile¹**

¹ Source: State of the Borough

0-17	56,718: (21%)
18-34	72,807: (27%)
35-49	68,257: (25%)
50-64	44,807: (17%)
65+	28,632: (11%)

Target Population Profile

- **There are a disproportionate number of older residents in this block, with at least 11 of the secure tenants or leaseholders in Stapleford North are aged over 60.**
- **Several tenants and leaseholders have young children living in the block.**

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

- **Section 105 consultation, informal needs assessments and 1-1 engagement.**

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal as a result of a need related to their protected characteristic?

The age profile in the block is considerably older than the age profile across the borough. The decision to demolish and replace the block will therefore have a disproportionate impact on older residents.

Elderly residents

Where elderly or vulnerable residents are to be rehoused, the Council recognise that this may more significantly impact them due to the higher prevalence of physical disabilities and mental health difficulties amongst the older population (compared to the general population). Dedicated support would be offered to impacted residents – such as financial and one-to-one support from rehousing officers throughout the rehousing process.

The Council recognises that being rehoused could have negative impacts on those with this protected characteristic if they have support or healthcare needs in the local area. These residents would be supported to find a suitable property in the local area where possible. This would include carrying out occupational therapy assessments to determine if any specialist adaptations or equipment would be required in the new property – which the Council would pay for.

Young children

Where there are young children in this block, the Council recognises that the impact of rehousing on them could be negative. All effort would be made to work closely with residents to ensure that those with children are prioritised for moves in the local area, so that they do not need to move schools wherever possible.

Where young children are present on the site, they would be negatively impacted in the short term if it was necessary for them to move schools as a result of rehousing. Under the Broadwater Farm Rehousing and Payments Policy, those with young children will be prioritised for housing in the local area, and housing officers would work closely with these residents to help them find the most suitable housing option. This should mitigate this concern, by helping these residents remain at the same school wherever possible.

Resident leaseholders will be positively impacted with the provision for home loss payments, equity loans and the leaseholder right to return contained within this policy.

Non-resident leaseholders will be positively impacted by the provision of home loss payments and market value for their properties.

Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

The impact will be both positive and negative, as described above.

4b. Disability²

Data

Borough Profile ³

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.

Target Population Profile

² 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.

³ Source: 2011 Census

- **Our needs assessments suggest that a number of residents in this block suffer from ill health or disabilities, including hearing difficulties and significant hospital treatment.**

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

- **Section 105 consultation, informal needs assessments and 1-1 engagement.**

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

Some residents with disabilities may face particular challenges. The Council has identified that some residents in this block have mobility issues. Further residents have hearing difficulties and need BSL interpretation.

Any other disabilities will be identified through individual needs assessments as part of the rehousing process.

The Council recognises that being rehoused could have negative impacts on those with this protected characteristic if they have support or healthcare needs in the local area. These residents would be supported to find a suitable property in the local area where possible. This would include carrying out occupational therapy assessments to determine if any specialist adaptations or equipment would be required in the new property – which the Council would pay for.

Under the Broadwater Farm Rehousing and Payments Policy, they will be positively impacted by the two rights to return that are guaranteed within this policy. Compared to the existing Stapleford North homes, the new homes would be more accessible and be more suitable to those with disabilities, positively impacting those with this protected characteristic.

Resident leaseholders will be positively impacted with the provision for home loss payments, equity loans and the leaseholder right to return contained within this policy.

Non-resident leaseholders will be positively impacted by the provision of home loss payments and market value for their properties.

Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Both negative and positive impacts, as outline above.

4c. Gender Reassignment⁴

Data

Borough Profile

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.⁵

Target Population Profile

The Council does not hold specific data on residents regarding this protected characteristic. Individual engagement throughout the consultation has not identified any of the residents in this block with this protected characteristic.

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

- **Section 105 consultation, informal needs assessments and 1-1 engagement.**

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

The Council recognises that re-housing can be a challenge for someone with this protected characteristic, due to the need to access specific healthcare and support networks. The Council will continue to work with residents of this block to ensure that specific impacts

⁴ 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.

⁵ 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.

based on this protected characteristic are mitigated, in the event that this is identified at a later date.

The Council recognises that being rehoused could have negative impacts on those with this protected characteristic if they have support or healthcare needs in the local area. These residents would be supported to find a suitable property in the local area where possible.

Under the Broadwater Farm Rehousing and Payments Policy they would be positively impacted by the two rights to return that are guaranteed within this policy.

Resident leaseholders will be positively impacted with the provision for home loss payments, equity loans and the leaseholder right to return contained within this policy.

Non-resident leaseholders will be positively impacted by the provision of home loss payments and market value for their properties.

Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Both negative and positive, as detailed above.

4d. Marriage and Civil Partnership

Data

Borough Profile ⁶

Divorced or formerly in a same-sex civil partnership which is now legally dissolved: (8.2%)

In a registered same-sex civil partnership: (0.6%)

Married: (33.3%)

Separated (but still legally married or still legally in a same-sex civil partnership): (4.0%)

Single (never married or never registered a same-sex civil partnership): (50.0%)

Widowed or surviving partner from a same-sex civil partnership: (3.9%)

Target Population Profile

⁶ Source: 2011 Census

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

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

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

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

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

Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

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

4e. Pregnancy and Maternity

Data

Borough Profile ⁷

Live Births in Haringey 2019: 3646

Target Population Profile

The council does not hold data on pregnancy and maternity among its tenants and leaseholders. However, through engagement with residents, it has become clear that there are residents who are currently pregnant.

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

⁷ Births by Borough (ONS)

- **Section 105 consultation, informal needs assessments and 1-1 engagement.**

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

The council does not hold data on pregnancy and maternity among its tenants and leaseholders. However, through engagement with residents, it has become clear that there are residents who are currently pregnant in the Stapleford North block. Mitigation to ensure these residents are not disproportionately impacted will be fully considered through the individual needs assessments that will be undertaken as part of the rehousing. It is not clear at what stage of their pregnancy that the rehousing will take place, so rehousing officers will work closely with these residents to minimise disruption to their lives. There is also a chance that other residents could become pregnant in this time. Therefore, the council will need to ensure that it considers the inequalities and discrimination experienced by those who are pregnant or who are new mothers throughout.

The disruption caused by demolition and replacement will need to be mitigated through dedicated support for any resident who presents with this protected characteristic during the rehousing process.

The Council recognises that residents with this protected characteristic will be negatively impacted in the short-term by the process of rehousing. Rehousing officers would work closely with residents in this case to ensure that they were supported to find suitable properties, such as in the local area to continue accessing healthcare and support networks. These residents would be positively impacted by the rehousing policy as this would allow them to be placed on Band A on the Housing Register and to move to a more suitable sized property for their newly expanded household (the Stapleford North properties are all 1-bedroom). The council have already identified several residents who would benefit as a result of this.

Resident leaseholders will be positively impacted with the provision for home loss payments, equity loans and the leaseholder right to return contained within this policy.

Non-resident leaseholders will be positively impacted by the provision of home loss payments and market value for their properties.

Secure tenants will be positively impacted by the two Rights to Return guaranteed by the Broadwater Farm Rehousing and Payments Policy and by the improved safety and quality of their new homes.

Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Both negative and positive, as detailed above.

4f. Race

Data

Borough Profile ⁸

Arab: **0.9% in total**

Any other ethnic group: 3.9%

Asian: **9.5% in total**

Bangladeshi: 1.7%

Chinese: 1.5%

Indian: 2.3%

Pakistani: 0.8%

Other Asian: 3.2%

Black: **18.7% in total**

African: 9.0%

Caribbean: 7.1%

Other Black: 2.6%

Mixed: **6.5% in total**

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%

Target Population Profile

⁸ Source: 2011 Census

The Council is aware that those living in this block are disproportionately from BAME backgrounds compared to the general or borough populations.

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

- **Section 105 consultation, informal needs assessments and 1-1 engagement.**

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

The Council is aware that those living in this block are disproportionately from BAME backgrounds compared to the general or borough populations. Therefore, there will be a disproportionate impact on those with this protected characteristic. The Council recognises that for BAME people there may be specific cultural ties, such as businesses locally that cater specific cultural needs of residents of a particular race or ethnicity.

As a result of their over-representation in the impacted group, residents from a BAME background will be disproportionately impacted by the disruption caused from needing to be rehoused. The residents would receive dedicated support to ensure that they were able to prepare for and be supported through these moves.

The Council recognises that being rehoused could have negative impacts on those with this protected characteristic if they have support or cultural ties in the local area. These residents will be supported to find a suitable property in the local area where possible under the Broadwater Farm Rehousing and Payments Policy.

Under the Broadwater Farm Rehousing and Payments Policy they will be positively impacted by the two rights to return that are guaranteed within this policy. They will also be positively impacted by the financial and one-to-one support from rehousing officers they will receive under the rehousing policy, which aims to make sure no resident is financially worse off as a result of rehousing.

Resident leaseholders will be positively impacted with the provision for home loss payments, equity loans and the leaseholder right to return contained within this policy.

Non-resident leaseholders will be positively impacted by the provision of home loss payments and market value for their properties.

