

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:	Temporary Accommodation Rent Setting Policy
Service Area:	Housing Demand
Officer Completing Assessment:	James Vale
Equalities Advisor:	Guy Latham
Cabinet meeting date:	
Director/Assistant Director	Maddie Watkins

2. Executive summary

The proposed policy aims to align rents charged to residents living in temporary accommodation (TA) with other types of housing provision.

Context

The scope of the proposal is limited to properties which are held in the General Fund (GF), and those which are leased or licensed to the council for less than 10 years. The General Fund is the council's main revenue account, used for day-to-day income and spending on council services. It is distinct from the Housing Revenue Account (HRA), which is a ring-fenced portion of the General Fund that manages council housing-related finances including all the council's general needs and sheltered housing stock.

Rents for properties held in the HRA typically align with the Rent Standard issued by the Regulator of Social Housing. This uses a weighted average of property values (30%) and local income (70%) to establish a so-called “formula rent”. A few limited exemptions to the Rent Standard are allowed; for example, charging the higher London Affordable Rent in some council new-build schemes part funded by the Greater London Authority. The Rent Standard also offers flexibility to charge up to 5% above formula rent (10% for supported housing) to take local factors and concerns into account. Rents for 2025/26 for properties held in the HRA were approved by Full Council in March 2025.¹

Properties held in the GF have historically had another purpose prior to their use as TA, and/or have a “meanwhile use” as TA pending longer-term plans for the site. Examples of properties held in the GF include: two lodges (Whitehall and Broadwater Lodges) used to house and support families on a short-term basis. The rent setting approach for these properties has not been reviewed since 2017. This review maintained rents at their 2011/12 level. (note: there is another lodge held in the HRA. The approach for setting this lodge’s rent was updated in the 2025 HRA MTFS and this decision brings all lodge rent levels in to line).

Most properties procured by the council for use for TA are leased/licensed to the Council for less than 10 years. This includes private sector leased accommodation, and housing procured by the council on a nightly basis. These properties are not subject to the Rent Standard as they are not owned by a registered provider of social housing, for example the council or a housing association. Rents are currently set at £40 per week above the January 2011 Local Housing Allowance (LHA) rate in the area that the property is situated. The Local Housing Allowance is set by Government based on private market rents being paid by tenants in a defined Broad Rental Market Area (BRMA). For context there are 14 BRMAs that span Greater London, with two covering Haringey (Inner North London and Outer North London).

Summary of proposed policy:

Properties held in the General Fund (Broadwater Lodge, Whitehall Lodge):

The rent for current residents in the Council owned Lodges will continue at the existing rent plus an annual increase determined by the Rent Standard of CPI+1%, this year 2.7%. For new residents, rents will be set at the full formula rent + 10%. This will bring the General Fund Lodges into line with the Lodge held in the Housing Revenue Account.

For all residents, there will be an increase in service charges to full cost of delivering those services. All rents and service charges will be eligible for housing benefit.

¹ [Agenda item - 2025/26 Budget and Medium-Term Financial Strategy 2025/30 | Haringey Council](#)

Rents in properties leased/licensed to the Council for less than 10 years. This includes private sector leased (PSL), and nightly paid annexes (NPA):

Rents will be set at the full Local Housing Allowance (LHA), determined by the size of the property. Rents are currently set at £40 per week above the January 2011 local LHA rate. This will apply to new and existing tenants.

Housing Benefit

There is an important distinction between households in receipt of Housing Benefit (HB) and those that are not. Housing Benefit calculations are complex and are highly dependent upon the individual circumstances of a household. This includes family composition, number of children, income from employment, savings, and receipt of other benefits.

The proposed rent increases would not directly affect any household in receipt of partial Housing Benefit save for those receiving the nominal 50 pence. That is, when Housing Benefit covers a portion of their housing costs (greater than 50 pence). The amount that they would pay would not change if the rent increases as their contribution to rental payments is based on their income and circumstances and is not dependent on the rent charged.

However, residents will be affected by the proposal if they are not in receipt of Housing Benefit for whatever reason. This includes residents that make payment for the cost of temporary accommodation themselves (“self-payers”), usually due to having a high household income and/or over £16k in savings. In the case of ineligible households, they may become eligible for partial Housing Benefit if the rent increases above their current rent contribution. The approximate minimum household income where certain households are projected to no longer be eligible for HB is shown in the table below.

Table 1: Example of eligibility for Housing Benefit by household type under the proposed rents (subject to the household meeting other eligibility criteria such as savings)

Household category	Approx max annual income	Gross pay of full-time workers in Haringey - rank ² Percentile of Haringey residents in full-time work are paid less than this figure
Single person 1 bedroom.	£35,000	28 percentiles
Parent, 1 child 2 bedrooms	£46,000	51 percentiles
Couple, 2+ children 4 bedrooms	£80,000	42 percentile – both parents work full-time 90 percentile – one parent works full time

The income threshold where residents become ineligible to receive Housing Benefit is reasonably high. The exception is for single households, where around three

² Annual Survey of Hours and Earnings (ASHE), Haringey, 2024. Gross pay before tax, National Insurance, or other deductions. [Nomis - Query Tool - annual survey of hours and earnings - resident analysis](#)

quarters of residents within the borough in full-time work would likely be ineligible for HB on income grounds.

The proportion of households listed as not in receipt of HB is significantly higher than initial assumptions about the level of “self-payers” prior to undertaking this EqIA (estimated at a few percent). This suggests that many of these households may be eligible for HB but are not claiming.

