

## Equality Impact Assessment

<b>Name of Project</b>	Temporary Accommodation Placements Policy	<b>Cabinet meeting date <i>If applicable</i></b>	4 <sup>th</sup> July 2016 Lead Member signing
<b>Service area responsible</b>	Housing Commissioning, Investment & Sites Service		
<b>Name of completing officer</b>	Nick Smith/Denise Gandy	<b>Date EqIA created</b>	21 March 2016
<b>Approved by Director / Assistant Director</b>	Dan Hawthorn	<b>Date of approval</b>	

The Council has a public sector equality duty under the Equalities Act (2010) to have due regard to:

- tackle discrimination and victimisation of persons that share the characteristics protected under S4 of the Act. These include the characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex (formerly gender) and sexual orientation;
- advance equality of opportunity between people who share those protected characteristics and people who do not;
- foster good relations between people who share those characteristics and people who do not.

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.

<b>Stage 1 – Names of those involved in preparing the EqIA</b>		
1. Project Lead	Nick Smith/ Denise Gandy	5.
2. Equalities / HR	Kathryn Booth	6.
3. Legal Advisor	Robin Levett /Michelle Williams	7.
4. Trade unions		8.

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

Members are being asked to approve the Temporary Accommodation Placements Policy and arrangements for annual monitoring of placements.

This report relates to the Council's approach to meeting the housing needs of households in temporary accommodation, including those that share the protected characteristics. It is therefore of high relevance to the Council's Equality Duty.

The Temporary Accommodation Placements Policy provides guidance on the placement of households in temporary accommodation. It highlights the process for decision-making on the type of accommodation and the location of

accommodation to meet interim placements and longer term placements. The policy notes that due to shortage of supply an increasing number of households are likely to be placed outside the borough, on the periphery of London and in some circumstances, further afield.

The policy outlines the circumstances in which priority will be given to households for accommodation in the borough or in neighbouring boroughs. These criteria are as follows:

**Priority for in-borough accommodation will be given to:**

- Members of an applicant's household with a severe and enduring health condition requiring intensive and specialist medical treatment where a move from Haringey would disrupt that treatment and continuity of care.
- Members of an applicant's household who are in receipt of a significant package and range of health care options that cannot be easily transferred.
- Members of an applicant's household with a severe and enduring mental health problem who are receiving psychiatric treatment and aftercare provided by community mental health services and have an established support network where a transfer of care would severely impact on their well being.
- Households with children registered on the Child Protection Register in Haringey who are linked into local services and where it is confirmed that a transfer to another area would adversely impact on their welfare.
- Households containing a child with special educational needs who is receiving education or educational support in Haringey, where change would be detrimental to their well-being.
- An applicant or a member of their household who have a longstanding arrangement to provide care and support to another family member in Haringey who is not part of the resident household and would be likely to require statutory health and social support if the care ceased.

- Any other special circumstance will also be taken into account (including any particular needs of the children in the household not already identified).

**Priority for placements within neighbouring boroughs will be given to:**

- Applicants who have as part of their household, a child or children who are enrolled in GCSE, AS or A level courses or post 16 vocational qualifications (for example, BTEC) in Haringey, with exams to be taken within the academic year. Wherever practicable we will seek to place such households within 60 minutes' travelling distance of their school or college.
- Wherever practicable, an applicant or a member of their household who works for more than 16 hours per week will not be placed more than one hour travelling distance by public transport, from their place of employment. Consideration will also be given to the affordability of the travel arrangements needed to reach the place of employment. This will include women who are on maternity leave from employment.
- Any other special circumstance will be taken into account.

Applicants who meet none of the above criteria are likely to be offered properties outside of Haringey and the neighbouring boroughs, in other parts of London or outside London.

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

Data Source	What does this data include?
Not Applicable	The proposed Temporary Accommodation Placements Policy does not impact on Haringey Council employees (unless residents of the borough and are also homeless or likely to become homeless) and thus included below.

