

# **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: Revision of Statement of Licensing Policy

**Service Area:** Regulatory Services

Officer Completing Assessment: Daliah Barrett

**Equalities Advisor:** Guy Latham

Cabinet meeting date (if applicable): N/A

**Director:** Eubert Malcolm

# 2. Executive summary

Please complete this section *after* completing the rest of the form and summarise:

- The policy proposal, its aims and objectives, the decision in consideration. Please focus on **the change** that will result from this decision.
- Results of the analysis: potential positive and negative equality impacts
- Mitigations that will be taken to minimise negative equality impacts (if relevant)
- Next steps (this may include: if/when the EQIA will be refreshed, planned consultation, future stages of the project).

Haringey Council is the licensing authority under the Licensing Act 2003 and is responsible for granting licences in the borough in respect of a wide variety of activities. These are:

The sale and/or supply of alcohol.



- The provision of regulated entertainment (which includes music and/or dance, theatres, cinemas, indoor sporting events).
- Late night refreshments.

All activities that come within the definition of the 2003 Act are covered. This would cover personal licences, which are held by individual licensees, registered supervisors, and premises licences, including clubs (premises certificates) and temporary events (permissions).

All licences/permissions relating to a premises is termed as a premises licence. The 2003 Act requires that the council, after consultation, adopts and publishes a licensing policy, which is reviewed every five years. The council will apply the policy when making decisions on applications made under the Act. However each individual application must still be treated on its own merits and proper consideration must be given to each individual application.

The policy must be reviewed and ratified by Full Council by November 2025. This Statement of Licensing Policy has been prepared in accordance with the provisions of the Licensing Act and the published guidelines made under Section 182 of the Act. The policy has, as required by legislation, be consulted on and reviewed. The new guidelines issued by the Secretary of State have also been taken into account.

The new Statement of Licensing Policy will have some level of impact for: public services, particularly those with an enforcement role; residents, particularly those that live near areas with alcohol-related or late night economy impacts; and the owners, operators, staff and customers of premises licensed to sell alcohol. The Statement of Licensing Policy may also have some impact on individuals who suffer alcohol-related harms, and their families and communities.

It is unlikely that the new Statement of Licensing Policy will have any impact on the equalities of the protected characteristics. The application of the Statement of Licensing Policy is universally applied to all residents, visitors and businesses in Haringey regardless of the protected characteristics. The Statement of Licensing Policy does provide a policy framework for the application of the Licensing Act 2003 which includes a restriction on any sales of alcohol to those under the age of 18 years old.

The evidence of impact only relates to age, the legislation underlying the SOLP has a restriction on the sale of alcohol to only those 18 years old and over. There is a body of research evidence that indicates that people under the age of 18 are more at risk of harms form alcohol purchase and consumption than those over the age of 18. As such the restriction is justified on these grounds and is the UK law.

The policy states the general principles that the council will take into account when determining each licence application on its own merits.



The Licensing Authority may depart from its own policy if the individual merits of the application warrant such a departure. In such circumstances the Licensing Authority must be able to justify its decision should there be a challenge.

The Licensing Act 2003 requires that we carry out our various licensing functions so as to promote the four licensing objectives:

- The prevention of crime and disorder.
- Public safety.
- The prevention of public nuisance.
- The protection of children from harm.

#### The main stakeholders are:

- Entertainment and leisure businesses have enjoyed a liberalisation of the laws and regulation that relates to licensable activity. The general business community have enjoyed having longer opening hours. A more liberal opening regime is considered by some to be a driver for expanding the economy and therefore, there will be prospect of more regeneration for the borough and more jobs. There will also be the prospect of generally increasing the quality of life by the provision of a more diverse and accessible entertainment's sector in the borough.
- Local residents would be concerned at the possible increase in anti-social behaviour and the increase in noise and nuisance and the detrimental effect it may have on their quality of life. The revised policy is intended to help empower local residents and businesses by raising awareness of the statutory consultation timeframes and how they can participate in the decision making process.
- The various responsible authorities, who look to the policy as a source of reference to help them achieve the licensing objectives.

The aim of the policy has got to be the delivery of a compromise that will help deliver a more diverse entertainment environment with the economic and accessible benefits it may deliver, but not at the expense of local residents and other stakeholders who would not want their quality of life affected

Links and impact on other services, strategies, functions, or procedures. The policy sets out those areas where it will interact with other policy areas, accepting the need to avoid duplication. It is noted that any action must have regard to the Licensing Objectives and must not be ultra vires under the Licensing Act 2003. Local aims and objectives that policy may assist with:

• Provide a safe environment for people to enjoy.



