

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:	Redwing and Turnstone Local Lettings Plan
Service Area:	Housing Demand
Officer Completing Assessment:	Martin Gulliver
Equalities Advisor:	Guy Latham
Cabinet meeting date (if applicable):	
Director/Assistant Director:	Maddie Watkins Assistant Director, Housing Demand

2. Executive summary

Haringey has an ageing population. The Council wants to expand the offer to older residents beyond the current offer of sheltered housing or care homes. The Council's engagement with older residents has revealed there is a strong demand for accessible, safe, and secure homes which can be occupied for many years.

The Wingspan Scheme is a high-quality development of 272 new council homes located in Tottenham Hale. All these homes will be let at Council rents. The Council believes that the 46 one-bedroom and 73 two-bedroom homes located in Redwing Court & Turnstone Court are particularly suitable for older residents looking for accessible, safe, and secure homes. The Council is therefore seeking to put in place

a Local Lettings Plan ('Lettings Plan') that will ensure these 119 homes are let to people aged fifty-five or over.

There is a disproportionately high representation on the housing register of people who are:

- are black and/or
- female and/or
- under the age of 18

The most significant aim of Local Lettings Policy is to reserve 199 Homes for people over the age of 55, and in particular, to those who are also existing tenants who may release a family home.

With the introduction of a minimum age of 55, there will be an impact on those who do not meet this criterion (unless they are a carer). As the scheme is comprised of 46 one-bedroom homes and 73 two-bedrooms, the effect will be split between single/couples needing a one-bedroom property (typically aged twenties to thirties) and small families needing two-bedrooms who will typically include one or two children under 18. This impact will be slightly mitigated by an expected increase in larger homes released by existing tenants downsizing from family homes. These homes would be used to house families with up to 5 to 6 children.

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.

Engagement informing the development of the Local Lettings Plan

The Local Lettings Plan was designed following research and engagement with older residents who might be suitable for this scheme and those occupying larger homes. This engagement was undertaken by an external research company and included a survey and individual conversations in person or by phone where necessary. The Council also used the outcomes of this research to inform its development of an Older People's Housing Strategy and Rightsizing Strategy.

Consultation with those affected by the Local Lettings Plan

The Council has also undertaken a six-week consultation specifically targeting 3,380 applicants on the housing register who had a housing need for a home with one or two bedrooms. The Council also targeted 40 nearby tenants who would have been offered these homes through the Neighbourhood Moves Scheme.

Outcomes of consultation

There were 751 hits on the survey site (22% of those who were contacted) and 130 responses (3.8%).

Overall response to the Lettings Plan

Support was received across all age groups, national identities and benefit statuses, except for those aged 21-40, where 46% were against and 38% in favour. However, there was a notable difference in response among those with 2 A' Levels, a degree or a professional qualification (where 49% were in favour) and those who with a lower or no or a foreign qualification (where 88% were in favour). Support was mixed among those who preferred not to provide details of their educational qualifications with 48% in favour and 45% against.

Of those who did respond, there was strong support for the scheme with 65% either happy or satisfied. However, there was also 33% of respondents who were unhappy or dissatisfied with the scheme.

Response to the minimum age

The consultation also asked about the minimum age which should be applied to the scheme. Although the largest age selection was against any minimum age with 37% selecting this option, 57% of respondents selected one of the four ages offered indicating support for the scheme's principal feature. Those who are against a minimum age included all but five of the 33 who were against the scheme but also 14 of the 65 who were in support of the scheme.

Response to who these homes should be offered to

Support for the scheme's proposals to prioritise existing tenants in larger homes was not well supported with only 15% agreeing. The most popular group to be offered these homes (with 50% support) were those living in temporary accommodation and Band B. This is slightly less than the representation (65%) of temporary accommodation applicants among those who were invited to take place in the survey.

This sentiment was repeated in the comments respondents provided in the consultation survey and in emails. Notably, it was frequently stated that these homes should be offered to those in Temporary Accommodation instead of older people. However, these are not distinct groups and with 198 applicants over the age of 55 in Temporary Accommodation, many of these homes will be allocated to people in Temporary Accommodation.

