

Equality Impact Assessment

Name of Project	Temporary Accommodation Placements Policy	Cabinet meeting date <i>If applicable</i>	18 October 2016
Service area responsible	Housing Commissioning, Investment & Sites Service		
Name of completing officer	Nick Smith/Martin Gulliver	Date EqIA created	21 March 2016
Approved by Director / Assistant Director	Dan Hawthorn	Date of approval	30 September 2016

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

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act; ;
- advance equality of opportunity between people who share a 'protected characteristic' and people who do not;
- foster good relations between people who share a relevant 'protected characteristic' and people who do not.

The 'protected characteristics' are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex (formerly gender) and sexual orientation. They also cover marriage and civil partnership with regards to eliminating discrimination.

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 duties 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	Nick Smith/ Martin Gulliver	5.
2. Equalities / HR	Kathryn Booth	6.
3. Legal Advisor	Robin Levett /Michelle Williams	7.

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

This report relates to the Council’s approach to meeting the housing needs of households requiring temporary accommodation, including those that share the protected characteristics. Members are being asked to approve the Temporary Accommodation Placements Policy. The Policy is informed by the overall Supply Plan, which identifies a shortage of supply in the borough. The Policy therefore provides criteria for the placement of households in temporary accommodation within and outside of the borough and sets out the support that will be provided for households placed outside of London.

It is of relevance to the Council’s Equality Duty as the demographic profile of those in housing need has a high proportion of those within the protected groups, and because applicants who meet none of the criteria under the Policy for being offered accommodation in the borough are likely to be offered properties outside of Haringey and in the neighbouring boroughs, 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, at the time when the first draft assessment was being prepared.

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 these 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 placement criteria on working hours could therefore only be completed on 2,102 households. **The analysis has 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.

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

Age	All individuals living in temporary accommodation	Individuals within the Cohort
0-16	5,268 48.4%	3,422 50.6%
16-24	1,506 13.8%	790 11.7%
25-34	1,540 14.1%	1,015 15.0%
35-44	1,505 13.8%	954 14.1%
45-54	842 7.7%	464 6.9%
55-64	175 1.6%	84 1.2%
65+	40 0.4%	21 0.3%

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

Not Known	15 0.1%	8 0.1%
Total	10,891	6,758

Assessment of education status and examinations

One priority for placement in neighbouring boroughs is based on whether a member of the household is in education and due to be taking exams in that academic year. The assessment is therefore based on the age of children in the household and it has been assumed that all children aged 15 for the following September will be taking GCSEs and anyone aged 16 or 17 and recorded as being 'in school' or 'full time education' will be taking GCSEs, AS or A' Levels (or their equivalent). Anyone over 18 is 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.

Data Source	What does this data include?
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EqIA 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
Internal Crystal report: HW0137 Single Vulnerable Adults	Vulnerabilities in Single Households in temporary accommodation, including Pregnancy, Physical & Mental Health, Learning Difficulties, Ex-offenders, Substance Misuse, 16/17 year olds and Leaving care. Cross referenced with reports HW0116 above & HW0137 below.
Internal Crystal report: TA0181 Households in Temporary Accommodation	Nationality, Family Structure & 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 & HW0137 above.
ONS LC3304EW - Provision of unpaid care by age (Census 2011) ONS LC3304EW	Provision of Unpaid Care by age and borough


