

## 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

<b>Name of proposal:</b>	<b>Draft Housing Strategy 2024-2029</b>
<b>Service Area:</b>	<b>Housing</b>
<b>Officer Completing Assessment:</b>	<b>Hannah Adler / Marc Lancaster</b>
<b>Equalities/HR Advisor:</b>	<b>TBC</b>
<b>Cabinet meeting date (if applicable):</b>	<b>7 November 2023</b>
<b>Director/Assistant Director</b>	<b>David Joyce / Robbie Erbmann</b>

### 2. Executive summary

The proposal is for a new Housing Strategy for Haringey, to run for five years after its adoption by Full Council. The Housing Strategy is a wide-ranging document covering a number of housing issues and setting out the Council's approach to addressing these issues.

The strategy comprises four strategic objectives, covering the following areas:

- **Delivering new homes of all kinds**
- **Improving the social rented sector**
- **Improving the private rented sector**
- **Homelessness prevention and alleviation**

Five fundamental principles run through each of those objectives and underpin all areas of the strategy:

- **Communication and co-production** - communicating clearly, transparently, and respectfully with residents, and putting residents at the centre of the design of services and of homes.
- **An active council** – using all levers and powers at our disposal to tackle the housing crisis.
- **Working across the council and in partnership** - putting housing at the heart of what this council does, and taking a lead in bringing residents, community groups, voluntary and private sector organisations together to tackle the housing crisis.
- **Creating and maintaining sustainable and healthy communities** - working with residents to deliver new, better, and healthier homes and neighbourhoods, enhancing the places and sense of community that make them proud to call Haringey home.
- **Responding to the climate emergency** - delivering homes and neighbourhoods that are healthier and more resilient.

The commitments under each of the four objectives are set out below.

#### New homes

- a. Firstly, the Strategy sets out an overall target of 1592 new homes per year. This is in accordance with the Mayor of London's London Plan.
- b. Secondly, the Strategy notes the preferred types of affordable housing in Haringey, based on a Strategic Housing Market Assessment and confirmed by formal consultation responses. There is a strong preference for affordable housing to be developed as housing for affordable rent rather than affordable sale. Within this, there is a strong preference for homes at social rent, as opposed to other forms of affordable rent.
- c. Thirdly, the Strategy sets out the required mix in terms of house size. The preferred mix for social rented housing considers both the longer-term needs of the borough alongside the shorter-term needs identified from the Council's housing register. The required mix for intermediate rented housing and for intermediate home ownership is also set out.
- d. Fourthly, the Strategy commits to continuing with a major new Council Housing Delivery Programme.

#### 2) Social rented sector

- a. The Strategy acknowledges failings in the management of Council housing over many years and commits changing this as a matter of urgency.
- b. For the Council's own homes, tenants and leaseholders, this includes commitments to bringing all homes up to decent homes standard by 2028, to ensuring that all homes meet basic fire and other safety standards, to improving services to tenants, and to the greater involvement of residents in decision making.
- c. The Strategy also commits to closer working with other registered providers of social housing in Haringey to ensure improvements across the whole sector.

### 3) Private rented sector

- a. The Strategy commits to improving the private rented sector and providing support to tenants in the private rented sector in three ways. Firstly, the Strategy commits to seek the continuation of existing licensing schemes and to measures that will support landlords to understand and meet their responsibilities.
- b. Secondly, the Strategy commits the Council to using its enforcement powers to take action where landlords are failing to meet standards, and to bring empty homes into use where possible.
- c. Finally, the Strategy commits to providing a broad range of support to tenants in the private rented sector – both through its own services and by signposting to partners in the borough. It also commits to actively promoting private tenants' rights through communications campaigns.

### 4) Preventing and alleviating homelessness

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

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

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

- Sets out a clear preference for social rented housing over other kinds of affordable housing, while making it clear that all affordable housing is welcomed. This means there is a preference for social housing over other forms of affordable rented housing (e.g. intermediate rent) as well as affordable home ownership (e.g. shared ownership or first homes). This means that the Strategy is prioritising the needs of those who need social rented housing over those who need other forms of affordable housing. This decision is taken on the basis of clear evidence from the Strategic Housing Market Assessment, but needs to be noted and considered.
- Sets out the desired breakdown of affordable homes of various types by bedroom size. There is an emphasis on providing more family sized social rented homes (which means fewer 1-bedroom homes). This is based on an analysis of existing supply and existing and projected need.
- In the affordable home ownership sector, there is an emphasis on more 1-bed homes because larger affordable homes for ownership become unaffordable to those who are eligible for them. This means that some households who do not qualify or are not a priority for social housing but will struggle to buy market housing may be disadvantaged. However, this is to a great extent due to the high cost of affordable home ownership for larger homes.