4. Data and Impact Analysis

The following data is taken from the Housing Register on 7 January 2025 and covers the members of the households in Band A or Band B who have a housing need of a home with 1 or 2 bedrooms.

4a. Age

Data

The data below compares the borough profile with that of all household members of Band A and Band B Housing Register applications for homes with one or two bedrooms as of 1 June 2024. With only 119 homes in this scheme, most of these applicants would not receive any offer from this scheme.

Age	Borough		Band A/B 1-2 beds	
0-17	54,422	21%	1,232	31%
18-34	71,660	27%	1,050	26%
35-49	63,930	24%	896	22%
50-64	46,516	18%	586	15%
65+	27,706	10%	272	7%
Total	264,234	100%	4,036	100%

The data shows a similar age profile for those in Band A/B one/two-bedroom households to those in the borough except for those who are under 18 (who are over-represented) and those who are over-50 (who are slightly under-represented).

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?

Young people under the age of 18 are over-represented compared to the borough profile whereas people over the age of 50 are under-represented. While the latter will gain from the proposal (or at least those over-55), there will be a loss to children in two-bedroom households near the top of the housing register as this will mean those households will need to wait slightly longer for the next one bed/two bed homes. There will though be limited or no loss to those lower in the housing register as (save for existing tenants moving) the impact of this policy would be to remove the same number of two-bedroom households who are ahead of them on the waiting list.

Where a home is taken up by an existing tenant who was not on the register, this will largely be through the first priority – that is under-occupiers and those who need an adapted home. Although there may be a few of the latter grouping who are currently in a one-bedroom home and over-crowded, this is expected to be minimal. Existing Social tenants moving will therefore generally be moving from a property with the same number of bedrooms (leading to no long-term loss to the housing register) or a home with more bedrooms. Where a larger home is released, this will benefit not only younger applicants but, crucially, their children.

Typically, a two-bedroom home (such as some of the new homes cover by this Lettings Plan) would only house one or maybe two children. However, if a home with four-bedrooms was released, this could benefit four to six children. There is thus likely to be a small net benefit to those under the age of 17.

b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

With the introduction of a minimum age, anyone outside this age-range will not receive an offer unless they are a carer for the tenant. However, this scheme will benefit those who are older and, as set out above, are likely to have an overall positive impact of those who are under 18 due to the family homes expected to be released.

The introduction of a minimum age within this Local Lettings Policy is considered a proportionate means of achieving a legitimate aim. The aim of the Lettings Plan is two-fold: -

- Firstly, to enable older people to move to a long-term suitable home while they are better able to manage the move. For many this may be a current need, as their present home is unsuitable and/or future a likely future need which is likely to develop as they age. This policy seeks to create a safe, accessible and quiet accommodation which is aimed at being suitable for the rest of their interdependent lives. The alternative to this – only rehousing people when their health has deteriorated – will not only cause older people to become vulnerable and isolated in unsuitable homes but will also delay the release of family homes they may be occupying. This scheme benefits older (and in the long-term) potentially more vulnerable households over younger households below this threshold who may not have any such vulnerabilities. This is because the housing register does not give additional preference to those with low-level medical need to those in Temporary Accommodation who represent most of those affected).
- Secondly, the Lettings Plan also aims to increase the number of larger homes which are released which would replace a one or two bed home (benefiting at most two adults and two children) with a larger home which would benefit a family of four to six children. Under-occupation moves thus benefit more people and, typically, younger applicants and their children.

Potential Impacts

While most households will not be housed, the effect of these changes is a beneficial effect on those who are 55 or older and a small but positive affect on those who are under 18 with higher numbers of family homes being released.