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

### **Individuals and Households**

An assessment based on households captures only the characteristics of the head of household. As members of the household will have different characteristics, the following analysis has been made on all the individuals living in temporary accommodation rather than the head of the household. This has allowed inclusion of partners and children into the assessment. However, it should be noted that family units have been used for the analysis of family structure in the gender section.

### **Data used in this Analysis**

This Equalities Impact Assessment has used available data to assess individuals who were living in temporary accommodation on 29 February 2016.

### **Assessment of work status**

One priority for placement in neighbouring boroughs is based on the work status of each member within a household, and to assess a household against this criteria, full work status is needed for each working age adult within that household.

From the sources available, full work status data was held on 2,102 households and only partial or no work status on the remaining 1,070 households. The working hours priority could therefore only be completed on 2,102 households. The analysis has thus been applied to the cohort of 6,758 individuals who live within these 2,102 assessable households.

This cohort represents 61.5% of all individuals living in temporary accommodation and has a similar gender, age and ethnicity profile as the whole population of temporary accommodation. These profile comparisons are shown in the following tables.

<b>Gender</b>	<b>All individuals living in temporary accommodation</b>	<b>Individuals within the Cohort</b>
<b>Female</b>	<b>6,280</b> 57.7%	<b>3,953</b> 58.5%
<b>Male</b>	<b>4,611</b> 42.3%	<b>2,805</b> 41.5%
<b>Total</b>	<b>10,891</b>	<b>6,758</b>

<b>Age</b>	<b>All individuals living in temporary accommodation</b>	<b>Individuals within the Cohort</b>
<b>0-16</b>	<b>5,268</b> 48.4%	<b>3,422</b> 50.6%
<b>16-24</b>	<b>1,506</b> 13.8%	<b>790</b> 11.7%
<b>25-34</b>	<b>1,540</b> 14.1%	<b>1,015</b> 15.0%
<b>35-44</b>	<b>1,505</b> 13.8%	<b>954</b> 14.1%
<b>45-54</b>	<b>842</b> 7.7%	<b>464</b> 6.9%
<b>55-64</b>	<b>175</b> 1.6%	<b>84</b> 1.2%
<b>65+</b>	<b>40</b> 0.4%	<b>21</b> 0.3%
<b>Not Known</b>	<b>15</b> 0.1%	<b>8</b> 0.1%

<b>Ethnicity</b>	<b>All individuals living in temporary accommodation</b>	<b>Individuals within the Cohort</b>
<b>Asian</b>	<b>756</b> 6.9%	<b>419</b> 6.2%
<b>Black</b>	<b>3,796</b> 34.9%	<b>2,446</b> 36.2%
<b>Chinese or Other Ethnic Group</b>	<b>1,422</b> 13.1%	<b>871</b> 12.9%
<b>Mixed</b>	<b>396</b> 3.6%	<b>304</b> 4.5%
<b>Not known</b>	<b>1,303</b> 12.0%	<b>708</b> 10.5%
<b>White</b>	<b>3,218</b> 29.5%	<b>2,010</b> 29.7%
<b>Total</b>	<b>10,891</b>	<b>6,758</b>

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### **Assessment of education status and examinations**

To assess if a member of the household is enrolled in GCSE, AS or A level courses and taking exams within the academic year, it has been assumed that all children aged 15 at 1 September 2015 will be taking GCSEs. It is also been assumed that those aged 16 or 17 on 1 September 2015 and recorded as being 'in school' or 'full time education' will be taking GCSEs, AS or A' Levels or their equivalent. Anyone over 18 on 1 September 2015 is taken as an adult and therefore would not meet the priority criteria.

It is accepted that some children taking A 'levels may not be recorded as "in school" and so not included in the assessment, but also that some 17 & 18 years olds recorded as 'in school' or in 'full time education' may have left studies and/or may not be taking exams in the current academic year.