Table 2: Number of households in temporary accommodation by property type and Housing Benefit status (as of 26 February 2025)

Number of households	TA (all types)	GF Lodge	TA leased / licensed for less than 10 years ³
Full HB	1,211 (46%)	45 (82%)	1,026 (50%)
Partial HB	463 (17%)	*	437 (21%)
No HB / self-payers	835 (31%)	6 (11%)	497 (24%)
Interim placement / Unknown	148	4 (7%)	83 (4%)
Total	2,657	55	2,043

Families living in the lodges seem to be more likely to be receiving HB than those living in leased TA; this could be related to the additional level of support provided in the lodges.

The proportion of households listed as not in receipt of HB is significantly higher than initial assumptions about the level of “self-payers” prior to undertaking this EqIA (estimated at a few percent). This suggests that many of these households may be eligible for HB but are either not claiming or where there is a claim in progress which is not in payment yet.

Summary of impacts

In general families with children and residents identifying as Black are over-represented in the TA population relative to the borough average and so may be more likely to be negatively impacted by the proposed rent increases. For households in receipt of HB, however, the scale of this impact would be mitigated since it would be covered by the relevant benefit.

³ Defined as annexes procured on a nightly basis, properties leased from landlords in the private sector (PSL), and commercial hotels. Although households living in commercial hotels will not be impacted by the proposed policy while living in the hotel, they have been included throughout this analysis since they are likely to move onto nightly paid or PSL provision as longer-term temporary accommodation.

Around a third of households in TA are listed as not currently claiming Housing Benefit. This includes 95 households where one of the residents has a disability¹⁴ of which are under the age of 18. Many of these may be eligible for HB and a targeted approach should be undertaken to mitigate any future impact.

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.

Haringey is committed to consulting with residents where the views of residents will inform a decision. However, the setting of rents is largely constrained by national rent laws setting out the maximum rent and benefit claimed. The council is thus constrained by these regulations and so consultation prior to the decision would not be meaningful.

Residents affected will though receive a formal rent increase letter. For those in Lodges this will be delivered by hand. The format of this letter will be aligned to match that sent to council tenants in general needs accommodation. The letter will be written in layman's terms to ensure transparency in the council's communications and enable all residents to fully understand the implications of the content of the letter. The letter will also include contact details, so residents know how to get in touch with the council if they have questions and concerns or need to access a translated version. A contact number for the Rental Income team will be provided to ensure those who are affected and who are 'self-payers' can get in touch with the team to discuss the increase.

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

Not applicable

4. Data and Impact Analysis

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

There are two main data sources that have been used in the development of this Equality Impact assessment. These are as follows:

- Data from the 2021 Census commissioned by the Office for National Statistics (ONS). This was used to establish a baseline for the population of the Borough as a whole. [OOB]
- Locally held data on households living in temporary accommodation (snapshot taken on the 31 December 2024). This includes:
 - o The type of accommodation (Haringey-operated lodge, Haringey-operated hostel, nightly paid annex, private sector leased, commercial hotel)
 - o Equalities data (age, gender, ethnicity, marital status, disability, sexual orientation of main applicant)
 - o Rent charged for that property
 - o Information about whether that household is claiming Housing Benefit

Where other data sources have been used, these shall be referenced in the relevant section of this EqlA. There is a risk that the snapshot of households at a single point in time may not be fully representative of households in temporary accommodation. A sensitivity analysis was therefore carried out using snapshots at other points in time to determine any temporal changes (if any). Throughout this EqlA figures with raw counts of less than three have been suppressed to prevent disclosure of individuals and are denoted by an asterisk (*).

Statistical testing has been used to assess potential differences between the population impacted by this proposal and the borough as a whole. The choice of technique used is dependent upon the type of data to be compared. The output of these tests is typically a score or statistic (chi-squared, z-score).

A useful metric is the “p-value. In the context of this EqlA it essentially reflects the likelihood that the observed difference between the target population and the borough population is simply due to chance, as opposed to some underlying effect. This is expressed as a decimal: a p-value of less than 0.05 (5%) is generally considered as a “statistically significant” difference. It is good practice to reference the particular test statistic as well as the p-value; this has been done throughout this EqlA.

Note that the p-value is a somewhat blunt tool as it is impacted by relative sample sizes. Even if a difference is found to be statistically significant, it does not necessarily mean that it will have a large practical significance in the real world. In the case of categorical variables (for example ethnicity, gender) it is also useful to consider the “effect size”. This is a quantitative measure which describes the scale of any difference. As defined in this EqlA a value of 0.1, 0.3, and 0.5 would be considered evidence of a small, medium, or large effect respectively. In some instances, the 95% confidence interval (abbreviated as CI) has been shown and expressed as a range of values. This is a measure of the statistical uncertainty about a central value, for example in a proportion or ratio. For brevity this central value is not always shown.

4a. Age

Data

Figures reflect the total number of individuals as opposed to the number of households. Percentages may not total to 100% due to rounding.

Age group	Borough ⁴	TA (all types)	TA (GF lodges)	TA (leased / licensed <10 years)
0-17	54,422 (21%)	4,120 (44%)	86 (52%)	3,074 (44%)
18-34	71,660 (27%)	2,496 (27%)	40 (24%)	1,878 (27%)
35-49	63,930 (24%)	1,818 (19%)	34 (21%)	1,351 (19%)
50-64	46,516 (18%)	840 (9%)	4 (2%)	638 (9%)
65+	27,706 (10%)	131 (1%)	*	94 (1%)
People	264,234	9,405	164	7,035
Mean age	37 years	25 years	21 years	26 years
Chi-squared statistic		3,510	120	2,643
p-value		< 0.001	< 0.001	< 0.001
Effect size		0.113 (small)	0.021 (negligible)	0.099 (small)

For tenants on housing benefit, there will be no impact on their contribution to their rent as HB will increase to match the increase. A very small number of residents (possibly none) may become temporarily Benefit Capped but with the roll out of Universal Credit (which exempts TA rent from the calculations), these will be reduced to zero over the next year.

