

Equality Impact Assessment (EQIA)

The Equality Impact Assessment (EQIA) form is a template for analysing a policy or proposed decision for its potential effects on individuals with protected characteristics covered by the Equality Act 2010.

The council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not

The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

1. Responsibility for the Equality Impact Assessment

Name of proposal:	Vulnerable tenants and leaseholders policy
Service Area:	Housing management
Officer Completing Assessment:	Marc Lancaster & Max Tolley
Equalities Advisor:	Elliot Sinnhuber
Cabinet meeting date (if applicable):	18 June 2024
Director/Assistant Director	Nimisha Patel

2. Executive summary

The Council conducted a comprehensive review of the policy on vulnerable tenants adopted by Homes for Haringey and concluded that the Council's landlord services required an entirely new policy in this area. Following our review, the proposed new Vulnerable Tenants and Leaseholders Policy has been prepared which moves very substantially away from the existing Homes for Haringey Vulnerable Residents Policy. The central change is expanding the current very narrow definition of vulnerability. The existing policy is restricted to cases where safeguarding is a concern.

The proposed policy sets out the Council's commitment to assisting vulnerable people living in Council homes or occupying as leaseholders from the Council to access our housing management services and to sustain their tenancy. This includes individuals with protected characteristics covered by the Equality Act 2010.

A core aim of the policy is that by seeking to remove disadvantages and deliver equal access to services for all tenants and leaseholders, this will impact positively on all groups with protected characteristics.

The new policy makes the following changes which will positively impact our vulnerable tenants and leaseholders by:

- Defining a vulnerable person as anyone that includes anyone who currently experiences difficulties with everyday living; and, in order not to be disadvantaged by those difficulties, needs either additional support or service adaptation to access our landlord services, or additional support to sustain their tenancy.
- Focusing on understanding an individual's needs in relation to individual service areas rather than on categorising their vulnerability.
- Ensuring that individual needs are identified the policy sets out that we will look for common indicators of vulnerability; and to ensure those needs are met we will clearly identify individuals who are currently vulnerable.
- Detailing how we identify residents who are or may be vulnerable – including by encouraging and valuing self-reporting, better use of data, and formal assessments.
- Outlining that all housing staff, contractors, and agents regularly receive high-quality training, supervision, and guidance on identifying, assessing, and supporting vulnerable tenants and leaseholders.
- Not assuming that whole groups of people with specific characteristics are vulnerable. Every resident is treated as an individual when assessing vulnerability and determining the level of support required.

Data from the 2021 Census data has been used to inform this EQIA in assessing how the proposed policy will affect people with protected characteristics amongst the Council's tenant population with data on leaseholders not available.

The findings included that council Haringey Council's tenant population compared to the wider borough population has a significantly higher proportion of young people (under 24) and older people (over 50) and a significantly higher proportion of individuals who have a disability under the Equality Act (2010). There is a significantly higher proportion of individuals who identify as Muslim, and slightly higher proportion of individuals who identify as Christian, Buddhist or another religion. This is countered by a significantly lower proportion of tenants who don't associate with any religion or identify as Jewish, Hindu or Sikh. There is also a significantly higher proportion of female individuals.

The proposed policy should have a positive impact for the protected characteristic of age by including a new requirement that the council consider child protection whenever a resident's vulnerability is considered. The policy also explains that the Council will provide additional support or adapt its service to ensure that tenants or leaseholders who are vulnerable due to age, to access housing management services; or provide them with additional support to sustain their tenancy.

It should have a positive impact on the protected characteristic of disability by stating that where the Council believe that a tenant or leaseholder may lack mental capacity, the Council make a referral to Adult Social Care. If a formal assessment by Adult Social Care services identifies the individual as lacking capacity to make decisions, the Council will work with their appointed representative to ensure that they can access housing services and sustain their tenancy.

By stating that where a resident's ideal method of communication is not practical in the context of a housing management service and that the Council will work with them to reach agreement about appropriate arrangements that will work best for them; this should also have a positive impact on the protected characteristic of race.

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.

