

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 individuals 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 treats socioeconomic status as a local protected characteristic.

1. Responsibility for the Equality Impact Assessment

Name of proposal:	High Road West Scheme – Consultation with secure tenants on the Love Lane Estate on the use of Ground 10a powers
Service Area:	Placemaking and Housing
Officer Completing Assessment:	Scott Mundy
Equalities Advisor:	Elliot Sinnhuber
Cabinet meeting date (if applicable):	19 th July 2022
Director/Assistant Director	Peter O'Brien

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2. Executive summary

Proposal Proposal

The proposal is relevant to Phase A of the High Road West regeneration scheme in north Tottenham, which includes the redevelopment of the Love Lane Estate, and will deliver 500 new council homes for existing and new residents, jobs and employment spaces, community uses, and enhanced green and open spaces.

The Council has a Love Lane Landlord Offer in place to residents on the estate, which includes the guarantee of a new Council home in the scheme which meets the need of their household. The Council has a dedicated Rehousing team in place to support residents through each stage of the move process.

Following previous rounds of consultation, Cabinet is being asked to agree to the commencement of statutory consultation with secure tenants on the Love Lane Estate, regarding a proposal to seek the Secretary of State's approval of the redevelopment scheme for the purpose of Ground 10A of Part II of Schedule 2 of the Housing Act 1985 ("Ground 10A").

Ground 10A is one of the statutory grounds under which possession of a secure tenancy may be ordered by a court if it is seeking to end the tenancy, on the grounds that suitable accommodation is available. If pursued, this would ensure that the Council has the ability to obtain vacant possession of a property on the Love Lane Estate which is required for demolition, and which is subject to a secure tenancy, should a tenant not be willing to leave a property even once suitable alternative accommodation had been offered as part of the rehousing process.

The ability to use of Ground 10A is a means to enable delivery of Phase A of the scheme and bring about the benefits described above. If these powers were not in place, there a risk that Phase A of the scheme could not be delivered.

In considering the impact, the benefits of Phase A of the scheme have been considered against the impact on secure tenant households who share a protected characteristic due to the requirement to be rehoused from their current home. The impact of the proposal is mitigated by the provisions in the Council's Landlord Offer, which ensures that residents will be offered suitable alternative accommodation, including within the new scheme.

As of July 2022, there are 38 secure tenant households on the Love Lane Estate who would be affected by the proposal and whose views would be sought through the statutory consultation.

Outcome of the analysis

The analysis has found that there may be certain demographics who are disproportionately impacted by the rehousing process due to their specific needs. This includes older and disabled residents. There are also demographics who may

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be disproportionately impacted due to overrepresentation amongst secure tenants on the Love Lane Estate compared to the borough average, including black residents, particularly those who are African or Caribbean.

The Council has mitigation measures in place to ensure any impact on residents due to the need to be rehoused is kept to a minimum. Through the Landlord Offer, residents are guaranteed an offer of a new Council home in their existing community, which will ensure that they can maintain their existing support networks. The Rehousing team will also work with households on a one-to-one basis and respond to their specific needs during the move process.

In addition, the aim of the Council is that most residents will be able to make one move to their new property, achieved by the phased approach to the development. Any residents who need to move temporarily will have the highest priority for the new homes as soon as they are ready, and the aim of the Council is that any temporary moves are kept within the Love Lane Estate or as close as possible. These measures will also help to minimise any impacts on those who share protected characteristics.

The proposal will overall help the Council to meet its obligations under the Public Sector Equality Duty by providing certainty on the delivery of Phase A of the High Road West scheme, which will include 500 new Council homes. This will create positive impacts for individuals across a range of protected groups by increasing the provision of affordable housing, particularly beneficial for those who occupy a lower-socio-economic banding. This will help advance equality of opportunity for residents and help to foster good relations between groups who share a relevant protected characteristic and those who do not.

Next steps

If Cabinet agrees to commence statutory consultation on the proposal, then this is expected to take place in autumn 2022. The responses to the consultation will be considered and reported back to Cabinet following completion of the consultation. This EqIA would be refreshed at that time, incorporating any additional data received through the consultation process.

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? Detail how your approach will facilitate the inclusion of protected groups likely to be impacted by the decision.

This proposal follows a number of statutory consultations with secure tenants on the Love Lane Estate since 2012, around proposals including the redevelopment of the estate and their housing offer, see below:





- Section 105 consultation on the redevelopment proposals and Secure Tenant Guide (link to Cabinet report, November 2014)
- Section 105 consultation on the ownership and management of the replacement homes (link to Cabinet report, September 2017)
- Consultation on the High Road West Local Lettings Policy (link to Cabinet report, July 2021).