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

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

With regard to the fourth strategic objective, the broad aims are around preventing people from becoming homeless by providing them with early and targeted support, ensuring that people who become homeless and are in priority need are provided with accommodation to suit their needs and broader wrap-around support, supporting

those at risk of rough sleeping, and setting out broad principles for a new housing allocations policy. These objectives are designed to support some of the borough's most vulnerable people – those who are already homeless or at risk of becoming so, and those who are sleeping rough or at risk of sleeping rough. With regard to the last objective, the Council's housing allocations policy sets out who is prioritised for social housing. This is an important policy with important equalities' considerations, and when the new policy is brought forward (initially for consultation) it will be accompanied by a full equalities' impact assessment.

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

- Those who need social rented housing; i.e. those who are currently on the housing register
- Those who already live in social rented housing
- Those who live in the private rented sector
- Those who are homeless, and at risk of homelessness
- Those who are rough sleeping, or at risk of rough sleeping

By stating a clear preference for social rented housing over other types of affordable housing, in particular affordable home ownership, the Housing Strategy has prioritised the needs of those who need social rented housing over those who do not qualify or are unlikely to have priority for social rented housing but cannot afford market housing. By definition, this group is likely to live in the private rented sector, so by striving to improve this sector the Housing Strategy addresses their immediate housing situation rather than that which they aspire to. It is worth noting that planning policy requires a percentage of homes to be delivered as intermediate housing so this will still be provided.

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

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

Consultation and engagement significantly inform the final Housing Strategy having allowed us to assess and further mitigate its impact on protected groups of residents.

Between 26 September and 16 December 2022 the Council carried out formal consultation on the draft Housing Strategy. 706 responses were received

Responses broadly reflect the tenure and housing situation of Haringey's residents, though social housing tenants, homeowners, and homeless or insecurely housed people were over-represented, and private renters were under-represented.

Only 57 respondents provided any Equalities Monitoring information. Within this small sample, Black, Asian and Minority Ethnic groups were under-represented as were

men, younger residents, and residents with lower levels of formal educational qualification. This small sample should be seen against the tenure information which reflects a much broader range of responses.

Of this small sample:

- Nearly two thirds were female
- Nearly two thirds were white compared to 57% of Haringey residents
- Older people were over-represented: 35-49 and 65+ age groups were over-represented; 25% of respondents were retired
- 40% had some form of disability compared to 20% of Haringey residents
- Almost all respondents had English as their main language
- 86% of respondents had Level 4 qualifications or higher compared to 39% across Haringey
- 20% of respondents were in receipt of some form of benefit

However, the consultation's overwhelming support for the draft strategy was reflected across demographic categories.

Consultation responses expressed serious concern about the quality of housing and services to our own tenants and leaseholders. This reflects concerns raised by residents in other surveys, and it reflects concerns raised by and to the Regulator of Social Housing, as set out below.

The responses received from the consultation have informed significant improvements to the Strategy's provisions for groups with protected characteristics:

- Transforming services to our tenants and leaseholders, and designing those services with them
- Ensuring and improving the quality of our Council housing
- Embedding these functions into the Council's core business
- Clarify our practical commitments to protecting the existing places and communities that make people proud to call Haringey, to building council homes across all of Haringey, and in particular to doing everything possible to prevent residents being 'priced out' of a changing borough.
- Strengthen links between the housing strategy and Employment and Skills strategies
- Include a focus on building stronger communities on our estates
- Prioritise a communications campaign to publicise the work that the Council can do to support private renters and address the lack of confidence and knowledge felt by renters, and to publicise the HMO licensing schemes
- Introduce more detail about sustainability and environmental commitments, in particular on preventing the use of gas and oil in new homes and on supporting the retrofitting of owner-occupied homes



- Include commitments to Supported Living including for young adults with SEND
- Include a commitment to bring forward an Older People's Housing Strategy

All these changes further strengthen the Strategy's positive impact on Haringey residents across the range of protected characteristics that are disproportionately represented within the borough's poorer residents.

## 4. Data and Impact Analysis

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

### 4a. Age

#### Data

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

**54,422: 0-17 (21%)**

**71,660: 18-34 (27%)**

**63,930: 35-49 (24%)**

**46,516: 50-64 (18%)**

**27,706: 65+ (10%)**

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

A combination of council-held data, the 2021 census and studies showing national and regional trends.