- To broaden the appeal of the late night economy
- To create an environment that attracts appropriate investment and allows responsible businesses to thrive and grow.
- To tackle alcohol related harm and to promote health and wellbeing.
- To address any negative perceptions in areas of the borough and to encourage people to work together to deliver real change.
- To give people a voice in decisions that affect them.
- To promote equality, diversity, and inclusion.

The aims are consistent with the general duties under the Equality Act to eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity and to foster good relations. A safer, welcoming borough and time economy with a broader appeal would serve to promote equality particularly between those persons with protected characteristics.

No policy can undermine the right of an individual to have their application determined on its relative merits or to make relevant representations against an application. The policy is subject to further consultation. Any person aggrieved by a decision has the right of appeal.

The Statement of Licensing Policy has been refreshed and includes the following key updates:

- Updated wording on Haringey and the local economy/make-up of the borough.
- Updated wording on child exploitation in the policy.
- Removal of text which restates an existing statutory requirement from other legislation.
- A new section on protection against terrorist acts.
- Wording updated on recommended framework hours.
- Updated wording on public nuisance, including controlling noise break out and general nuisance.
- Inclusion of sexual harassment and gender based violence. Promotion of WAVE and ask for Angela schemes in the policy.
- Wording on environmental sustainability.

The majority of the matters listed above were already contained in the policy but have been refreshed to promote the Licensing Objectives and to uphold the principles of the Licensing Act 2003 at a local level.

The revised policy seeks to reflect changes in the national legislation, and associated guidance, and to more closely reflect the council's own vision and values.

Other changes are designed to promote a safe and welcoming offer and to create a sense of place, which should help to broaden the appeal of the borough as a whole.



It is a borough wide policy, all interested parties have the right to make representation on a licence application.

There are broadly two groups impacted by this policy – those applying for a license and people in the community impacted by the decisions made as a result of this policy.

No equalities data is collected from applicants for licenses as the majority of applications go through an E-Gov portal which does not require this information. **NB** the Council has no control on the questions asked on the application forms.

In terms of the impact on the community, the assessment is based on the extent to which the policy is able to meet its objectives of:

- The prevention of crime and disorder.
- Public safety.
- The prevention of public nuisance.
- The protection of children from harm.

# 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.

The consultation will be emailed out to:

- Local Residents and Tenants associations
- Responsible Authorities
- Local Businesses
- Religious bodies and organisations
- Relevant and associated business organisations
- Regeneration Team
- Parks Service
- Local holders of On & Off licences,
- Licence holders
- Local Councillors

Information will be provided in translated versions.

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

To be updated following consultation.

# 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: <a href="https://www.haringey.gov.uk/local-democracy/about-council/state-of-the-borough">https://www.haringey.gov.uk/local-democracy/about-council/state-of-the-borough</a>.

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%)

# **Target Population Profile**

This is a borough-wide proposal; therefore the target population profile is identical to the borough profile.

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

- Residents Survey 2021
- Corporate Plan EQIA
- Police Crime Reports

# 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 as a result of a need related to their protected characteristic?

Haringey has a relatively young population with a quarter of the population under the age of 20, and 91% of the population aged under 65 (89% London and 83% England).

The largest age group of victims of crime were between 25 and 34 years, forming 28% of all victims (13% female, 15% male). 35 to 44 year olds were the second largest group, followed by 16 to 24 year olds. Younger residents appear to be overrepresented among victims of crime.

<sup>&</sup>lt;sup>1</sup> Census, 2021 – <u>Population and household estimates, England and Wales - Office for National Statistics (ons.gov.uk)</u>



The largest group of suspects of crime in Haringey in 2017/18 were described as being aged between 16 and 24 years old, forming almost 1 in 3 of all suspects. The next largest suspect group was described as being aged between 25 and 34 years old (28%), followed by 35 to 44 year olds (17%).

# **Potential Impacts**

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

A specific aim of the policy is the protection of children from harm. The Act prohibits the sale of alcohol to those under 18 but does allow under 18's to enter licensed premises, although this is at the discretion of the management. Haringey Trading Standards carry out regular test purchasing operations designed to detect under age sales of alcohol to children. The new policy is tighter on actions following such sales, with those responsible now facing action after just one failure, as opposed to three currently. A significant proportion of new licences have conditions attached requiring licence holders to have a 'challenge 25' policy where those who look under 25 are asked for photo ID before a sale can be made.