We engaged with Haringey residents through attending two meetings of the Resident Voice Board near the start of the policy development process and towards the end of the process. These sessions ensured that the views of vulnerable tenants and leaseholders with the protected characteristics were represented in the policy development process.

For example, Board members asked that the policy include a more proactive approach to identifying vulnerability. Following this feedback, a line was added to the policy as follows: "At key points, Council housing officers formally assess whether a tenant or resident leaseholder requires specific adaptations or priority to access housing services and whether they need additional support". The board also asked that people being discharged from hospital be added to the policy's list for where the Council look for common indicators of vulnerability to ensure that individual needs are identified. This situation has been added to the policy list as a common indicator of vulnerability. The engagement was undertaken with officers from the Housing Strategy and Policy team.

We also carried out wide ranging engagement with council staff and the policy evolved as part of this engagement.

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

We attended meetings of the Council's Resident Voice Board on 16 November 2023 and 15 February 2024. They told us that the policy should include coverage of the following points:

- The need to signpost to social prescribers and recognise the important role played by unpaid carers.
- That poverty can make people vulnerable, and people discharged from hospital can also be vulnerable.
- The importance of staff training on supporting vulnerable tenants and leaseholders.
- A more proactive approach to identifying vulnerability was needed.
- The definition of sustaining tenancies should be expanded to be more about a good life in tenancy.

4. Data and Impact Analysis

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

4a. Age

Data

Borough Profile¹

- 54,422: 0-17 (21%)
- 71,660: 18-34 (27%)
- 63,930: 35-49 (24%)
- 46,516: 50-64 (18%)
- 27,706: 65+ (10%)

Local Authority Social Rented Tenant Population Profile²

- 0 – 15: 7963 (20%)
- 16 – 24: 6120 (16%)
- 25 – 34: 5000 (13%)
- 35 – 49: 6773 (17%)
- 50 – 64: 8365 (21%)
- 65+: 4745 (12%)

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

¹ 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)

² Census, 2021 – [Custom dataset: https://www.ons.gov.uk/datasets/create/filter-outputs/aae4d546-9260-4541-aea9-870a8da7536d#get-data](https://www.ons.gov.uk/datasets/create/filter-outputs/aae4d546-9260-4541-aea9-870a8da7536d#get-data)

2021 Census data has been used to identify the age distribution of the tenant population.

Data on the age distribution of leaseholders is not available.

Detail the findings of the data

Haringey Council's tenant population has a significantly higher proportion of young people (under 24) and older people (over 50) than what is observed in the wider borough population.

Impact

Positive impact.

People of all ages may need support from our housing management teams to continue living independently, older people are more likely to require additional support. A new requirement in this policy is that we consider child protection whenever we consider a resident's vulnerability. Where it is identified as a specific factor, alongside this policy we address it through our Safeguarding Council Tenants and Leaseholders Policy and the Council's overarching Safeguarding Policy.

The proposed policy explains that we will provide additional support or adapt our service to ensure that tenants or leaseholders who are vulnerable due to age, to access our housing management services; or provide them with additional support to sustain their tenancy.

4b. Disability

Data

Borough Profile

- Disabled under Equality Act – 13.7%³
 - 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 depression⁴
- 1.7% of residents diagnosed with a severe mental illness⁵
- 0.4% of people in Haringey have a learning disability⁶

³ Census, 2021 – [Disability, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/disabilityandlongtermhealth/bulletins/disabilityandlongtermhealth/2021)

⁴ NHS Quality Outcomes Framework – [Prevalence of diagnosed depression among GP registered population age 18+](https://www.nhs.uk/quality-improvement/quality-outcomes-framework/prevalence-of-diagnosed-depression-among-gp-registered-population-age-18/)

⁵ 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/prevalence-of-diagnosed-mental-health-diagnosis-among-gp-registered-population-age-18/)

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

Local Authority Social Rented Tenant Population Profile⁷

- Disabled under the Equality Act – 22.4% (8729)
 - Day to day activities limited a lot – 12.9% (5040)
 - Day to day activities limited a little – 9,5% (3689)

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

2021 Census data has been used to identify the prevalence of disabilities in the tenant population.

Data on the prevalence of disabilities among leaseholders is not available.