4b. Disability

Data

Borough Profile

- Disabled under Equality Act – 13.7%¹
 - 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 depression²
- 1.7% of residents diagnosed with a severe mental illness³
- 0.4% of people in Haringey have a learning disability⁴

¹ Census 2021 - [Disability, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/disabilityandlongtermhealth/bulletins/disabilityinenglandandwales/2021)

² 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/)

³ 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/)

⁴ PHE Learning disability profiles - <https://fingertips.phe.org.uk/learning-disabilities#page/0/gid/1938132702/pat/6/par/E12000007/ati/102/are/E09000014>

The data below compares the borough profile with that of all household members of Band A and Band B Housing Register applications for homes with one or two bedrooms as of 1 June 2024. With only 119 homes in this scheme, most of these applicants would not receive any offer from this scheme. ^[OBJ]

Disability	Borough		ALL		Over-55	
			Band A/B 1-2 beds		Band A/B 1-2 beds	
Yes	36,200	14%	403	10%	207	33%
no/not known	228,034	86%	3,633	90%	425	67%
Total	264,234	100%	4,036	100%	632	100%

The data shows a slight under-representation those with a disability among those in all Band A/B one/two-bedroom households compared to the borough but a significantly higher representation among those who will benefit from the scheme.

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?

Those with a disability are over-represented in comparison to both the borough and those waiting for a one- or two-bedroom home.

b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

Like most new build homes, these 119 homes will be level access, and the Lettings Plan will improve the housing prospects of older people with a current disability who are over-represented among those who will benefit from the Lettings Plan. This will mean lower change to those who fall outside the age group and who are at the top of the waiting list. This scheme will also have a positive impact as these homes being allocated as long-term homes for older people who are anticipated will need adaptations and level access in the medium term.

The Lettings Plan also gives priority for two-beds to those who have or need live-in carers and so can improve the lives of those who need the care and allowing them to remain in the community.

Potential Impacts

The proposal is likely to see slight fall in the number of these homes offered to those with a disability now, offset by the number of tenants housed who are expected to have disabilities in the short- to medium-term.

4c. Gender Reassignment

Borough Profile⁵

⁵ Census 2021 - [Gender identity, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

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

The gender reassignment data is not available for those on the Housing Register.

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?

The gender reassignment data is not available for those on the Housing Register.

b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

There is a higher rate of homelessness for those who have had gender reassignment where they are forced to leave a family home. These are typically for a one-bedroom home for them (and any partner). However, the majority of these households do not appear on the housing register as they are supported through the Pathway scheme.

Potential Impacts

It is not anticipated that that the changes will have an undue impact on those who have gender reassigned.

4d. Marriage and Civil Partnership

Data

Borough Profile ⁶

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%)

Housing Register Profile

The data on marital status for people on the Housing Register is not available directly. Though the relationship between applicants and other household members is recorded where they are not the main applicant nor their status if the partner or former partner is not part of the application. This data is thus unreliable.

⁶ Census 2021 - [Marriage and civil partnership status in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

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?

Accurate data is not available.

b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

Although accurate data is not available, there is no reason to believe the Lettings Plan will have an undue impact dependent on marital status.

Potential Impacts

There are no expected impacts related to marital status as marital status is not taken into account with regard to Housing Allocations of the Local Lettings Plan.

4e. Pregnancy and Maternity

Data

Borough Profile ⁷

Live Births in Haringey 2021: 3,376

Target Population Profile

This data is not available.

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?

Accurate data is not available.

b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

Those who are pregnant are very likely to fall outside the minimum age and so would not be eligible for these homes. However, those who are pregnant with a second or third child may benefit from the scheme as more family homes are likely to become available.

Potential Impacts

Those who are pregnant are not expected to be overly impacted as those who are in smaller households (one- or two-bedroom homes) will be partially offset by the benefit for those who need larger homes.

4f. Race

⁷ Births by Borough (ONS)

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 nationality⁸.