There are no known differences for applicants.

The policy seeks to promote the licensing objectives under the Licensing Act 2003, which includes the Protection of Children from Harm. Section 5 of the policy seeks to introduce appropriate measures to promote this objective at a local level and to strengthen links to safeguarding. The promotion of a safe night time offer will help to protect all users from alcohol related crime and disorder and encourage a wider age range to enjoy a night out in a safe and responsible way. The overall impact on residents of all ages is positive.

Young people are over represented in Haringey and are over represented as victims of crime. A specific aim of the policy is to protect children from harm. Therefore this will be positive for younger people.

Fear of crime is disproportionately high among older people. Should the policy achieve its objectives to prevent crime and disorder and public safety, older people will also be positively impacted.

# 4b. Disability Data

# **Borough Profile**

- Disabled under Equality Act 13.7%<sup>2</sup>
  - Day to day activities limited a lot 6.1%
  - Day to day activities limited a little 7.5%

<sup>&</sup>lt;sup>2</sup> Census, 2021 – Disability, England and Wales - Office for National Statistics (ons.gov.uk)



- 7.5% of residents people diagnosed with depression<sup>3</sup>
- 1.7% of residents diagnosed with a severe mental illness<sup>4</sup>
- 0.4% of people in Haringey have a learning disability<sup>5</sup>

# **Target Population Profile**

This is a borough-wide proposal; therefore the target population profile is identical to the borough profile.

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

- Residents Survey 2021
- Corporate Plan EQIA
- Police Crime Reports

# 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?

There is no universal definition of disability. Here we use the Census data on long term health problem or disability and self-reported health as proxies. This shows that 14% of residents have a long term health problem that limits their day to day activity, lower than England but in line with London.

Some individuals are specifically targeted as victims of crime on the basis of prejudice relating to disability. In the year to December 2017 Haringey recorded 14 instances of disability hate crime.

Fear of crime is higher among residents with long-term illnesses and disabilities. Perceptions of safety after dark for these Haringey residents stand at 49% compared to the Haringey average of 69%.

# **Potential Impacts**

<sup>&</sup>lt;sup>3</sup> NHS Quality Outcomes Framework – <u>Prevalence of diagnosed depression among GP registered population age</u> 18+

<sup>&</sup>lt;sup>4</sup> NHS Quality Outcomes Framework – <u>Prevalence of diagnosed mental health diagnosis among GP registered population age 18+</u>

<sup>&</sup>lt;sup>5</sup> PHE Learning disability profiles – <a href="https://fingertips.phe.org.uk/learning-disabilities#page/0/gid/1938132702/pat/6/par/E12000007/ati/102/are/E09000014">https://fingertips.phe.org.uk/learning-disabilities#page/0/gid/1938132702/pat/6/par/E12000007/ati/102/are/E09000014</a>



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

There are no known differences for applicants.

The policy must be consistent with the Licensing Act 2003, and it does not override the primary legislation or the Equality Act 2010. Each case must be considered on its relative merits. It does not discriminate on the grounds of disability. Licensed premises should comply with the Equality Act 2010. Premises should seek to promote accessibility and inclusion. The prevention of crime is one of the Licensing Objectives. Licensed premises should make reasonable adjustments.

We have data on crime against disabled people which is evidence that disabled people have a high fear of crime. Should the policy achieve its objectives to prevent crime and disorder and public safety, it will have a positive impact on disabled people.

# 4c. Gender Reassignment

#### Data

# Borough Profile<sup>6</sup>

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

# **Target Population Profile**

This is a borough-wide proposal; therefore the target population profile is identical to the borough profile.

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

- Residents Survey 2021
- Corporate Plan EQIA
- Police Crime Reports

#### 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?

<sup>&</sup>lt;sup>6</sup> Census, 2021 – Gender identity, England and Wales - Office for National Statistics (ons.gov.uk)



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

There is very little robust data on Haringey or the UK's trans population. However it is estimated that there are between 200,000 and 500,000 people who identify as trans in the UK.

Some groups are specifically targeted as victims of crime on the basis of prejudice relating to gender reassignment. The council does not have local data regarding victimisation based on this protected characteristic or the level of fear of crime among individuals who identify as a different gender to the one they were assigned at birth.

# **Potential Impacts**

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

There are no known differences for applicants.

The policy must be consistent with the Licensing Act 2003, and it does not override the primary legislation or the Equality Act 2010. Each case must be considered on its relative merits. It does not discriminate on the grounds of gender reassignment. Licensed premises should comply with the Equality Act 2010. Premises should seek to promote accessibility and inclusion.