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

Homeowners tend to be considerably older than those living in other tenures. 9.6% of homeowners are aged under 35 – 27% of the borough are aged 18-34. 26.6% of homeowners are aged 65 or over – more than the borough average population and more than live in any other tenure<sup>2</sup>. This is in line with data showing that while London's home ownership rate has fallen in recent decades, there are stark differences in the trends for different age groups. Home ownership has fallen for all age groups other than the over 65s, and most sharply for people aged under 35: in 1990, 25% of households in London headed by someone aged 16-24 and 57% of households headed by someone aged 25-34 owned their home. However, by 2019

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<sup>1</sup> Census 2021 - [Population and household estimates, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/population-and-household-estimates)

<sup>2</sup> 2021 Census

these figures had fallen to 5% and 29% respectively. <sup>3</sup> 72% of home sales in Haringey are to people buying without the need for a mortgage.

Social housing tenants in Haringey also tend to be considerably older than the rest of the borough's population. More than one in five Council tenants and just less than one in five Housing Association tenants are aged over 65. Only 11% of Council tenants and 13% of Housing Association tenants are younger than 35.<sup>4</sup>

Private renters tend to be much younger than those in other housing tenures. 35% of Haringey private renters are aged less than 35. Nearly nine in every ten renters are younger than 55: 9% are aged between 55 and 65; 4% are older than 65.

76% of households on the housing register are aged under 50. However, 30% of those in the most urgent need are aged over 60 years. <sup>5</sup>

## Impacts

Older people are far more likely to be homeowners than younger people. Though the Strategy does not prioritise homeowners, it does not disadvantage them and in some measures – including supporting the retrofit of owner-occupied homes – it offers positive impacts.

Responses to our consultation disproportionately represented older age groups, and those responses showed strong support for the Housing Strategy. In response to that consultation, we have also committed in the Housing Strategy to bring forward an Older People's Housing Strategy to specifically address the housing and accommodation needs of older people in the borough.

It is arguable that younger people aspiring to homeownership but unable to afford market prices are not supported in this by the housing strategy, since the housing strategy states an explicit preference for social rented housing over affordable home ownership. However, affordable home ownership will still be delivered in Haringey; and the challenges of home-ownership for younger people need to be addressed nationally. And the Housing Strategy promotes intermediate rent which is more accessible than affordable home ownership to a larger group of young people. Additionally, delivering new social housing benefits the 76% of households on the housing register who are aged under 50.

Younger people are more likely to live in the private rented sector, although the number of older people in the private rented sector is also growing. By seeking to improve conditions in the private rented sector, the housing strategy will benefit people across all age groups but have a disproportionately positive impact on younger people.

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

<sup>4</sup> ONS – Census 2021

<sup>5</sup> HfH data



Older people are disproportionately represented among council tenants. By seeking to improve the condition of council owned stock, as well as services provided to council tenants, this group will be actively supported by the housing strategy.

Although three quarters of households on the housing register are aged under 50, nearly a third of those in the most urgent need are over 60 years old.<sup>6</sup> The Strategy's commitment to deliver more Council housing and more homes for affordable rent supports both these groups.

## 4b. Disability<sup>7</sup>

### Data

#### Borough Profile

- Disabled under Equality Act – 13.7%<sup>8</sup>
  - Day to day activities limited a lot – 6.1%
  - Day to day activities limited a little – 7.5%
- 7.5% of residents people diagnosed with depression<sup>9</sup>
- 1.7% of residents diagnosed with a severe mental illness<sup>10</sup>
- 0.4% of people in Haringey have a learning disability<sup>11</sup>

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

A combination of council-held data, the 2021 census and studies showing national and regional trends.

#### Detail the findings of the data.

23% of homeowner households and 18% of households in Haringey's private rented sector have at least one adult whose day-to-day activities are limited by long-term physical or mental health conditions or illnesses. This is a lower proportion than the wider Haringey population.<sup>12</sup>

Social housing tenants in Haringey are much more likely to be restricted by disability and poor health. 43% of Council tenant households and 41% of Housing Association households have at least one disabled adult whose day-to-day activities are limited by long-term physical or mental health conditions or illnesses. 26% of Haringey

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<sup>6</sup> Locally held data, Haringey Council

<sup>7</sup> In the Equality Act a disability means a physical or a mental condition which has a substantial and long-term impact on your ability to do normal day to day activities.

