



Haringey Council

Equality Impact Assessment

Name of Project	Haringey's Housing Strategy 2017-2022	Cabinet meeting date If applicable	18 October 2016
Service area responsible	Housing Commissioning, Investment & Sites Team		
Name of completing officer	Kathryn Booth / Martin Gulliver	Date EqIA created	19 May 2015 (first draft)
Approved by Director / Assistant Director	Dan Hawthorn	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 and any other conduct prohibited under the Act
- Advancing equality of opportunity between those with 'protected characteristics' and those without them
- Fostering good relations between those with 'protected characteristics' and those without them.

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 – Martin Gulliver	5.
2. Equalities / HR – Kathryn Booth	6.
3. Legal Advisor (where necessary) – Robin Levett	7.
4. Trade union N/A	8.

Stage 2 - Description of proposal including the relevance of the proposal to the general equality duties and protected groups. Also carry out your preliminary screening (Use the questions in the Step by Step Guide (The screening process) and document your reasoning for deciding whether or not a full EqIA is required. If a full EqIA is required move on to Stage 3.

The Housing Strategy

Haringey Council wishes to put in place a new Housing Strategy which better reflects the Council’s Corporate Plan, includes key objectives on housing and growth in the borough, and takes account of changes in national and regional housing and welfare policy, changes in the local housing market and demographic changes in the borough.

Haringey’s draft Housing Strategy 2016-2021 explains the Council’s approach to housing across all tenures and in all areas of the borough. The **vision** for the Housing Strategy is:

“Housing is about people and communities, not just bricks and mortar. This means mixed and inclusive neighbourhood where residents can lead happy and fulfilling lives.”

There are a wide range of specific approaches to achieving the Housing Strategy’s vision, grouped under its **objectives** which are to:

- Achieve a step change in the number of new homes being built
- Improve help for those in housing crisis
- Drive up the quality of housing for all residents
- Ensure that housing delivers a clear social dividend

The Housing Strategy will be delivered through a range of housing-related policies and plans, which are already in place or are being developed/updated. These are shown in the lists below. These policies and plans relate to the full range of housing tenures in the borough. For example, the Private Sector Strategy will focus on the private rented and owner occupied sectors. EqIAs related to these policies and plans will be carried out as appropriate. The outcomes envisaged by the Housing Strategy will be monitored and reviewed annually to ensure they continue to be responsive to changes in the local, regional and national landscape.

Examples of policies and plans already in place include:

- Homelessness Strategy 2012-2014
- Affordable Warmth Strategy 2009-2019
- Housing Investment and Estate Renewal Strategy 2013-2023
- Housing Commissioning Plan 2012-2015
- Older Peoples' Housing Strategy 2011-2021
- Tenancy Strategy 2014-2016
- Allocations Scheme

Examples of policies and plans being developed/updated include:

- Estate Renewal Re-housing and Payments Policy
- Allocations Scheme (update)
- Tenancy Strategy (update)
- Intermediate Housing Policy
- Homelessness Strategy/Delivery Plan
- Private Sector Strategy/Delivery Plan
- Affordable Warmth Strategy (update)
- HRA Business Plan
- Supported Housing Review
- Temporary Accommodation Placements Policy
- Housing Supply Plan
- Stock Investment & Estate Renewal Policy

This EqIA is an update of the EqIA approved in June 2015 and incorporates the outcome of the second consultation and reflects changes made to the Housing Strategy following that consultation. Further EqIA's will be undertaken for the underlying policies and plans set out

above e.g. the Homelessness Strategy/Delivery Plan and Intermediate Housing Policy.

Final Draft

The proposed final Housing Strategy contains five main amendments from the draft. These main changes are summarised below:

(a) Updates to ensure the Housing Strategy and the Local Plan are in alignment

The final strategy has been amended to strengthen its alignment with the Local Plan. This will enable the Housing Strategy to support the Local Plan in providing guidance for new development, in particular in regards to the delivery of affordable housing. These changes are of a technical nature and will have no specific impact on this EqIA.