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>Female</td> <td>3,953 58.5%</td> <td>1,490 62.4%</td> </tr> <tr> <td>Male</td> <td>2,805 41.5%</td> <td>898 37.6%</td> </tr> <tr> <td>Total</td> <td>6,758</td> <td>2,388</td> </tr> </tbody> </table>	Individuals in Cohort			Gender (Individuals)	All individuals within the cohort	Individuals in cohort with no priority	Female	3,953 58.5%	1,490 62.4%	Male	2,805 41.5%	898 37.6%	Total	6,758	2,388	
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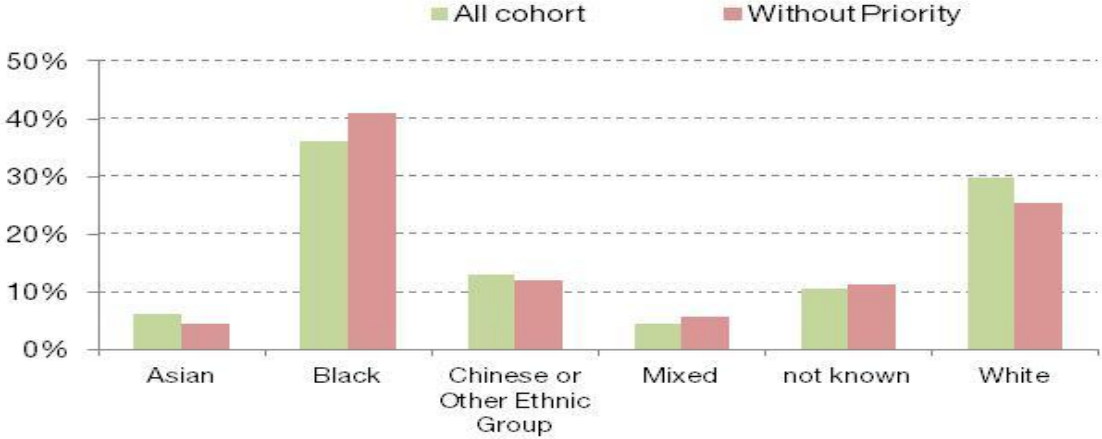
	Positive	Negative	Details	None – why?																														
			<p>As the majority of households living in temporary accommodation are lone females with dependant children, this analysis has also assessed the impact of different family structures. In this assessment it is observed that 'Lone females with dependant children' represent 62.7% of the families, but 77.9% of those families who would not be given priority to remain in the borough or in neighbouring boroughs.</p> <table border="1"> <thead> <tr> <th colspan="3">Families in Cohort</th> </tr> <tr> <th>Family Type</th> <th>All families in cohort</th> <th>Families in cohort without priority</th> </tr> </thead> <tbody> <tr> <td>Couple with dependant children</td> <td>195 9.3%</td> <td>39 4.8%</td> </tr> <tr> <td>Couple with no dependant children</td> <td>11 0.5%</td> <td>2 0.2%</td> </tr> <tr> <td>Lone female</td> <td>58 2.8%</td> <td>18 2.2%</td> </tr> <tr> <td>Lone female with dependant children</td> <td>1,319 62.7%</td> <td>636 77.9%</td> </tr> <tr> <td>Lone male</td> <td>49 2.3%</td> <td>15 1.8%</td> </tr> <tr> <td>Lone male with dependant children</td> <td>82 3.9%</td> <td>28 3.4%</td> </tr> <tr> <td>Other</td> <td>388 18%</td> <td>78 10%</td> </tr> <tr> <td>Total</td> <td>2,102</td> <td>816</td> </tr> </tbody> </table>	Families in Cohort			Family Type	All families in cohort	Families in cohort without priority	Couple with dependant children	195 9.3%	39 4.8%	Couple with no dependant children	11 0.5%	2 0.2%	Lone female	58 2.8%	18 2.2%	Lone female with dependant children	1,319 62.7%	636 77.9%	Lone male	49 2.3%	15 1.8%	Lone male with dependant children	82 3.9%	28 3.4%	Other	388 18%	78 10%	Total	2,102	816	
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	Positive	Negative	Details	None – why?
			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.	
Gender Reassignment			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.	✓
Age		✓	<p>Children under 16 make up 48.4% of individuals in Temporary Accommodation and 50.6% of those in the cohort. The 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 difference is in contrast to that for those aged 35-44 and 45-54 who together represent 8.1% of the sample but 5.2% of those not given priority.</p>	

	Positive	Negative	Details		None – why?
			Individuals in cohort		
			Age Groups (individuals)	All individuals within the cohort	Individuals in cohort with no priority
			0-16	3,422 50.6%	1,335 55.9%
			16-24	790 11.7%	228 9.5%
			25-34	1,015 15.0%	399 16.7%
			35-44	954 14.1%	298 12.5%
			45-54	464 6.9%	105 4.4%
			55-64	84 1.2%	18 0.8%
			65+	21 0.3%	3 0.1%
			Not Known	8 0.1%	2 0.1%
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Disability		✓	<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.</p> <p>Some disabled people with low level support needs may be affected by the policy. However, individual assessments will seek to determine if moves unduly affect each household and to consider any issues raised.</p>	✓																								

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Race & Ethnicity		✓	<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 slightly 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">Individuals in cohort</th> </tr> <tr> <th>Ethnicity</th> <th>All individuals within the cohort</th> <th>Individuals in cohort with no priority</th> </tr> </thead> <tbody> <tr> <td>Asian</td> <td>419 6.2%</td> <td>105 4.4%</td> </tr> <tr> <td>Black</td> <td>2,446 36.2%</td> <td>981 41.1%</td> </tr> <tr> <td>Chinese or Other Ethnic Group</td> <td>871 12.9%</td> <td>289 12.1%</td> </tr> <tr> <td>Mixed</td> <td>304 4.5%</td> <td>136 5.7%</td> </tr> <tr> <td>not known</td> <td>708 10.5%</td> <td>270 11.3%</td> </tr> <tr> <td>White</td> <td>2,010 29.7%</td> <td>607 25.4%</td> </tr> <tr> <td>Total</td> <td>6,758</td> <td>2,388</td> </tr> </tbody> </table>	Individuals in cohort			Ethnicity	All individuals within the cohort	Individuals in cohort with no priority	Asian	419 6.2%	105 4.4%	Black	2,446 36.2%	981 41.1%	Chinese or Other Ethnic Group	871 12.9%	289 12.1%	Mixed	304 4.5%	136 5.7%	not known	708 10.5%	270 11.3%	White	2,010 29.7%	607 25.4%	Total	6,758	2,388	
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Sexual Orientation			<p>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.</p>	✓																					
Religion or Belief (or No Belief)			<p>Information on religion is not available for those in temporary accommodation. 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.</p>	✓																					