Households currently living in most types of TA are significantly younger than the borough average. This reflects the fact that families with dependent children that are experiencing homelessness will ordinarily be placed into TA due to priority need.

Age group	TA (GF lodges)		TA (leased / licensed for less than 10 years)	
	Household on Full or partial HB	Household on No HB	Household on Full or partial HB	Household on No HB
0-17	72 (87.8%)	10 (12.2%)	2,314 (77.6%)	667 (22.4%)
18-34	33 (89.2%)	4 (10.9%)	1,378 (73.8%)	489 (26.2%)
35-49	27 (81.8%)	6 (18.2%)	1,003 (75.2%)	331 (24.8%)
50-64	4	*	460 (70.8%)	190 (29.2%)
65+	*	*	75 (75.0%)	25 (25.0%)
Sample size	136	20	5,230	1,702

⁴ Census, 2021 – [Population and household estimates, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/populationandhousehold/populationandhouseholdestimates/populationandhouseholdestimates)

Chi-squared statistic	0.97	18.1
p-value	0.615	0.012
Effect size	-	0.051 (negligible)

Around 68% of households with children aged under 18 are listed as claiming Housing Benefit to cover some or all their housing costs. This compares to a rate of 62% for other types of households. Although this result is statistically significant (demonstrated by the p-value being less than 0.05), the corresponding effect size is very small (less than 0.1). There is therefore no substantial difference between the age distributions of residents in households that are in receipt of HB and those which are not.

- a) **Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?**
- b) **Might members of this group be disproportionately affected by this proposal as a result of a need related to their protected characteristic?**

There is an overrepresentation of families with children in TA relative to the borough average. This means that the changes resulting from the policy will have a disproportionate impact on households with children. This impact is mitigated for households in receipt of Housing Benefit, who are marginally more likely to be families with children.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Younger residents in households not claiming Housing Benefit are more likely to be negatively affected by the proposed policy due to the overrepresentation of households with children amongst the current TA cohort. All other households will likely see a proportionate impact.

4b. Disability

Data

Borough Profile

- Disabled under Equality Act – 13.7%⁵
 - Day to day activities limited a lot – 6.1%
 - Day to day activities limited a little – 7.5%

⁵ Census, 2021 – [Disability, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/people-and-population/disability).

- 7.5% of residents people diagnosed with depression⁶
- 1.7% of residents diagnosed with a severe mental illness⁷
- 0.4% of people in Haringey have a learning disability⁸

In the 2021 Census households living in social housing were significantly more likely to report that at least one of the members of the household were disabled under the Equality Act (43%) compared to the borough average (28%). [OBJ]

Detail the findings of the data.

a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?

As shown in the previous section, the age distribution of households currently living in TA is significantly different from those living in other types of housing. Meaningful comparison can only be made by treating the two datasets on an equal footing. This can be done by direct age-standardisation to a reference population, in this case the 2013 European Standard Population. This procedure is recommended by the Office for National Statistics. For completeness both the crude and age-standardised rates are shown.

Proportion of residents that are disabled	Borough	TA (all)	TA Lodges	TA - leased / licensed <10yrs
Crude rate				
- All ages	13.7%	4.1%	*	4.2%
- Aged 15-74	14.0%	6.0%	*	6.2%
Age-standardised rate				
- All ages	16.5%	9.9%	*	10.5%
- Aged 15-74	15.8%	10.8%	*	11.8%
Sample size	264,234	9,405	164	7,035
Z (age-standardised all ages)		-20.87	Too little data	-16.11
Two-tailed p-value		< 0.001		< 0.001

The data suggest that residents living in temporary accommodation may be less likely to have a disability compared to residents in other types of housing. Various factors may contribute to this.

⁶ NHS Quality Outcomes Framework – [Prevalence of diagnosed depression among GP registered population age 18+](#)

⁷ NHS Quality Outcomes Framework – [Prevalence of diagnosed mental health diagnosis among GP registered population age 18+](#)

⁸ PHE Learning disability profiles – <https://fingertips.phe.org.uk/learning-disabilities#page/0/gid/1938132702/pat/6/par/E12000007/ati/102/are/E09000014>

Between April and December 2024 around 8% (CI: 7.0 to 9.1%) of households approaching Housing Needs that reached the initial assessment stage and 10% of households (CI: 6.9 to 14.2%) that were owed a main duty had “physical illness or disability” listed as a priority need. At face value this suggests that households including someone with a disability may be less likely to approach the council as homeless (for whatever reason). Moreover, residents experiencing homelessness with a disability – especially if it significantly limits their day-to-day activities – would have the highest level of priority need and therefore would on average likely spend less time in TA.

Direct comparison is made more difficult since there is an element of self-reporting by residents. This is combined with local and ONS frameworks for describing disability potentially not being uniformly aligned.

	TA (GF lodges)		TA (leased / licensed for less than 10 years)	
	Full or partial HB	No HB	Full or partial HB	No HB
Disabled	*	*	227 (4.3%)	63 (3.7%)
Sample size	136	20	5,230	1,702
Z-score	Too little data		1.114	
Two-tailed p-value			0.265	

There is no significant difference between the proportion of residents that are in receipt of HB with a disability and those which do not.

Potential Impacts

- **Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).**

For tenants on housing benefit, there will be no impact on their contribution to their rent as HB will increase to match the increase. A very small number of residents (none) may become temporarily Benefit Capped but with the roll out of Universal Credit (which exempts TA rent from the calculations), these will be reduced to zero over the next year.

