

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:	Housing Arrears Policy
Service Area:	Income management
Officer Completing Assessment:	Max Tolley
Equalities Advisor:	Elliot Sinnhuber
Cabinet meeting date (if applicable):	15 October 2024
Director/Assistant Director	Jahedur Rahman

2. Executive summary

The new Housing Arrears policy will be a new Council policy which has the aim of detailing the Council's approach to minimising rent and service charge arrears.

The new policy will positively impact our tenants /licensees with protected characteristics by:

- Confirming that the Council will signpost the benefits' uptake and financial inclusion support available to vulnerable and low-income households.

- Stating that the Council will prioritise working in partnership across the organisation and with other organisations to provide wide ranging support to vulnerable tenants and licensees where we have a record of their vulnerability. Our approach focuses on early intervention in line with our vulnerable tenants and leaseholders policy.
- Recognising the economic and social cost of eviction and taking a preventative and proactive approach to dealing with rent arrears and sustaining tenancies.
- By linking to the Council's translation and interpretation policy with the aim that language should never be a barrier to accessing services, this should also have a positive impact on the protected characteristic of race.

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 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.

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 (RVB) 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, RVB members raised the need to proactively support vulnerable tenants/licensees with the aim of helping them to avoid falling into arrears and to prioritise this support. We have outlined at section 8.2 that we prioritise working in partnership across the Council and with other organisations to provide wide ranging support to vulnerable tenants and licensees where we have a record of their vulnerability. Our approach focuses on early intervention in line with our vulnerable tenants and leaseholders policy.

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 Resident Voice Board in February and May 2024. They told us that the policy should include coverage of the following points:

- Clarify the support provided by the Council provide to tenants/licensees who receive Universal Credit with issues that they may encounter.
- The support available to vulnerable tenants/licensees with the aim of helping them to avoid falling into arrears and to prioritise this support.

4. Data and Impact Analysis

Note: officers may want to complement their analysis with data from the State of the Borough and ward profiles, found here: <https://www.haringey.gov.uk/local-democracy/about-council/state-of-the-borough>.

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/populationandhousehold/populationandhouseholdestimates)

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.

Potential Impacts

Positive impact.

People of all ages may fall into rent arrears, and we know from our data that those aged 34 – 65 years are the group with the highest number of tenants in arrears. Most of the arrears cases are in our 50 - 60 years old band and the next impacted age band are 34 - 50-year-olds.

The policy responds to this by confirming that the Council have tenancy sustainment as a core part of its function as a landlord. This means that the Council signpost the benefits' uptake and financial inclusion support available to vulnerable and low-income households irrespective of age.

The policy outlines the Council's approach to supporting tenants/licenses including vulnerable tenants by highlighting the measures in place to minimise arrears if timely payment cannot be made.

4b. Disability

Data

Borough Profile

- Disabled under Equality Act – 13.7%²
 - 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 depression³
- 1.7% of residents diagnosed with a severe mental illness⁴
- 0.4% of people in Haringey have a learning disability⁵

² Census, 2021 – [Disability, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/people-and-population/population-statistics/articles/disability-england-and-wales-2021)

³ NHS Quality Outcomes Framework – [Prevalence of diagnosed depression among GP registered population age 18+](https://www.nhs.uk/quality-outcomes-framework/prevalence-of-diagnosed-depression-among-gp-registered-population-age-18/)

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

⁵ 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 Profile ⁷

- 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.

Potential Impacts

Positive impact.

We know that nationally there are people with a disability who are more likely to be in debt.

We recognise that people with disabilities are more likely to face unemployment due to accessibility barriers or limitations imposed by their disability. This can cause financial hardship and difficulty managing debt. Living with a disability often also comes with extra expenses, such as adaptive equipment, medical care, or personal assistance. These costs can further strain finances and make debt repayment more challenging.

The policy will have a positive impact on tenants or leaseholders with a disability because it outlines that the Council will provide wide ranging support to disabled tenants. This includes signposting them to various forms of financial assistance that they may be entitled to offering to send large print letters when communicating with a tenant about rent arrears.

When contacting a tenant who is known to have a disability, or it emerges during the contact that they have a disability. We will record this on our housing management system to guide future communications.

4c. Gender Reassignment

Data

Borough Profile⁶

- 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 Profile⁹

- 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.

Potential Impacts

Neutral impact identified.

4d. Marriage and Civil Partnership

Note: Only the first part of the equality duty ("*Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act*") applies to this protected characteristic.

Data

Borough Profile⁷

- Divorced or formerly in a same-sex civil partnership which is now legally dissolved: (9.9%)
- Married or registered civil partnership: (35.8%)

⁶ Census, 2021 – [Gender identity, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/ethnicityandnationality/bulletins/genderidentityinenglandandwales/2021)

⁷ Census, 2021 – [Marriage and civil partnership status in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/relationshipsandpartnerships/bulletins/marriageandcivilpartnershipstatusinenglandandwales/2021)

- 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 Profile ¹¹

- 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.

Potential Impacts

Neutral impact identified.

4e. Pregnancy and Maternity

Note⁸:

- Pregnancy is the condition of being pregnant or expecting a baby.
- Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Data

Borough Profile ⁹

Live Births in Haringey 2021: 3,376

Target Population Profile

The council does not hold data on pregnancy and maternity among its tenants.