<sup>8</sup> Census 2021 - [Disability, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/people-and-population/disability-and-long-term-health-conditions/disability)

<sup>9</sup> NHS Quality Outcomes Framework - [Prevalence of diagnosed depression among GP registered population age 18+](https://www.nhs.uk/quality-improvement/quality-outcomes-framework/qof-2019-2020/prevalence-of-diagnosed-depression-among-gp-registered-population-age-18/)

<sup>10</sup> NHS Quality Outcomes Framework - [Prevalence of diagnosed mental health diagnosis among GP registered population age 18+](https://www.nhs.uk/quality-improvement/quality-outcomes-framework/qof-2019-2020/prevalence-of-diagnosed-mental-health-diagnosis-among-gp-registered-population-age-18/)

<sup>11</sup> PHE Learning disability profiles - <https://fingertips.phe.org.uk/learning-disabilities#page/0/gid/1938132702/pat/6/par/E12000007/ati/102/are/E09000014>

<sup>12</sup> ONS – Census 2021

households have at least one disabled member. 1,149 Council tenant households and 671 Housing Association households have two or more disabled adults.<sup>13</sup>

15% of Council tenant households and 13% of Housing Association households have at least one member who is an unpaid carer.<sup>14</sup>

Around 40% of Haringey's disabled children live in social rented housing. More social housing tenants have disabled children than parents in other tenures.<sup>15</sup>

A third of social housing tenants in Haringey are either unemployed or economically inactive due to long-term sickness or disability. This proportion is twice as high as in the wider Haringey population.<sup>16</sup>

32% of those in the most urgent need on the housing register have a disability.

## Impacts

Where respondents gave data, responses to our consultation disproportionately represented disabled people, and those responses showed strong support for the Housing Strategy. In response to that consultation, we have also committed in the Housing Strategy to significant improvements provisions that disproportionately impact positively on disabled people:

- Transforming services to our tenants and leaseholders, and designing those services with them
- Ensuring and improving the quality of our Council housing
- Embedding these functions into the Council's core business
- Clarifying our practical commitments to protecting the existing places and communities that make people proud to call Haringey, to building council homes across all of Haringey, and in particular to doing everything possible to prevent residents being 'priced out' of a changing borough.
- Strengthening links between the housing strategy and Employment and Skills strategies to ensure the construction sector is as diverse as possible
- Including a focus on building stronger communities on our estates
- supporting the retrofitting of owner-occupied homes
- Include commitments to Supported Living including for young adults with SEND
- Include a commitment to bring forward an Older People's Housing Strategy

Social tenants, and in particular council tenants, are more likely to be limited in their day-to-day activities by a disability or illness. The housing strategy seeks to address

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<sup>13</sup> ONS – Census 2021

<sup>14</sup> ONS – Census 2021

<sup>15</sup> ONS – Census 2021

<sup>16</sup> ONS – Census 2021

this in two key ways: firstly, by seeking to improve the condition of council owned stock and services provided to council tenants; secondly by taking a needs-based approach to the delivery of new council housing to ensure that new housing meets the needs of those on the housing register with a disability, as well as by ensuring that supported housing is delivered as part of the overall supply of new housing in the borough.

Given that disabled people are disproportionately likely to be living in social rented housing – and that those in the greatest need on the housing register are most likely to be disabled – the strategy’s focus on delivering more affordable housing and improving housing quality for social renters will have a broadly positive impact on the group.

The Strategy will ensure that more than 10% of all new affordable homes built in Haringey will be wheelchair adaptable. We will ensure that 20% of the Council homes we deliver will be wheelchair adaptable. We will actively encourage other housing developers to meet this higher standard.

Through our Bespoke Homes Programme, we will ensure that those new wheelchair adaptable Council homes are designed and built from as early a stage as possible around the individual needs of their future tenants. To achieve this, we will over the next two years develop a better and more detailed overview of complex housing need on the housing register and put in place processes that ensure the right households can be identified at the right stage of the development process. We will review the Allocations Policy so that it supports the aims of the Bespoke Homes programme.

We will work with Housing Associations so that the same approach is adopted over the next five years to all wheelchair adaptable affordable homes in the borough.

#### **4c. Gender Reassignment<sup>17</sup>**

##### **Data**

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

- Gender Identity different from sex registered at birth but no specific identity given – 0.5%
- Trans woman – 0.1%
- Trans man - 0.1%

##### **Target Population Profile**

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<sup>17</sup> Under the legal definition, a transgender person has the protected characteristic of gender reassignment if they are undergoing, have undergone, or are proposing to undergo gender reassignment. To be protected from gender reassignment discrimination, an individual does not need to have undergone any specific treatment or surgery to change from one’s birth sex to one’s preferred gender. This is because changing one’s physiological or other gender attributes is a personal process rather than a medical one.

<sup>18</sup> Census 2021 - [Gender identity, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/ethnicityandnationality/bulletins/census2021/genderidentityenglandandwales)

We are not able to conduct meaningful statistical analysis of the trans population by tenure type. We do know that 25% of young people who are rough sleeping are LGBTQ+.

