

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:	Metered charging policy
Service Area:	Housing
Officer Completing Assessment:	Hannah Adler
Equalities/HR Advisor:	Elliot Sinnhuber
Cabinet meeting date (if applicable):	December 2022
Director/Assistant Director	David Joyce / Robbie Erbmman

2. Executive summary

Background

The Council is the landlord of approximately 1700 homes heated by District Energy Networks. Over the coming years, new homes will be built by the Council across the borough that will also be heated by District Energy Networks. Currently the Council charges these tenants for heat as a service charge and service charge levels are set in the Annual Budget. Older heat supplies are unmetered, and charges have been levied at a flat rate for all tenants. There is a legal requirement to retrofit meters in

certain circumstances, and newer council systems will be installed with meters. Once meters are installed, there is a legal requirement to charge residents based on actual heat usage. This means that a new charging policy and tariff needs to be set out to meet this legal requirement.

Alongside this, a policy on debt management will be set out to transparently clarify how the council will work with any tenants who find themselves in debt. This includes setting out the many steps the Council will take when tenants fall behind on their payments, the options for tenants who fall into arrears including the offer of a payment plan and access to the Council's financial inclusion team, and the instances in which the Council will take the last step of disconnecting tenants from their heat, including circumstances in which the Council will never disconnect heat.

In practice, the residents to whom this immediately applies are tenants living at Broadwater Farm. In time, tenants moving into newly-built council homes will also be charged based on usage. This policy will also apply to tenants living in any homes that are retrofitted with meters. Since this decision and change in the first instance only concerns tenants living at Broadwater Farm, the impact on this population group is being considered so as to analyse any impacts on groups sharing a protected characteristic. However, it should be noted that in time other tenants will also be charged based on usage, either because their homes are retrofitted with meters, or because they move into newly-built homes with meters.

It should be noted that it is proposed that this change to metered charging is introduced in summer 2023; following a number of months where affected tenants are provided with an indication of their heat usage and what they would have paid had they been charged based on usage. This is so that tenants have the time to understand their heat usage and the implications for their bills. Alongside this, advice on safely keeping heat use low will be shared.

Metered charging means that tenants will pay for their heat based on usage. Previously, tenants paid a flat rate regardless of usage. The change in policy means that those who use more heat and hot water will pay more than those who use less heat and hot water. Additionally, this policy is likely to mean that all tenants consider their heat use more carefully; indeed the government's rationale for requiring metered charging is to encourage households to use heat more carefully and contribute to the UK's zero carbon ambitions.

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.

These changes are being introduced because they are required by legislation. Because of this, the Council is not required to formally consult with tenants in advance, although they must be formally notified of the change.

However, the Council will be engaging with tenants on Broadwater Farm in advance of formally notifying them so that tenants are given the opportunity to ask questions and fully understand the proposed change. The engagement activities are being undertaken with officers who work specifically on Broadwater Farm and therefore who know and understand the estate and its residents well. Interpreters and translators will be present to ensure that those for whom English is not their first language will be able to understand the proposals. A number of drop-in sessions are planned. Stakeholders on the estate will be contacted, including the children's centre and church, to ensure diverse groups are reached.

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

n/a

4. Data and Impact Analysis

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

4a. Age

Data

Borough Profile¹

0-17 (21%)

18-34 (27%)

35-49 (25%)

50-64 (17%)

65+ (11%)

BWF tenants

<20 0%

20-34 11%

35-49 28%

50-64 36%

65+ 25%

NB: The above BWF percentage columns included data for named tenants but not their household membership, whilst the column Borough average records the latter. Therefore, this is an indicative practical comparative.

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

Council held resident data and 2011 census data for Haringey.

¹ Source: State of the Borough

Detail the findings of the data.

Broadwater Farm tenants seem to skew older than the borough average. However, these figures are based on named tenants and therefore does not account for other household members, such as children or family members.

Impact

It is possible that older people may need to use more heat and hot water than younger people, in part because they are more likely to be retired and therefore at home for more of the day.

It is also possible that older tenants who live alone will live in a smaller home, which means that they would use less energy.

This means that this could have both a positive and negative impact on older tenants.

The Council does not hold comprehensive data on the number of households with children living on Broadwater Farm. However, households with more children may mean higher energy bills due to household size and households with children under five will usually be at home more and require more heating. This means that this could have a negative impact on households with a large number of children, or with young children.

The proposed debt management policy and process sets out the support that the council and partner organisations will offer people, which will help people who are struggling to pay their bills. This includes noting tenants who are struggling to pay their bills and signposting them to internal and external financial inclusion services. Also, tenants will have several months where they are informed of their heat usage in advance of being charged on usage, as well as advice on reducing usage.

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.

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

Target Population Profile

Disability data is unknown for around 50% of households on Broadwater Farm. Where data is available, it suggests that those with disabilities are under-represented on the estate compared to the borough average (27.5% vs. 34.9%).

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

Council held resident data and 2011 census data for Haringey.

Detail the findings of the data.