All residents would be positively impacted by the higher quality of the new homes and the fact that they would no longer be living in structurally unsound blocks.

Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Both negative and positive, as detailed above.

4g. Religion or belief

Data

Borough Profile ⁹

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%

Target Population Profile

The Council and Homes for Haringey do not collect this data on residents and where the data is collected, it is frequently under-reported. Data from the consultation suggests that residents in this block are more likely to be religious than the borough average.

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

- **Section 105 consultation, informal needs assessments and 1-1 engagement.**

Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

There may be a greater impact on those who go to a specific place of worship or are part of a religious community. Where possible, the Broadwater Farm Rehousing and Payments Policy aims to give residents choice about their move to a new home and therefore should

⁹ Source: 2011 Census

help these residents ensure they have access to places of worship or their religious community.

Secure tenants and resident leaseholders would be positively impacted by the disturbance and home loss payments and the two Rights to Return guaranteed by the Broadwater Farm Rehousing and Payments Policy. They will also benefit from the improved safety and quality of their new homes. The Rights to Return will ensure that, should residents wish, they can return to the estate and therefore be close to the religious institutions or communities that they currently belong to.

The effects of being required to move will, in part, be offset by support being given to each household, including financial help with the costs of moving. They would also receive one-to-one support from rehousing officers to find suitable properties in the local area where possible.

Resident leaseholders will be positively impacted with the provision for home loss payments, equity loans and the leaseholder right to return contained within this policy.

Non-resident leaseholders will be positively impacted by the provision of home loss payments and market value for their properties.

4h. Sex

Data

Borough profile ¹⁰

Females: 50.5%

Males: 49.5%

Target Population Profile

The data suggests that there is a fairly even split of males and females in the affected block – in line with the borough population.

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

- **Section 105 consultation, informal needs assessments and 1-1 engagement.**

Detail the findings of the data.

¹⁰ Source: 2011 Census

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

There is no reason to believe that there would be specific negative impact on anyone due to this protected characteristic as a result of the preferred option.

However, it is noted that residents with children and lone parents (who are disproportionately women) may face particular disruption. The Council recognises that moving home will be more disruptive to households with children, who may have to make alternative arrangements for schooling. These changes are more likely to affect single mothers who may have support networks in place in the local area, benefit from local facilities aimed at single parent households, and benefit from proximity to work arrangements.

Under the Broadwater Farm Rehousing and Payments Policy, those with children in a local school will be given priority to remain in the local area should they wish to do so. Further to this, they would be positively impacted by the two rights to return that are guaranteed within this policy. In addition, the policy makes provisions for disturbance payments to cover all of the reasonable costs of moving, which could include new school uniforms if a child or children were to move schools as a result of moving.

It is also noted that, where identified, those with children currently living in Stapleford North (all of which are 1-bedroom properties) will be able to move to more suitable properties with enough bedrooms for their families. Therefore, they will be positively impacted by being on Band A for rehousing.

Resident leaseholders will be positively impacted with the provision for home loss payments, equity loans and the leaseholder right to return contained within this policy.

Non-resident leaseholders will be positively impacted by the provision of home loss payments and market value for their properties.

Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Both negative and positive, as detailed above.

4i. Sexual Orientation

Data

Borough profile ¹¹

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.

Target Population Profile

The Council and Homes for Haringey do not collect this data on residents and where the data is collected, it is frequently under-reported. There is no reason to believe that the residents in this block are disproportionately represented with this protected characteristic. Therefore, it is not believed that individuals with this protected characteristic would be disproportionately affected by the decision to demolish and replace Stapleford North.

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

- **Section 105 consultation, informal needs assessments and 1-1 engagement.**

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

It is not believed that the disruption caused by rehousing would disproportionately impact affected residents based on this protected characteristic. Secure tenants and resident leaseholders would be positively impacted by the home loss and disturbance payments and the two Rights to Return guaranteed by the Broadwater Farm Rehousing and Payments Policy. They will also be positively impacted by the improved safety and quality of their new homes.

Resident leaseholders will be positively impacted with the provision for home loss payments, equity loans and the leaseholder right to return contained within this policy.

Non-resident leaseholders will be positively impacted by the provision of home loss payments and market value for their properties.

¹¹ Source: ONS Integrated Household Survey

Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Neutral to positive impact overall.

4j. Socioeconomic Status (local)

Data

Borough profile

Income¹²

Haringey is the 4th most deprived borough in London as measured by the IMD score in 2019. 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 Attainment¹³

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.

Target Population Profile

The Council recognises that social tenants, temporary accommodation residents and leaseholders in this block are disproportionately likely to be from low-income households. Therefore, those from low-income backgrounds will disproportionately be impacted by the decision to demolish and replace Stapleford North.