Personal Independence Payment (PIP) and Disability Living Allowance (DLA) benefits are disregarded as income with respect to the amount of Housing Benefit that household is eligible for. However, some other benefits (Carer’s Allowance, Industrial Injuries Disablement Benefit) are treated as income, and therefore receipt of these may reduce the HB entitlement for that household. Residents receiving any of the above benefits are not subject to the benefit cap.

Locally held information suggests that residents living in TA with a disability have a similar likelihood of being in a self-paying household – who would be most affected by the proposed policy – compared to other households. Therefore, the proposed policy will likely have a neutral impact overall with respect to the protected characteristic of disability.

4c. Gender Reassignment

Under the Equality Act 2010, a person has the protected characteristic of gender reassignment if “the person is proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attributes of sex.” In this context the term “trans” is used in this EqIA to describe anyone who defines as having their gender identity different to their sex registered at birth. This includes those who identify as a trans man, trans woman, non-binary, another minority gender identity, or no specific gender identity.

Data

Borough Profile⁹

Updated guidance has recently been published by the ONS (26 March 2025) regarding the applicability and suitability of gender identity figures obtained from the 2021 Census.¹⁰ This states that “The Census 2021 gender identity estimates should not be used to provide estimates of the sizes of the population who identified as trans man, trans woman, non-binary, and all other gender identities”.

For context a strong spatial correlation can be seen (at both local and London-wide levels) between areas with a higher proportion of residents identifying as a gender different from the sex registered at birth and those with residents reporting little or no English language proficiency.^{11,12} In Haringey this is particularly evident in the east of the Borough. At the same time, there may be systematic under-reporting from certain communities, especially in cases where the Census return was filled out by the head of the household on behalf of younger family members.

	Haringey
Proportion of 2021 Census respondents who	0.32%
• were coded as a trans man or a trans woman and provided a response to the gender identity write-in that was different to their response to the sex question, for example, sex female and	

⁹ Census, 2021 – [Gender identity, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/gender-identity)

¹⁰ [Census 2021 gender identity estimates for England and Wales, additional guidance on uncertainty and appropriate use - Office for National Statistics](#)

¹¹ [Quality of Census 2021 gender identity data - Office for National Statistics](#)

¹² [ONS letter to the OSR on Census 2021 gender identity estimates - Office for National Statistics](#)

gender identity write-in “man”, and/or	
• provided a gender identity write-in that was an unambiguously trans response, for example, “non-binary”, “trans man”, “gender fluid”	
Proportion that identified as having a gender identity different from their sex assigned at birth	1.24%

The true proportion of residents in Haringey that identify as trans is likely between these two bounds. The first value is a lower bound as it is probable that the categorisation used may have genuinely missed some residents identifying as trans, specifically those that did not provide a response in the gender identity write-in box. Meanwhile the second value is a lower bound for the reasons highlighted above.

Detail the findings of the data.

- a) **Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?**
- b) **Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?**

For tenants on housing benefit, there will be no impact on their contribution to their rent as HB will increase to match the increase. A very small number of residents (possibly none) may become temporarily Benefit Capped but with the roll out of Universal Credit (which exempts TA rent from the calculations), these will be reduced to zero over the next year.

Gender identity of residents in most types of temporary accommodation is not recorded, only their sex. To first order the proportion of residents in TA that identify as trans can be approximated as the appropriate figures from the 2021 Census reweighted by the appropriate ethnic group and age distributions of residents in TA. A conservative estimate using this reweighting procedure projects that at least 0.38% (95% CI: 0.24 to 0.59%) of TA residents identify as trans. This assumes that the likelihood of someone living in temporary accommodation is independent of a person’s gender identity, which may not be the case.

Potential Impacts

- **Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).**

Due to a lack of suitable and reliable information we are unable to determine what the impact of this policy will have on residents of a given gender identity. However, there is no current reason to believe that the impact on residents with this protected characteristic will be disproportionately felt compared to cisgender residents.

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 Profile ¹³

- 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%)

Target Population Profile

Married or registered civil partnership	Borough	TA (all types)	TA (GF lodges)	TA (leased / licensed for less than 10 years)
Crude rate	33.3%	> 9.6%	> 7.2%	> 9.5%
Age-standardised rate	35.8%	> 12.7%	> 4.9%	> 12.5%
Sample size	218,993	6,125	83	4,606

Detail the findings of the data.

- Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?**
- Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?**

For tenants on housing benefit, there will be no impact on their contribution to their rent as HB will increase to match the increase. A very small number of residents (possibly none) may become temporarily Benefit Capped but with the roll out of Universal Credit (which exempts TA rent from the calculations), these will be reduced to zero over the next year.

¹³ Census, 2021 – [Marriage and civil partnership status in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/people-and-population/marriage-and-civil-partnership/status-in-england-and-wales)

Unfortunately, data limitations mean that knowledge of marital status for most residents in TA is solely based upon relationship of other members of the household with respect to the main applicant; that is, if someone living in that household is listed as the husband, wife, or civil partner of the main applicant. Single adults and single parents would not have a value in this field, and we would therefore be unable to tell if they were married or divorced for example. All values shown above should therefore be treated as lower bounds of the true value, as highlighted by the greater than (>) symbol.

Potential Impacts

- **Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).**

A lack of suitable data limits the proper assessment of any potential disproportionality of residents in temporary accommodation based on marital status. Nevertheless, the proposed policy and mitigations will apply equally to all residents regardless of their marital status. Therefore, the proposed policy is likely to have a neutral impact with respect to this protected characteristic.

4e. Pregnancy and Maternity

Note¹⁴:

- Pregnancy is the condition of being pregnant or expecting a baby.
- Maternity refers to the period after the birth. 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 ¹⁵	TA (all types)
Pregnant ¹⁶	2,450 – 2,670 (3.9 – 4.3%)	9 (0.3%)
Within 26 weeks of giving birth	1,530 (2.5%)	23** (0.9%)
Total	3,980 – 4,200 (6.4 – 6.8%)	31 (1.2%)
Sample size	62,138	2,619

Pregnant or recently given birth	Full or partial HB	No HB
- Yes	17 (1.0%)	11 (1.3%)

¹⁴ Equality and Human Rights Commission, 2022 – [Pregnancy and maternity discrimination](#).