Unknown impact – We do not have local data regarding transphobic hate crime, but it is reasonable to believe that it does occur locally. However, the scale to which this policy can reasonably be expected to improve safety or reduce crime against this group is unknown.

# 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 7

- 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%%)

<sup>&</sup>lt;sup>7</sup> Census, 2021 – <u>Marriage and civil partnership status in England and Wales - Office for National Statistics</u> (ons.gov.uk)



- 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**

This is a borough-wide proposal; therefore the target population profile is identical to the borough profile.

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

- Residents Survey 2021
- Corporate Plan EQIA
- Police Crime Reports

# 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?

Haringey has a higher proportion of couples in a registered same sex civil partnership than England and London. 0.6% (or 1,191 residents), compared to 0.2% for England and 0.4% for London.

The council does not have local data regarding levels of victimisation or fear of crime among individuals who are married or in a civil partnership.

# **Potential Impacts**

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

There are no known differences for applicants.

No anticipated impact – The policy must be consistent with the Licensing Act 2003, and it does not override the primary legislation or the Equality Act 2010. Each case must be considered on its relative merits. It does not discriminate on the grounds of marital status. Licensed premises should comply with the Equality Act 2010.

# 4e. Pregnancy and Maternity

# Note8:

Pregnancy is the condition of being pregnant or expecting a baby.

<sup>&</sup>lt;sup>8</sup> Equality and Human Rights Commission, 2022 – Pregnancy and maternity discrimination.



 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**

This is a borough-wide proposal; therefore the target population profile is identical to the borough profile.

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

- Residents Survey 2021
- Corporate Plan EQIA
- Police Crime Reports

# 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 council does not have local data regarding victimisation based on this protected characteristic or the level of fear of crime among individuals who are pregnant or care for small children.

# **Potential Impacts**

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

There are no known differences for applicants.

No anticipated impact – The policy must be consistent with the Licensing Act 2003, and it does not override the primary legislation or the Equality Act 2010. Each case must be considered on its relative merits. It does not discriminate on the grounds of

<sup>&</sup>lt;sup>9</sup> Births by Borough (ONS)



pregnancy and maternity. The policy seeks to broaden the offer of family friendly premises in the borough.

# 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.<sup>10</sup>

#### **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%

# <u>White:</u> **57.0% in total**

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

• Irish: 2.2%

Gypsy or Irish Traveller: 0.1%

• Roma: 0.8%

• Other White: 22.1%

# **Target Population Profile**

This is a borough-wide proposal; therefore the target population profile is identical to the borough profile.

<sup>&</sup>lt;sup>10</sup> Race discrimination | Equality and Human Rights Commission (equalityhumanrights.com)

<sup>&</sup>lt;sup>11</sup> Census 2021 - Ethnic group, England and Wales - Office for National Statistics (ons.gov.uk)



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

- Residents Survey 2021
- Corporate Plan EQIA
- Police Crime Reports

# 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?

Haringey is the 5th most ethnically diverse borough in the country. Over 65% of residents come from non-White British communities, compared to 20% in England and 55% in London.

Some groups are specifically targeted as victims of crime on the basis of prejudice relating to race. Haringey recorded 970 hate crimes during 1st February 2023 - 31st January 2024.

According to police categorisations, the most common ethnicity of victims is White North European (IC1), forming 46% of all victims. This is followed by Black (IC3) victims (27%) and White South European (IC2) (16%). This indicates that Black residents are over-represented among victims, relative to the proportion of Black Haringey residents (19%).

Fear of crime is highest among residents from White Other, Asian, and Black communities, with perceptions of safety after dark ranging from 62 to 64% compared to a Haringey average of 69%.

While we do not hold data on the race and ethnicity of applicants for licenses, the data shows that some groups are disproportionately represented in the criminal justice system. Young black African and Afro-Caribbean men are particularly likely to be overrepresented in our criminal justice system. Therefore, the restrictions around obtaining a license when you have a criminal convection is more likely to impact African and Afro-Caribbean men. It is important to also note that the Council is now legally obliged to carry out immigrant checks on applicants. Immigrants are disproportionately from ethnic minority backgrounds. This disproportionate impact is only likely to be relevant in a small number of cases. For example, no applicant has been turned down to date on immigration grounds.

# **Potential Impacts**



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

The policy must be consistent with the Licensing Act 2003, and it does not override the primary legislation or the Equality Act 2010. Each case must be considered on its relative merits. It does not discriminate on the grounds of race.