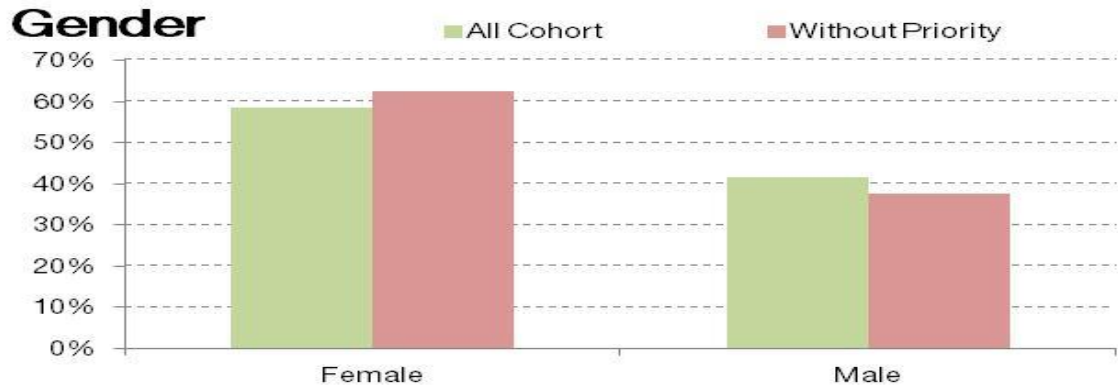
<b>Data Source</b>	<b>What does this data include?</b>
EqlA Profile on Harinet	Age, gender, ethnicity, disability information – for the Council and the Borough
Internal Crystal report: HW0116 Households in Temporary Accommodation	Date of Birth and ethnicity of all individuals in temporary accommodation, including family members. Taken 29 February 2016 Cross referenced with reports HW0137 & TA0181 below

<p>Internal Crystal report: HW0137 Single Vulnerable Adults</p>	<p>Vulnerabilities in Single Households in temporary accommodation, including Pregnancy, Physical &amp; Mental Health, Learning Difficulties, Ex-offenders, Substance Misuse, 16/17 year olds and Leaving care. Cross referenced with reports HW0116 above &amp; HW0137 below.</p>
<p>Internal Crystal report: TA0181 Households in Temporary Accommodation</p>	<p>Nationality, Family Structure &amp; Housing Benefit and Net Rent, of Homeless Households in Temporary Accommodation over the previous 6 months, as of 29 February 2016. Cross referenced with reports HW0116 &amp; HW0137 above.</p>
<p>ONS LC3304EW - Provision of unpaid care by age (Census 2011) <a href="#"><u>ONS LC3304EW</u></a></p>	<p>Provision of Unpaid Care by age and borough</p>

**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	Negative	Details	None – why?															
Gender		✓	<p>In comparison to all individuals within the cohort, there is a higher percentage of females who would not meet the priority to remain in the borough or in neighbouring boroughs. These comparisons include all individuals in the cohort including children.</p> <table border="1"> <thead> <tr> <th colspan="3">Individuals in Cohort</th> </tr> <tr> <th>Gender (Individuals)</th> <th>All individuals within the cohort</th> <th>Individuals in cohort with no priority</th> </tr> </thead> <tbody> <tr> <td><b>Female</b></td> <td><b>3,953</b> 58.5%</td> <td><b>1,490</b> 62.4%</td> </tr> <tr> <td><b>Male</b></td> <td><b>2,805</b> 41.5%</td> <td><b>898</b> 37.6%</td> </tr> <tr> <td><b>Total</b></td> <td><b>6,758</b></td> <td><b>2,388</b></td> </tr> </tbody> </table>	Individuals in Cohort			Gender (Individuals)	All individuals within the cohort	Individuals in cohort with no priority	<b>Female</b>	<b>3,953</b> 58.5%	<b>1,490</b> 62.4%	<b>Male</b>	<b>2,805</b> 41.5%	<b>898</b> 37.6%	<b>Total</b>	<b>6,758</b>	<b>2,388</b>	
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	Positive	Negative	Details	None – why?
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As the majority households in living in temporary accommodation are lone females with dependant children, this analysis has also assessed the impact different family structures. In this assessment it is observed that 'Lone females with dependant children' represent 62.7.0% of the families, but 77.9% of those families who would not be given priority to remain in the borough or in neighbouring.