	Positive	Negative	Details	None – why?									
Pregnancy & Maternity		✓	<p>The Policy gives priority to those who are on maternity leave to remain in the borough. It is also noted that on 30 August 2016 there were only 14 pregnant women living in Temporary Accommodation and 11 in the cohort. Of these, 8 pregnant women who would not be given priority for other reasons.</p> <table border="1"> <thead> <tr> <th colspan="3">Individuals in Cohort</th> </tr> <tr> <th>Pregnancy</th> <th>All individuals within the cohort</th> <th>Individuals in cohort with no priority</th> </tr> </thead> <tbody> <tr> <td>Total</td> <td>11</td> <td>8</td> </tr> </tbody> </table> <p>It is noted that new parents are likely to need higher support levels and this should be taken into account when assessing each client.</p>	Individuals in Cohort			Pregnancy	All individuals within the cohort	Individuals in cohort with no priority	Total	11	8	
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Marriage and Civil Partnership (note this only applies in relation to eliminating unlawful discrimination (limb 1))			<p>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 more need for local support networks, which should be taken into account when assessing each client.</p>	✓									

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	Not applicable	Not applicable	The proposals will not impact on staff
Gender Reassignment	As above	As above	As above	As above
Age	As above	As above	As above	As above
Disability	As above	As above	As above	As above
Race & Ethnicity	As above	As above	As above	As above
Sexual Orientation	As above	As above	As above	As above
Religion or Belief (or No Belief)	As above	As above	As above	As above
Pregnancy & Maternity	As above	As above	As above	As above
Marriage and Civil Partnership <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 Council will seek to minimise the number of households placed outside of the borough.

The Placements Policy criteria will ensure that the most vulnerable groups are given priority for in-borough and neighbouring borough placements. However, the EqIA identifies 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

Haringey Council has consulted on the Temporary Accommodation Placements Policy and possible mitigation measures formed a key part of this consultation.

Following consultation, Homes for Haringey is finalising the support package, which has been amended in the light of consultation

The outcomes of the approved Temporary Accommodation Placements Policy will include an assessment of the impact on the protected groups and the support packages. 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.

Mitigations

Support will be offered to help finding a school for children in the new area, together with a capped payment for households to assist with the costs of re-locating outside of London. Households will be allowed to use this money on their own priorities, including immediate expenses such as school uniforms.

Distance to appropriate religious institutions should be taken into account when assessing each client. The support package includes

Stage 6 - Initial Impact analysis

Actions to mitigate, advance equality or fill gaps in information

representing 55.9% of individuals not being given priority.

There may also be an impact on location of placement with access to religious institutions.

Those receiving support may also have more barriers to moving to new locations.

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.

help to find local community groups / religious groups.

Priority is given to households 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.

Following consultation, additional support has been added to those with low level support. Individual assessments will also seek to determine if moves unduly affect each household and to consider any issues raised. The support package also includes help to re-connect with health services.

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

Data Source (include link where published)	What does this data include?
<p>The consultation Consultation on the Temporary Accommodation Placements Policy commenced on 13th July and ended on 7th September 2016. All residents of temporary accommodation on 13th July 2016 were either sent an email or a letter inviting them to comment on the placement priorities and support package. There were also four drop-in sessions at Russell Road temporary accommodation unit, and at Wood Green and Marcus Garvey libraries.</p> <p>The consultation focused on the following areas:</p> <ul style="list-style-type: none"> • Criteria for placement within the borough • Criteria for placement in a neighbouring borough • Support packages and length of support • Whether the policy should apply to all residents of temporary accommodation or just new applicants 	<p>Demographics of respondents There were 369 responses split fairly evenly between on-line and paper replies. This represents 12% of all households in temporary accommodation.</p> <p>Of all respondents:</p> <ul style="list-style-type: none"> • The majority (64%) were aged 25-44, 27% aged 45-64 and 5% preferred not to say or did not supply an answer. • 21% recorded themselves as having a disability with 12% preferred not to say. • Seen in terms of broad ethnic categories, the most numerous respondents were Black or Black British African (31%) or Caribbean (12%), and then White British (8%). However, 17% preferred not to say or did not respond. • The majority of respondents (71%) were female and 25% were male. 4% preferred not to say or did not respond. <p>Views of Respondents on Placement Criteria All placement criteria were supported with at least 63% of all respondents supporting each criterion and no more than 16% against. A significant proportion (12% to 21%) gave no response.</p> <p>Additional criteria suggested for in the borough placement included;</p> <ul style="list-style-type: none"> • The length of time someone has been in temporary

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

Data Source (include link where published)

What does this data include?