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

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

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

### **Impacts**

Neutral / positive

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

### **Data**

#### **Borough Profile** <sup>19</sup>

Divorced or formerly in a same-sex civil partnership which is now legally dissolved: (9.9%)

Married or registered civil partnership: (35.8%)

Separated (but still legally married or still legally in a same-sex civil partnership): (2.9%)

Single (never married or never registered a same-sex civil partnership): (45.3%)

Widowed or surviving partner from a same-sex civil partnership: (6.1%)

### **Impacts**

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

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

### **Data**

#### **Borough Profile** <sup>20</sup>

Live Births in Haringey 2021: 3,376

### **Target Population Profile**

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<sup>19</sup> Census 2021 - [Marriage and civil partnership status in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/marriageanddivorce/articles/marriageandcivilpartnershipstatusinenglandandwales/2021)

<sup>20</sup> Births by Borough (ONS)

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

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

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

2% of households moving into social housing in London included a pregnant woman<sup>21</sup>. The Labour Force Survey for the same year (2019-20) does not report the proportion of all households in London that include a pregnant woman, but it does say that 3% of households have one or more children aged under 12 months.

The share of households with children has varied little for households that own their home outright (from 13% in 2004, to 14% in 2020) and has risen for households that are buying with a mortgage (from 44% in 2012 to 51% in 2020).<sup>22</sup>

31% private renting households in London include children, up from one in five in 2004.<sup>23</sup>

The share of households with children in Haringey has fallen slightly for social renting households (from 43% to 38%) in 2020).<sup>24</sup>

### **Impacts**

#### **Positive:**

- The housing strategy seeks to provide housing for Haringey's families, in particular by increasing the percentage of social rented homes delivered as larger homes.
- The housing strategy sets the breakdown of affordable home ownership towards one-bedroom homes. This is because larger homes for ownership become too expensive for qualifying households to buy.
- It also seeks to improve conditions in the private rented sector in general, a sector housing a growing number of households with children.

Negative: by only a small percentage of affordable home ownership being delivered as family sized housing.

The responses received from the consultation have informed significant improvements to the Strategy's provisions for pregnant people and mothers who are over-represented in social housing:

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<sup>21</sup> CORE lettings data, MHCLG 2019

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

<sup>23</sup> Housing in London 2020 The evidence base for the London Housing Strategy – GLA

<sup>24</sup> Labour Force Survey household data, 2020

- Transforming services to our tenants and leaseholders, and designing those services with them
- Ensuring and improving the quality of our Council housing
- Embedding these functions into the Council's core business

In addition, we have strengthened the Strategy's commitment to promoting gender diversity in the construction sector.

## 4f. Race

### Data

#### **Borough Profile** <sup>25</sup>

Arab: **1.0%**

Any other ethnic group: 8.7%

Asian: **8.7%**

Bangladeshi: 1.8%

Chinese: 1.5%

Indian: 2.2%

Pakistani: 0.8%

Other Asian: 2.4%

Black: **17.6%**

African: 9.4%

Caribbean: 6.2%

Other Black: 2.0%

Mixed: **7.0%**

White and Asian: 1.5%

White and Black African: 1.0%

White and Black Caribbean: 2.0%

Other Mixed: 2.5%

White: **57.0% in total**

English/Welsh/Scottish/Norther Irish/British: 31.9%

Irish: 2.2%

Gypsy or Irish Traveller: 0.1%

Roma: 0.8%

Other White: 22.1%

### Target Population Profile

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<sup>25</sup> Census 2021 - [Ethnic group, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk)



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

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

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

36% of social housing tenants define themselves as Black. 22% of social housing tenants define themselves as ethnically White British, 14% as White with a non-British heritage, and 7% as Asian. On in ten households renting from the Council or a Housing Association are made up of more than one ethnicity.<sup>26</sup>

Council tenants who are young, Black, Bangladeshi, or women are much more likely to live in overcrowded households than other Council tenants. 60% of severely overcrowded households are Black.

66% of private renters define as White. Most of those White private renters do not define as British. 39% of private renters define themselves as white and not British and 27% as White British. 11% of private renters define as Black, 6% as Asian, 6% as mixed and 11% as another ethnicity.<sup>27</sup>

70% of homeowners define as White – and 70% of those White homeowners define as ethnically White British. 10% define as Black, 10% as Asian, 6% as other and 5% as mixed ethnicity.

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

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

39% of Haringey rough sleepers were British nationals. 36% were EU nationals, 15% African and 7% Asian.