Haringey is highly diverse. Black residents are over-represented among victims of crime and fear of crime is highest among residents from White Other, Asian and Black communities. Should the policy achieve its objects to prevent crime and disorder and public safety, residents from ethnic minority backgrounds will be positively impacted. Ethnic minority background applicants may be negatively impacted based on their immigration status or criminal record. However, this is only likely to impact on a very small number of people and it can be reasonably expected that this will be outweighed by the positive benefits as referenced above.

# 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%

# **Target Population Profile**

This is a borough-wide proposal; therefore the target population profile is identical to the borough profile.

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

- Residents Survey 2021
- Corporate Plan EQIA
- Police Crime Reports

# Detail the findings of the data.

<sup>&</sup>lt;sup>12</sup> Census, 2021 – Religion, England and Wales - Office for National Statistics (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?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

Haringey is one of the most religiously diverse places in the UK. The most common religion was Christianity, accounting for 45% of residents, less than London (48.4) and less than England (59.4%). The next most common religions were Muslim (14.3%) – higher than London (12.3%) - and Jewish (3%). Haringey had a lower percentage of residents who were Hindu (1.8%) and Sikh (0.3%) than London (5.0% and 1.5%, respectively). A quarter of Haringey residents stated that they did not have a religion, higher than London (20.7%).

Some groups are specifically targeted as victims of crime on the basis of prejudice relating to religion. Haringey recorded 970 hate crimes during 1st February 2023 - 31st January 2024. The overall total for hate crime has increased by 23% when comparing to the previous 12-months (787).

# **Potential Impacts**

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

There are no known differences for applicants.

The policy must be consistent with the Licensing Act 2003, and it does not override the primary legislation or the Equality Act 2010. Each case must be considered on its relative merits. It does not discriminate on the grounds of religion, although some religions or faiths may not support the sale of alcohol as a licensable activity.

We have data on crime against people based on their religion which is evidence that minority religious groups have a high fear of crime. Should the policy achieve its objects to prevent crime and disorder and public safety, residents from religious minority groups will be positively impacted.

4h. Sex

Data

Borough profile 13

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

#### **Target Population Profile**

This is a borough-wide proposal; therefore the target population profile is identical to the borough profile.

<sup>&</sup>lt;sup>13</sup> Census 2021 – Gender identity: age and sex, England and Wales - Office for National Statistics (ons.gov.uk)



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

- Residents Survey 2021
- Corporate Plan EQIA
- Police Crime Reports

# 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?

There is a relatively equal gender split in Haringey, just over half of the population is female (50.5%), in line with England and London.

Women comprise 47% of victims of all crime in Haringey and 17% of suspects, indicating under representation relative to the borough population, although this varies by nature of crime (with women overrepresented as victims of crimes such as sexual offences and domestic violence).

# **Potential Impacts**

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

There are no known differences for applicants.

The policy must be consistent with the Licensing Act 2003, and it does not override the primary legislation or the Equality Act 2010. Each case must be considered on its merits.

Overall, males are more likely to be the victims of crime and females are more likely to have a fear of crime. Should the policy achieve its objects to prevent crime and disorder and public safety, both groups will be positively impacted.

# 4i. Sexual Orientation

# Data

Borough profile 14

Straight or heterosexual: 83.4%

Gay or Lesbian: 2.7%

• Bisexual: 2.1%

<sup>&</sup>lt;sup>14</sup> Census, 2021 – <u>Sexual orientation, England and Wales - Office for National Statistics (ons.gov.uk)</u>



• All other sexual orientations: 0.8%

Not answered: 11.0%

# **Target Population Profile**

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

- Residents Survey 2021
- Corporate Plan EQIA
- Police Crime Reports

# Detail the findings of the data.

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3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013. In Haringey this equates to 6,491 residents.

Some groups are specifically targeted as victims of crime on the basis of prejudice relating to sexual orientation. In the year to December 2017, Haringey recorded 94 instances of homophobic hate crime.

There is no specific information on the proportion of users of licensed premises, further information could be sought as part of the consultation on the Statement of Licensing Policy

# **Potential Impacts**

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

There are no known differences for applicants.

The policy must be consistent with the Licensing Act 2003, and it does not override the primary legislation or the Equality Act 2010. Each case must be considered on its merits. There are no known premises advertising as LGBTQ+ venues.



We have data on crime against LGBTQ+ people which is evidence that LGBTQ+ people have a high fear of crime. Should the policy achieve its objectives to prevent crime and disorder and public safety, it will have a positive impact on LGBTQ+ people.