Families in Cohort		
Family Type	All families in cohort	Families in cohort without priority
<b>Couple with dependant children</b>	<b>195</b> 9.3%	<b>39</b> 4.8%
<b>Couple with no dependant children</b>	<b>11</b> 0.5%	<b>2</b> 0.2%
<b>Lone female</b>	<b>58</b>	<b>18</b>

	Positive	Negative	Details			None – why?
				2.8%	2.2%	
			<b>Lone female with dependant children</b>	<b>1,319</b> 62.7%	<b>636</b> 77.9%	
			<b>Lone male</b>	<b>49</b> 2.3%	<b>15</b> 1.8%	
			<b>Lone male with dependant children</b>	<b>82</b> 3.9%	<b>28</b> 3.4%	
			<b>Other</b>	<b>388</b> 18%	<b>78</b> 10%	
			<b>Total</b>	<b>2,102</b>	<b>816</b>	
			<p>Lone parent families are more likely to have informal support in the local area, and may also find it more difficult to return to the borough for medical, schooling and other reasons due to child care commitments. This may also affect the continuity of schooling for children who are not taking GCSE, A/O or A' Levels.</p>			
Gender Reassignment			<p>Information on gender reassignment is not available in relation to the proportion of households presenting as homeless, accessing temporary accommodation or on the council's housing register. However, the Temporary Accommodation Placements Policy is not anticipated to have a disproportionate impact on this protected group.</p>			✓

	Positive	Negative	Details	None – why?																					
Age		✓	<p>Children under 16 make up 48.4% of individuals in Temporary Accommodation and 50.6% of those in the cohort The Placements policy will therefore affect this age group and the percentage of those aged under 16 (55.9%) is significantly higher in those who would not be given priority. There is also a small difference in those individuals aged between 25 to 34 who will not be given priority (15.0%) compared with the cohort (16.7%).</p> <p>This increase is in contrasts to the lower percentages of those aged 35-44 and 45-54 who together represent 8.1% of the Sample and 5.2% of those not given priority.</p> <table border="1"> <thead> <tr> <th colspan="3">Individuals in cohort</th> </tr> <tr> <th>Age Groups (individuals)</th> <th>All individuals within the cohort</th> <th>Individuals in cohort with no priority</th> </tr> </thead> <tbody> <tr> <td><b>0-16</b></td> <td><b>3,422</b> 50.6%</td> <td><b>1,335</b> 55.9%</td> </tr> <tr> <td><b>16-24</b></td> <td><b>790</b> 11.7%</td> <td><b>228</b> 9.5%</td> </tr> <tr> <td><b>25-34</b></td> <td><b>1,015</b> 15.0%</td> <td><b>399</b> 16.7%</td> </tr> <tr> <td><b>35-44</b></td> <td><b>954</b> 14.1%</td> <td><b>298</b> 12.5%</td> </tr> <tr> <td><b>45-54</b></td> <td><b>464</b> 6.9%</td> <td><b>105</b> 4.4%</td> </tr> </tbody> </table>	Individuals in cohort			Age Groups (individuals)	All individuals within the cohort	Individuals in cohort with no priority	<b>0-16</b>	<b>3,422</b> 50.6%	<b>1,335</b> 55.9%	<b>16-24</b>	<b>790</b> 11.7%	<b>228</b> 9.5%	<b>25-34</b>	<b>1,015</b> 15.0%	<b>399</b> 16.7%	<b>35-44</b>	<b>954</b> 14.1%	<b>298</b> 12.5%	<b>45-54</b>	<b>464</b> 6.9%	<b>105</b> 4.4%	
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	Positive	Negative	Details		None – why?
			<b>55-64</b>	<b>84</b> 1.2%	<b>18</b> 0.8%
			<b>65+</b>	<b>21</b> 0.3%	<b>3</b> 0.1%
			<b>Not Known</b>	<b>8</b> 0.1%	<b>2</b> 0.1%
			<b>Total</b>	<b>6,758</b>	<b>2,388</b>