25% of people rough sleeping in Haringey were Black, 16% were White British, and 35% White and not British.<sup>30</sup>

### **Impacts**

The responses received from the consultation have informed significant improvements to the Strategy's provisions in areas disproportionately impacting on minority ethnic groups:

- Transforming services to our tenants and leaseholders, and designing those services with them
- Ensuring and improving the quality of our Council housing

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<sup>26</sup> Locally held data, Haringey Council

<sup>27</sup> ONS – Census 2021

<sup>28</sup> HfH data

<sup>29</sup> HfH data

<sup>30</sup> CHAIN (Combined Homelessness and Information Network) data

- Embedding these functions into the Council's core business
- Clarify our practical commitments to protecting the existing places and communities that make people proud to call Haringey, to building council homes across all of Haringey, and in particular to doing everything possible to prevent residents being 'priced out' of a changing borough.
- Strengthening our commitment to support a diverse construction sector
- Include a focus on building stronger communities on our estates
- Prioritise a communications campaign to publicise the work that the Council can do to support private renters and address the lack of confidence and knowledge felt by renters, and to publicise the HMO licensing schemes

The housing strategy has a strong focus on improving the quality of Council homes and services to its tenants, so it will have a positive impact on those living in Council housing, who are disproportionately from BAME backgrounds.

Delivering more council housing will benefit those on the housing register and in Temporary Accommodation, where black households are very overrepresented.

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

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

Structural inequality means that black and minority ethnic people are much more likely to become homeless. Our strategy commits to ensuring that our policies, services, and the approach of our workforce responds to the specific assets, needs and barriers experienced by these residents.

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

### **Data**

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

Christian: 39%

Buddhist: 0.9%

Hindu: 1.3%

Jewish: 3.6%

Muslim: 12.6%

No religion: 31.6%

Other religion: 2.3%

Religion not stated: 8.0%

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<sup>31</sup> Census 2021 - [Religion, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk)

Sikh: 0.3%

### **Target Population Profile**

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

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

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

Slightly higher proportions of people identifying their religion as Jewish (4.1% of homeowners) and Hindu (2.4%) own their own home than other religious groups. Muslims are significantly less likely than other religious groups to own their home.

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

Muslims are much more likely to rent from a social landlord – 19.6% of social renters identify as Muslim. Christians are a little more likely to rent from a social landlord – 53.1% of social renters give their religion as Christianity.

### **Impacts**

Neutral in almost all cases. The strategy's focus on improving council housing will have a particularly positive impact on the 19.6% of social renters who identify as Muslim.

## **4h. Sex**

### **Data**

#### **Borough profile <sup>32</sup>**

Females: (51.8%)

Males: (48.2%)

### **Target Population Profile**

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

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

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<sup>32</sup> Census 2021 - [Gender identity: age and sex, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

## Detail the findings of the data.

There is no significant sex differential for those living in owner-occupied homes— 51.8% of the population is female, and 51.7% of residents in owner-occupied homes are female.<sup>33</sup>

Women and girls are significantly less likely to live in Haringey's private rented sector than men or boys – while they make up 51.8% of the population, they make up 49.9% of residents in the private rented sector.<sup>34</sup>

Women and girls are much more likely to live in Haringey's social rented sector than men or boys – they make up 55.1% of residents in the social rented sector.<sup>35</sup>

64% of people holding a Council tenancy are women. 63% of households on the housing register are comprised of, or are headed by, women.<sup>36</sup>

11,285 households are waiting for social housing on the housing register. Two thirds of them are households headed by women.<sup>37</sup>

In Haringey, only 15% of people experiencing rough sleeping were women. The average age of death for women who experience rough sleeping is 42 years; for men it is 44.<sup>38</sup>

## Impacts

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

Where respondents gave data, responses to our consultation disproportionately represented women, and those responses showed strong support for the Housing Strategy. In response to that consultation, we have also committed in the Housing Strategy to significant improvements provisions that disproportionately impact positively on women and girls:

- Transforming services to our tenants and leaseholders, and designing those services with them
- Ensuring and improving the quality of our Council housing
- Embedding these functions into the Council's core business

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<sup>33</sup> 2021 census

<sup>34</sup> 2021 census

<sup>35</sup> 2021 census

<sup>36</sup> Council data

<sup>37</sup> Council data

<sup>38</sup> State of the Borough

- Clarify our practical commitments to protecting the existing places and communities that make people proud to call Haringey, to building council homes across all of Haringey, and in particular to doing everything possible to prevent residents being 'priced out' of a changing borough.
- Strengthening our commitment to support a diverse construction sector
- Include a focus on building stronger communities on our estates

#### **4i. Sexual Orientation**

##### **Data**

##### **Borough profile** <sup>39</sup>

- Straight or heterosexual: 83.4%
- Gay or Lesbian: 2.7%
- Bisexual: 2.1%
- All other sexual orientations: 0.8%
- Not answered: 11.0%

##### **Target Population Profile**

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

We do not have reliable data on sexuality by tenure.

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

##### **Impacts**

The housing strategy's aim is that everyone in Haringey has a safe, stable and secure home; including residents who identify as lesbian, gay and bisexual.

