

# **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: Tenancy Management Policy and

Tenancy Strategy

Service Area: Tenancy Management

Officer Completing Assessment: Max Tolley
Equalities Advisor: Guy Latham
Cabinet meeting date (if applicable): October 2025

Director/Assistant Director Neehara Wijeyesekera

# 2. Executive summary

The Tenancy Management Policy and Tenancy Strategy are being assessed under the same Equality Impact Assessment due to the similarities between both document and their joint focus on the management of social housing tenancies and tenancy sustainment in Haringey.

The main difference is that that the Tenancy Management Policy applies to Council tenants whereas the Tenancy Strategy sets out the matters that the Council, and other Registered Providers of social housing in the borough, are required to consider when developing or reviewing their own Tenancy Policies. The Tenancy Management Policy will be a new Council policy replacing and consolidating previous Homes for Haringey policies. It aims to outline the Council's approach to providing an efficient and effective tenancy management service which has tenancy



sustainment at its core. It details the types of tenancies offered and the approach to ending tenancy in circumstances such as eviction, surrender, death or abandonment.

The Tenancy Strategy sets out the matters that the Council, and other Registered Providers of Social Housing in the borough, are required to consider when developing or reviewing their own Tenancy Policies. Our previous strategy was last adopted in 2014, and the Localism Act 2011 requires a strategy to be in place. It aims to provide guidance and support to social housing providers in letting social housing, developing housing policies, and supporting residents to live independently and sustain their tenancies.

The policy makes the following changes which are likely to have the most positive impact on council tenants with the protected characteristics of age, disability and race because they might face less secure tenancies in other rental sectors:

- Confirms that the Council will offer secure lifetime tenancies to new council tenants (following a 12 month introductory period) impacts
- Uses the definition of a vulnerable person as anyone who currently
  experiences difficulties with everyday living; and, in order not to be
  disadvantaged by those difficulties, needs either additional support or service
  adaptation to access our landlord services, or additional support to sustain
  their tenancy.
- Details that home visits and welfare checks for Council tenants are carried out to assess all safeguarding risks
- Commits to updating tenant profile information and to discussing with tenants whether they have any vulnerabilities and seeking to identify suitable support needs if necessary.
- Confirms that the home visits will be used to identify any translation and interpretation requirements.

The policy links to and follows the approach in the Council's vulnerable tenants and leaseholders policy to supporting tenants and leaseholders. This confirms that the following common indicators of vulnerability help to inform our staff training and underpin assessment forms.

- age
- disability
- experience of care
- ability to act, engage and cope such as language skills
- addiction, and learning disability
- and exceptional life events such as a recent history of street homelessness, bereavement
- or discharge from hospital or other institutional care

The strategy is likely to have the most positive impact on council tenants with the protected characteristics of age, disability and race because they might face less secure tenancies in other rental sectors. This is because it:



- Recommends that Registered Providers follow the same principles above adopted by the Council's policy
- Including by issuing lifetime tenancies, supporting tenants by taking early action to address any concerns which could put their tenancy at risk
- Producing tenancy agreements that are accessible and available to tenants including vulnerable tenants.

Data from the 2021 Census data has been used to inform this EQIA in assessing how the proposed policy will affect people with protected characteristics amongst the Council's tenant population.

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

## 3. Consultation and engagement

<u>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.</u>

We engaged with Haringey residents through attending two meetings of the Tenancy Management Continuous Improvement Group near the start of the policy and strategy development process and towards the end. These sessions ensured that the views of a wide range of tenants including those with the protected characteristics of age, disability and race were represented in the policy and strategy development process.

For example, group members asked that the policy confirmed how the Council's housing teams would pick up if a person is vulnerable. Following this feedback, details were added confirming the four main ways in which the Council aim to become aware on a responsive basis that a resident is vulnerable or has a common indicator of vulnerability.

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

<u>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</u>



We attended meetings of the Council's Resident Voice Board on 20 June 2024 and the Council's Tenancy Management Continuous Improvement Group on 24 July 2024 and 27 November 2024. They told us that the policy should include coverage of the following points:

- How the Council's housing teams pick up if a person is vulnerable.
- Clarifying the Council's policy criteria for granting a new tenancy including in the sections on succession and exceptional circumstances.
- The policy approach when council housing was abandoned.
- How the council will respond when a young care leaver is not coping well during the first year of their tenancy.