Detail the findings of the data

Haringey Council's tenant population has a significantly higher proportion of individuals who have a disability under the Equality Act (2010) than what is observed in the wider borough population.

Potential Impacts

Positive impact.

Not all tenants or leaseholders with disabilities will need help to live independently, however where support needs are identified and recorded, the policy confirms we will provide this.

The policy states that where we believe that a tenant or leaseholder may lack mental capacity, we make a referral to Adult Social Care. Where a resident has been formally assessed by Adult Social Care services as lacking capacity to make decisions, we will work with their appointed representative to ensure that they can access housing services and sustain their tenancy.

4c. Gender Reassignment

Data

Borough Profile⁸

⁷ Census, 2021 - Custom dataset: <https://www.ons.gov.uk/datasets/create/filter-outputs/dda3992e-e16d-420a-a2d2-14a491b30045#get-data>

⁸ Census, 2021 – [Gender identity, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/ethnicityandnationality/bulletins/genderidentityenglandandwales/2021)

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

Social Rented Tenants Population Profile ⁹

- Gender Identity different from sex registered at birth but no specific identity given – 0.76%
- Trans woman – 0.24%
- Trans man - 0.22%

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

2021 Census data has been used to estimate the proportion of tenants that report that their gender identity is different from sex registered at birth. Data that splits Local Authority social rented households from other Housing Association or Registered Provider social rented households is not available.

Data on the gender identity distribution of leaseholders is not available.

Detail the findings of the data

Haringey's social rented tenant population has a slightly higher proportion of individuals who report their gender identity as different from sex registered at birth than what is observed in the wider borough population.

Potential Impacts

Positive impact.

We take gender reassignment into account when considering whether somebody is vulnerable in terms of this policy – especially where there is an intersection of multiple protected characteristics, we know that individuals are statistically more likely to be subject to discrimination and exclusion. However, we never assume that somebody is vulnerable or has particular needs because they have a protected characteristic.

4d. Marriage and Civil Partnership

Data

⁹ Census, 2021 – [Gender Identity by Tenure – Office for National Statistics \(on.gov.uk\)](https://www.on.gov.uk)

Borough Profile ¹⁰

- 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%)

Local Authority Social Rented Tenant Population Profile¹¹

- Divorced or formerly in a same-sex civil partnership which is now legally dissolved: 3602 (9.2%)
- Married or registered civil partnership: 7519 (19.3%)
- Separated, but still legally married or still legally in a same-sex civil partnership: 1349 (3.5%)
- Single, never married or never registered a same-sex civil partnership: 17033 (43.7%)
- Widowed or surviving partner from a same-sex civil partnership: 1501 (3.9%)
- Does not apply: 7963 (20.4%)

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

2021 Census data has been used to identify the distribution of marital status among tenants.

Data on the distribution of marital status of leaseholders is not available.

Detail the findings of the data

Haringey Council's tenant population has a significantly lower proportion of individuals who are married or in a registered civil partnership than what is observed in the wider borough population.

Potential Impacts

Neutral impact.

¹⁰ Census, 2021 – [Marriage and civil partnership status in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/people-population/marriage-civil-partnership/marriage-and-civil-partnership-status-in-england-and-wales)

¹¹ Census, 2021 - Custom dataset: <https://www.ons.gov.uk/datasets/create/filter-outputs/ffce57a7-f77b-4ea8-aad8-281df31dfae1#get-data>

When we consider vulnerabilities, we assess the entire household and not only the lead tenant.

4e. Pregnancy and Maternity

Data

Borough Profile ¹²

Live Births in Haringey 2021: 3,376

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?

Data on the number of pregnancies and births among tenants and leaseholders is not available.

Detail the findings of the data.

N/A

Potential Impacts

Positive impact.

We take pregnancy and maternity into account when considering whether somebody is vulnerable in terms of this policy – especially where there is an intersection of multiple protected characteristics, we know that individuals are statistically more likely to be subject to discrimination and exclusion. However, we never assume that somebody is vulnerable or has particular needs because they have a protected characteristic.