Additionally, the strategy has as a fundamental principle co-producing services and policy with residents, including residents who are often unrepresented in consultation and engagement exercises. By seeking to improve support to people who are, or are at risk of, rough sleeping, the housing strategy should have a positive impact on this group in which LGBT people are overrepresented.

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

##### **Data**

##### **Borough profile**

##### **Income**

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<sup>39</sup> Census 2021 - [Sexual orientation, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/people-population/diversity-and-cultural-identity/sexual-orientation)

- 6.9% of the population of Haringey were claiming unemployment benefit as of April 2023<sup>40</sup>
- 19.6% of residents were claiming Universal Credit as of March 2023<sup>41</sup>
- 29.3% of jobs in Haringey are paid below the London Living Wage<sup>42</sup>

### **Educational Attainment**

- Haringey ranks 25<sup>th</sup> out of 32 in London for GCSE attainment (% of pupils achieving strong 9-5 pass in English and Maths)<sup>43</sup>
- 3.7% of Haringey's working age population had no qualifications as of 2021<sup>44</sup>
- 5.0% were qualified to level one only<sup>45</sup>

### **Area Deprivation**

Haringey is the 4<sup>th</sup> most deprived in London as measured by the IMD score 2019. The most deprived LSOAs (Lower Super Output Areas, or small neighbourhood areas) are more heavily concentrated in the east of the borough, where more than half of the LSOAs fall into the 20% most deprived in the country.<sup>46</sup>

### **Target Population Profile**

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

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

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

The median house price rose 89% in the last ten years to £587,000.<sup>47</sup> Haringey's median house price to earnings ratio is 18.03, significantly above the London average.

The proportion buying a home with a mortgage fell in the early half of the decade but has been relatively stable since 2015. 72% of home sales in Haringey are to people buying without the need for a mortgage.

Around 8% of homeowners are either unemployed or economically inactive due to long-term sickness or disability<sup>48</sup>.

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<sup>40</sup> ONS - [ONS Claimant Count](#)

<sup>41</sup> DWP, StatXplore - [Universal Credit statistics, 29 April 2013 to 9 March 2023 - GOV.UK \(www.gov.uk\)](#)

<sup>42</sup> ONS - Annual Survey of Hours and Earnings (ASHE) - Estimates of the number and proportion of employee jobs with hourly pay below the living wage, by work geography, local authority and parliamentary constituency, UK, April 2017 and April 2018 - Office for National Statistics

<sup>43</sup> DfE - GCSE attainment and progress 8 scores

<sup>44</sup> LG Inform - Data and reports | LG Inform (local.gov.uk)

<sup>45</sup> LG Inform - Data and reports | LG Inform (local.gov.uk)

<sup>46</sup> IMD 2019 - English indices of deprivation 2019 - GOV.UK (www.gov.uk)

<sup>47</sup> ONS Annual Survey of Hours and Earnings 2020

<sup>48</sup> ONS - Census 2021



66.7% of homeowners have formal qualifications to degree or postgraduate level. 11.8% have no qualification.

London's private renters broadly reflect the income distribution of the wider population. 58% of private tenants are in the top two fifths of the national household income distribution and 14% are in the bottom fifth <sup>49</sup>

15% of Haringey households renting privately are either unemployed or economically inactive due to long-term sickness or disability – a higher proportion than owner-occupiers and a lower proportion than social renters. <sup>50</sup>

Figures from Rightmove show that the average advertised rent in London rose by 15.8% between July 2021 and July 2022. This represents the highest ever annual growth in any region since their records began. Rightmove figures show that rents in Haringey rose by 19.1% in the 12 months to October 2022.

16% of private renters in Haringey – more than 6,056 households - are in receipt of Housing Benefit or the housing element of Universal Credit. 116 households renting privately are benefit capped. <sup>51</sup>

More and more private renters are struggling to make ends meet or to afford basic needs. By July, 27% of private renters in London said they were struggling to make ends meet or pay for basic needs. Just 36% of private renters said they were coping or comfortable. <sup>52</sup>

19% of private renters have no qualification; 54.9% are qualified to degree or postgraduate level.

Poverty and lower educational disadvantage are highly concentrated in the social rented sector.

A third of social housing tenants in Haringey are either unemployed or economically inactive due to long-term sickness or disability. This proportion is twice as high as in the wider Haringey population. <sup>53</sup>

Across London, more than a third of social housing tenants said they were struggling to make ends meet or pay for basic needs <sup>54</sup>

34.2% of social housing tenants have no formal qualifications.

