



Haringey Council

Equality Impact Assessment

Name of Project

Supply Plan & Temporary
Accommodation Allocations Policy

**Cabinet meeting date
*If applicable***

9th February 2016

Service area responsible

Name of completing officer

Nick Smith/Denise Gandy

Date EqIA created

**Approved by Director / Assistant
Director**

Dan Hawthorn

Date of approval

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.

Stage 1 – Names of those involved in preparing the EqIA	
1. Project Lead Nick Smith/ Denise Gandy	5.
2. Equalities / HR Kathryn Booth	6.
3. Legal Advisor (where necessary) Robin Levett	7.
4. Trade union	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.

A Cabinet report is being brought forward to members for decision. Members are being asked to approve:

- The Supply Plan, including Temporary Accommodation Procurement Plan
- The Temporary Accommodation allocations policy and arrangements for annual monitoring of placements
- Arrangements for producing, publicising and monitoring the annual lettings plan including the allocation of properties between homeless households and estate renewal decants.

This report relates to the Council's approach to meeting the housing needs of some of the borough's most vulnerable residents, including those that share the protected characteristics. It is therefore of high relevance to the Council's Equality Duty.

The Temporary Accommodation allocation 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 Borough on the periphery of London and in exceptional 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.

The Temporary Accommodation allocation policy sets out who has priority for in-borough placements, and neighbouring borough placements. These can be summarised as (summary description only):

Priority for in-borough accommodation will be given to

- Applicants with a severe and enduring health condition requiring intensive and specialist medical treatment.
- Applicants who are in receipt of a significant package and range of health care options that cannot be easily transferred.
- Applicants with a severe and enduring mental health problem who are receiving psychiatric treatment and aftercare
- Households with children registered on the Child Protection register in Haringey, or families who have high social needs
- Households containing a child with special educational needs
- Applicants who have a longstanding arrangement to provide care and support to another family member in Haringey
- Any other special circumstance will also be taken into account

Priority for placements within neighbouring boroughs will be given to:

- Applicants who have as part of their household, a child or children who are taking exams to be taken within the academic year.
- Applicants who work 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. 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 and on the periphery of North London.

Annual Lettings Plan

A key decision going forward is the proportion of permanent lettings allocated to homeless households in temporary accommodation as compared to the proportion allocated to estate renewal decants and it is for this reason we are exploring the equalities impact of this decision.

Data

In assessing the Equalities Impact of this policy, data has been collated on All Homeless Households in Temporary Accommodation, and compared with those who do not meet the criteria for remaining in the borough, and data on residents of possible re-generation sites (Love Lane, Northumberland Park and Broadwater farm).

It should be noted that data on which households in Temporary Accommodation are working over 16 hours a week is not available. In lieu of this information, and the absence of this data, housing benefit payments to rent accounts has been used as a measure of whether the household is

working. It has been assumed that those not receiving housing benefit are likely to be working, though it is clear that there are other reasons for housing benefit not being paid, including suspended claims, and that some household working more than 16 hours will still receive housing benefit.

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?
EqIA Profile on Harinet	Age, gender, ethnicity, disability information – for the Council and the Borough
Internal Crystal report: TA0181 Households in TA	Age, gender, ethnicity and family structure of Homeless Households in Temporary Accommodation over the previous 6 months, as of 4 December 2015
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. <i>Cross referenced with report TA0181 above</i>
Internal Crystal report: HW0116 Households in TA	Date of Birth and ethnicity of all residents in Temporary Accommodation, including family members. <i>Cross referenced with report TA0181 above</i>
Internal Crystal report: TM0172 - Demographic Information	Age, gender, ethnicity, disability information on tenants

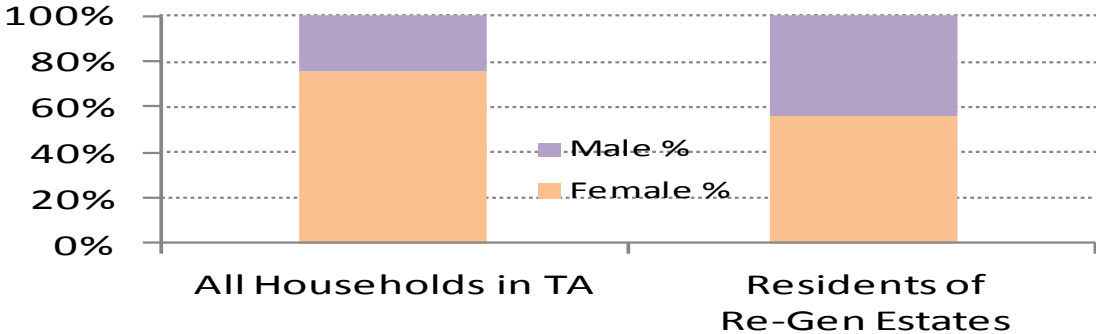
Stage 5a – Considering the above information, what impact will this proposal have on the following groups in terms of impact on residents and service delivery:

Positive and negative impacts identified will need to form part of your action plan.