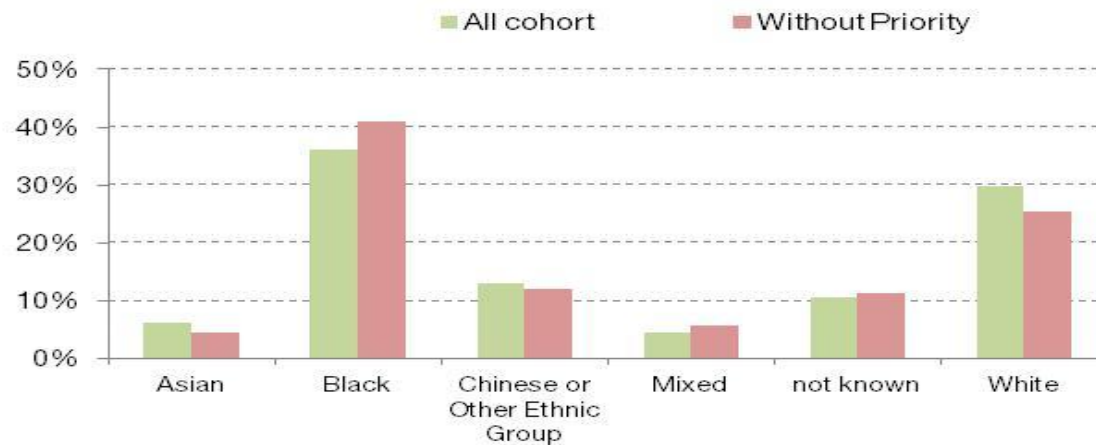


It is also noted that those aged 45 and 65 typically provide significantly higher levels of unpaid care which has not been taken into account in this assessment due to the limited records available. From the census 2011, 5.0% of households aged 25 to 34 year olds provide unpaid care, compared with 9.8% for those aged 35 to 49.

	Positive	Negative	Details	None – why?									
<b>Disability</b>		✓	<p>The Temporary Accommodation Placements Policy is not expected to adversely affect those with severe disabilities as the policy sets out a priority to remain in the borough for those with severe and enduring health conditions and mental health problems where treatment or care outside of borough would be detrimental to their health or wellbeing. Priority is also given to households containing a child with SEN (Special Educational Needs) receiving education or support in Haringey.</p> <p>The policy does allow some disabled people with low level support needs to be moved. However, individual assessments will seek to determine if moves unduly affect each household and to consider any issues raised.</p>	✓									
<b>Race &amp; Ethnicity</b>		✓	<p>For most ethnicities, the proportion of individuals who would not be given priority is broadly similar to the proportion of all individuals within the cohort. However, there is a higher percentage of those with a Black ethnicity who would not be given priority (41.1% compared with 36.2%) and a correspondingly lower percentage of those with a White Ethnicity (25.4% not given priority compared with 29.7% of the cohort). These comparisons include all individuals in the cohort including children.</p> <table border="1"> <thead> <tr> <th colspan="3"><b>Individuals in cohort</b></th> </tr> <tr> <th><b>Ethnicity</b></th> <th><b>All individuals within the cohort</b></th> <th><b>Individuals in cohort with no priority</b></th> </tr> </thead> <tbody> <tr> <td><b>Asian</b></td> <td><b>419</b> 6.2%</td> <td><b>105</b> 4.4%</td> </tr> </tbody> </table>	<b>Individuals in cohort</b>			<b>Ethnicity</b>	<b>All individuals within the cohort</b>	<b>Individuals in cohort with no priority</b>	<b>Asian</b>	<b>419</b> 6.2%	<b>105</b> 4.4%	
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	Positive	Negative	Details		None - why?
			<b>Black</b>	<b>2,446</b> 36.2%	<b>981</b> 41.1%
			<b>Chinese or Other Ethnic Group</b>	<b>871</b> 12.9%	<b>289</b> 12.1%
			<b>Mixed</b>	<b>304</b> 4.5%	<b>136</b> 5.7%
			<b>not known</b>	<b>708</b> 10.5%	<b>270</b> 11.3%
			<b>White</b>	<b>2,010</b> 29.7%	<b>607</b> 25.4%
			<b>Total</b>	<b>6,758</b>	<b>2,388</b>