It also follows the positive resident ballot in summer 2021, where the majority of participating residents voted in favour of the redevelopment of the estate as part of the scheme, on the basis of their Landlord Offer.

The proposal put forward will support the Council in ensuring that it has certainty of delivery of Phase A of the scheme. This will therefore support the Council to honour its commitments to residents, by delivering the new Council homes as well as the wider scheme, the plans for which have been developed with the community over many years.

In undertaking consultation, the Council will be taking steps to ensure that all secure tenants are able to respond and take part. This includes providing translated versions of the consultation materials in the relevant languages identified. Alongside providing the written consultation material to all secure tenant households by post, engagement activities will include drop-in sessions in the local area, door knocking, and offers of one-to-one meetings with an interpreter present if required.

The consultation materials will include 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 proposal. This will be particularly important for members of the household who are not the lead tenant (see section 4).

The responses to the consultation will be considered and reported back to Cabinet following completion of the consultation, to inform whether this proposal is pursued.

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

This section will be completed following the consultation.

4. Data and Impact Analysis

Overview of data sources

The borough-wide data used in this assessment is taken from Haringey Council's 'State of the Borough' review, which can be found at the following link: <u>https://www.haringey.gov.uk/local-democracy/about-council/state-of-the-borough</u>, and the 2011 Census.





The data on the target population, that is Council secure tenants on the Love Lane Estate, is taken from in-house housing data retrieved in June 2022. The housing register is updated on a regular basis and therefore this data is deemed to be an accurate representation of the makeup of tenants at this time. It should be noted that the above dataset primarily relates to lead tenants and includes limited information for other members of the same household.

Secure tenants on the estate are a fixed group of residents, in respect that there will not be 'new' individuals affected by these proposals. As a result, the demographics of this group including protected characteristics are unlikely to change significantly over the coming years during the period in which the proposal is implemented (if pursued following consultation, a further decision by Cabinet, and approval by the Secretary of State).

4a. Age

<u>Data</u>

Borough Profile ¹	Target Population Profile
56,718: 0-17 (21%)	The data indicates that secure tenant
72,807: 18-34 (27%)	households are almost entirely 45+,
68,257: 35-49 (25%)	with the 45-54, 55-64, and 65+ age
44,807: 50-64 (17%)	brackets consisting of around a third
28,632: 65+ (11%)	each. There is a very small proportion
	of residents aged below 45.

<u>Summary</u>

The data shows that there is a higher proportion of adults over the age of 45 amongst secure tenant households, in comparison to the wider borough profile, particularly those in the 65+ age group (around a third compared to 11%). As older people are overrepresented amongst this group, it is possible that they may be disproportionally affected by the proposal.

Data from housing need assessments undertaken by the Rehousing team indicates that less than 5 households within the target population have children under the age of 18. However, children and young people have specific needs which means they could be disproportionately impacted, and as this has been considered in the mitigation measures.

Potential Impacts

¹ Source: State of the Borough

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The rehousing process may potentially have a short-term negative impact for residents who share this protected characteristic. Elderly residents are likely to experience relocation stress, having felt more settled in their home and environment. The moving process could disrupt their routines, rituals and surroundings. In addition, they may not be as equipped to handle the requirements of the move process, such as physically moving furniture or making arrangements for disconnections / reconnections.

The impact on this group is mitigated by the commitments in the Council's Landlord Offer, which includes the guarantee of a new Council home in the scheme (in the area of the existing estate). Most residents will make one move to their new home. These commitments will ensure that the existing community is kept together. It will also prevent any impact from occurring as a result of a household being forced to leave their existing support network (including schools, social groups and access to healthcare) which may have heightened impact on older and younger people.

The Council has a dedicated Rehousing Team, who will help residents through every step of the rehousing process. This includes planning and facilitating removals, disconnecting and reconnecting appliances, and packing/unpacking. The team will always ensure that it responds to the needs of elderly residents. As described in the Landlord Offer, secure tenants will receive compensation for the inconvenience of needing to move home.

Over the longer-term, the rehousing process should have a positive impact, by rehousing residents to a new Council home that meets the needs of their household. The needs of each household will be identified by a housing need assessment undertaken by the Rehousing team. For elderly residents, this includes ensuring that homes are accessible and that any suitable adaptations are undertaken in the new home prior to moving in.