(b) Clarification of the definition of affordable housing

Following feedback from the second stage of consultation, the definition of affordable housing has been clarified to reflect the view that market properties in Haringey are beyond the reach of households on average incomes. This clarification will allow the Council and its partners to target resources towards those households who are most in need and on lower incomes. For example, support for low cost shared ownership will benefit both existing social housing tenants who are supported to become home owners, as well as those in housing need who will be able to move into the social rented homes vacated. Those most in need are likely to include disproportionate numbers of households with protected characteristics including age, gender and ethnicity.

(c) Confirmation of the Council's commitment to social housing providing settled homes, despite the abolition of lifetime tenancies for new lettings

The Housing and Planning Act introduced fixed term tenancies for future social housing tenants. This change directly contradicts Haringey's current policy of providing lifetime tenancies for social tenants, in order to support secure and stable communities. The Housing Strategy has been updated to reflect impact of this change. It reiterates a commitment to maintain lifetime tenancies for existing tenants and to minimise potential negative impacts of fixed term tenancies for new tenants, by continuing to support secure and stable communities. This commitment will be expanded on in the forthcoming Tenancy Strategy update, which will seek to mitigate adverse effects by, for example, maximising tenancy length and minimising the burden of tenancy renewal.

(d) Confirmation of the Council's commitment to fighting fuel poverty, delivering energy efficiency and reducing carbon emissions within new and existing housing using a range of measures, in the light of the withdrawal of the Code for Sustainable Homes

The Code for Sustainable Homes was withdrawn from Government planning guidance in March 2015. The final Housing Strategy confirms a continued commitment to effective carbon management to meet objectives for both environmental sustainability and the reduction of fuel poverty and outlines our approach to improving energy efficiency in the borough's housing stock. These changes to the

Housing Strategy will deliver a reduction in carbon emissions, but will also benefit low income households who are most affected by fuel inefficiency and who are likely to be over-represented amongst individuals with protected characteristics.

(e) Updated arrangements for delivery of the Housing Strategy via a range of integrated plans and policies

In addition to the changes outlined above, the Housing Strategy confirms the council's approach of developing integrated plans and policies to support the Housing Strategy. Each plan or policy will be supported by an EqlA. These changes are of a technical nature and will have no specific impact on this EqlA.

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?
N/A – the proposed Housing Strategy does not impact on Haringey Council employees	

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?
2011 census data (Census 2011)	Tenure, ethnicity, sex, religion, sexuality, disability & age
GVA (2014) Haringey Strategic Housing Market Assessment based on a Housing Needs Survey of 1004 residents with a minimum of 10% of respondents (100 people) from each of the Housing Market Areas identified within the borough. (SHMA)	Population, household spaces, dwelling stock, occupancy, age, ethnicity, household composition, occupational levels, tenure, house price and rents, household incomes
Joint Strategic Needs Assessment – Housing (JSNA-Housing)	Population, tenure, house prices and affordability, homelessness, ethnicity of homeless households
Trust for London/New Policy Institute, London's Poverty Profile (London Poverty Profile)	Population, ethnicity, wealth inequality, income, tenure

Sex

- Data indicates high levels of homelessness amongst female lone parents. This will be explored further in the forthcoming Homelessness Review and action planning, which will be set out in Haringey's revised Homelessness Strategy/Delivery Plan.

Age

- Data indicates that homelessness in the age group 16-24 and 25-44 is high compared to their expected profile from census data. This will be explored further in the forthcoming Homelessness Review and action planning set out in Haringey's revised Homelessness Strategy/Delivery Plan.
- There is so far a small amount of data available on the age of buyers of shared ownership homes in Haringey, so it is difficult to draw firm conclusions. Age data on new shared ownership purchasers will be monitored and any relevant findings may influence the content of Haringey's planned Intermediate Housing Policy

Disability

- Homelessness acceptances due to mental or physical disability is higher than would be expected given the profile of disability in the 2011 census, indicating that disability may be a factor in causing homelessness for these groups of households. This issue will be explored in the forthcoming Homelessness Review and an appropriate response set out in Haringey's new Homelessness Strategy/Delivery Plan.

