



Haringey Council

Equality Impact Assessment (EqIA) Name of Project

Local Lettings Policy for Ambrose Court and Mallory Court, Cannon Road, N17

**Cabinet meeting date
If applicable**

Cabinet Member Signing on 5 February 2015

Service area responsible

Chief Operating Officer

Name of completing officer

Perry Singh

Date EqIA created

20 January 2015

Approved by Director / Assistant Director

Date of approval

The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to:

- Eliminating discrimination, harassment and victimisation
- Advancing equality of opportunity
- Fostering good relations

In addition the Council complies with the Marriage (same sex couples) Act 2013.

Haringey Council also has a 'Specific Duty' to publish information about people affected by our policies and practices.

All assessments must be published on the Haringey equalities web pages. All Cabinet papers MUST include a link to the web page where this assessment will be published.

This Equality Impact Assessment provides evidence for meeting the Council's commitment to equality and the responsibilities outlined above, for more information about the Council's commitment to equality; please visit the Council's website.

Stage 1 – Names of those involved in preparing the EqIA		
1. Project Lead	Perry Singh	5.
2. Equalities / HR	Zakir Chaudhry	6.
3. Legal Advisor (where necessary)	Michelle Williams	7.
4. Trade union		8.

Stage 2 - Description of proposal including the relevance of the proposal to the general equality duties and protected groups

2.1 This document assesses a Local Lettings Policy being proposed for the Council's allocations to 30 new homes being constructed by Newlon Housing Association at Ambrose Court and Mallory Court, Cannon Road, N17. The proposed Local Lettings Policy gives priority to Love Lane Estate residents whose homes will be demolished following approval by the Cabinet of the High Road West Masterplan Framework. The new homes at Ambrose Court and Mallory Court are scheduled for completion at the end of March 2015, when they will be ready for letting.

2.2 The potential equalities implications arising from the proposed Local Lettings Policy include:

- (a) Whether there are any equalities implications in respect of protected groups, arising from the proposed re-housing of Love Lane Estate tenants, rather than Housing Register applicants, at 30 homes at Ambrose and Mallory Courts.
- (b) Whether the consultation undertaken has been conducted in accordance with equalities guidance and whether the consultation responses raise any equalities concerns in respect of protected groups.

Stage 3 – Scoping Exercise - Employee data used in this Equality Impact Assessment

Identify the main sources of the evidence, both quantitative and qualitative, that supports your analysis. This could include for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of recent relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national.

Data Source (include link where published)	What does this data include?
Not applicable	

Stage 4 – Scoping Exercise - Service data used in this Equality Impact Assessment

This section to be completed where there is a change to the service provided

Data Source (include link where published)	What does this data include?
Approved EqIA:Service Delivery in respect of Proposed Changes to the Allocations Scheme (dated September 2014) submitted to the Cabinet on 14 October 2014, in particular pages 5 – 14.	Gender, ethnicity, religion, sexuality and vulnerability/disability information in respect of Housing Register applicants and their priority banding for the allocation of accommodation by the Council.
Approved EqIA for the High Road West Masterplan Framework (dated December 2014) submitted to the Cabinet on 16 December 2014, in particular pages 7 to 13.	Age, gender, ethnicity, language, religion/belief. and health/disability information in respect of the relevant High Road West ‘census output areas’ (which closely accord with the Love Lane Estate and provide the the lowest scale data available) and which form part of the Northumberland Park ward (as shown on map included on page 7).

**Stage 5a – Considering the above information, what impact will this proposal have on the following groups in terms of impact on residents and service delivery:
Positive and negative impacts identified will need to form part of your action plan.**

	Positive	Negative	Details	None – why?
Sex				Table 1 below indicates that households on the Housing Register include a disproportionately high number of females. This is due in part to the Housing Register data only reporting on the head of household, whereas the High Road West records all residents.
Gender Reassignment				Impact unknown due to insufficient data.
Age				Whilst there is data

				available in respect age for of High Road West residents it is not available for Housing Register applicants. Therefore, impact unknown due to insufficient data.
Disability	<p>The information in Table 2 below is incomplete but suggests that a similarly high level of disability/poor health/vulnerability is present in both Housing Register applicants and High Road West residents. The Local Lettings Policy gives a high priority to critical and serious medical cases, which will include residents with disability/health needs.</p> <p>The 30 units at Ambrose and Mallory Courts all meet 'lifetime homes' standard, which can be adapted to meet needs of people with a disability, and include 7 wheelchair accessible units (23%</p>			

	of total).			
Race & Ethnicity				Pre-existing positive impact from re-housing BME groups on Housing Register, broadly unaffected by proposed re-housing of High Road West residents with broadly similar race and ethnicity profile – see table 1 and notes below.
Sexual Orientation				Impact unknown due to insufficient data.
Religion or Belief (or No Belief)				Impact unknown due to insufficient data.
Pregnancy & Maternity				Impact unknown due to insufficient data.
Marriage and Civil Partnership				Impact unknown due to insufficient data.