## Impacts

The responses received from the consultation have informed significant improvements to the Strategy's provisions in areas where those with socioeconomic disadvantage are over-represented:

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<sup>49</sup> English Housing Survey 2019-20

<sup>50</sup> ONS – Census 2021

<sup>51</sup> Council data

<sup>52</sup> GLA/YouGov cost of living polling, cited in GLA - Housing in London report, October 2022

<sup>53</sup> ONS – Census 2021

<sup>54</sup> GLA/YouGov cost of living polling, cited in GLA - Housing in London report, October 2022

- Transforming services to our tenants and leaseholders, and designing those services with them
- Ensuring and improving the quality of our Council housing
- Embedding these functions into the Council's core business
- Clarify our practical commitments to protecting the existing places and communities that make people proud to call Haringey, to building council homes across all of Haringey, and in particular to doing everything possible to prevent residents being 'priced out' of a changing borough.
- Strengthening our commitment to support a diverse construction sector
- Include a focus on building stronger communities on our estates
- Prioritise a communications campaign to publicise the work that the Council can do to support private renters and address the lack of confidence and knowledge felt by renters, and to publicise the HMO licensing schemes
- Include commitments to Supported Living including for young adults with SEND

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

By improving conditions in social housing, the housing strategy will improve the housing of some of the borough's poorest and most educationally disadvantaged residents reside and educationally disadvantaged residents.

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

## **5. Key Impacts Summary**

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

The housing strategy is a major strategy which will impact a large number of people in the borough. Those impacts are broadly very positive for groups with protected characteristics.

By improving conditions in social rented housing, in particular council housing, and by seeking to improve the Council's responses to homelessness, the strategy will have a positive impact across the protected characteristics, in particular on groups who are socioeconomically disadvantaged, BAME, disabled, older, and women. And by providing more social housing and in particular more family sized social housing, the strategy will also support these groups, as well as families with young children.

The strategy aims to ensure that nearly 1600 new homes a year are built in the borough – and most of these homes will be for private sale. Though the strategy does not prioritise affordable home ownership, the strategy may have a negative

impact on those who aspire to homeownership but are less socioeconomically advantaged. This group is more likely to be younger. However, the focus on increasing the supply of intermediate rent and on improving the private rented sector will have a disproportionate and positive impact on the same group.

### **5b. Intersectionality**

People in housing need and those living in social housing are disproportionately disadvantaged across multiple areas and have more than one protected characteristic - especially in terms of race, socio-economic status, and disability. The housing strategy prioritises assistance to these groups.

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

706 responses were received to the consultation informing this Housing Strategy.

Responses broadly reflect the tenure and housing situation of Haringey's residents, though social housing tenants, homeowners, and homeless or insecurely housed people were disproportionately represented, and private renters were under-represented.

Only 57 respondents provided any Equalities Monitoring information. Within this small sample, Black, Asian, and other Minority Ethnic groups were under-represented. Men, younger residents, and residents with lower levels of formal educational qualification were also under-represented. However, this small sample should be seen against the tenure information which suggests a much more representative range of responses.

The consultation showed overwhelming support for the draft strategy. At a high level, 91% agreed with our objectives. That support was retained in almost all areas and across demographic measures.

The responses received from the consultation have informed improvements to the Strategy's provisions for groups with protected characteristics, as set out above.

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

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

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

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

## **7. Amendments and mitigations**

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

**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.

**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?**

Not applicable – there are no actual or potential negative impacts identified.

## **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 equalities impact of the Housing Strategy will be monitored by Lead Members, the Senior Leadership Team and the Housing Policy Team including through:

- Annual reviews of planning data on housing delivery
- Monthly reviews of the delivery of Council housing in line with Strategic priorities
- Annual reviews of Council tenants' and leaseholders' satisfaction
- Housing Improvement Board chaired by the Chief Executive and a new residents forum to hold the Housing Improvement Board to account and to ensure it is informed by the views and experiences of tenants and leaseholders.
- New Tenant Satisfaction Measures (TSMs) on key issues such as repairs, safety checks, and complaints
- Ongoing monitoring and review by the Social Housing Regulator
- Reviews of private sector licensing in 2024 and 2027
- Quarterly reporting on homelessness statistics
- A newly established Homelessness Board
- The Council's ongoing Scrutiny process
- Monitoring of the Corporate Delivery Plan

The Housing Strategy will be formally reviewed from 2027 with a new Strategy to be put in place in 2028. That new Strategy will include a transparent assessment of delivery against its priorities and their impact on those with protected characteristics.

The Housing Strategy prioritises the ongoing involvement of relevant groups and communities in the delivery of key aspects of the policy. A formal consultation will take place to inform the new Housing Strategy in 2028.

**Date of EQIA monitoring review:**

TBC

## 8. Authorisation

EQIA approved by (Assistant Director/ Director)

**[Type answer here].**

Date

**[Type answer here].**

## 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.