A consultation on the policy and strategy was held between 25 June and 6 August 2025 on the <u>Council's online consultation platform</u>, <u>Commonplace</u>. This generated 443 visitors and 12 responses which included making the following points:

- Welcomed seeing the council clarifying its preference for lifetime tenancies in the Tenancy Strategy.
- Unhappy at delays to the major works at Stellar House
- A lot of residents don't follow their tenancy agreements e.g. throwing rubbish, nappies and general waste from out of their windows
- Wanted the Council to do more to prevent homelessness and on security measures
- Suggested that ASB should be fully addressed in a strategy.

# 4. Data and Impact Analysis

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

## 4a. Age

#### Data

### Borough Profile<sup>1</sup>

54,422: 0-17 (21%)

• 71,660: 18-34 (27%)

• 63,930: 35-49 (24%)

46,516: 50-64 (18%)

• 27,706: 65+ (10%)

## **Local Authority Social Rented Tenant Population Profile<sup>2</sup>**

0 - 15: 7963 (20%)
16 - 24: 6120 (16%)

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

 $<sup>^2 \, \</sup>text{Census}, \, 2021 - \underline{\text{Custom dataset: https://www.ons.gov.uk/datasets/create/filter-outputs/aae4d546-9260-4541-aea9-870a8da7536d\#get-data}\\$ 



25 - 34: 5000 (13%)
35 - 49: 6773 (17%)
50 - 64: 8365 (21%)
65+: 4745 (12%)

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

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

#### Detail the findings of the data

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?

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

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

Our new Council tenants are offered an introductory tenancy for a trial period of 12 months before they become secure tenants. This may disproportionately impact upon younger people who are less likely to have previously held a tenancy compared to older people who are more likely to have held a tenancy before.

This includes younger people who may be holding their first tenancy and their first experience of keeping to the terms in a tenancy agreement.

The impact is marginal because after 12 months the tenancy will automatically become a secure tenancy unless the Council take action to end or extend the introductory tenancy. The Council will only do this if the tenant breaches their tenancy agreement.

#### **Impact**

Positive impact.

The approach in the Tenancy Management Policy to offer secure lifetime tenancies to new council tenants (following a 12 month introductory period) impacts on residents of all ages but especially benefits young and older tenants that might face less secure tenancies in other rental sectors. Our focus is on providing the security and peace of mind we know that tenants want to support them with building a long-



term future within their communities without having to undergo the uncertainty of a tenancy review at the end of a fixed-term tenancy.

The policy confirms the focus is on supporting all tenants to sustain their tenancies and to successfully conclude their introductory tenancy. To support new tenants, sustain their tenancies, the policy confirms the Council will aim to undertake a new tenancy check at 6 weeks following the tenancy start date, and then undertake tenancy reviews at 6 months, 9 months and 12 months prior to an introductory tenancy coming to an end.

The Tenancy Strategy should also have a positive impact by recommending that Registered Providers support tenants to sustain their tenancies by taking early action to address any concerns which could put their tenancy at risk and recommending that Registered Providers issue lifetime tenancies instead of fixed-term tenancies for all new tenants.

# 4b. Disability

#### Data

#### **Borough Profile**

- Disabled under Equality Act 13.7%<sup>3</sup>
  - 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 depression<sup>4</sup>
- 1.7% of residents diagnosed with a severe mental illness<sup>5</sup>
- 0.4% of people in Haringey have a learning disability<sup>6</sup>

# Local Authority Social Rented Tenant Population Profile 7

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

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

2021 Census data has been used to identify the prevalence of disabilities in the tenant population. Data that splits Local Authority social rented households from other Housing Association or Registered Provider social rented households is not available.

#### Detail the findings of the data

<sup>&</sup>lt;sup>3</sup> Census, 2021 – <u>Disability, England and Wales - Office for National Statistics (ons.gov.uk)</u>

<sup>&</sup>lt;sup>4</sup> NHS Quality Outcomes Framework – <u>Prevalence of diagnosed depression among GP registered population age</u>

<sup>&</sup>lt;sup>5</sup> NHS Quality Outcomes Framework – <u>Prevalence of diagnosed mental health diagnosis among GP registered</u> population age 18+

<sup>&</sup>lt;sup>6</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>

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



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?