### Ethnicity



Placement out of London may have an adverse affect on access to cultural facilities and links to established communities.

	Positive	Negative	Details	None – why?									
<b>Sexual Orientation</b>			Information on sexual orientation is not available in relation to the proportion of households in temporary accommodation. However, the Temporary Accommodation Placements Policy is not anticipated to have a disproportionate impact on this protected group.	✓									
<b>Religion or Belief (or No Belief)</b>			Information on religion is not available for those in temporary accommodation and only partially for those on estates. However, it is noted that for those in temporary accommodation who may be moved out of the borough, distance to appropriate religious institutions and should be taken into account when assessing each client.	✓									
<b>Pregnancy &amp; Maternity</b>		✓	<p>The Placements Policy gives priority to those who are on maternity leave and so those on maternity leave will be excluded. It is also noted that on 29 February 2016 there were only 20 pregnant women living in Temporary Accommodation and 18 in the cohort. Of these, 9 pregnant women who would not be given priority for other reasons.</p> <table border="1"> <thead> <tr> <th colspan="3"><b>Individuals in Cohort</b></th> </tr> <tr> <th><b>Pregnancy</b></th> <th><b>All individuals within the cohort</b></th> <th><b>Individuals in cohort with no priority</b></th> </tr> </thead> <tbody> <tr> <td><b>Total</b></td> <td><b>18</b></td> <td><b>9</b></td> </tr> </tbody> </table> <p>It is noted that new parents are likely to need higher support levels should be taken into account when assessing each client.</p>	<b>Individuals in Cohort</b>			<b>Pregnancy</b>	<b>All individuals within the cohort</b>	<b>Individuals in cohort with no priority</b>	<b>Total</b>	<b>18</b>	<b>9</b>	
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<b>Pregnancy</b>	<b>All individuals within the cohort</b>	<b>Individuals in cohort with no priority</b>											
<b>Total</b>	<b>18</b>	<b>9</b>											

	Positive	Negative	Details	None – why?
<b>Marriage and Civil Partnership</b> (note this only applies in relation to eliminating unlawful discrimination (limb 1))			There is no information for individuals in temporary accommodation on their marriage/civil partnership status. However, it is noted that single parent households will be affected and may have greater need of local support networks, which should be taken into account when assessing each client.	✓

**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.**

	<b>Positive</b>	<b>Negative</b>	<b>Details</b>	<b>None – why?</b>
<b>Sex</b>	Not applicable	Not applicable	Not applicable	The proposals will not impact on staff
<b>Gender Reassignment</b>	As above	As above	As above	As above
<b>Age</b>	As above	As above	As above	As above
<b>Disability</b>	As above	As above	As above	As above
<b>Race &amp; Ethnicity</b>	As above	As above	As above	As above
<b>Sexual Orientation</b>	As above	As above	As above	As above
<b>Religion or Belief (or No Belief)</b>	As above	As above	As above	As above
<b>Pregnancy &amp; Maternity</b>	As above	As above	As above	As above
<b>Marriage and Civil Partnership</b> <i>(note this only applies in relation to eliminating unlawful discrimination (limb 1))</i>	As above	As above	As above	As above

## Stage 6 - Initial Impact analysis

## Actions to mitigate, advance equality or fill gaps in information

The Council will, wherever possible, seek to acquire affordable temporary accommodation within the borough and in neighbouring boroughs. However, where there is insufficient affordable temporary accommodation, placing families in borough may cause them excessive financial hardship. Where sufficient affordable temporary accommodation is not available the Council will have to seek alternative accommodation further afield.

