

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 and treats socioeconomic status as a local protected characteristic.

1. Responsibility for the Equality Impact Assessment

Name of proposal:	Increased heat charges for tenants receiving heat from council owned district energy networks
Service Area:	Housing
Officer Completing Assessment:	Hannah Adler
Equalities/HR Advisor:	Elliot Sinnhuber
Cabinet meeting date (if applicable):	March 2022
Director/Assistant Director Erbmann	David Joyce / Jon Warlow / Robbie

2. Executive summary

Background

The Council is the landlord of approximately 1700 homes heated by council-owned District Energy Networks. The Council buys gas for these district energy networks, and then recharges end users (tenants, leaseholders and businesses) for this. Tenants living in these homes receive their heat and hot water directly from the Council, and

pay for this as part of their service charge. Tenants currently pay a flat rate for their heat and hot water, irrespective of usage, however tenants with a heat meter will soon switch to being charged based on usage. A separate EQIA has been prepared for this.

The Council will set heat charges for 23/24 in March 2023. These will significantly increase, and all tenants receiving heat and hot water from a council-owned district energy network will see their charges increase. This is in line with what the majority of Haringey residents, and the majority of council tenants, will have experienced over the past year.

However, to protect tenants from the full impact of the rise in energy prices, for 2023/24 the Council will only seek to recover 75% of costs in cases where recovering 100% of costs would lead to an increase of over 50% on the cost of energy from 2022/23. This means that although tenants will see a significant increase in their heat charges for 2023/24 it is not as significant an increase as would have been the case without the Council's intervention here.

The Council has various support offers for residents (including some specifically for council tenants) who are affected by rising costs. This includes both advice and guidance on both accessing benefits, better paid employment and advice managing household finances, as well as direct payments to those who are at the sharpest end of the cost of living crisis.

When service charges rise above inflation the Council prepares an equalities impact assessment.

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.

As noted above, consultation is not required for this increase in service charge since the Council is recharging tenants for the cost of running its district energy networks.

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.

c. 1500 tenanted households live in homes heated by Council-owned district energy networks. These are spread out across the borough, and include all homes at Broadwater Farm and some sheltered housing.

4a. Age

Data

Borough Profile¹

0-17 (21%)
18-34 (27%)
35-49 (25%)
50-64 (17%)
65+ (11%)

Tenants receiving heat from Council owned district energy networks

<24 1%
25-34 4%
35-44 10%
45-54 15%
55-64 25%
65-74 17%
75-84 14%
85+ 6%

NB: The above includes data for named tenants but not their household membership, whilst the borough profile 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.

Detail the findings of the data.

The data shows that tenants receiving their heat from council-owned DENs skew older than the borough average, with 62% over 55; whereas only 28% of the borough's population is over 50.

Impact

Older people are more likely to be retired and there is therefore a likelihood that their income is lower. This means that they may be less able to afford a rise in heat charges.

¹ Source: State of the Borough

There is however a range of support available from national government to mitigate against this, including winter fuel payments.

Additionally, the Council's financial inclusion services support council tenants in accessing benefits, and in maximising household income. The Council also manages the household support fund, targeting financial support to those most in need.

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

The data the Council holds shows that 83% of tenants receiving their heat from council-owned DENs do not have a disability, while 17% do.

This skews higher than the borough profile shown above; however the borough profile figures shown only account for people aged 16-64; it is possible that if people over 64 were also taken into account the percentage of people with a physical disability would be higher.

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 a higher percentage of tenants receiving their heat from council-owned DENs have a disability as compared to the borough as a whole; however the borough profile figures shown only account for people aged 16-64; it is possible that if people over 64 were also taken into account the percentage of people with a physical disability would be higher.

Impacts

People who are disabled, who have learning difficulties or mental ill health are more likely to be out of work or in lower paying work and there is therefore a likelihood that

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

their income is lower. This means that they may be less able to afford a rise in heat charges.

There is however government support to mitigate against this.

As noted above, the Council's financial inclusion services support council tenants in accessing benefits, and in maximising household income. The Council also manages the household support fund, targeting financial support to those most in need.

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 have local data regarding 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?

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

There is no reason why this group would be disproportionately impacted by this decision by virtue of their shared protected characteristic.

4d. Marriage and Civil Partnership

Data

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.

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.

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 with young children are dealt with elsewhere in this EqIA.

Impacts

There is no reason why this group would be disproportionately impacted by this decision by virtue of their shared protected characteristic.

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

⁶ Source: 2011 Census

⁷ Births by Borough (ONS)

Detail the findings of the data.