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

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

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

#### **Potential Impacts**

Positive impact.

By confirming that a welfare check will be carried out as part of the home visits to tenants, the policy should positively impact disabled tenants by assessing all likely safeguarding risks. The policy confirms that this includes assessing for any abuse, neglect, self-neglect and hoarding, cuckooing or whether specialist support is needed such as an assessment of mental capacity.

The policy also confirms that the home visit is used to discuss with tenants if they have any vulnerabilities including disabilities that the Council is not already aware of, seek to identify suitable support needs and update tenant profile information, where needed.

The tenancy strategy recommends that Registered Providers support tenants to sustain their tenancies by taking early action to address any issues or concerns as above, which could put their tenancy at risk.

# 4c. Gender Reassignment

#### Data

### Borough Profile<sup>8</sup>

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

# Social Rented Tenants Population Profile 9

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

<sup>&</sup>lt;sup>8</sup> Census, 2021 – Gender identity, England and Wales - Office for National Statistics (ons.gov.uk)

<sup>&</sup>lt;sup>9</sup> Census, 2021 – Gender Identity by Tenure – Office for National Statistics (on.gov.uk)



Trans man - 0.22%

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

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

#### Detail the findings of the data

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

### **Potential Impacts**

Positive impact

The policy outlines that a welfare check will seek to identify and meet any specialist support needs that tenants have, and the strategy recommends that Registered Providers support tenants to sustain their tenancies by taking early action to address any issues or concerns.

# 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 10

- Divorced or formerly in a same-sex civil partnership which is now legally dissolved: (9.9%)
- Married or registered civil partnership: (35.8%)
- Separated (but still legally married or still legally in a same-sex civil partnership):
   (2.9%%)
- Single (never married or never registered a same-sex civil partnership): (45.3%)
- Widowed or surviving partner from a same-sex civil partnership: (6.1%)

## Local Authority Social Rented Tenant Population Profile 11

- Divorced or formerly in a same-sex civil partnership which is now legally dissolved: 3602 (9.2%)
- Married or registered civil partnership: 7519 (19.3%)

<sup>&</sup>lt;sup>10</sup> Census, 2021 – <u>Marriage and civil partnership status in England and Wales - Office for National Statistics (ons.gov.uk)</u>

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



- Separated, but still legally married or still legally in a same-sex civil partnership: 1349 (3.5%)
- Single, never married or never registered a same-sex civil partnership: 17033 (43.7%)
- Widowed or surviving partner from a same-sex civil partnership: 1501 (3.9%)
- Does not apply: 7963 (20.4%)

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

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

### Detail the findings of the data

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

#### **Potential Impacts**

No impact identified.

Both the Tenancy Strategy and the Tenancy Management Policy apply equally to all tenants, irrespective of marital or partnership status. The documents explicitly recognise and uphold the rights of spouses and civil partners, particularly in relation to succession and assignment of tenancies, in accordance with the Equality Act 2010 and other relevant legislation. There are no provisions that differentiate or disadvantage individuals based on their marital or civil partnership status, and the policies are written and implemented in a neutral and inclusive manner.

# 4e. Pregnancy and Maternity

#### Note<sup>12</sup>:

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

#### Data

### Borough Profile 13

Live Births in Haringey 2021: 3,376

#### **Target Population Profile**

<sup>&</sup>lt;sup>12</sup> Equality and Human Rights Commission, 2022 – <u>Pregnancy and maternity discrimination</u>.

<sup>&</sup>lt;sup>13</sup> Births by Borough (ONS)



The council does not hold data on pregnancy and maternity among its tenants, from other Housing Association or Registered Provider social rented households.

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

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

#### Detail the findings of the data.

N/A

### **Potential Impacts**

No impact identified.

The Tenancy Strategy and Tenancy Management Policy apply equally to all tenants and do not contain any provisions that disadvantage individuals on the basis of pregnancy or maternity.