# 4j. Socioeconomic Status

# Data - Corporate Plan Borough profile - State of the Borough Income

- 6.9% of the population of Haringey were claiming unemployment benefit as of April 2023<sup>15</sup>
- 19.6% of residents were claiming Universal Credit as of March 2023<sup>16</sup>
- 29.3% of jobs in Haringey are paid below the London Living Wage<sup>17</sup>

#### **Educational Attainment**

- Haringey ranks 25<sup>th</sup> out of 32 in London for GCSE attainment (% of pupils achieving strong 9-5 pass in English and Maths)<sup>18</sup>
- 3.7% of Haringey's working age population had no qualifications as of 2021<sup>19</sup>
- 5.0% were qualified to level one only<sup>20</sup>

# **Area Deprivation**

Haringey is the 4<sup>th</sup> most deprived in London as measured by the IMD score 2019. The most deprived LSOAs (Lower Super Output Areas, or small neighbourhood areas) are more heavily concentrated in the east of the borough, where more than half of the LSOAs fall into the 20% most deprived in the country.<sup>21</sup>

# **Target Population Profile**

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

# Consultation is open to the public.

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?

<sup>&</sup>lt;sup>15</sup> ONS - ONS Claimant Count

<sup>&</sup>lt;sup>16</sup> DWP, StatXplore - Universal Credit statistics, 29 April 2013 to 9 March 2023 - GOV.UK (www.gov.uk)

<sup>&</sup>lt;sup>17</sup> ONS – Annual Survey of Hours and Earnings (ASHE) - Estimates of the number and proportion of employee jobs with hourly pay below the living wage, by work geography, local authority and parliamentary constituency. UK, April 2017 and April 2018 - Office for National Statistics

<sup>18</sup> DfE - GCSE attainment and progress 8 scores

<sup>19</sup> LG Inform – Data and reports | LG Inform (local.gov.uk)

<sup>&</sup>lt;sup>20</sup> LG Inform – Data and reports | LG Inform (local.gov.uk)

<sup>&</sup>lt;sup>21</sup> IMD 2019 – English indices of deprivation 2019 - GOV.UK (www.gov.uk)



# No impact.

# **Potential Impacts**

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

No negative impacts.

# **5. Key Impacts Summary**

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

The principal conclusion of this EQIA is that there is no anticipated negative impact on any characteristic, and potential positive impacts as a result of the policy on sex, age, race and ethnicity. This will be tested during consultation.

This EQIA will be updated following the public consultation to address any impacts on protected characteristics that emerge during this process.

# 5b. Intersectionality

- Many proposals will predominantly impact individuals who have more than one protected characteristic, thereby transforming the impact of the decision.
- This section is about applying a systemic analysis to the impact of the decision and ensuring protected characteristics are not considered in isolation from the individuals who embody them.
- Please consider if there is an impact on one or more of the protected groups? Who are the groups and what is the impact?

#### None

# 5c. Data Gaps

Based on your data are there any relevant groups who have not yet been consulted or engaged? Please explain how you will address this

#### None

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

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

In your answer, please consider the following three questions:

- Could the proposal result in any direct/indirect discrimination for any group that shares the relevant protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a relevant protected characteristic and those who do not?



 Will the proposal help to foster good relations between groups who share a relevant protected characteristic and those who do not?

The principal conclusion of this EQIA is that there is no anticipated negative impact on any characteristic, and some positive impacts as a result of the policy on sex, age, race and ethnicity.

# 7. Amendments and mitigations

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

None.

Further information on responding to identified impacts is contained within accompanying EQIA guidance Please delete 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. 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/N** 

None.

**Adjust the proposal**: the EQIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> 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** 

None.

**Stop and remove the proposal**: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision. **Y/N** 

None.

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:

Consultation is open to the public.

Application processes are set in legislation and require applicants to be age 18 or above. No action required from the Council.



Lead officer: Daliah Barrett

Timescale: End July 2025

Please outline any areas you have identified where negative impacts will happen because of the proposal, but it is not possible to mitigate them.

Please provide a complete and honest justification on why it is not possible to mitigate the:

Consultation is open to the public.

Application processes are set in legislation and require applicants to be age 18 or above. No action required from the Council.

# 7. 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?

Information will be requested during the consultation process.

# Date of EQIA monitoring review:

October 2025

# 8. Authorisation

EQIA approved by (Director) Eubert Malcolm

Date 17<sup>th</sup> July 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.