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

- **Section 105 consultation, informal needs assessments and 1-1 engagement.**

Detail the findings of the data.

¹² Source: Annual Survey of Hours and Earnings, ONS, 2019

¹³ Source: Annual Population Survey 2019 (via nomis)

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

These residents will face some level of disruption due to the need to be rehoused. The provisions set out under the Broadwater Farm Rehousing and Payments Policy – such as home loss and disturbance payments, and the Right to Return – will help to offset these negative impacts.

The Council recognises that residents with this protected characteristic will be negatively impacted in the short-term by the process of rehousing. Rehousing officers will work closely with residents in this case to ensure that they were supported to find suitable properties, including through the financial provisions set out in the Broadwater Farm Rehousing and Payments Policy. This policy was developed in adherence to the Estate Renewal Rehousing and Payments Policy (ERRPP) which aims to ensure that residents are not financially worse off as a result of rehousing. This includes by providing a £7,100 Home Loss payment for secure tenants and disturbance payments to cover the reasonable costs of moving home (such as new school uniforms for a change of schools). Resident leaseholders will benefit from a home loss payment worth 10% of the market value of their property and equity loans to enable them to move to new properties either locally or further afield (should this be approved by the discretion panel). Non-resident leaseholders are entitled to a home loss payment worth 7.5% of the market value of their property.

Resident leaseholders will also have the option to return to a council tenancy if they are unable to access any other housing option and receive a lump sum payment worth 25% of the value of their property or, if higher, the amount they paid for their home updated by house price index. This gives vulnerable leaseholders alternative options and will have a positive impact to minimise disruption caused by rehousing.

In addition, at Cabinet in December 2021, it was agreed that rent for secure tenants returning to Broadwater Farm (e.g., once the new homes are built) is to be capped at no more than 10% above the average rent for equivalent size properties on the estate. This will allow these residents to return on similar terms to their previous tenancy. This will have a positive impact on these residents, ensuring that they can afford to return to the estate should they wish (and benefit from brand new homes).

All residents to be rehoused due to this decision will benefit from the improved safety and quality of their new homes.

Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Both negative (short-term) and positive (medium to long-term), as detailed above.

5. Key Impacts Summary

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

Overall, this decision will have a positive impact on all residents. Firstly, those that are rehoused will benefit from better quality, more suitable homes; the provisions set out in the BWFRPP; and the improved quality of their homes and the estate should they opt to return. The wider benefits to the community are also clear, with more family homes to be delivered and better place-making – with improvements to green and open spaces and accessibility on Willan Road as a result of the demolition and reprovision of Stapleford North.

The Neighbourhood Move Scheme also ensures that it is the local community (i.e., those on the Broadwater Farm estate) who will benefit most from these proposals – giving priority to these residents for the new homes.

It is not believed that this proposal would result in any direct or indirect discrimination for any group that shares a protected characteristic.

5b. Intersectionality

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

Many of the residents in this block will have protected characteristics in two or more equalities strands, such as elderly BAME residents or women with mobility issues. The Council recognises that inter-connected protected characteristics require a tailored approach that recognises the specific needs of individuals and households. This is why all effort will be made to ensure that every resident has all of the information and support necessary throughout the rehousing process, such as by undertaking individual needs assessments and providing financial support under the Broadwater Farm Rehousing and Payments Policy.

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

None applicable.

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?

It is not believed that this proposal would result in any direct or indirect discrimination for any group that shares a protected characteristic.

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 **Y**

No major change to the proposal, all negative impacts are mitigated.

Adjust the proposal: the EQIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly set out

below 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**

N/A

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**

N/A

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:

Socio-economic – most residents will be from lower-income backgrounds and hence impacted by the need to be rehoused.

Action: provisions for financial support, set out in the BWFRPP and detailed in this EQIA, will mitigate the costs of moving home and ensure all reasonable costs are covered for residents. The provision of equity loans for resident leaseholders and the Right to Return for resident leaseholders and secure tenants, ensures these residents can afford to return to the estate. The 10% rent cap (above the average for an equivalent property on the estate) for returning secure tenants will mitigate the impact of newer council homes having higher council rents (due to the rent formula) and ensure that these residents can afford to return to the estate should they wish to do so.

Lead officer: **Sarah Lovell**

Timescale: **24-months**

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 the:

N/A

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?

Equalities duties will be taken into account throughout every stage of the rehousing and demolition process and on a case-by-case basis.

Date of EQIA monitoring review:

N/A

8. Authorisation

EQIA approved by (Assistant Director/ Director)

Peter O'Brien

Date

19.05.2022

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.