#### 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>14</sup>

#### **Data**

## Borough Profile 15

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%

<sup>&</sup>lt;sup>14</sup> Race discrimination | Equality and Human Rights Commission (equalityhumanrights.com)

<sup>&</sup>lt;sup>15</sup> Census 2021 - Ethnic group, England and Wales - Office for National Statistics (ons.gov.uk)



• Other Mixed: 2.5%

#### White: 57.0% in total

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

• Irish: 2.2%

• Gypsy or Irish Traveller: 0.1%

• Roma: 0.8%

• Other White: 22.1%

### Local Authority Social Rented Tenant Population Profile 16

### Asian: 9.1%

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

#### Black: 39.6%

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

#### Mixed: 6.8%

• White and Asian: 0.6%

White and Black African: 1.2%White and Black Caribbean: 2.7%

• Other Mixed: 2.3%

#### White: 31.0%

English/Welsh/Scottish/Norther Irish/British: 18.8%

• Irish: 1.6%

Gypsy or Irish Traveller: 0.1%

• Roma: 0.2%

Other White: 10.4%

#### Other Ethnic Group: 13.4%

Arab: 1.7%

• Any other ethnic group: 11.7%

<sup>&</sup>lt;sup>16</sup> Census 2021 – <u>Custom dataset: https://www.ons.gov.uk/datasets/create/filter-outputs/d44a7d29-fc6f-4c90-b4d0-1f38b22ada43#get-data</u>



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

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

### **Detail the findings of the data**

Haringey Council's tenant population has a significantly higher proportion of individuals who identify as Black, and slightly higher proportion of individual who identify as Asian or another ethnic group in the dataset above than what is observed in the wider borough population. There is a significantly lower proportion of tenants who identify as White than the wider borough population. Some tenants of a different nationality do not speak, read or write English as their first language and may face difficulties in reporting tenancy issues.

#### **Potential Impacts**

Positive impact.

The data from the Council's Translation and Interpretation policy shows that people from different races and ethnic groups may have lower levels of English proficiency as outlined in the policy. This policy will positively impact those who have English as an additional language by committing to identify any translation and interpretation requirements, thereby improving access to housing services.

In addition, the policy's focus on tenancy sustainment, preventing homelessness and supporting vulnerable tenants is likely to benefit ethnic minority groups who are often overrepresented in housing need. The inclusion of clear, fair procedures for tenancy decisions and appeals also helps to ensure equitable treatment and reduce the risk of discrimination.

# 4g. Religion or belief

#### Data

### Borough Profile 17

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%

<sup>&</sup>lt;sup>17</sup> Census, 2021 – Religion, England and Wales - Office for National Statistics (ons.gov.uk)



## Local Authority Social Rented Tenant Population Profile 18

Christian: 42.4%
Buddhist: 1.1%
Hindu: 0.6%
Jewish: 0.4%
Muslim: 25.9%
No religion: 16.7%
Other religion: 5.3%

Religion not stated: 7.4%

• Sikh: 0.2%

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

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

#### Detail the findings of the data

Haringey Council's tenant population has a significantly higher proportion of individuals who identify as Muslim, and slightly higher proportion of individual who identify as Christian, Buddhist or another religion than what is observed in the wider borough population. This is a significantly lower proportion of tenants who don't associate with any religion or identify as Jewish, Hindu or Sikh.

#### **Potential Impacts**

No impact identified.

The policy and strategy are applied equally to all tenants regardless of their faith or belief system and contain no provisions that would disadvantage individuals based on religious practices or requirements. Tenants are supported in a way that respects individual needs and circumstances.

# 4h. Sex

Data

Borough profile 19

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

<sup>&</sup>lt;sup>18</sup> Census 2021 – <u>Custom dataset: https://www.ons.gov.uk/datasets/create/filter-outputs/3f832a2b-5432-443e-8926-7e0d92e3cc03#get-data</u>

<sup>&</sup>lt;sup>19</sup> Census 2021 – Gender identity: age and sex, England and Wales - Office for National Statistics (ons.gov.uk)



## Local Authority Social Rented Tenant Population<sup>20</sup>

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

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

2021 Census data has been used to identify the distribution of sex in the tenant population. Data that splits Local Authority social rented households from other Housing Association or Registered Provider social rented households is not available.

#### Detail the findings of the data

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

### **Potential Impacts**

No impact identified.