Table 1 - Gender of Housing Register applicants as compared to High Road West residents

	<u>HOUSING REGISTER</u>	<u>HIGH ROAD WEST AREA</u>
<u>Male</u>	35%	670 (53%)
<u>Female</u>	65%	606 (47%)

Table 2 - Disability Status of Housing Register applicants as compared to High Road West residents

	<u>HOUSING REGISTER</u>	<u>HIGH ROAD WEST AREA</u>
<u>Disabled</u>	17% of households in band A of Housing Register are disabled, together with a further 15% deemed to be vulnerable.	16.7% of people in Northumberland Park ward suffer from long term limiting illness and 7.2% describe their health as bad or very bad.
<u>Not Disabled</u>	unclear	unclear

Table 3 - Ethnicity of Housing Register applicants as compared to High Road West residents and 2011 census

	<u>HOUSING REGISTER</u>	<u>HIGH ROAD WEST AREA</u>	<u>CENSUS 2011</u>
<u>Asian</u>	7.2%	9%	9.5%
<u>Black</u>	40.8%	44%	18.8%
<u>Mixed</u>	2.8%	7%	6.5%
<u>Other</u>	10.2%	5%	4.7%
<u>White</u>	35.9%	35%	60.5%
<u>Not known/Refused</u>	3.1%	0%	0%

Notes on Table 3

Table 3 above shows that both Housing Register applicants and High Road West residents include approximately 65% BME households and 35% white households, as compared to 40% BME households and 60% white households across Haringey as at 2011 Census. Therefore, on this basis, the impact of re-housing High Road West residents in the 30 units at Ambrose and Mallory Courts, rather than Housing Register applicants, is broadly neutral. The re-housing of both groups disproportionately benefits BME households (compared to the wider Haringey population), who are often over represented amongst those in housing need and/or living in disadvantaged areas. Within the overall BME category, the High Road West residents include a higher proportion black and mixed households, whereas the Housing Register includes more 'other' households.

N.B. The Housing Register statistics presented in Table 3 above, relate to all applicants on the Housing Register. Currently, Housing Register applicants are prioritised into 5 bands (A,B,C,D and E) with band A being the highest priority band. The equivalent race and ethnicity data for bands A – C (the only bands with a realistic prospect of re-housing) are – Asian (7%), Black (45%), Mixed (2%), Other (7%), White (35%) and Not known/Refused (3%). These proportions have even greater similarity to the equivalent High Road West figures.

Stage 5b – For your employees and considering the above information, what impact will this proposal have on the following groups:

Positive and negative impacts identified will need to form part of your action plan.				
	Positive	Negative	Details	None – why?
Sex				Not applicable
Gender Reassignment				Not applicable
Age				Not applicable
Disability				Not applicable
Race & Ethnicity				Not applicable
Sexual Orientation				Not applicable
Religion or Belief (or No Belief)				Not applicable
Pregnancy & Maternity				Not applicable
Marriage and Civil Partnership				Not applicable

Stage 6 - Initial Impact analysis	Actions to mitigate, advance equality or fill gaps in information
<p>The analysis conducted in stage 5a above, compares the profiles of Housing Register applicants and High Road West residents, with comparative information available in respect of gender, disability and ethnicity only. This demonstrates that both the Housing Register and High Road West residents include similarly high proportions of disadvantaged groups and that re-housing Love Lane Estate residents under the proposed Local Lettings Policy, rather than Housing Register applicants, will not have a significant impact.</p> <p>Whilst the impact for most groups is assessed as neutral, a positive impact is identified in respect of people with a disability, as the Local Lettings Policy gives a high priority to critical and serious medical cases, which will include people with disability/health needs. Also, the 30 homes at Ambrose and Mallory Courts are built to 'lifetime homes' standards, which means they can be adapted to meet the needs of people with a disability, and 7 (23%) are wheelchair accessible units.</p>	

Stage 7 - Consultation and follow up data from actions set above	
Data Source (include link where published)	What does this data include?