Data

Ethnicity	Borough		ALL		Over-55	
			Band A/B 1-2 beds		Band A/B 1-2 beds	
Asian	22,988	9%	202	6%	25	4%
Black	46,505	18%	1,222	39%	206	37%
Mixed	18,496	7%	210	7%	23	4%
Other	25,631	10%	460	15%	72	13%
White	150,613	57%	1,077	34%	233	42%
Total	264,234	100%	3,171	100%	559	100%
Unknown			865		73	
Total	264,234	100%	4,036		632	

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?

The data shows that among those who would be eligible under the Lettings Plan, there is an over-representation of those with a Black and Other ethnicity compared to the borough, and under-representation of those with an Asian and White ethnicity.

However, there is a slight underrepresentation of those with Asian, Black, Mixed and Other ethnicities compared to those who would be eligible for these homes if the Lettings Plan was not put in place.

b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

With a higher representation of Asian, Black, Mixed and Other Ethnicities in younger age groups, these ethnicities are less likely to be allocated these homes. However, this over-representation among younger people will also mean they are more likely to benefit from more larger homes becoming available.

Potential Impacts

The changes will have a small negative impact on household members from Asian, Mixed and White Ethnicities due to their lower representation among over-55-year-olds who need one or two bedrooms compared to their representation in the borough. Conversely there will be a net benefit for those over-represented (Black and Other Ethnicities).

4g. Religion or belief

Data

Borough Profile ⁹

⁸ [Race discrimination | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://www.equalityhumanrights.com/en/our-work/anti-discrimination-law/race-discrimination)

⁹ Census 2021 - [Religion, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/religiousandethnicgroups)

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%

Target Population Profile

Religion is not recorded in the housing data.

Potential Impacts

- Although religion is not recorded in the housing data, it is not anticipated that the changes will have an undue impact on the basis of religion.

4h. Sex

Data

Sex	Borough		Band A/B 1-2 beds	
Female	136,873	52%	2,345	58%
Male	127,361	48%	1,691	42%
Total	264,234	100%	4,036	100%

The data above shows that females are over-represented on the Housing Register for those needing a home with one or two bedrooms. This representation is mirrored in the target age group (over-55) who are likely to benefit from the Local Lettings Plan.

- 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?

The data shows there is an over-representation of females among both those on the housing register (Band A and B) looking for a home with one or two bedrooms and of those who may benefit from the Local Lettings Plan.

- Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

Sex	Borough		Band A/B 1-2 beds		Band A/B 1-2 beds	
Female	136,873	52%	2,345	58%	366	58%
Male	127,361	48%	1,691	42%	266	42%
Total	264,234	100%	4,036	100%	632	100%

Females are over-represented on those who may receive offers compared to the borough and are equally likely to benefit from the Local Lettings Plan compared to those who would be ineligible to receive an offer due to age.

Potential Impacts

This policy is likely to have a small positive on females due to their over-representation compared to the borough and, with a longer life expectancy, these

are homes are likely to benefit females for longer periods. There will also be a secondary benefit if larger homes are released as females are also over-represented among those seeking a family home.

4i. Sexual Orientation

Data

Borough profile ¹⁰

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

The housing register does not record sexuality but there are no anticipated impacts of this scheme on residents on the basis of their sexual orientation.

4j. Socioeconomic Status

- 6.9% of the population of Haringey were claiming unemployment benefit as of April 2023¹¹
- 19.6% of residents were claiming Universal Credit as of March 2023¹²
- 29.3% of jobs in Haringey are paid below the London Living Wage¹³

The housing register does not record income, but most of those housed (55 or older) will be in receipt of a pension unlike those who are younger.

Educational Attainment

- Haringey ranks 25th out of 32 in London for GCSE attainment (% of pupils achieving strong 9-5 pass in English and Maths)¹⁴.
- 3.7% of Haringey's working age population had no qualifications as of 2021¹⁵
- 5.0% were qualified to level one only¹⁶.

The housing register does not record education but there is a significant increase in higher level education among younger population and lower among older people who would benefit from this scheme.