Race & ethnicity

- Homelessness data indicates Black households approach as homeless at a level which is more than twice their representation in Haringey's population. This compares with White households who present in numbers which are around two thirds of their representation in Haringey's population.
- There is so far a small amount of data available on the ethnicity of buyers of shared ownership homes in Haringey, so it is difficult to draw firm conclusions. Ethnicity data on new shared ownership purchasers will be monitored and any relevant findings will influence the content of Haringey's planned Intermediate Housing Policy.

Sexual Orientation

Currently there is no information on sexual orientation recorded for any of the internal data sources used as part of this review. However, 3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013. In it's research for "Housing, homelessness and young LGBT people" (2015), the TUC advised that nationally LGBT have slightly higher home ownership rates (69% compared with 64%), but represent 24% of all homeless young people and that Stonewall Housing report that two-thirds of their callers have housing problems arising from discrimination because of their sexuality or gender identity.

Religion and Belief

Currently there is no information on religion and belief recorded for any of the internal data sources used as part of this review.. However, the 2011 Census reports that 45% of residents were Christian, 14% were Muslim and 3% Jewish. There were low numbers of Hindu (1.8%) and Sikh (0.3%) residents. A quarter of Haringey residents stated that they did not have a religion,

Pregnancy and Maternity

Currently there is no information on pregnancy and maternity recorded for any of the data sources used as part of this review.

Marriage and Civil Partnership

Currently there is no information on marriage and civil partnership recorded for any of the internal data sources used as part of this review. However, the Census in 2011 found 50% were single, 34% were married or in a civil partnership, and 16% were separated, divorced or widowed. As noted under the protected characteristic of sex, data is collected on lone parents, which indicates that female lone parents have the highest level of homelessness acceptances of all groups in Haringey.

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.

	<i>Positive</i>	<i>Negative</i>	<i>Details</i>	<i>None – why?</i>
Sex	✓		<p>Currently lone female parents are over-represented in homelessness acceptances and temporary accommodation. Objective 2 of the Housing Strategy, “Improving help for those in housing crisis” addresses this issue, which will be taken forward in revisions to the Homelessness Strategy/Delivery Plan. The situation of lone female parent homeless households, and other groups, will also be addressed through Objective 4 “Ensure that housing delivers a clear social dividend”; Objective 3, “Drive up the quality of housing of all residents” (which includes proposals to tackle quality in the private housing sector) and Objective 1, “Achieve a step change in the number of new homes built”.</p> <p>To help those in housing crisis, the Council will provide more wrap-around services and assist people to live independently by putting in place clear pathways so people can access and leave support services in a planned way. The Council is working with partners to increase the number of affordable rented homes built in the borough. This will benefit female-headed households on the Council’s Housing Register as they receive the majority of social and affordable lettings. With its partners, the Council will help residents to secure employment and apprenticeships and access training opportunities as a means of improving access to housing.</p>	
Gender Reassignment			<p>Young LBGT are more likely to be affected by Housing Crisis, and in particular in relation to family relationships. These will need to be addressed as part of the Homelessness Delivery Plan.</p>	<p>The needs for these groups in specific contexts will be explored in more detail through subsequent needs assessment e.g. the</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.