4f. Race

In the Equality Act 2010, race can mean ethnic or national origins, which may or may not be the same as a person's current nationality.¹³

¹² Births by Borough (ONS)

¹³ [Race discrimination | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://www.equalityhumanrights.com/en/race-discrimination)

Data

Borough Profile ¹⁴

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%

Local Authority Social Rented Tenant Population Profile ¹⁵

Asian: 9.1%

- Bangladeshi: 3.4%
- Chinese: 0.9%
- Indian: 0.9%
- Pakistani: 0.7%
- Other Asian: 3.2%

¹⁴ Census 2021 - [Ethnic group, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk)

¹⁵ Census 2021 – [Custom dataset: https://www.ons.gov.uk/datasets/create/filter-outputs/d44a7d29-fc6f-4c90-b4d0-1f38b22ada43#get-data](https://www.ons.gov.uk/datasets/create/filter-outputs/d44a7d29-fc6f-4c90-b4d0-1f38b22ada43#get-data)

Black: 39.6%

- African: 23.2%
- Caribbean: 11.8%
- Other Black: 4.6%

Mixed: 6.8%

- White and Asian: 0.6%
- White and Black African: 1.2%
- White and Black Caribbean: 2.7%
- Other Mixed: 2.3%

White: 31.0%

- English/Welsh/Scottish/Norther Irish/British: 18.8%
- Irish: 1.6%
- Gypsy or Irish Traveller: 0.1%
- Roma: 0.2%
- Other White: 10.4%

Other Ethnic Group: 13.4%

- Arab: 1.7%
- Any other ethnic group: 11.7%

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

2021 Census data has been used to identify the distribution of ethnic groups among tenants.

Data on the distribution of marital status of leaseholders is not available.

Detail the findings of the data

Haringey Council's tenant population has a significantly higher proportion of individuals who identify as Black, and slightly higher proportion of individual who identify as Asian or another ethnic group than what is observed in the wider borough population. This is countered by a significantly lower proportion of tenants who identify as White than the wider borough population.

Potential Impacts

The policy recognises that structural inequality makes it more challenging for some people to achieve the outcomes they want and need.

Along with the local protected characteristic of socioeconomic status factors recognised by the Equality Act (2010) includes race which can put individuals at greater risk of exclusion. We take this into account when considering whether somebody is vulnerable in terms of this policy – especially where there is an intersection of multiple protected characteristics, we know that individuals are statistically more likely to be subject to discrimination and exclusion. However, we never assume that somebody is vulnerable or has particular needs because they have a protected characteristic.

The policy states that where a resident's ideal method of communication is not practical in the context of a housing management service, we work with them to reach agreement about appropriate arrangements that will work best for them. For example, we may not have capacity to guarantee that all phone calls will be made by a speaker of their first language, but we may be able to commit to speaking to a specific household member whose spoken English is more fluent and/or to writing with simple translations in place.

4g. Religion or belief

Data

Borough Profile ¹⁶

- 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%
- Sikh: 0.3%

Local Authority Social Rented Tenant Population Profile ¹⁷

- Christian: 42.4%
- Buddhist: 1.1%
- Hindu: 0.6%
- Jewish: 0.4%
- Muslim: 25.9%
- No religion: 16.7%
- Other religion: 5.3%
- Religion not stated: 7.4%
- Sikh: 0.2%

¹⁶ Census, 2021 – [Religion, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk)

¹⁷ Census 2021 – [Custom dataset: https://www.ons.gov.uk/datasets/create/filter-outputs/3f832a2b-5432-443e-8926-7e0d92e3cc03#get-data](https://www.ons.gov.uk/datasets/create/filter-outputs/3f832a2b-5432-443e-8926-7e0d92e3cc03#get-data)

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

2021 Census data has been used to identify the distribution of religion among tenants.

Data on the distribution of religion of leaseholders is not available.

Detail the findings of the data.

Haringey Council's tenant population has a significantly higher proportion of individuals who identify as Muslim, and slightly higher proportion of individual who identify as Christian, Buddhist or another religion than what is observed in the wider borough population. This is countered by a significantly lower proportion of tenants cla

Potential Impacts

Neutral impact.