¹⁵ ONS - [Births in England and Wales: birth registrations - Office for National Statistics](#)

¹⁶ ONS - [Births in England and Wales: birth registrations - Office for National Statistics](#). In 2023 there were 3,064 reported live births in Haringey. Assuming that 80-90% of all pregnancies go to term ([Baby loss statistics | Tommy's](#)), and an average gestation period of 38 weeks, this gives a range of the number of residents that are likely to be pregnant at any one time. Denominator for percentage is the ONS 2023 mid-year estimate for females aged 16-44 years old (62,138 people).

- No	1,623	835
Total	1,640	846
Chi-squared	0.795	
p-value	0.552	

** Number of children aged under 6 months in TA. Unable to tell from the data available if the mother gave birth within 26 weeks and the child had passed away, was placed with family members, placed into care etc.

Detail the findings of the data.

- a) **Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?**
- b) **Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?**

The data suggest that residents living in TA may be less likely to be pregnant or have given birth in the last 26 weeks compared to Haringey residents in other types of accommodation. No significant difference could be seen in comparing households in receipt of HB and those that were not.

Potential Impacts

- **Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).**

Although the policy is likely to negatively impact households not in receipt of Housing Benefit, the data available suggest women who are pregnant or have recently given birth are not disproportionately represented. The policy is therefore likely to have a neutral impact for this group.

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. [OBJ]

Data

All percentages shown use the sample size excluding unknown as the denominator. Locally held data is recorded differently to the ONS harmonised Census categories for ethnic groups. In order to make a somewhat direct comparison with ONS data the Other White, Other White European, White Greek Cypriot, White Kurdish, White Turkish, and White Turkish Cypriot categories have been aggregated into a "White Other" category. Similarly, the East African Asian and British Asian categories have been included in "Other Asian", while the Black British category has been included in "Other Black".

Note that the ONS harmonised categories for Black African and Black Caribbean are in fact Black/Black British African and Black/Black British Caribbean. This means that some residents listed locally as Black British may identify as Black/Black British African or Black/Black British Caribbean if this option were given. The result of this is a possible systematic over-reporting of differences for the Other Black ethnic group and under-reporting for Black African and Black Caribbean. A similar argument follows for residents of Asian ethnic background.

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

Ethnic group	Borough ¹⁷	TA (all types)	TA (GF lodges)	TA (leased / licensed <10 yrs)
Asian	8.7%	696 (9.4%)	13 (11.8%)	512 (9.1%)
Bangladeshi	1.8%	216 (2.9%)	8 (7.3%)	153 (2.7%)
Chinese	1.5%	40 (0.5%)	*	35 (0.6%)
Indian	2.2%	38 (0.5%)	4 (3.6%)	26 (0.5%)
Pakistani	0.8%	49 (0.7%)	*	39 (0.7%)
Other Asian	2.4%	353 (4.8%)	3 (2.7%)	259 (4.6%)
Black	17.6%	3,197 (43.4%)	33 (30.0%)	2,486 (44.2%)
African	9.4%	1,957 (26.5%)	23 (20.9%)	1,524 (27.1%)
Caribbean	6.2%	540 (7.3%)	*	436 (7.7%)
Other Black	2.0%	700 (9.5%)	10 (9.1%)	526 (8.5%)
Mixed	7.0%	342 (4.6%)	7 (6.4%)	271 (4.8%)
White & Asian	1.5%	13 (0.2%)	*	11 (0.2%)
White & Black African	1.0%	59 (0.8%)	4 (3.6%)	44 (0.8%)
White & Black Caribbean	2.0%	85 (1.2%)	3 (2.7%)	61 (1.1%)
Other Mixed	2.5%	185 (2.5%)	*	155 (2.8%)
Other	9.7%	1,088 (14.8%)	30 (27.3%)	836 (14.9%)
Arab	1.0%	46 (0.6%)	*	37 (0.7%)
Any Other Ethnic Group	8.7%	1,042 (14.1%)	30 (27.3%)	799 (14.2%)
White	57.0%	1,980 (26.9%)	25 (22.7%)	1,480 (26.3%)
White British	31.9%	381 (5.2%)	3 (2.7%)	286 (5.1%)
White Irish	2.2%	111 (1.5%)	*	67 (1.2%)
Gypsy or Irish Traveller	0.1%	29 (0.4%)	*	20 (0.4%)

¹⁷ Census 2021 - [Ethnic group, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

Roma	0.8%	*	*	*
Other White	22.1%	1,459 (19.8%)	22 (20.0%)	1,107 (19.7%)
Prefer not to say		70 (0.9%)	*	44 (0.8%)
Unknown		2,032	49	1,533
Sample size	264,234	9,405	159	7,162
Sample size ex. unknown	264,234	7,373	110	5,629

Residents from ethnic minority backgrounds are significantly more likely to be living in temporary accommodation compared to those identifying as White British. A more detailed breakdown is shown in the table below.

In each case the range shown (XX – XX) is the 95% confidence interval for the ratio of residents in that type of TA identifying as from that ethnic group compared to the equivalent group identifying as White British. A value of less than 1 means that group is less likely to be in TA, more than 1 means that it is more likely to be in TA, with 1 meaning no difference. It can then be inferred that no significant disproportionality between that ethnic group and White British can be seen if that range spans 1, for example, 0.8 – 2.0.