	<i>Positive</i>	<i>Negative</i>	<i>Details</i>	<i>None – why?</i>
				homelessness delivery plan and supported housing review
Age	✓		<p>The Housing Strategy should have a positive impact on homeless applicants from all age groups under objective 2– ‘Improving help for those in housing crisis’</p> <p>The Housing Strategy objective to achieve a step change in the number of new homes being built includes plans to assist more people to access home ownership. This is likely to benefit first time buyers who tend to be in younger age groups but should also have a positive impact on buyers from all age groups.</p>	
Disability	✓		<p>The Housing Strategy recognises the needs of those with disabilities and seeks to address these through a range of provisions. Proposals include increasing the provision of housing related support services through the development of new support pathways and enabling independent living, for example, through disabled facilities grants.</p>	
Race & Ethnicity	✓		<p>Objective 2, “Improve help for those in housing crisis” - The Housing Strategy should have a positive impact on homeless applicants from all ethnic backgrounds. Black households should benefit most from initiatives to prevent homelessness, as they are currently disproportionately represented amongst homeless acceptances. Objectives 1, 2, 3 and 4, “Achieve a step change in the number of new homes being built”, “Improving help for those in housing crisis”, “Drive up the quality of housing for all residents” and “Ensure that housing delivers a clear social</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.

	<i>Positive</i>	<i>Negative</i>	<i>Details</i>	<i>None – why?</i>
			<p>dividend” respectively, should also lead to a positive outcome for people from all ethnic groups.</p> <p>Data shows that housing crisis disproportionately affects Black households. The Council will provide more wrap-around services and assist people to live independently by putting in place clear pathways so people can access and leave support services in a planned way. The council is working with partners to increase the number of affordable rented homes built in the borough. This will benefit Black households who are disproportionately represented on the council’s Housing Register as they receive a substantial number of social and affordable lettings. With its partners, the council will help residents to secure employment and apprenticeships and access training opportunities as a means of improving access to housing.</p> <p>Initial research into who bought the shared ownership units at one scheme of 48 units in the Borough, gave rise to cause for concern that households from BME communities were under represented in those households buying properties. In response to this concern, further research has been done on all shared ownership schemes sold in the borough during the last 2 years. This data analysis shows a much more complex picture. The proportion of households from different communities that buy into shared ownership schemes varies from scheme to scheme, and is influenced by such factors as geography, marketing, sales values, and the share of a property, that households are able to buy in the property that they purchase.</p> <p>The Council intends to use this research to develop an Intermediate</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.

	<i>Positive</i>	<i>Negative</i>	<i>Details</i>	<i>None – why?</i>
			<p>Housing Policy that seeks to maximise the opportunities for all lower income households to be able to access intermediate products, both shared ownership, and intermediate market rented homes. An EQiA will be produced to assess the new policy, which is scheduled for consideration by the Cabinet during 2016/17.</p> <p>An additional benefit will arise from the new Intermediate Housing Policy because the policy will target sales to households who can release a social housing unit. These units will be allocated on the basis of the Allocations Scheme to households on the Housing Register, which reflects housing need in the borough. Disadvantaged households including those with protected characteristics are over represented on the Housing Register.</p>	
Sexual Orientation			<p>Young LBGT are more likely to be affected by Housing Crisis, and in particular in relation to family relationships. These will need to be addressed as part of the Homelessness Delivery Plan.</p> <p>Information on sexual orientation is not available for Haringey homeless and tenant households but 3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013.</p>	
Religion or Belief (or No Belief)			<p>Information on religion on homeless and tenant households is not available. However, the 2011 Census reports that 45% of residents were Christian, 14% were Muslim and 3% Jewish. There were low numbers of Hindu (1.8%) and Sikh (0.3%) residents. A quarter of Haringey residents stated that they did not have a religion,</p>	
Pregnancy & Maternity				There is insufficient data and research to comment.

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.

	<i>Positive</i>	<i>Negative</i>	<i>Details</i>	<i>None – why?</i>
Marriage and Civil Partnership (note this only applies in relation to eliminating unlawful discrimination (limb 1))			However, the Census in 2011 found 50% were single, 34% were married or in a civil partnership, and 16% were separated, divorced or widowed.	There is insufficient data and research to comment.