4b. Disability²

Data

Borough Profile ³	Target Population Profile
 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. 	For over half of secure tenant households on the Love Lane Estate, it is recorded that a member of the household has a disability. The nature of this data does not confirm whether this relates to a physical or mental condition.

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: State of the Borough

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

Summary

The data shows that there is a high proportion of secure tenants who have a physical impairment or mental health condition. This group may therefore be disproportionately impacted by the proposal. Depending on the nature of their disability, this group may also be impacted more significantly by the disruption caused as a result of the need to move home.

Potential Impacts

The rehousing process may potentially have a short-term negative impact for disabled residents. These residents may have connections with local care or support services which could be uprooted through a move. Their existing home may also be adapted to meet their needs (although this may not be the case in all circumstances, particularly for those living in temporary accommodation). If a resident has a mental health condition, then this could be worsened by the change in surroundings.

The impact on these residents is mitigated by the commitments in the Landlord Offer, which includes the guarantee of a new Council home in the scheme (in the area of the existing estate). Most residents will be able to move direct to the new home, and any temporary moves will be kept within the estate or as close as possible. These measures will ensure that residents can maintain their links to local support services. It should be noted that there may be instances where a resident would be better suited to move to specialised accommodation elsewhere (e.g. sheltered housing), which would be identified through a housing need assessment and developed as an option with the household for their consideration.

The Rehousing team will support residents through the move process, with special measures taken for residents with disabilities. The team will arrange for an Occupational Therapist assessment to take place, to identify any special adaptations (e.g. grab rails, a wheelchair accessible kitchen) and ensure these take place before the move to the new home. The team will also engage with the relevant support services to minimise any impacts on residents with a mental condition through the move process and achieve the best outcome for their individual needs.

Over the longer-term, the rehousing process should have a positive impact for residents, by rehousing residents to a new Council home that meets the needs of their household. This includes any adaptations for residents with a disability, which in many cases is likely to offer an improved environment over their current situation.





4c. Gender Reassignment⁴

<u>Data</u>

Borough Profile ⁵	Target Population 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 2,000 Haringey residents are Trans. ⁶	No data is held on this protected characteristic for the target population.

Summary & Potential Impacts

The Council does not have data based on this protected characteristic. The Council does not envisage that the proposal will have a disproportionate impact on this particular protected characteristic.

The consultation on the proposal 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.

4d. Marriage and Civil Partnership

<u>Data</u>

Borough Profile ⁷	Target Population Profile
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%)	Married (21%) Single (73%) Unknown or Other (6%)

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 ones preferred gender. This is because changing ones physiological or other gender attributes is a personal process rather than a medical one.

⁵ Source: State of the Borough

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⁶ 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.

⁷ Source: State of the Borough



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%)	

<u>Summary</u>

Available data indicated that there is a higher proportion of single people amongst secure tenant households on the Love Lane Estate in comparison to the borough average.

Potential Impacts

The Council does not envisage that the proposal will have a disproportionate impact on residents who share this particular protected characteristic. Households will be treated the same through the rehousing process regardless of their marital / civil partnership status. Housing need assessments will be undertaken by the Rehousing team to ensure that the new homes reflect the need of those living in the property.

4e. Pregnancy and Maternity

<u>Data</u>

Borough Profile ⁸	Target Population Profile
Live Births in Haringey 2019: 3,646	No data is held on this protected characteristic for the target population. However as discussed in section 4h. ('Sex'), there are a high proportion of women in the target population.

Summary

The Council does not hold data on this protected characteristic for the target population. The consultation on the proposal will help the Council to better

⁸ Births by Borough (ONS)

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understand the demographics on the estate in relation to this protected characteristic.

Potential Impacts

The rehousing process may potentially have a short-term negative impact for residents who are pregnant. The residents may have a support network in their local area or connection to support / childcare services.

This impact is mitigated through the commitments in the Landlord Offer, which includes the guarantee of a new Council home in the scheme (in the area of the existing estate). Most residents will be able to move direct to the new home, and any temporary moves will be kept within the estate or as close as possible. For residents who are pregnant or have young children, this will ensure that they can maintain existing links including for childcare, schooling, pregnancy/maternity groups, or healthcare.

The Rehousing team will support residents through the move process to minimise disruption. Special measures taken for residents who are pregnant.

Over the longer-term, the rehousing process should have a positive impact for residents, by rehousing residents to a new Council home that meets the needs of their household, including the right number of bedrooms. This may be more beneficial for residents who are pregnant or have young children.