Ethnic group	TA (all types)	TA (lodges)	TA (leased / licensed <10 yrs)	Mean age in TA (years)
Asian	5.91 – 7.60	4.53 – 55.8	5.67 – 7.59	28.1
Bangladeshi	8.48 – 11.9		7.77 – 11.6	27.5
Chinese	1.61 – 3.10		1.83 – 3.70	32.1
Indian	1.04 – 2.02		0.88 – 1.97	29.8
Pakistani	3.80 – 6.93		3.88 – 7.62	27.1
Other Asian	10.6 – 14.3		10.1 – 14.3	28.0
Black	13.6 – 17.0	6.11 – 65.0	13.9 – 17.8	27.0
African	15.6 – 19.5		15.9 – 20.5	27.7
Caribbean	6.39 – 8.32		6.7 – 9.1	30.7
Other Black	25.7 – 33.3		25.3 – 34.0	21.9
Mixed	3.53 – 4.74	2.75 – 41.1	3.65 – 5.10	23.4
White & Asian	0.42 – 1.26		0.44 – 1.49	22.5
White & Black African	3.75 – 6.52		3.56 – 6.76	23.4
White & Black Caribbean	2.81 – 4.51		2.57 – 4.49	22.6
Other Mixed	5.19 – 7.40		5.67 – 8.42	23.9
Other	8.35 – 10.6	10.0 – 108	8.40 – 11.0	24.6
Arab	2.83 – 5.24		2.92 – 5.82	22.7
Any Other Ethnic Group	8.91 – 11.3		8.94 – 11.7	24.7
White (not White British)	4.77 – 5.97	2.78 – 31.1	4.64 – 6.02	30.0
White British	-	-	-	26.1

White Irish	3.41 – 5.23		2.60 – 4.44	28.8
Gypsy, Irish Traveller, or Roma	1.85 – 3.94		1.57 – 3.91	20.9
Other White	4.94 – 6.19		4.90 – 6.37	30.3
Sample size	7,373	110	5,629	

The biggest disproportionality is for residents from Black ethnic backgrounds, who are around 15 times more likely (centre of the confidence interval) to be in temporary accommodation compared to White British residents. Some confidence intervals are very broad; this is due to the small relative sample size and highlights the lack of certainty in the value.

Age may be a confounding factor – the average (mean) age of residents in TA varies from 21.9 for those identifying as Other Black compared to 32.1 for those identifying as Chinese.

Accommodation leased for less than 10 years

Average weekly rent increase by number of bedrooms required

Ethnicity	1	2	3	4	5	Average
Asian	£16.38	£59.78	£72.90	£84.24	£127.27	£66.02
Black	£16.76	£62.33	£73.84	£80.97	£129.95	£68.71
Mixed	£17.92	£63.61	£73.47	£81.47	£128.80	£66.10
Other	£16.38	£60.63	£72.79	£87.97	£128.80	£62.39
White British	£15.77	£61.88	£72.93	£80.79		£59.62
White (not White British)	£15.04	£61.63	£73.82	£81.90	£128.80	£66.38
Average	£16.28	£61.75	£73.57	£81.95	£129.43	£66.45

The proposed rent increase (in absolute terms) does not appear to disproportionately affect residents identifying as from a particular ethnic group. Some small differences can be seen in the above table, for example slightly lower average figures for White British residents. These can be attributed to small variations in the LHA area in which someone was housed by ethnic group in the order of +/- 5%.

Ethnicity	TA (GF lodge)		TA (leased / licensed <10yrs)	
	Full or partial HB	No HB	Full or partial HB	No HB
Asian	11 (11.6%)	4	393 (9.6%)	107 (8.0%)
Black	25 (26.3%)	7	1,823 (44.3%)	603 (44.9%)
Mixed	8 (8.4%)	*	177 (4.3%)	82 (6.1%)
Other	28 (29.5%)	*	613 (14.9%)	191 (14.2%)
White British	3 (3.2%)	*	205 (5.0%)	65 (4.8%)
White (not White British)	21 (22.1%)	*	866 (21.0%)	289 (21.5%)
Prefer not to say	*	*	38 (0.9%)	5 (0.5%)

Unknown	40	7	1,115	360
Sample size	135	18	5,230	1,702
Sample size ex. unknown	95	11	4,115	1,342

There is no significant difference by ethnicity between households in receipt of HB and those which are not.

Potential Impacts

- **Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).**

There is an overrepresentation of residents from ethnic minority backgrounds amongst the current temporary accommodation tenants in Haringey relative to the borough average. This means that the changes resulting from the proposed policy will have a disproportionate impact on ethnic minority communities. However, it should be noted that this impact is not specifically as a result of their protected characteristic of race, but rather due to a demographic overrepresentation within the current cohort of temporary accommodation tenants. The proposed policy does not discriminate on the basis of race or ethnicity, and mitigations available to the wider cohort (for households in receipt of HB) are equally available to all racial and ethnic groups.

4g. Religion or belief

Data

The religion or belief of residents in most types of temporary accommodation is not recorded. It is possible, however, to gain an estimated breakdown. For someone identifying as from a certain ethnic group and age group, the likelihood of that person following a given belief is assumed to be the same whether they live in TA or other settings. The distribution of the belief of residents within TA can therefore be approximated as the 2021 Census figures reweighted by the appropriate ethnic group and age distributions of residents in TA.

	Borough ¹⁸	TA (all types, projected)
Buddhist	0.9%	0.9%
Christian	39.3%	45.7%
Hindu	1.3%	0.8%
Jewish	3.6%	2.7%
Muslim	12.6%	21.1%
No religion	31.6%	18.3%
Not answered	8.0%	7.7%

¹⁸ Census, 2021 – [Religion, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk)

Other religion	2.3%	2.7%
Sikh	0.3%	0.2%
Unknown		
Sample size	264,237	9,405

The data suggest that residents living in temporary accommodation are more likely to follow some religion or belief compared to the rest of the borough. This is likely to be an indirect consequence of certain ethnic groups being proportionally over-represented in TA, particularly members of the Black community and residents from “any other ethnic group”.