Consultation

- 7.1 The consultation in respect of the Local Lettings Policy for Ambrose and Mallory Courts has been conducted with:
- (a) the Love Lane Estate residents (as part of the section 105 consultation on the High Road West Regeneration proposals) and
 - (b) all households on the Housing Register.
- 7.2 The consultation letters sent to both Love Lane Estate residents and Housing Register applicants included similar information and were accompanied by a copy of the proposed Local Lettings Plan for Ambrose and Mallory Courts, a Feedback Card/Form, a freepost return envelope and a form in six languages for households to request translated, audio, disk, Braille or larger type versions of the consultation documents. The Feedback Card/Form requested responses to 4 consultation questions, provided space for additional comments and requested information on the respondent's age, disability, gender and ethnicity.
- 7.3 The consultation documents were sent to all 297 properties on the Love Lane Estate. The Local Lettings Policy formed part of the wider consultation on the High Road West Masterplan proposals. This consultation took place between 13th September 2014 and 25th October 2014.
- 7.4 The Housing Register consultation letter was sent to over 9,300 households on the Register, with a closing date of 11 January 2015. The Housing Register consultation deadline was extended until 25 January 2015, for the 20 households who requested and received translated or larger type consultation documents.
- 7.5 There were 12 consultation responses from Love Lane Estate. All these responses were sent by post. There were 725 responses from Housing Register applicants. Of these responses, 18 were submitted online and 707 by post.
- 7.6 The 12 Love Lane Estate responses represents a 4% response rate. The 725 Housing Register responses represent a response rate of 7%.

7.7 An analysis has been conducted to assess the degree to which the equalities profile of the respondents reflects the equalities profiles of the wider groups from which they are drawn i.e. Love Lane Estate residents and Housing Register applicants. The results of this analysis are set out below:

(a) Love Lane Respondents

	Proportion of Love Lane consultation respondents by group		Proportion of Love Lane residents by group	
Gender:	Male	5 (42%)	Male	670 (53%)
	Female	7 (58%)	Female	606 (47%)
	Prefer not to say	0	Prefer not to say	
	Blanks	0	Blanks	
Age	18-24	0	20 – 24 *	11%
	25-39	1 (13%)	25-39	37%
	40-64	5 (62%)	40-64	42%
	65-80	0	65-80	8%
	80+	2 (25%)	80+	2%
	Prefer not to say	1	Prefer not to say	
	Blanks	3	Blanks	
Disability	Yes	5 (50%)	Yes	16.7% **
	No	5 (50%)	No	
	Prefer not to say	2	Prefer not to say	
	Blanks	0	Blanks	
Ethnicity	Asian	2 (17%)	Asian	9%
	Black	8 (67%)	Black	44%
	Mixed	1 (8%)	Mixed	7%
	Other	0	Other	5%
	White	1 (8%)	White	35%
	Prefer not to say	0	Prefer not to say	
	Blanks	0	Blanks	

Notes

*Note different to age banding used for consultation responses.

**16.7% of people in Northumberland Park ward suffer from long term limiting illness and 7.2% describe their health as bad or very bad.

(b) Housing Register Respondents

	Proportion of Housing Register consultation respondents by group		Proportion of Housing Register applicants by group	
Gender:	Male	269 (39%)	Male	35%
	Female	417 (61%)	Female	65%
	Prefer not to say	9	Prefer not to say	
	Blanks	29	Blanks	
Age	18-24	27 (4%)	18-24	not available
	25-39	222 (36%)	25-39	"
	40-64	334 (54%)	40-64	"
	65-80	30 (5%)	65-80	"
	80+	1 (1%)	80+	"
	Prefer not to say	44	Prefer not to say	
Disability	Yes	130 (21%)	Yes	17%*
	No	488 (79%)	No	
	Prefer not to say	59	Prefer not to say	
	Blanks	47	Blanks	
Ethnicity	Asian	43 (6%)	Asian	7%
	Black	286 (43%)	Black	41%
	Mixed	18 (3%)	Mixed	3%
	Other	18 (3%)	Other	10%
	White	304	White	36%
	(45%)		Prefer not to say	
	Prefer not to say	14	Blanks	
Blanks	41			

Note

*17% of households in band A of Housing Register are disabled, together with a further 15% deemed to be vulnerable.