The policies are applied equally to all tenants regardless of sex and contain no provisions that differentiate or disadvantage individuals based on whether they are male or female. Support is provided based on individual needs and circumstances, ensuring fair and equitable treatment for all.

#### 4i. Sexual Orientation

#### Data

#### Borough profile 21

Straight or heterosexual: 83.4%

Gay or Lesbian: 2.7%

Bisexual: 2.1%

All other sexual orientations: 0.8%

Not answered: 11.0%

# Local Authority Social Rented Tenant Population Profile <sup>22</sup>

Straight or heterosexual: 86.5%

Gay or Lesbian: 1.2%

• Bisexual: 0.9%

All other sexual orientations: 0.5%

Not answered: 11.0%

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

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

<sup>&</sup>lt;sup>21</sup> Census, 2021 – Sexual orientation, England and Wales - Office for National Statistics (ons.gov.uk)

<sup>&</sup>lt;sup>22</sup> Census 2021 – Sexual Identity by Tenure – Office for National Statistics (ons.gov.uk)



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

### Detail the findings of the data

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

#### **Potential Impacts**

No impact identified.

The policies are applied equally to all tenants regardless of their sexual orientation and contain no provisions that differentiate or disadvantage individuals based on this characteristic. The Council's approach to tenancy management is inclusive and based on individual needs, ensuring fair and respectful treatment for all tenants.

## 4j. Socioeconomic Status

**Data** 

#### **Borough profile**

#### Income

- 6.9% of the population of Haringey were claiming unemployment benefit as of April 2023<sup>23</sup>
- 19.6% of residents were claiming Universal Credit as of March 2023<sup>24</sup>
- 29.3% of jobs in Haringey are paid below the London Living Wage<sup>25</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>26</sup>
- 3.7% of Haringey's working age population had no qualifications as of 2021<sup>27</sup>
- 5.0% were qualified to level one only<sup>28</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

<sup>&</sup>lt;sup>23</sup> ONS - ONS Claimant Count

<sup>&</sup>lt;sup>24</sup> DWP, StatXplore – Universal Credit statistics, 29 April 2013 to 9 March 2023 - GOV.UK (www.gov.uk)

<sup>&</sup>lt;sup>25</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>&</sup>lt;sup>26</sup> DfE – GCSE attainment and progress 8 scores

<sup>&</sup>lt;sup>27</sup> LG Inform – Data and reports | LG Inform (local.gov.uk)

<sup>&</sup>lt;sup>28</sup> LG Inform – Data and reports | LG Inform (local.gov.uk)



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>29</sup>

### **Local Authority Social Rented Tenant Population**

#### Income

- On Census Day 2021, 47.7% of Haringey Council tenants were not in employment.<sup>30</sup>
  - Of these, 48.7% had never worked, 40.0% had not worked in the last 12 months, and 11.4% had worked in the last 12 months.

#### **Educational Attainment**

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

## Household Deprivation<sup>32</sup> 33

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

Household is deprived in the education dimension: 31.95%
Household is deprived in the employment dimension: 31.83%

Household is deprived in the health and disability dimension: 47.27%

Household is deprived in the housing dimension:
 28.38%

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

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

#### Detail the findings of the data

Haringey Council's tenant population has a significantly higher proportion of residents who:

<sup>&</sup>lt;sup>29</sup> IMD 2019 – English indices of deprivation 2019 - GOV.UK (www.gov.uk)

<sup>&</sup>lt;sup>30</sup> Census 2021 – <u>Custom Dataset: https://www.ons.gov.uk/datasets/create/filter-outputs/89fb7f4d-a003-4946-815a-5ee3f1688fac#get-data</u>

<sup>&</sup>lt;sup>31</sup> Census 2021 – <u>Custom Dataset: https://www.ons.gov.uk/datasets/create/filter-outputs/a344970f-c34f-44d2-a7f3-ca342af8cacf#get-data</u>

<sup>&</sup>lt;sup>32</sup> Census 2021 – <u>Custom Dataset: https://www.ons.gov.uk/datasets/create/filter-outputs/b517d031-1601-4ea9-926a-0a87cc896427#get-data</u>

<sup>&</sup>lt;sup>33</sup> Census 2021 – <u>Custom Dataset:</u> <a href="https://www.ons.gov.uk/datasets/create/filter-outputs/44b7fcd4-a533-43da-a430-c7761c1d00f6#get-data">https://www.ons.gov.uk/datasets/create/filter-outputs/44b7fcd4-a533-43da-a430-c7761c1d00f6#get-data</a>



- Are long-term unemployed than what is observed in the wider borough population.
- Do not hold any formal educational qualifications than what is observed in the wider borough population.
- Have significantly higher levels of household deprivation than what is observed in the wider borough population.