Potential Impacts

- **Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).**

The proposed policy may have a disproportionately negative impact for residents following a belief, likely as an indirect consequence of certain ethnic groups being proportionately over-represented in TA relative to the borough average. We are, however, unable to determine conclusively whether this is the case due to incomplete recording of belief. The proposed policy does not discriminate on the basis of religion, and mitigations available to the wider cohort (for households in receipt of HB) are equally available to all religious groups.

4h. Sex

Data

- Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?**
- Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?**

Sex	Borough ¹⁹	TA (all types)	TA (GF lodges)	TA (leased / licensed for less than 10 years) ^[OBJ]
Female	127,240 (51.8%)	5,278 (56.1%)	101 (62.0%)	3,985 (55.6%)
Male	136,995 (48.2%)	4,124 (43.9%)	62 (38.0%)	3,175 (44.3%)
Sample size	264,235	9,402	163	7,162

¹⁹ Census 2021 – [Gender identity: age and sex, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/gender-identity)

Chi-squared statistic	231	11.9	157
p-value	< 0.001	< 0.001	< 0.001
Effect size	0.029	0.007	0.024

Residents in most types of temporary accommodation are disproportionately likely to be female. This reflects the fact that around 1 in 3 households in TA are single parent households, and in over 90% of cases that parent is the mother. For residents in the Single Homeless Pathway, however, the opposite is true, with around 3 in 4 residents being male.

Sex	TA (GF lodge)		TA (leased / licensed for less than 10 years)	
	Full or partial HB	No HB	Full or partial HB	No HB
Female	84 (62%)	11 (55%)	2,920 (56%)	922 (54%)
Male	51 (38%)	9 (45%)	2,310 (44%)	778 (46%)
Sample size	135	20	5,230	1,700
Chi-squared statistic	0.139		1.260	
p-value	0.709		0.262	

No significant difference can be observed between households that are in receipt of HB and those that are not.

Potential Impacts

- **Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).**

There is an overrepresentation of residents identifying as female (and especially those with children) amongst the current temporary accommodation tenants in Haringey relative to the borough average. This means that the changes resulting from the proposed policy will have a disproportionate impact on women. However, it should be noted that this impact is not specifically as a result of their protected characteristic of sex, but rather due to a demographic overrepresentation within the current cohort of temporary accommodation tenants. The proposed policy does not discriminate on the basis of sex, and mitigations available to the wider cohort (for households in receipt of HB) are equally available to all residents.

4i. Sexual Orientation

Data

Haringey does not currently record the sexual orientation of all residents in temporary accommodation, only the main applicant. This means that a significant portion of residents will not have this information captured, particularly for children.

For someone identifying as from a certain ethnic group and age group, the likelihood of that person having a given sexual orientation is presumed to be the same whether they live in TA or other settings. This may not be strictly true, given that there is some evidence that people identifying as LGBTQ+ are more likely to experience homelessness, however it is a sensible presumption to first order.^{20,21} The proportion of residents in TA that identify as having a sexual orientation other than heterosexual (abbreviated as LGB+) can therefore be approximated as the appropriate figures from the 2021 Census reweighted by the appropriate ethnic group and age distributions of residents in TA.

For completeness both the breakdown from the raw data and the estimated figures using this reweighting procedure are shown.

	Borough ²²	TA (all types)
Straight or Heterosexual	83.4%	472 (86.8%)
Gay or Lesbian	2.7%	3 (0.6%)
Bisexual	2.1%	*
All other sexual orientations	0.8%	6 (1.1%)
Not answered	11.0%	63 (11.6%)
Unknown		2,102
Sample size	216,006	2,646
Sample size exc. unknown		544
Proportion identifying as LGB+	5.6%	1.7% (recorded) 4.7% (projected)
Z-score		-0.99 (projected)
Two-tailed p-value		0.322 (projected)

Potential Impacts

- **Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).**

We are unable to determine conclusively what the impact will be due to incomplete data.

4j. Socioeconomic Status

Data

²⁰ [LGBT in Britain - Home and Communities \(2018\) | Stonewall](#)

²¹ [LGBT Youth Homelessness Research Report 2025 - There's No Place Like Home - akt](#)

²² Census, 2021 – [Sexual orientation, England and Wales - Office for National Statistics \(ons.gov.uk\)](#)

Borough profile

Income

- 7.8% of the population of Haringey were claiming unemployment benefit as of December 2024²³
- 23.7% of residents aged 16-65 were claiming Universal Credit as of November 2024²⁴
- Around 29% (CI: 23.3 to 33.9%) 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) ^[OBJ]
- Around 8.0% (CI: 4.4 to 11.6%) of Haringey's working age population had no qualifications as of 2023²⁶
- 5.0% were qualified to level one only (equivalent to grade 1-3 at GCSE) ²⁷

Area Deprivation

Haringey is the 4th most deprived in London as measured by the Index of Multiple Deprivation (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. ^[OBJ]

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?

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?**
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?**

As a proxy for socioeconomic status, we use the Index of Multiple Deprivation (IMD) decile of the postcode that the household is currently living in. The IMD decile is

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 – [Number and proportion of employee jobs with hourly pay below the living wage - Office for National Statistics](#)

²⁶ ONS Annual Population Survey – [Your Data - Nomis - Official Census and Labour Market Statistics](#)

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

defined such that 1 indicates the 10% most deprived areas, and 10 the 10% least deprived areas.