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

	Positive	Negative	Details	None – why?
Sex				The Housing Strategy has no impact on staffing structures
Gender Reassignment				As above
Age				As above
Disability				As above
Race & Ethnicity				As above
Sexual Orientation				As above
Religion or Belief (or No Belief)				As above
Pregnancy & Maternity				As above
Marriage and Civil Partnership (note this only applies in relation to eliminating unlawful discrimination (limb 1))				As above

Stage 6 - Initial Impact analysis	Actions to mitigate, advance equality or fill gaps in information
Achieve a step change in the number of new homes built	<p>The Housing Strategy provides the framework for enabling the Council to meet the Mayor of London's target of building 1,502 new homes per year over the next 10 years. This will improve housing support and access to housing for a wide range of households including social housing for those in highest need and shared ownership, with support for those that need it to mitigate any negative impacts.</p> <p>The Council will monitor all shared ownership sales with Housing Association partners in order to better understand if certain groups access these schemes less than others.</p>
Improve help for those in housing crisis	<p>The impact of the Housing Strategy will be more targeted housing related support to help people live more independently, including services to prevent rough sleeping. Homelessness prevention services will promote early intervention, as well as building community capacity to help prevent homelessness. Supporting work and strategies, such as the Homelessness Strategy/Delivery Plan, will address any particular concerns the data highlights about particular groups with protected characteristics.</p>
Drive up the quality of housing for all residents	<p>The Housing Strategy will drive up standards:</p> <ul style="list-style-type: none"> • In the private rented sector by introducing a licensing scheme for private landlords working in the borough and setting up a lettings agency . These initiatives will tackle issues of poor repair and management, improve health and safety in the private rented sector and ensure statutory compliance with property standards. • In the social rented sector by progressing improvement works to Council-owned homes and working with partner registered providers to improve quality of the homes they manage. • Ensure the design of new homes built meets Haringey's Quality Charter
Ensure that housing delivers a clear social dividend	<p>Examples of how the Housing Strategy will provide an impact include improved community cohesion and self-help through increasing community capacity and building resilience within individual households</p>

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

Data Source (include link where published)	What does this data include?
<p>First stage consultation report</p> <p>Between October and December 2014, a wide range of stakeholders were consulted on the proposed vision, priorities and principles for Haringey’s new Housing Strategy.</p> <p>The outcome from the first stage consultation was broad support for the vision, priorities and principles set out in the consultation document.</p> <p>As a result of consultation, one of the original priorities was split into two objectives: “Improve help for those in housing crisis” and ‘Ensure that housing delivers a clear social dividend’.</p>	<p>First stage consultation report</p> <p>There were 330 responses to the survey, which was available in online and in paper format.</p> <p>Of the respondents:</p> <ul style="list-style-type: none"> • The majority of respondents were in the middle of the age range; 49% aged 25-44 and 32% aged 45-64. • 16% reported that they had a disability. • Regarding ethnicity, the majority of respondents were White 46%, but Black and minority ethnic respondents were almost as numerous at 43%. 11% preferred not to say. • 61% of respondents were female, 34% male and 5% preferred not to say. <p>The following issues were raised in first stage consultation which have an equalities impact:</p> <ul style="list-style-type: none"> • Addressing the needs of a growing older population by making sure all new homes meet Lifetime Homes standards and 10% meet wheelchair housing standards. • Residents should have access to better support with their housing problems by introducing new support pathways which lead to independence for people who are vulnerable and have complex housing needs. <p>These issues were addressed in the draft strategy. Wheelchair standards for example are addressed in supporting planning policy. Support pathways are developed in further detail in supporting policies and plans, and through Housing Related Support</p>
<p>Second stage consultation report</p> <p>Second stage consultation took place over a 14 week period between July and October 2015.</p> <p>During the second consultation exercise,</p>	<p>Second stage consultation report</p> <p>There were 97 responses to second stage consultation, which was available online and in paper format.</p> <p>Of the respondents:</p>