4f. Race

In the Equality Act 2010, race can mean ethnic or national origins, which may or may not be the same as a person's current nationality.⁹

<u>Data</u>

Borough Profile ¹⁰	Target Population Profile
<u>Arab: 0.9%</u>	<u>Asian</u> : 8%
Any other ethnic group: 3.9%	
	<u>Black</u> : 37%
<u>Asian: 9.5%</u>	
Bangladeshi: 1.7%	<u>White</u> : 32%
Chinese: 1.5%	
Indian: 2.3%	Any other Ethnic Group: 18%
Pakistani: 0.8%	
Other Asian: 3.2%	<u>Unknown</u> : 5%
Black: 18.7%	

⁹ Race discrimination | Equality and Human Rights Commission (equalityhumanrights.com)

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¹⁰ Source: 2011 Census



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 totalEnglish/Welsh/Scottish/NortherIrish/British: 34.7%Irish: 2.7%Gypsy or Irish Traveller: 0.1%Other White: 23%

Summary

The data shows that there a higher proportion of black residents amongst secure households on the Love Lane Estate in comparison to the borough average, particularly those who are African or Caribbean. The proposal is therefore likely to impact on this community disproportionately.

Potential Impact

There may be a higher short-term impact on black residents as a result of the rehousing process given their overrepresentation within the target demographic. This will be mitigated through the work of the Rehousing team, who will get to know each household on a one-to-one basis and ensure that their individual needs, including any cultural considerations of the relevant demographics, are taken into account in the move process. Translation and interpreter services will also be provided to ensure that residents are fully informed and engaged and can put their requirements and preferences forward.

The Landlord Offer, which includes the guarantee of a new Council home in the scheme (in the area of the existing estate) will ensure that the community is kept together through the rehousing process. Most residents will be able to move direct to the new home, and any temporary moves will be kept within the estate or as close as possible. This particularly important for Black households and other minority groups who are likely to have established links in their local area related to this protected characteristic.

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Over the longer-term, the rehousing process should have a positive impact for residents, by rehousing residents to a new Council home that meets the needs of their household. The new homes have also been developed with residents to respond to cultural preferences, e.g. providing serving space and a range of living room / kitchen layouts.

4g. Religion or belief

<u>Data</u>

Borough Profile ¹¹	Target Population Profile
Christian: 45%	Christian: 21%
Buddhist: 1.1%	Muslim: 16%
Hindu:1.9%	Unknown, other or no religion: 63%
Jewish:3%	
Muslim: 14.2%	
No religion: 25.2%	
Other religion: 0.5%	
Religion not stated: 8.9%	
Sikh: 0.3%	

Available data indicates that the demographics of secure tenants on the Love Lane Estate in relation to religion is broadly similar to the wider borough profile. The data does however show a lower proportion of residents who identify as Christian, and a higher proportion of residents as 'unknown'.

The consultation on the proposal will help the Council to better understand the demographics on the estate in relation to this protected characteristic.

Potential Impacts

The rehousing process may potentially have a short-term negative impact on residents who share this protected characteristic, as they are more likely to have established links in their local area to places of worship or other religious communities. These residents may also have cultural needs that make moving home more challenging.

This impact will be mitigated through the work of the Rehousing team, who will get to know each household on a one-to-one basis and ensure that their individual needs, including any cultural considerations of the relevant demographics, are taken into account in the move process.

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¹¹ Source: 2011 Census



The Landlord Offer, which includes the guarantee of a new Council home in the scheme (in the area of the existing estate) will ensure that the community is kept together through the rehousing process. Most residents will be able to move direct to the new home, and any temporary moves will be kept within the estate or as close as possible. This will ensure that the links to religious communities in the local area can be maintained.

Over the longer-term, the rehousing process should have a positive impact for residents, by rehousing residents to a new Council home that meets the needs of their household in their existing community.

4h. Sex

<u>Data</u>

Borough profile ¹²	Target Population Profile
Females: (50.5%)	Females: (61%)
Males: (49.5%)	Males: (39%)

<u>Summary</u>

The data indicates that there is a higher proportion of women amongst lead secure tenants on the Love Lane Estate in comparison to the borough average. This group are therefore likely to be disproportionately impacted by the proposal.