The policy recognises that structural inequality makes it more challenging for some people to achieve the outcomes they want and need. Along with the local protected characteristic of socioeconomic status factors recognised by the Equality Act (2010) include religion or belief which can put individuals at greater risk of exclusion.

We take these factors into account when considering whether somebody is vulnerable in terms of this policy – especially where there is an intersection of multiple protected characteristics, we know that individuals are statistically more likely to be subject to discrimination and exclusion. However, we never assume that somebody is vulnerable or has particular needs because they have a protected characteristic.

4h. Sex

Data

Borough profile ¹⁸

- Females: (51.8%)
- Males: (48.2%)

¹⁸ Census 2021 – [Gender identity: age and sex, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/ethnicityandnationality/bulletins/genderidentityageandsexenglandandwales/2021)

Local Authority Social Rented Tenant Population Profile¹⁹

- Female: 21,486 (55.1%)²⁰
- Male: 17,482 (44.9%)

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

2021 Census data has been used to identify the of sex in the tenant population. No data is available on the age distribution of leaseholders.

Detail the findings of the data

Haringey's tenant population has a significantly higher proportion of female individuals than what is observed in the wider borough population.

Potential Impacts

Positive impact.

The policy recognises that Structural inequality makes it more challenging for some people to achieve the outcomes they want and need. Along with the local protected characteristic of socioeconomic status, factors recognised by the Equality Act (2010) includes sex which can put individuals at greater risk of exclusion.

We take this into account when considering whether somebody is vulnerable in terms of this policy – especially where there is an intersection of multiple protected characteristics, we know that individuals are statistically more likely to be subject to discrimination and exclusion. However, we never assume that somebody is vulnerable or has particular needs because they have a protected characteristic.

4i. Sexual Orientation

Data

Borough profile ²¹

- Straight or heterosexual: 83.4%
- Gay or Lesbian: 2.7%

¹⁹ Census, 2021 – Custom dataset: <https://www.ons.gov.uk/datasets/create/filter-outputs/aae4d546-9260-4541-aea9-870a8da7536d#get-data>

²⁰ Census, 2021 – Custom dataset: <https://www.ons.gov.uk/datasets/create/filter-outputs/aae4d546-9260-4541-aea9-870a8da7536d#get-data>

²¹ Census, 2021 – [Sexual orientation, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/sexualorientationandgender/articles/sexualorientationandgenderinenglandandwales/2021)

- Bisexual: 2.1%
- All other sexual orientations: 0.8%
- Not answered: 11.0%

Local Authority Social Rented Tenant Population Profile ²²

- Straight or heterosexual: 86.5%
- Gay or Lesbian: 1.2%
- Bisexual: 0.9%
- All other sexual orientations: 0.5%
- Not answered: 11.0%

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

2021 Census data has been used to identify the distribution of sexual identity among social rented tenants. Data that splits Local Authority social rented households from other Housing Association or Registered Provider social rented households is not available.

Detail the findings of the data

Haringey's social rented tenant population has a significantly lower proportion of individuals who report their sexual identity as something other than Straight or Heterosexual than what is observed in the wider borough population.

Potential Impacts

Positive impact.

Structural inequality makes it more challenging for some people to achieve the outcomes they want and need. Along with the local protected characteristic of socioeconomic status factors recognised by the Equality Act (2010) includes sexual orientation which can put individuals at greater risk of exclusion.

We take this into account when considering whether somebody is vulnerable in terms of this policy – especially where there is an intersection of multiple protected characteristics, we know that individuals are statistically more likely to be subject to discrimination and exclusion. However, we never assume that somebody is vulnerable or has particular needs because they have a protected characteristic.