Overall families living in TA are overall more likely to be living in relatively greater socioeconomically deprived areas compared to other residents. Larger families (with 6 or more members) are more likely to be living in more deprived areas compared to smaller families.

There is, however, a distinction between families placed within Haringey and those placed out of borough. Families placed out of borough are generally living in less deprived areas compared to those living within Haringey. The raw figures are skewed somewhat by residents that have been placed in Barnet where the average level of deprivation is much lower (mean IMD decile = 6.3).

IMD decile	2-5 household members		6+ household members	
	Full or partial HB	No HB	Full or partial HB	No HB
1	621	425	105	136
2	1734	974	503	300
3	1501	642	396	208
4	987	434	224	136
5	294	128	45	33
6	307	165	87	24
7	140	73	20	26
8	54	39	33	*
9	16	14	*	6
10	14	*	*	*
Mean IMD decile	3.18	2.98	3.08	2.82
Chi-squared statistic	69.0		85.5	
Two-tailed p-value	< 0.001		< 0.001	
Effect size	0.089 (negligible)		0.194 (small)	

Families not in receipt of HB – and especially larger families - were disproportionately likely to be living in more deprived areas compared to those in receipt of HB.

It is important to note that property prices (and by extension rents) are generally lower in more socioeconomically deprived areas. Historically this has led to a greater supply of both social housing and properties for use as TA in these areas. There is also the caveat that residents in temporary accommodation are moved to properties that the council can afford – in line with the TA Placements Policy. This differs from private tenants and owners, who move where they can afford. In other words,

residents in temporary accommodation may be living in localities that they may not otherwise be living in if circumstances were different.

Potential Impacts

- **Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).**

There is limited data on a household's socio-economic status and the site of their current TA is determined by where the council can secure affordable accommodation rather than the economic status of the household as would be the case with private tenancies and home ownership. It is therefore difficult to assess the impact. However, those who are on lower incomes are more likely to be on Housing Benefits and so not affected by the change. Conversely, those on higher incomes are less likely to be on HB and so more likely to be negatively affected.

5. Key Impacts Summary

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

Families with children and residents identifying as Black are over-represented in the TA population. Residents in one or both of these categories are therefore more likely to be negatively impacted by the proposed rent increases in temporary accommodation. This is primarily due to over-representation. For households in receipt of HB, however, the scale of this impact would be mitigated since it would be covered by the relevant benefit.

Around a third of households in TA are listed as not currently claiming Housing Benefit. This includes 95 households where one of the residents has a disability, 14 of which are under the age of 18. Many of these may be eligible for HB and a targeted approach should be undertaken to mitigate any future impact.

5b. Intersectionality

Households in TA that include residents of White Irish, Gypsy, or Irish Traveller backgrounds (64 households, 140 residents in total) were disproportionately living in more deprived areas compared to residents of other ethnic backgrounds (average IMD deciles 2.6 and 3.1 respectively). The reason for this is unclear at present. Only 55% of these households appear to have been claiming any Housing Benefit.

5c. Data Gaps

Three data gaps have been identified with respect to certain protected characteristics of residents in most types of TA. These are:

- Sexual orientation
- Gender identity

- Marital status

Information about these is only collected for the main applicant at the time that they approach the council, and their homelessness application is formally assessed. Capturing accurate information about sexual orientation or gender identity for all residents in TA may be both difficult and lead to ethical concerns that could put one or more of the household members at risk. For example, the head of a household may fill out the relevant form to update details but not realise that one of their children identifies as LGBTQIA+. Recording of marital status is in principle less difficult but would require updates to the back end of the reporting systems used.

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

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

Under the Equality Act 2010, indirect discrimination occurs when “a policy which applies in the same way for everybody has an effect which particularly disadvantages people with a protected characteristic. Where a particular group is disadvantaged in this way, a person in that group is indirectly discriminated against if he or she is put at that disadvantage. Indirect discrimination can also occur when a policy would put a person at a disadvantage if it were applied. This means, for example, that where a person is deterred from doing something, such as applying for a job or taking up an offer of service, because a policy which would be applied would result in his or her disadvantage, this may also be indirect discrimination.”

The proposed policy and mitigations (for households in receipt of HB) apply equally to all households in temporary accommodation regardless of their protected characteristics. In this sense, the proposal neither helps nor prevents advancement of equality of opportunity between groups who share a relevant protected characteristic, and those who do not. For the same reasoning neither does it help to foster good relations between groups who share a protected characteristic and those who do not.

However, the findings of this EqIA suggest that younger residents in a family unit and those identifying as from ethnic minority groups may be more likely to be negatively impacted by the proposed policy. There is, therefore, the possibility that indirect discrimination may occur for members of the above groups. However, it should be noted that this impact is not specifically as a result of their protected characteristic of sex or race, but rather due to a demographic overrepresentation within the current cohort of temporary accommodation tenants.

7. Amendments and mitigations

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

Further information on responding to identified impacts is contained within accompanying EQIA guidance

Please delete Y/N as applicable

No major change to the proposal: the EQIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken.

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: No actions are proposed at this time, but a Mitigation Fund will be considered as part of the annual review.

Timescale: Annual Budget Review (October-November)

8. Ongoing monitoring

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

- Who will be responsible for the monitoring?
- What the type of data needed is and how often it will be analysed.
- When the policy will be reviewed and what evidence could trigger an early revision
- How to continue to involve relevant groups and communities in the implementation and monitoring of the policy?

The policy will be reviewed annually as part of the annual budget review which will consider the impact on residents. This may include the creation of a Mitigation Fund to help those who are unduly affected by the policy.

Date of EQIA monitoring review: 28 April 2025

8. Authorisation

EQIA approved by (Assistant Director/ Director) Maddie Watkins

Date 17/06/2025

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.