Potential Impacts

The rehousing process may potentially have a short-term negative impact for residents who share this protected characteristic. This is mitigated by the commitments in the Council's Landlord Offer, which includes the guarantee of a new Council home in the scheme (in the area of the existing estate), keeping the community together. This prevents any impact from occurring as a result of a household being forced to leave their existing support network, which may have heightened impact on women.

Over the longer-term, the rehousing process should have a positive impact for residents, by rehousing residents to a new Council home that meets the needs of their household. The needs of each household will be identified by a housing need assessment undertaken by the Rehousing team.

4i. Sexual Orientation

<u>Data</u>

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¹² Source: 2011 Census



Borough profile ¹³	Target Population Profile
3.2% of London residents aged 16 or	No data is held on this protected
over identified themselves as lesbian,	characteristic for the target population.
gay or bisexual in 2013. In Haringey this	
equates to 6,491 residents.	

Summary & Potential Impacts

The Council does not have data based on this protected characteristic. The Council does not envisage that the proposal will have a disproportionate impact on this particular protected characteristic.

Households will be treated the same through the rehousing process regardless of their sexual orientation.

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

4j. Socioeconomic Status (local)

<u>Data</u>

Borough profile	Target Population Profile
Income 8.3% of the population in Haringey were claiming unemployment benefit on 9 December 2021. ¹⁴ 20.8% of the population in Haringey were claiming Universal Credit on 9 December 2021. ¹⁵ 29% of employee jobs in the borough are paid less than the London Living Wage. ¹⁶ Educational Attainment	 Income Northumberland Park has: ²¹ Highest percentage of households in the borough in receipt of benefits (72%) and earning less than London Living Wage (21%) Highest percentage of residents in borough who have been worried that their household would not have enough food (20%)
While Haringey's proportion of students attaining grade 5 or above in English	Lower percentage of households who could pay an unexpected

¹³ Source: ONS Integrated Household Survey



¹⁴ ONS Claimant Count

¹⁵ LG Inform

 $^{^{16}}$ ONS

²¹ Source: Residents Survey 2021



and Mathematics GCSEs is higher than	expense of £100 in comparison
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the national average, it is below the	to borough average (62%
London average. ¹⁷	compared to 68%)
4.4% of Haringey's working age	
populations had no qualifications in	Educational Attainment
2020. ¹⁸ 4.8% were qualified to level one	 Northumberland has the joint
only. ¹⁹	highest percentage of residents
	stating that they did not speak
Area Deprivation	English well (5% compared to
Haringey is the 4th most deprived in	borough average of 3%) ²²
London as measured by the IMD score	 Around 53% students
2019. The most deprived LSOAs (Lower	Northumberland Park achieve
Super Output Areas or small	Grade 9-4 in English and Maths,
neighbourhood areas) are more heavily	the fourth lowest in the borough
concentrated in the east of the borough	
where more than half of the LSOAs fall	Area Deprivation
into the 20% most deprived in the	
country. ²⁰	The Scheme is located in LSOAs which
	fall in the 20% most deprived in the
	country, with parts of the Love Lane
	Estate in the 10% most deprived, as
	measured by the IMD score 2019. ²³

Summary

The ward-level data shows that residents in the local area, including secure tenants on the Love Lane Estate are more likely to occupy a lower socio-economic banding.

Potential Impacts

The proposal should have a positive impact on those who occupy a lower socioeconomic banding. Evidence has shown that the provision of secure and affordable housing provides the foundation for better health. ²⁴ The commitment through the Landlord Offer to providing new Council homes which meets the needs of each household will help alleviate issues such as overcrowding. The new homes are also being designed to be more energy efficient than the existing homes, which should

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¹⁷ Source: Annual Population Survey 2019 (via nomis)

¹⁸ LG Inform - qualifications

¹⁹ LG Inform – level one

²⁰ <u>State of the Borough</u> (p.21)

²² Source: Residents Survey 2021

²³ <u>Haringey (mysociety.org)</u>

²⁴ Relationship between health and number of housing problems - The Health Foundation



reduce the impact on household finances. Such factors often prevent barriers to obtaining and maintaining stable employment.

More widely, the delivery of 500 Council homes as part of the scheme (which the proposal will help unlock) will also provide more opportunities for households on the wider housing register in Haringey to access the most affordable type of housing. The Neighbourhood Moves Scheme in place will prioritise allocation of the remainder of the new Council homes to residents living nearby the scheme, which is likely to benefit those of a similar socio-economic background.

Any short-term negative impact relating to household finances as a result of moving home is considered to responded to through the Landlord Offer, which provides compensation for affected households. This includes a Home Loss payment and disturbance payments to cover the costs of moving. The Rehousing Team will work with households to ensure that payments are made in a timely manner.