As noted above, the data suggest that there may be fewer people with disabilities on Broadwater Farm than across the borough as a whole.

Impacts

It is likely that residents with disabilities may spend more time at home, which would mean they may have higher energy use.

The proposed debt management policy and process sets out the support that the council and partner organisations will offer people, which will help people who are struggling to pay their bills. This includes noting tenants who are struggling to pay their bills and signposting them to internal and external financial inclusion services. Also, tenants will have several months where they are informed of their heat usage in advance of being charged on usage, as well as advice on reducing usage.

Tenants with disabilities will be provided with additional support if they fall into rent arrears and no tenant with disabilities would be disconnected by the Council from their heat supply.

There is therefore a potentially negative impact on groups sharing this protected characteristic, but one which is mitigated.

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

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.

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 have local data regarding this protected characteristic. There is no reason to believe that there will be specific impacts for this protected group.

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

Council held resident data and 2011 census data for Haringey.

Detail the findings of the data.

There is no reason to believe that the proposed changes will disproportionately impact anyone due to this protected characteristic.

Impacts

Neutral impact.

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

The council does not hold data on marriage and civil partnership among its residents.

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.

⁶ 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?

2011 census data for Haringey

Detail the findings of the data.

There is no reason to believe that the proposed changes will disproportionately impact anyone due to this protected characteristic. The impacts on families are dealt with elsewhere in this EqIA.

Impacts

Neutral impact.

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.

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

2011 census data for Haringey

Detail the findings of the data.

There is no data on pregnancy and maternity for tenants on Broadwater Farm, so a comparator is not possible.

Impacts

It is possible that households with babies or young children would spend more time at home which would mean they would use more heat and therefore face higher energy costs. It is also possible that households with children would have larger homes, which would also lead to higher heat usage and higher energy costs.

The proposed debt management policy and process sets out the support that the council and partner organisations will offer people, which will help people who are struggling to pay their bills. This includes noting tenants who are struggling to pay their bills and signposting them to internal and external financial inclusion services.

⁷ Births by Borough (ONS)

Also, tenants will have several months where they are informed of their heat usage in advance of being charged on usage, as well as advice on reducing usage.

No household with young children living at home would be disconnected by the Council from their heat supply.

There is therefore a potentially negative impact on this group, but mitigations are in place.

4f. Race

Data

Borough Profile ⁸

Any other ethnic group: **3.9%**

Arab: 0.9%

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%

⁸ Source: 2011 Census

Target Population Profile

<u>Asian</u>	5.68%	
Bangladeshi/UK Bangladeshi		1.74%
Chinese	0.46%	
East African Asian	0.23%	
Indian or UK Indian	0.46%	
British Asian	0.23%	
Other Asian	2.44%	
Pakistani / UK Pakistani	0.12%	

<u>Black</u>	46.86%	
Black African	29.23%	
Black British	4.18%	
Black Caribbean	12.18%	
Black Caribbean and White	0.23%	
Other Black	1.04%	

<u>Mixed</u>	0.27%	
Mixed Asian and White	0.23%	
Mixed Other	0.12%	
Mixed Black	0.12%	
Mixed Black African/White	0.23%	

<u>White</u>	38.63%	
Other White	2.55%	
Other White European	4.64%	
White British	10.09%	
White Greek Cypriot	0.93%	
White Irish	0.70%	
White Kurdish	6.15%	
White Turkish	10.44%	
White Turkish Cypriot	3.13%	

Other Ethnic Group Arab	0.23%	
Any Other Ethnic Group	7.89%	

The Broadwater Farm Tenant Data captures race as self-identified by named tenant, whereas column named Borough Average captures race as self-identified for all residents. The data held by the Council is incomplete. Furthermore, the categories do not match up directly with the 2011 Census data, which is used to present the borough averages. Therefore, this is an indicative practical comparison.

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

Council held resident data and 2011 census data for Haringey.

Detail the findings of the data.

The data shows that Black households are over-represented on Broadwater Farm compared to the borough average. Therefore, all proposals will have a disproportionate impact, whether positive or negative, on Black households by virtue of these households being higher in number on the estate. There is also a large Turkish and Kurdish population on the estate. The same potential impact can be said of these households too.

Impacts

There is no reason to believe that the proposed changes will disproportionately impact anyone due to this protected characteristic. Households who are high energy users will find themselves paying higher heat charges and households who are low heat users will find themselves paying lower heat charges. Black people, and Kurdish and Turkish people, are likely to be part of households that are both higher and lower users.

There is therefore likely to be a positive, neutral and negative impact.

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

Religion and belief are under-reported in Homes for Haringey data, with only around 30% of households declaring this information. From the data available, there are similar proportions of all major religions on the estate as the borough averages.

⁹ Source: 2011 Census

Therefore, there is no suggestion that any religion or belief is over-represented on the estate.

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

Council held resident data and 2011 census data for Haringey.

Detail the findings of the data.

The data suggests that no religion or belief is over-represented on the estate.