4j. Socioeconomic Status

Data

Borough profile

²² Census 2021 – Sexual Identity by Tenure – Office for National Statistics (ons.gov.uk)

Income

- 6.9% of the population of Haringey were claiming unemployment benefit as of April 2023²³
- 19.6% of residents were claiming Universal Credit as of March 2023²⁴
- 29.3% of jobs in Haringey are paid below the London Living Wage²⁵

Educational Attainment

- Haringey ranks 25th out of 32 in London for GCSE attainment (% of pupils achieving strong 9-5 pass in English and Maths)²⁶
- 3.7% of Haringey's working age population had no qualifications as of 2021²⁷
- 5.0% were qualified to level one only²⁸

Household Deprivation^{29 30}

- Household is not deprived in any dimension: 43.32%
- Household is deprived in one dimension : 33.86%
- Household is deprived in two dimensions: 16.78%
- Household is deprived in three dimensions: 5.48%
- Household is deprived in four dimensions: 0.58%

- Household is deprived in the education dimension: 18.48%
- Household is deprived in the employment dimension: 16.43%
- Household is deprived in the health and disability dimension: 28.71%
- Household is deprived in the housing dimension: 22.51%

Area Deprivation

Haringey is the 4th 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.³¹

Local Authority Social Rented Tenant Population Profile^{32 33}

²³ ONS – [ONS Claimant Count](#)

²⁴ DWP, StatXplore – [Universal Credit statistics, 29 April 2013 to 9 March 2023 - GOV.UK \(www.gov.uk\)](#)

²⁵ 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](#)

²⁶ DfE – [GCSE attainment and progress 8 scores](#)

²⁷ LG Inform – [Data and reports | LG Inform \(local.gov.uk\)](#)

²⁸ LG Inform – [Data and reports | LG Inform \(local.gov.uk\)](#)

²⁹ Census 2021 – [Custom Dataset: https://www.ons.gov.uk/datasets/create/filter-outputs/b517d031-1601-4ea9-926a-0a87cc896427#get-data](#)

³⁰ Census 2021 – [Custom Dataset: https://www.ons.gov.uk/datasets/create/filter-outputs/44b7fcd4-a533-43da-a430-c7761c1d00f6#get-data](#)

³¹ IMD 2019 – [English indices of deprivation 2019 - GOV.UK \(www.gov.uk\)](#)

³² Census 2021 – [Custom Dataset: https://www.ons.gov.uk/datasets/create/filter-outputs/b517d031-1601-4ea9-926a-0a87cc896427#get-data](#)

³³ Census 2021 – [Custom Dataset: https://www.ons.gov.uk/datasets/create/filter-outputs/44b7fcd4-a533-43da-a430-c7761c1d00f6#get-data](#)

- On Census Day 2021, 47.7% of Haringey Council tenants were not in employment.³⁴
 - Of these, 48.7% had never worked, 40.0% had not worked in the last 12 months, and 11.4% had worked in the last 12 months.

Educational Attainment

- 25.93% of Haringey Council's working age tenant population did not have any qualifications.³⁵

Household Deprivation^{36 37}

- Household is not deprived in any dimension: 20.34%
- Household is deprived in one dimension : 35.46%
- Household is deprived in two dimensions: 29.71%
- Household is deprived in three dimensions: 13.42%
- Household is deprived in four dimensions: 1.07%

- Household is deprived in the education dimension: 31.95%
- Household is deprived in the employment dimension: 31.83%
- Household is deprived in the health and disability dimension: 47.27%
- Household is deprived in the housing dimension: 28.38%

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

2021 Census data has been used to establish unemployment, educational attainment and levels of household deprivation in the tenant population. As the Census 2021 was carried out during a period of unprecedented, rapid change to the labour market, care must be taken when using the unemployment statistics.

No data is available on the age distribution of leaseholders.

Detail the findings of the data

Haringey Council's tenant population has a significantly higher proportion of residents who are long-term unemployed than what is observed in the wider borough population.

³⁴ Census 2021 – [Custom Dataset: https://www.ons.gov.uk/datasets/create/filter-outputs/89fb7f4d-a003-4946-815a-5ee3f1688fac#get-data](https://www.ons.gov.uk/datasets/create/filter-outputs/89fb7f4d-a003-4946-815a-5ee3f1688fac#get-data)

³⁵ Census 2021 – [Custom Dataset: https://www.ons.gov.uk/datasets/create/filter-outputs/a344970f-c34f-44d2-a7f3-ca342af8cacf#get-data](https://www.ons.gov.uk/datasets/create/filter-outputs/a344970f-c34f-44d2-a7f3-ca342af8cacf#get-data)