- accommodation or living in Haringey (20 respondents)
- Families with children at schools in Haringey (18 respondents)
- Single parents with kids who rely on support from family / friends in Haringey in the borough (10 respondents)
- People who have suffered physical abuse/domestic violence (5 respondents)
- Someone who needs support and/or supervision (3 respondents)
- Those that are receiving help for addiction and those in recovery in Haringey (2 respondents)
- Adults with learning difficulties but not a severe mental health issue (2 respondents)
- Pensioners with financial hardships(2 respondents)
- Pregnant woman (2 respondents)

These additional criteria were mirrored in criteria suggested for placement in neighbouring boroughs. However, additional criteria suggested included those who are:

- apprentices (4 people)
- in adult or formal education or university (3 people)
- self employed (2 people)
- have an confirmed offer of employment (2 people)
- those actively seeking work in Haringey (2 people)

Views of Respondents on the Support Package

Respondents were also asked to rank various support packages.

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

Data Source (include link where published)

What does this data include?

Although many respondents used this to score each criteria rather than ranking, there showed strong support for help in finding new schools, employment and child care with 230, 199, 178 respondents giving this a ranking of 1-3. Lower priority was given to reconnections (103), financial support for travel (83) and help finding local groups (68).

Additional support packaged focused on travel expenses to get back to work in Haringey / London (14), to get children to school (10) and to medical appointments (6). A further 7 suggested financial support to help them settle into the new place

50% of respondents believed that 6 months was an adequate time for support, and only 23% disagreed. The remaining respondents did not offer any preference.

In addition to the formal responses, the drop-in sessions were well attended and allowed extended conversation with residents of temporary accommodation. A repeated concern raised by residents was that they were unhappy with another temporary move, and especially outside London, but were more favourable if the move was a final move to a settled home.

Views of Respondents on the application of the policy

Finally, there was an even split in support for whether the placements policy should be applied to all residents of temporary accommodation, or just to new applicants.

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

Data Source (include link where published)

What does this data include?

Stage 8 - Final impact analysis

Under the proposed Temporary Accommodation Placements Policy, placement outside of London would be a measure of last resort and will affect around 50 households in 2016/17 rising to 400 a year in 2019/20. 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.

Following consultation, the Council has added additional placement criteria based on needs identified in the consultation. These new criteria support those in adult education, apprentices, and self-employed, and for those receiving support for lower level needs including those recovering from addictions. Suggested placement criteria not based on need, such as length of time living in temporary accommodation or Haringey, have not been accepted.

In the light of responses on support, the support package has been revised to include assistance to ensure the continuity of welfare benefits. As financial based support for travel was not a priority for respondents, this has been replaced by a single payment to assist households with the immediate costs of re-locating.

As highlighted in the consultation, the primary concern for both selection criteria and support was around education. The data shows that housing crisis disproportionately affects lone female parents who 63% of households, but 78% of those households who would not be given priority to remain in the borough or in neighbouring boroughs. The support package includes assistance with school admissions in the new area.

The consultation asked respondents about the length of time that relocating households should receive support for and 50% of respondents considered that six months was a reasonable period of time, whereas 23% did not. However, it has been identified that providing support earlier, pre-move, is the best way to mitigate the impact of moving. It is clear that many of

the support elements need to be addressed some weeks and months before the actual move takes place – for example utility connections, or assistance with welfare benefits or school places. This type of support must be provided effectively well within the six months previously envisaged and ideally be in place from the first day of the move or very soon after. For this reason, it is envisaged that support will be initiated immediately a potential move is identified, likely to be 3-4 months before the actual move.

This will provide an easier transition for relocating households and mitigate some of the potentially adverse impact of moving more effectively than the previous approach. Also, support will need to be highly tailored to meet a particular household's needs. This more flexible and tailored approach will allow for discretion in individual cases rather than working to defined time period; however, it is expected and overall the duration of support is likely to be six months, but this will differ according to household needs.

This EqIA will be updated annually in line with the equalities monitoring for these policies and monitored on an annual basis under the Council's Corporate Priority Five reporting and monitoring.

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.