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

Impacts

It is likely that households where someone is pregnant or caring for a young child are more likely to have a household member not working, or to be paying for childcare to enable parents to work; in any case it is likely that households containing people sharing this protected characteristic have either lower incomes or higher expenses, and therefore are more likely to be negatively impacted by a rise in heat costs.

As noted above, the Council's financial inclusion services support council tenants in accessing benefits, and in maximising household income. The Council also manages the household support fund, targeting financial support to those most in need.

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%

⁸ Source: 2011 Census

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

Asian 5.58%
 Bangladeshi/UK Bangladeshi 0.87%
 Chinese 0.56%
 East African Asian 0.31%
 Indian or UK Indian 0.68%
 British Asian 0.25%
 Other Asian 2.72%
 Pakistani / UK Pakistani 0.19%

Black 39.92%
 Black African 19.59%
 Black British 3.96%
 Black Caribbean 14.65%
 Black Caribbean and White 0.68%
 Other Black 1.04%

Mixed 1.37%
 Mixed Asian and White 0.25%
 Mixed Other 0.62%
 Mixed Black 0.19%
 Mixed Black African/White 0.31%

White 34.92%
 Other White 1.48%
 Other White European 3.52%
 White British 15.02%
 White Greek Cypriot 1.30%
 White Irish 1.98%
 White Kurdish 3.83%
 White Turkish 5.81%
 White Turkish Cypriot 1.98%

Other Ethnic Group Arab 0.19%
 Any Other Ethnic Group 5.69%

Unknown 13.16%

This 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 a significantly higher percentage of tenants receiving their heat from council-owned DENs are Black than across the borough's overall population.

Impacts

There is no reason why this group would be disproportionately impacted by this decision by virtue of their shared protected characteristic.

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 Council-held data, with only around 30% of households declaring this information. From the data available, of the affected tenants 7% are Muslim and 14% are Christian.

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

⁹ Source: 2011 Census

Council held resident data and 2011 census data for Haringey.

Detail the findings of the data.

The data available is too incomplete to be meaningful.

Impacts

There is no reason why this group would be disproportionately impacted by this decision by virtue of their shared 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, 54% are female and 44% are male (the remaining tenants have noted that they would prefer not to say).

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.

Impacts

There is no reason why this group would be disproportionately impacted by this decision by virtue of their shared protected characteristic.

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.

¹⁰ Source: 2011 Census

¹¹ Source: ONS Integrated Household Survey

Target Population Profile

Sexual orientation is unknown for 99.63% of the affected tenants.

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 available is too incomplete to be meaningful.

Impacts

There is no reason why this group would be disproportionately impacted by this decision by virtue of their shared protected characteristic.

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 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.

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

¹³ Source: Annual Population Survey 2019 (via nomis)

Target Population Profile

There is no Council held data on socioeconomic status for this group of tenants.

We do know that around half of these tenants live on Broadwater Farm, which historically, 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 who make up a significant proportion of the affected tenant group are more likely to be unemployed and lacking education, skills and training than across the borough as a whole.

Impacts

People who are unemployed or in lower paying work are more likely to have lower households incomes and therefore to be negatively impacted by an increase in heat costs.

As noted above, the Council's financial inclusion services support council tenants in accessing benefits, and in maximising household income. The Council also manages the household support fund, targeting financial support to those most in need.

5. Key Impacts Summary

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

The analysis shows that older people, Black people and people who are unemployed and lacking education, skills and training are overrepresented amongst the group of tenants receiving heat directly from a Council-owned DEN.

Of these, older people and people who are unemployed and lacking education, skills and training are likely to be negatively impacted by the rise in heat charges since they are more likely to be struggling financially.

There is a range of mitigations in place, both in the form of government support (e.g. winter fuel payments for older people) and Council support, as detailed in the EQIA.

5b. Intersectionality

Any tenants who share multiple protected characteristics making them particularly vulnerable to heat charges would be negatively affected, for example unemployed households with young children.

The mitigations in place for these groups are discussed above.

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

The rise in heat charges is a direct impact of the rising cost of gas. The council is recharging its tenants for 75% of its costs for 2023/24 to reduce the increase in heat charges from 2022/23 to 2023/24.

7. Amendments and mitigations

A range of mitigations is on place, as outlined above, including the Council only recovering 75% of its costs. The Council is also developing proposals for a £300k support fund to help tenants struggling with the cost of living.

The Council will ensure that affected tenants are aware of the Council's financial inclusion offer.

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 February 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.