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

Data Source (include link where published)	What does this data include?
<p>respondents highlighted a range of issues and concerns which, in summary, covered 3 main areas:</p> <ul style="list-style-type: none"> • Housing affordability: recognition that house prices in Haringey are beyond the reach of households on average incomes • Supply of new homes: support for policies which increase the supply of new homes, bring empty homes back into use and improve allocations to social housing • Vulnerable groups: support for a strategy which addresses the needs of residents with additional vulnerabilities or who face additional barriers to accessing suitable housing, for example disabled residents 	<ul style="list-style-type: none"> • The majority were in the middle of the age range, 35% were aged 25-44 and 24% aged 45-64. However, a considerable group (29%) chose not to say. • A majority, 54%, recorded themselves as having a disability. However, 38% preferred not to say. • Seen in terms of broad ethnic categories, the most numerous respondents were White British (34%). Taken together, Black and minority ethnic respondents were almost as numerous (30%). However, 35% preferred not to say. • As with the first stage consultation, the majority of respondents (43%) were female. 6% preferred not to say. <p>The following issues were raised in second stage consultation which have an equalities impact:</p> <ul style="list-style-type: none"> • Concern about 'gentrification' and increased house prices on existing communities, particularly BAME groups. • Recognising the need to meet the needs of people with disabilities on new build schemes through the planning system • Concerns over exclusion of LGBT residents where homelessness is related to sexual orientation; 'over 50% of people who approach Stonewall Housing state that their housing problem is directly related to their sexual orientation or gender identity' • Concern that young people are not adequately represented • Keep people with mental health issues in their own homes as long as possible • Fuel poverty can be alleviated through improving energy efficiency e.g. bringing Council owned properties up to SAP 80. <p>The final draft strategy seeks to address some of these issues through strengthening the Council's position in regards to housing affordability and carbon management. In regards to protected characteristics (e.g. age, sexual orientation) it should be noted that the Housing Strategy is a high-level strategic document which aims to provide an overview of the Council's position in regard to delivering the objectives set out by the Corporate Plan, and therefore applies to all residents. Effort has been made to ensure that the strategy conveys basic principles which can apply across different demographic groups.</p>

Stage 8 - Final impact analysis

Data shows that housing crisis disproportionately affects Black households and lone female parents, who are both over-represented in homelessness acceptances and amongst those in temporary accommodation.

To help those in housing crisis, the Council will provide more wrap-around services and assist people to live independently by putting in place clear pathways so people can access and leave support services in a planned way. The Council is working with partners to increase the number of affordable rented homes built in the borough. This will benefit both these groups as they receive the majority of social and affordable lettings. With its partners, the Council will help residents to secure employment and apprenticeships and access training

The outcome from the first stage consultation was broad support for the vision, priorities and principles set out in the consultation document.

There was strong support for the strategy from the second stage consultation with over 80% agreeing or strongly agreeing with the proposals, but with concerns raised around housing affordability, the supply and allocation of new homes, and support for vulnerable groups. Respondents were generally representative of Haringey's population, with an over-representation of respondents recording disability at the second stage. Changes to the Housing Strategy will mitigate these concerns through improved support for those in housing crisis, additional supply of affordable housing and through delivery plans, including the Homelessness Strategy/Delivery Plan and Intermediate Housing Policy.

This EqlA has identified ways in which the Housing Strategy can positively impact households with protected characteristics. The changes in the final version of the strategy seek to mitigate the adverse impacts of recent legislative changes and improve the delivery of genuinely affordable new housing to assist low income households, amongst whom protected groups are likely to be over represented.

Stage 9 - Equality Impact Assessment Review Log

Review approved by Director / Assistant Director	<input type="text"/>	Date of review	<input type="text"/>
Review approved by Director / Assistant Director	<input type="text"/>	Date of review	<input type="text"/>

Stage 10 – Publication

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