¹⁰ Census 2021 - [Sexual orientation, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/people-and-population/sexual-orientation)

¹¹ ONS - [ONS Claimant Count](https://www.ons.gov.uk/people-and-population/employment-and-unemployment/unemployment)

¹² DWP, StatXplore - [Universal Credit statistics, 29 April 2013 to 9 March 2023 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/universal-credit-statistics)

¹³ 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](https://www.ons.gov.uk/people-and-population/employment-and-unemployment/employment)

¹⁴ DfE - [GCSE attainment and progress 8 scores](https://www.gov.uk/government/statistics/gcse-attainment-and-progress-8-scores)

¹⁵ LG Inform - [Data and reports | LG Inform \(local.gov.uk\)](https://www.local.gov.uk/data-reports)

¹⁶ LG Inform - [Data and reports | LG Inform \(local.gov.uk\)](https://www.local.gov.uk/data-reports)

It is notable that the consultation response was sharply divided by the level of qualifications obtained by the respondent with those with 2 A' Levels, a degree or a professional qualification 49% in favour and 46% against compared with 88%

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 country¹⁷. These homes are more likely to appeal to those already living in these areas.

5. Key Impacts Summary

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

The Local Lettings Plan will support older people and is expected to release larger homes for families. This will lead to lower potential offers to those who need smaller homes.

5b. Intersectionality

There is an over-representation on the housing register of black single mothers. The Local Lettings Plan would mean few of these homes being available for those with few children but more to those with larger families who need larger homes.

5c. Data Gaps

The main data gaps are on Gender Reassignment, Religion and Sexual Orientation. These gaps require additional update of data which may be undertaken with the forthcoming review of the housing allocations policy.

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

The introduction of an age-criteria has a direct impact of those who do not meet this criteria. This impact will though be mixed if the Plan encourages more social tenants to release family homes as expected. The Plan has been designed to give these tenants priority and a marketing campaign will be undertaken to maximise the number of under-occupiers moving into these homes.

As well as encouraging under-occupiers, the Lettings Plan seeks to enable older people to move to a long-term suitable home while they are better able to manage the move. The homes are particularly suitable as they will provide safe, accessible and quiet accommodation which is suitable for the rest of their interdependent lives. The alternative to this – only rehousing people when their health has deteriorated – will not only cause older people to become vulnerable and isolated in unsuitable homes but will also delay the release of family homes they may be occupying.

This scheme benefits older (and in the long-term) potentially more vulnerable households over younger households below this threshold who may not have any such vulnerabilities. This is because the housing register does not give additional

¹⁷ IMD 2019 - [English indices of deprivation 2019 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019)

preference to those with low-level medical need to those in Temporary Accommodation who represent most of those affected.

7. Amendments and mitigations

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

No major change to the proposal: the EQIA demonstrates the proposal has minimal or mixed benefit to those with protected characteristics. Where there are impacts, these will in part offset by the benefit from the release of under-occupied family homes which can help more people.

The proposal will also only potentially affect those who are at the top of the housing register and close to receiving an offer. For these there will be a slightly delay them receiving an offer compared to these homes being offered through the normal lettings route.

For those who are lower down the waiting list, these homes are unlikely to have been allocated to them with or without the Lettings Plan. As with all new homes, the impact on those lower down the waiting list will improve when those above them are housed.

This will be the case under both the current arrangements and the Lettings Plan. The only exception is where a social tenant who is not on the register moves into these properties. These will mostly be those who are downsizing and though this will mean a loss of a 1 bed or 2 bed let being offered to the households above them on the housing register, this home will result in a larger home which could be used to benefit more people.

7. Ongoing monitoring

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

Lettings to the scheme will be monitored as part of the annual Lettings Review undertaken as part of the Annual Lettings Plan which monitors all Council lets. This review is undertaken in Spring each year and sets out the demographics of lets throughout the borough as well as setting out letting outturns and forecasts for the following year.

8. Authorisation

EQIA approved by Maddie Watkins Assistant Director Housing Demand

A handwritten signature in black ink, appearing to read "M Watkins".

Date: 13/05/2025

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.