Impacts

There is no reason to believe that the proposed changes will disproportionately impact anyone due to this protected characteristic.

4h. Sex

Data

Borough profile ¹⁰

Females: (50.5%)

Males: (49.5%)

Target Population Profile

Of the lead tenants where this data is available, 58% are female and 42% are male.

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

Council held resident data and 2011 census data for Haringey.

Detail the findings of the data.

A higher proportion of lead tenants on the Broadwater Farm estate are female than male. In addition to this, census data for the West Green Ward – in which Broadwater Farm is located – shows that 92% of lone parent households are headed up by women.

Impacts

Households who are high energy users will find themselves paying higher heat charges and households who are low heat users will find themselves paying lower

¹⁰ Source: 2011 Census

heat charges. Households headed by, or which are majority, women, are likely to be both higher and lower users.

There is therefore likely to be a positive, neutral and negative impact. The impact on lone parent households is considered 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

Sexual orientation is frequently under-reported in Homes for Haringey data, with fewer than 5% of households reporting this. From the data available, there is no suggestion that LGBTQ+ people are over-represented on the estate.

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

Council held resident data and 2011 census data for Haringey.

Detail the findings of the data.

There is no reason to believe that the proposed changes will disproportionately impact anyone due to this protected characteristic.

Impacts

This proposal will have a neutral impact on people with this protected characteristic as set out above.

4j. Socioeconomic Status (local)

Data

Borough profile

Income¹²

Haringey is the 4th most deprived borough in London as measured by the IMD score 2019 (where 1 = most deprived). The most deprived LSOAs (Lower Super Output

¹¹ Source: ONS Integrated Household Survey

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

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

Historically, Broadwater Farm has been affected by deprivation, with high unemployment in the 1980s. The estate falls across LSOAs including Haringey 013D which, as of 2015, is ranked **1,271** out of 32,844 LSOAs in England; where 1 is the most deprived. This puts residents of Broadwater Farm amongst the 5% most deprived neighbourhoods in the country.

Across Haringey, the majority of the areas that fall within the 10% most deprived nationally category lie within Tottenham. Within this context, Broadwater Farm represents a concentration of deprivation across several categories.

As of 2015, Broadwater Farm falls in a LSOA ranked 4693 out of 32,844 for education, skills and training; among the 20% most deprived for education, skills and training.

Detail the findings of the data.

As noted above, the data shows that residents on Broadwater Farm are more likely to be unemployed and lacking education, skills and training than across the borough as a whole.

Impacts

This proposal will have both a positive and negative impact on those from lower socio-economic backgrounds as set out above. People paying for their heat based on usage will mean that people who use less heat will pay less and people who use more heat will pay more. This is likely to mean that some people from lower socio-economic

¹³ Source: Annual Population Survey 2019 (via nomis)

backgrounds will have lower heat bills than the previous flat rate, and some will have higher.

It is also important to note that people who are unemployed may well spend more time at home, and therefore have higher heat charges.

The proposed debt management policy and process sets out the support that the council and partner organisations will offer people, which will help people who are struggling to pay their bills. This includes noting tenants who are struggling to pay their bills and signposting them to internal and external financial inclusion services. Also, tenants will have several months where they are informed of their heat usage in advance of being charged on usage, as well as advice on reducing usage.

5. Key Impacts Summary

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

The key findings are that people who are likely to stay at home for longer periods are likely to use more heat than others and therefore are likely to face increased heat charges. These people are likely to include older people, people with young children and people with disabilities. People who have larger homes are also likely to use more heat. These people are likely to include families with several children.

Having to pay more for heat will impact people who have less disposable income, and who are already disproportionately affected by the rising cost of living.

5b. Intersectionality

People who share protected characteristics making them more likely to both be at home more (older people, people with young children and people with disabilities) and less able to meet these costs (people who are unemployed and in low paid work) are particularly likely to be impacted negatively by this proposal. The council has set out its debt management policy to ensure tenants facing difficulty paying their bills are supported.

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

Not applicable.

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

As noted above, people who are likely to stay at home for longer periods are likely to use more heat than others and therefore are likely to face increased heat charges. These people are likely to include older people, people with young children and people with disabilities.

Having to pay more for heat will impact people who have less disposable income, and who are already disproportionately affected by the rising cost of living.

7. Amendments and mitigations

The introduction of metered, rather than flat rate, charging is a regulatory requirement. In order to avoid a negative impact on the groups of people described above, the Council has a debt management policy which includes signposting to the financial inclusion team whose role is to ensure that people facing financial difficulty are supported.

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

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

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: The actions taken are explained throughout this EQIA.

Lead officer: **N/A**

Timescale: **N/A**

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:

The actions taken to mitigate negative impacts are explained throughout this EQIA.

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 decision related to this EQIA is being taken by the Cabinet in January 2023. Further equalities assessments will be carried out where necessary throughout the delivery of the proposals.

Date of EQIA monitoring review:

n/a

8. Authorisation

EQIA approved by (Assistant Director/ Director)

Date of Update and Approval

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.