### **Potential Impacts**

Positive impact.

The policy will apply to all tenants including those on a low income.

The policy is expected to have a positive impact on residents from more deprived socioeconomic backgrounds, who make up a significant proportion of Haringey Council's tenant population. The Tenancy Strategy and Tenancy Management Policy prioritise tenancy sustainment, early intervention and support for vulnerable tenants, which will help prevent evictions and promote housing stability. The commitment to lifetime tenancies, clear communication and accessible services ensures that tenants on low incomes or with limited formal education are supported to maintain their homes and access the help they need.

## **5. Key Impacts Summary**

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

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

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

#### **5b.** Intersectionality



We know that along with the local protected characteristic of socio-economic status, some our tenants may have more than one of the protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

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

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

#### 5c. Data Gaps

For the Tenancy Strategy, data that splits Local Authority social rented households from other Housing Association or Registered Provider social rented households is not available.

**6. Overall impact of the policy for the Public Sector Equality Duty** Summarise the key implications of the decision for people with protected characteristics.

The policy and strategy are anticipated to have a positive impact on the protected characteristics of age, disability and race. It will likely have a neutral impact on those with other protected characteristics.

The policy makes the following changes which are likely to have the most positive impact on council tenants with the protected characteristics of age, disability and race because they might face less secure tenancies in other rental sectors.

- Confirming that the Council will offer secure lifetime tenancies to new council tenants (following a 12 month introductory period) impacts
- Defining a vulnerable person as anyone who currently experiences difficulties
  with everyday living; and, in order not to be disadvantaged by those
  difficulties, needs either additional support or service adaptation to access our
  landlord services, or additional support to sustain their tenancy.
- Detailing that home visits and welfare checks for Council tenants are carried out to assess all safeguarding risks
- Commits to updating tenant profile information and to discussing with tenants whether they have any vulnerabilities and seeking to identify suitable support needs if necessary.
- The policy also notes that the home visits will be used to identify any translation and interpretation requirements.

The policy links to and follows the approach in the Council's vulnerable tenants and leaseholders policy to supporting tenants and leaseholders. This confirms that the



following common indicators of vulnerability help to inform our staff training and underpin assessment forms.

- age
- disability
- experience of care
- ability to act, engage and cope such as language skills
- addiction, and learning disability
- and exceptional life events such as a recent history of street homelessness, bereavement
- or discharge from hospital or other institutional care

The strategy recommends that Registered Providers follow the same principles above adopted by the Council's policy. This includes by issuing lifetime tenancies, supporting tenants by taking early action to address any concerns which could put their tenancy at risk and producing tenancy agreements that are accessible and available to tenants including vulnerable tenants.

# 7. Amendments and mitigations

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

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

**No major change to the proposal**: the EQIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them

Υ

**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

Ν

**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.



# 7b. What specific actions do you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty?

Action: The actions taken are explained throughout this EQIA, although no anticipated negative impacts were identified.

Lead officer: N/A

Timescale: N/A

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

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

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

No negative impacts have been identified in relation to any of the protected characteristics, and as such, no specific mitigations are required. Equalities considerations have been central to the development of both the Tenancy Strategy and Tenancy Management Policy, ensuring that the policies are inclusive, fair and accessible to all.

# 7. Ongoing monitoring

Council officers from Housing management teams will lead on the delivery of this policy which will include monitoring of the equalities impact of this policy, and they will monitor impact in the long-term.

The Tenancy Management Continuous Improvement Group will also be involved and asked for their feedback when the policy is reviewed in three years' time and strategy in four years' time unless earlier events or legislation require an earlier update to this policy.

Date of EQIA monitoring review: 29 May 2025

#### 8. Authorisation

EQIA approved by (Assistant Director/ Director) **xxx** 

Date xxx 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.