The Placements Policy criteria will ensure that the most vulnerable groups – such as those with care needs - are given priority for in-borough and neighbouring borough placements. However, the EqlA notes that some protected groups may be disproportionately affected by the policy.

Lone female households with dependent children will be particularly affected as they represent 77.9%% of all households who won't meet the priority. This is household breakdown is also reflected in the Age profile with those under 16 representing 55.9% of individuals not being given priority.

### **TO BE REVIEWED AFTER CONSULTATION**

Haringey Council prioritises households according to vulnerability. However, where placements need to be made out of borough, a range of services and options are being developed to support these households.

Haringey Council will be consulting on the Temporary Accommodation Placements Policy, and possible mitigation measures will form a key part of this consultation.

#### The Consultation

The consultation will run for eight weeks from 13<sup>th</sup> July and ending on 7<sup>th</sup> September 2016. A questionnaire and pamphlet/flyer will be sent to all residents who may be affected setting out a summary of the main provisions of the draft policy, with a link to the full policy on line. Exit interviews with new applicants who present themselves at Apex House and Station Road will take place to find out their views on the draft policy

The consultation documents will be available in full on the Council's website and will include an equalities feedback form and a covering letter setting out the reasons for the council's proposal to adopt the policy.

Out of borough placements may have a negative impact for certain protected groups, for example, disruption to schooling for families with dependent children, separation from cultural and religious facilities which may have a larger effect on smaller communities, and loss of local support networks.

In addition, the Council will run drop in events to consult residents of Temporary Accommodation face to face and meetings with partners and homelessness organisations.

#### Mitigations

Following consultation, Homes for Haringey will be commissioned to develop a package of support. It is envisaged that the package will include a range of practical support and assistance, including help with:

- Help finding employment in new area
- Help finding child care
- Help finding a school for children in the new area
- Help finding a local GP or other medical assistance
- Removals and storage of items
- Reconnections (e.g. electricity /gas / phone / internet)
- Financial support to travel back to Haringey to see family and friends
- Help to arrange getting set up with things like Council Tax, getting set up with local support (formal social work or informal).
- Help finding local community groups / religious groups

The outcomes of an approved Temporary Accommodation Placements Policy will be monitored on an annual basis and will include an assessment of the impact on the protected groups. This

annual appraisal will give particular attention to those households who have been placed in accommodation in neighbouring boroughs and, exceptionally, out of London. The policy and the annual monitoring reports will be publically available.

**Stage 7 - Consultation and follow up data from actions set above**

<b>Data Source (include link where published)</b>	<b>What does this data include?</b>
<p>Consultation on the Temporary Accommodation Placements Policy will commence on 13<sup>th</sup> July and end on 7<sup>th</sup> September 2016.</p>	

**Stage 8 - Final impact analysis**

The EqIA notes that there would be adverse impacts for these households including isolation from support networks and disruption in schooling for children who are not taking GCSE, A/O or A' Level exams. Under the proposed Temporary Accommodation Procurement Policy, placement outside of London would be a measure of last resort. However, in situations where placement out of London is unavoidable due to the limited availability of affordable temporary accommodation and placement in London could cause a family unacceptable financial hardship, a clear package of support will be agreed to mitigate the impact for these households.

The EqIA will be updated annually in line with the equalities monitoring for these policies and as set out above.

## 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.