7.8 The Feedback Form asked both sets of consultees, the same set of 4 questions, with the following summarised results:

Consultation Questions	Love Lane Estate responses	Housing Register responses
1. Is the proposal for letting the social housing units at Ambrose and Mallory Courts clear?	Yes 9 (75%) No 3 (25%)	Yes 650 (91%) No 62 (9%)
2. Do you agree with the proposal to prioritise the tenants of the Love Lane Estate, for the units available at Ambrose and Mallory Courts?	Yes 9 (75%) No 3 (25%)	Yes 594 (84%) No 116 (16%)
3. Do you agree with the method we are proposing to prioritise Love Lane tenants who wish to move to Ambrose and Mallory Courts?	Yes 9 (75%) No 3 (25%)	Yes 591 (83%) No 119 (17%)
4. Units which remain un-let after the tenants of Love Lane have had the option to move will be advertised on Home Connections. Do you agree that this is the correct approach?	Yes 10 (83%) No 2 (17%)	Yes 610 (87%) No 95(13%)

7.9 The consultation responses summarised above should be treated with some caution in respect of Love Lane Estate responses, given the low number of responses received. In summary, the responses received indicate that::

- (1) A significant majority (75%) of the Love Lane responses received and a very substantial majority (91%) of Housing Register respondents found the proposal to be clear.
- (2) A significant majority (75%) of Love Lane responses received and a substantial majority (84%) of Housing Register respondents agreed with the proposal to prioritise Love Lane tenants for the units available.
- (3) A significant majority (75%) of Love Lane responses received and a substantial majority (83%) of Housing Register respondents agreed with the method being proposed within the Local Lettings Policy to prioritise between the Love Lane tenants wishing to move to Ambrose and Mallory Courts.
- (4) A substantial majority (83%) of Love Lane responses received and a very substantial majority (87%) of Housing Register respondents agreed that units which remain un-let after the tenants of Love Lane have had the option to move, should be advertised on Home Connections.

7.10 These consultation results demonstrate a high or very high level of support, from both Love Lane residents and Housing Register applicants, for the proposed Local Lettings Policy for Ambrose and Mallory Courts. However, the low numbers of Love Lane responses means that this conclusion, in respect of Love Lane residents, should be treated with some caution.

7.11 An analysis of the additional comments provided in some consultation responses has been conducted. Additional comments were provided on 289 responses from Housing Register applicants (40% of the total). No additional comments were added on the Love Lane responses.

7.12 The main identifiable issues raised relevant to equalities, were that:

- (a) people with a disability should be prioritised (6% of issues raised)
- (b) the respondent raised an existing health problem in their household (9% of issues raised)
- (c) concern for older or younger people and that they need to be supported/prioritised (1% of issues raised).

Stage 8 - Final impact analysis

This document assesses the potential equalities implications arising from the proposed Local Lettings Policy including:

- (a) Whether there are any equalities implications in respect of protected groups, arising from the proposed re-housing of Love Lane Estate tenants, rather than Housing Register applicants, at 30 homes at Ambrose and Mallory Courts.

The analysis conducted above compares the profiles of Housing Register applicants and High Road West residents, with comparative information available in respect of gender, disability and ethnicity only. This demonstrates that both the Housing Register and High Road West residents include similarly high proportions of disadvantaged groups and that re-housing Love Lane Estate residents under the proposed Local Lettings Policy, rather than Housing Register applicants, will not have a significant impact.

Whilst the impact for most groups is assessed as neutral, a positive impact is identified in respect of people with a disability, as the Local Lettings Policy gives a high priority to critical and serious medical cases, which will include people with disability/health needs. Also, the 30 homes at Ambrose and Mallory Courts are built to 'lifetime homes' standards, which means they can be adapted to meet the needs of people with a disability, and 7 (23%) are wheelchair accessible units.

- (b) Whether the consultation undertaken has been conducted in accordance with equalities guidance and whether the consultation responses raise any equalities concerns in respect of protected groups.

The analysis conducted above, compares the profile of consultation respondents from Love Lane with the wider High Road West population and similarly compares the profile of Housing Register respondents with all households on the Housing Register, where this information is available. This has shown that the consultation respondents from both Love Lane and the Housing Register broadly reflect the wider populations from which they are drawn.

The consultation responses are substantially in favour of the proposed Local Lettings Policy (although this conclusion should be treated with some caution in respect of Love Lane tenants, given the low number of responses). Only a small proportion of the additional comments provided relate to equalities issues, in respect of disability/health, older people and younger people, and mostly seek greater priority for the group the respondent belongs to. It is recognised that the data available in respect of some groups is insufficient and this will be addressed in future Local Lettings Policy consultations.

Stage 9 - Equality Impact Assessment Review Log

Review approved by Director / Assistant Director

Date of review

Review approved by Director / Assistant Director

Date of review

Stage 10 – Publication

Ensure the completed EqIA is published in accordance with the Council's policy.