³⁶ Census 2021 – [Custom Dataset: https://www.ons.gov.uk/datasets/create/filter-outputs/b517d031-1601-4ea9-926a-0a87cc896427#get-data](https://www.ons.gov.uk/datasets/create/filter-outputs/b517d031-1601-4ea9-926a-0a87cc896427#get-data)

³⁷ Census 2021 – [Custom Dataset: https://www.ons.gov.uk/datasets/create/filter-outputs/44b7fcd4-a533-43da-a430-c7761c1d00f6#get-data](https://www.ons.gov.uk/datasets/create/filter-outputs/44b7fcd4-a533-43da-a430-c7761c1d00f6#get-data)

Haringey Council's tenant population has a significantly higher proportion of residents who do not hold any formal educational qualifications than what is observed in the wider borough population.

Haringey Council's tenant population has significantly higher levels of household deprivation than what is observed in the wider borough population.

Potential Impacts

Positive impact.

The policy will have a positive impact on those from lower socioeconomic backgrounds. The reasons for this include that it states that:

- Providing help with money management, debt and rent arrears is a core part of the Council's commitment to supporting vulnerable tenants to sustain their tenancies. Where a vulnerable resident needs additional support from outside our housing management services to sustain their tenancy or access our services, we signpost or refer them to those external services.
- Where a vulnerable tenant or leaseholder needs additional support from outside of the council's housing management services to sustain their tenancy or access our services, they will be signposted or referred to those external services. One of the services listed includes free career advice and support to help council tenants back into employment, training or further education.

5. Key Impacts Summary

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

The data shows the following findings from Haringey Council's tenant population compared to the wider borough population:

- a significantly higher proportion of young people (under 24) and older people (over 50).
- a significantly higher proportion of individuals who have a disability under the Equality Act (2010).
- a slightly higher proportion of individuals who report their gender identity as different from sex registered at birth.
- a significantly lower proportion of individuals who are married or in a registered civil partnership.
- a significantly higher proportion of individuals who identify as Muslim, and slightly higher proportion of individual who identify as Christian, Buddhist or another religion. This is countered by a significantly lower proportion of tenants who don't associate with any religion or identify as Jewish, Hindu or Sikh.
- a significantly higher proportion of female individuals.
- a significantly lower proportion of individuals who report their sexual identity as something other than Straight or Heterosexual.

5b. Intersectionality

We know that along with the local protected characteristic of socio-economic status, vulnerable tenants and leaseholders may be vulnerable and have more than one of the protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. These can all put individuals at greater risk of exclusion. We take these factors into account when considering whether somebody is vulnerable in terms of this policy – especially where there is an intersection of multiple protected characteristics, we know that individuals are statistically more likely to be subject to discrimination and exclusion.

A core aim of the policy is that by seeking to remove disadvantages and deliver equal access to services for all tenants and leaseholders, this will impact positively on all groups with protected characteristics.

5c. Data Gaps

This policy applies to leaseholders; however, the Council don't hold data on the protected characteristics of leaseholders. A future action could include working with the Council's leasehold services to explore ways that this gap could be addressed.

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

Summarise the key implications of the decision for people with protected characteristics.

The proposed policy takes a holistic view of tenancy sustainment which includes supporting all tenants and leaseholders with any of the protected characteristics to live well in the community as a key factor in preventing homelessness and therefore a core housing management task for the Council.

For example, the policy has a positive impact on the protected characteristic of race by committing to reach agreement to establish what method and style of communication will work best for individuals and groups of residents where English is not their first language. The policy states that the Council may be able to commit to speaking to a specific household member whose spoken English is more fluent and/or to writing with simple translations in place.

7. Amendments and mitigations

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

No changes are proposed, however advancing equality of opportunities has been a golden thread when developing this policy.

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 **Y/N**

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. **Y/N**

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

Council officers from the housing management team will be responsible for delivering an action plan to implement this policy which will include monitoring of the equalities impact of this policy. The Council's Resident Voice Board will also be involved and asked for their feedback when the policy is reviewed in 3 years' time unless earlier events or legislation require an earlier update to this policy.

Date of EQIA monitoring review:

17 May 2024

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.