5. Key Impacts Summary

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

The data analysis of secure tenants on the Love Lane Estate, in comparison to the wider borough profile, has found that the proposal is likely to have a disproportionate impact on the following groups:

- Older residents (particularly 65+)
- Residents with a disability
- Black households, particularly those who are African or Caribbean

The data analysis has also found that secure tenants are likely to occupy a lower socio-economic banding.

This assessment has found that, while there may be certain demographics who are disproportionately impacted by the proposal due to overrepresentation or their specific needs, it is not anticipated that this will result in any direct or indirect discrimination for any such group that shares the relevant protected characteristics.

Any short-term negative impact will be mitigated as far as possible through close engagement with individual households, to ensure that specific needs are responded to during the rehousing process. The Love Lane Landlord Offer in place commits the Council to ensuring these objectives are delivered.

5b. Intersectionality

The data indicates that single, black women may be disproportionately impacted by the proposal, given the intersections between the demographics.

This means that while the proposal should have an overall long-term positive impact by ensuring that the new Council homes can be delivered for residents, the short-

5 For C'S



term negative impacts may be more pronounced. The mitigation measures in place, including the Rehousing team working with households on an individual basis to understand and respond to their needs, will need to include a particular focus on this group. This will need to be monitored, and further measures taken where relevant to ensure the rehousing process takes place smoothly and that disruption is kept to a minimum.

5c. Data Gaps

The analysis has identified gaps in the available data on:

- The demographics of household members other than the lead tenant
- Religion and belief
- Sexual orientation
- Gender reassignment

The proposed consultation on the proposal will seek to help the Council identify nonlead tenants with protected characteristics, to better inform the impact assessment. It will also seek to better understand the impacts more broadly on the three protected characteristics set out above. This data will also be obtained where possible through the housing need assessments which are ongoing.

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

The proposal will help overall to advance equality of opportunity between groups who share a relevant protected characteristic and those who do not. This is by providing certainty of delivery for the Council of Phase A of the High Road West scheme, which includes the delivery of 500 new Council homes, for existing and new residents. The community will be kept together through this process through the prioritisation of secure tenants (and non-secure tenants) for the new Council homes, which is confirmed in the Council's High Road West Local Lettings Policy.

The delivery of the 500 Council homes should have positive impacts for individuals across a range of protected groups by increasing the provision of affordable housing. Benefits will particularly be felt by, but not be limited to, protected groups overrepresented in lower socioeconomic groups, including residents from a minority background, women (including single mothers), and residents with limiting health conditions or disabilities.

The proposal will help to foster good relations between groups who share a relevant protected characteristic and those who do not, by supporting the delivery of a new neighbourhood through the scheme for both existing and new residents. As well as the new homes, the design of new public spaces and community uses will be developed with the community, with promoting community cohesion being one of the key objectives of the scheme.

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7. Amendments and mitigations

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

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

Adjust the proposal: the EQIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below **N**

Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision. **N**

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:

Through consultation on the proposal, the Council will seek to better understand if the proposal is likely to disproportionately impact any group with a protected characteristic, and the types of impacts these may include. If such impacts are identified, then further mitigation measures will be developed and built into the rehousing process to minimise these as far as possible. Such findings will be incorporated into the EqIA that accompanies the future report where the results of the consultation are reported back to Cabinet.

Lead officer:

Scott Mundy

Timescale: Subject to Cabinet approval, it is anticipated that consultation will take place in Autumn 2022, with this EqIA to be updated as part of that process.

For C'.B



7. Ongoing monitoring

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

The High Road West team will be responsible for ongoing monitoring of the equalities impact of the proposal, through the rehousing and engagement process. The team are working with individual households on a one-to-one basis and ensure that any impacts related to moving home are mitigated, through a flexible and sensitive approach.

As well as proactive dialogue with individual households, there are also regular Rehousing surgeries taking place on the estate at The Grange community hub, 32 White Hart Lane. These provide an opportunity for residents to make any concerns known, with relevant action then taken.

The equalities data on the residents impacted by the proposal primarily comes from the Council's housing data, which is subject to frequent review. The HRW team will also supplement this dataset with any additional equalities information accumulated through housing need assessments and general engagement.

Date of EQIA monitoring review: Expected Autumn 2022

8. Authorisation

EQIA approved by (Assistant Director/ Director)

Date

07/07/2022

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.