⁸ Equality and Human Rights Commission, 2022 – [Pregnancy and maternity discrimination](#).

⁹ 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?

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

Neutral impact identified.

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.¹⁰

Data

Borough Profile ¹¹

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/Northern Irish/British: 31.9%
- Irish: 2.2%

¹⁰ [Race discrimination | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://equalityhumanrights.com/)

¹¹ Census 2021 - [Ethnic group, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

- Gypsy or Irish Traveller: 0.1%
- Roma: 0.8%
- Other White: 22.1%

Local Authority Social Rented Tenant Population Profile ¹⁶

Asian: 9.1%

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

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 ethnic groups 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. There is a significantly lower proportion of tenants who identify as White than the wider borough population.

Potential Impacts

Positive impact.

The data from the Council's Translation and Interpretation policy shows that certain members of races and ethnic groups have lower levels of English proficiency.

The policy will positively impact those who have English as an additional language who may have difficulty understanding written information about their rent or arrears.

This is because it commits to communicating with tenants by writing Council arrears letters, emails and text messages in plain English with a simple, accessible and jargon-free style. It also notes that the Council will ensure that translation and interpretation is provided as required in the tenants preferred language with language lines added to the end of Council communications.

4g. Religion or belief

Data

Borough Profile ¹²

- 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 ¹⁸

- 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%

¹² Census, 2021 – [Religion, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk)

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 who don't associate with any religion or identify as Jewish, Hindu or Sikh.

Potential Impacts

Neutral impact identified.

4h. Sex

Data

Borough profile ¹³

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

Local Authority Social Rented Tenant Population

Female: 21,486 (55.1%)

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 distribution of sex in the tenant population.

No data is available on the age distribution of sex amongst 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

Neutral impact identified.

4i. Sexual Orientation

Data

¹³ Census 2021 – [Gender identity: age and sex, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/identityandgender/articles/genderidentityageandsexenglandandwales/2021)

4j. Socioeconomic Status

Educational Attainment

- Haringey ranks 25th out of 32 in London for GCSE attainment (% of pupils achieving strong 9-5 pass in English and Maths)¹⁸
- 3.7% of Haringey's working age population had no qualifications as of 2021¹⁹
- 5.0% were qualified to level one only²⁰

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.²¹

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 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.

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 and negative impact.

¹⁸ DfE – [GCSE attainment and progress 8 scores](#)

¹⁹ LG Inform – [Data and reports | LG Inform \(local.gov.uk\)](#)

²⁰ LG Inform – [Data and reports | LG Inform \(local.gov.uk\)](#)

²¹ IMD 2019 – [English indices of deprivation 2019 - GOV.UK \(www.gov.uk\)](#)

The policy states that non-payment of rent is a breach of the tenancy/licence and will not be tolerated. It follows on to confirm that failure to pay the rent when due will result in recovery action which could ultimately lead to eviction/repossession. We recognise that this would have an incredibly negative impact on a person and that arrears are most likely to impact someone from a low socioeconomic background.

We therefore acknowledge there will be a negative impact from the policy allowing for possible eviction, which may particularly adversely impact those with a lower socioeconomic background. However, this is mitigated by making it a last resort with this new policy outlining that the Council will exhaust all other options first will have a positive impact.

The policy is also clear about the high economic and social cost of eviction and seeks to address this through a preventative and proactive approach to dealing with rent arrears and sustaining tenancies.

In practice, the policy explains how this means signposting the benefits' uptake and financial inclusion support available and an approach to arrears recovery that uses a range of methods such as face to face meetings whether through home visits or visits to the Council's offices.

The policy also notes that as a Social Landlord, the Council recognise that tenants/licensees may sometimes suffer exceptional financial hardship. The policy states that in these circumstances the Council are prepared to accept reasonable repayment agreements based on a mutual assessment of what the tenant/licensee can afford.

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, some of our tenants may 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.

There is potential for similar issues for households whose protected characteristic (e.g., disability, ill health, mental health) or other social excluded group characteristics (e.g., credit history/personal debt, low literacy, offenders, drug and alcohol dependency) to impact their ability to work and/or income and therefore their ability to secure and maintain housing without assistance.

These can all put individuals at greater risk of exclusion. We take these factors into account when approaching arrears recovery by using a range of methods involving face to face contact whether through home visits or visits to our offices. The policy also links with the Council's vulnerable tenants and leaseholders policy.

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 policy will have a positive impact on the protected characteristics of age, disability, race and socio-economic status. It will have a neutral impact on those with other protected characteristics.

The Housing Arrears Policy recognises:

- The high economic and social cost of eviction and seeks to address this through a preventative and proactive approach to dealing with rent arrears and sustaining tenancies. The policy highlights the measures in place to minimise arrears if timely payment cannot be made.
- The need to adopt a coordinated approach to supporting vulnerable tenants/licensees and those in receipt of Universal Credit.
- The importance of the Council supporting residents who receive Universal Credit with issues that they may encounter.
- The need to proactively support vulnerable tenants/licensees by helping them to avoid falling into arrears and to prioritise this support.

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.

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 them:

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

7. Ongoing monitoring

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

Council officers from the Council's income management service will lead on the delivery of 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: 14 August 2024

8. Authorisation

EQIA approved by (Assistant Director/ Director)

Jahedur Rahman

Date

7 October 2024

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.