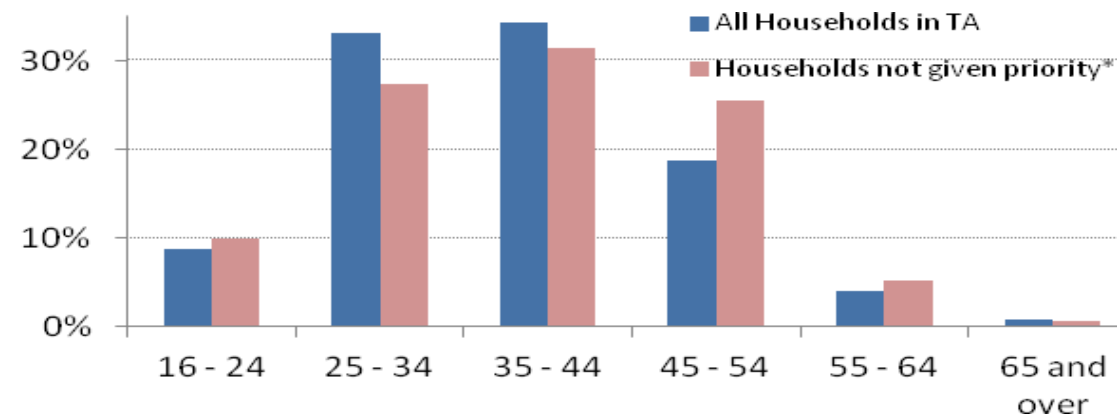
	Positive	Negative	Details	None – why?																						
Sex		✓	<p><u>Impact of Temporary Accommodation Allocations Policy</u></p> <p>Given the gender breakdown of those in TA, the location of offers will affect female headed families who make up 75.7% of households in TA.</p> <p>Looking at those households who would not be prioritised to stay within the borough or in neighbouring boroughs, this proportion slightly increases to 77.2%.</p> <table><tr><th>Gender</th><th>Measure</th><th>All Households in TA</th><th>Households not given priority*</th></tr><tr><td rowspan="2">Female</td><td>Number</td><td>2,380</td><td>478</td></tr><tr><td>%</td><td>75.7%</td><td>77.2%</td></tr><tr><td rowspan="2">Male</td><td>Number</td><td>766</td><td>140</td></tr><tr><td>%</td><td>24.3%</td><td>22.7%</td></tr><tr><td>Total</td><td>Number</td><td>3,146</td><td>618</td></tr></table> <p>Despite this similarity of the gender ratios of the two groups, there is a significant change in the family make up with those with dependant children increasing from 76% to 87%.</p> <p>The increase in families is split between Lone Female and Couple households, who both increase significantly. This increase is especially high for white households who form 32% of those not meeting the priority criteria compared with 25% for all those in TA. There is no change in the percentages of Lone male headed households.</p>	Gender	Measure	All Households in TA	Households not given priority*	Female	Number	2,380	478	%	75.7%	77.2%	Male	Number	766	140	%	24.3%	22.7%	Total	Number	3,146	618	
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			<p>sustainable for households in the long-term as accommodation costs will in most cases be more affordable.</p> <p><u>Impact of Lettings Plan</u></p> <p>The main impact of the lettings plan is the allocation of housing between homeless households and households decanted from re-generation estates.</p> <p>The distribution of properties to decanted households will result in an increase in the time Homeless Households spend in Temporary Accommodation. However, in the medium term, the allocation of lettings to decants will also mean that new properties coming out of estate renewals programmes will be released to Homeless Households rather than used to decant households on the estate.</p> <p>As there are a far higher percentage of females among homeless households than on the re-generation estates, these effects will be fall more on female headed families. There will also be a disproportional affect on single parents who represent 63% of those in Temporary Accommodation.</p> <table><tr><th>Gender</th><th>Measure</th><th>All Households in TA</th><th>Tenants on Re-Gen Estates</th></tr><tr><td rowspan="2">Female</td><td>Number</td><td>2,380</td><td>1,167</td></tr><tr><td>%</td><td>75.7%</td><td>56.1%</td></tr><tr><td rowspan="2">Male</td><td>Number</td><td>766</td><td>912</td></tr><tr><td>%</td><td>24.3%</td><td>43.9%</td></tr><tr><td>Not Known</td><td>Number</td><td>-</td><td>3</td></tr><tr><td>Total</td><td>Number</td><td>3,146</td><td>2,082</td></tr></table>	Gender	Measure	All Households in TA	Tenants on Re-Gen Estates	Female	Number	2,380	1,167	%	75.7%	56.1%	Male	Number	766	912	%	24.3%	43.9%	Not Known	Number	-	3	Total	Number	3,146	2,082	
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			 <p>As the estate renewal will deliver more 2 and 3 bed properties, this will benefit families in the future and will decrease the time spent Temporary Accommodation for families once these are delivered.</p> <p>If decants are given less priority, this will slow down the re-generation schemes and the deliver of new and larger properties.</p>	
Gender Reassignment			<p><u>Impact of Temporary Accommodation Allocations Policy & Lettings Plan</u></p> <p>The supply strategy and Temporary Accommodation placements policy are not anticipated to have a disproportionate impact on this protected group.</p> <p>However, 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. Similarly, information is not available for tenants on the possible estate renewal sites</p>	✓
Age		✓	<p><u>Impact of Temporary Accommodation Allocations Policy</u></p> <p>After applying the criteria for remaining in the borough and in neighbouring boroughs, there is a decrease in the percentages of 24 to 45 year olds and a significant increase in those between 45 and 65. This is largely due to the number of exam age of children younger age groups.</p>	

Age Group	Measure	All Households in TA	Households not given priority*
16 - 24	Number	278	61
	Percentage	8.8%	9.9%
25 - 34	Number	1,045	169
	Percentage	33.2%	27.3%
35 - 44	Number	1,078	194
	Percentage	34.3%	31.4%
45 - 54	Number	593	158
	Percentage	18.8%	25.6%
55 - 64	Number	126	32
	Percentage	4.0%	5.2%
65 and over	Number	26	4
	Percentage	0.8%	0.6%
Total	Number	3,146	618



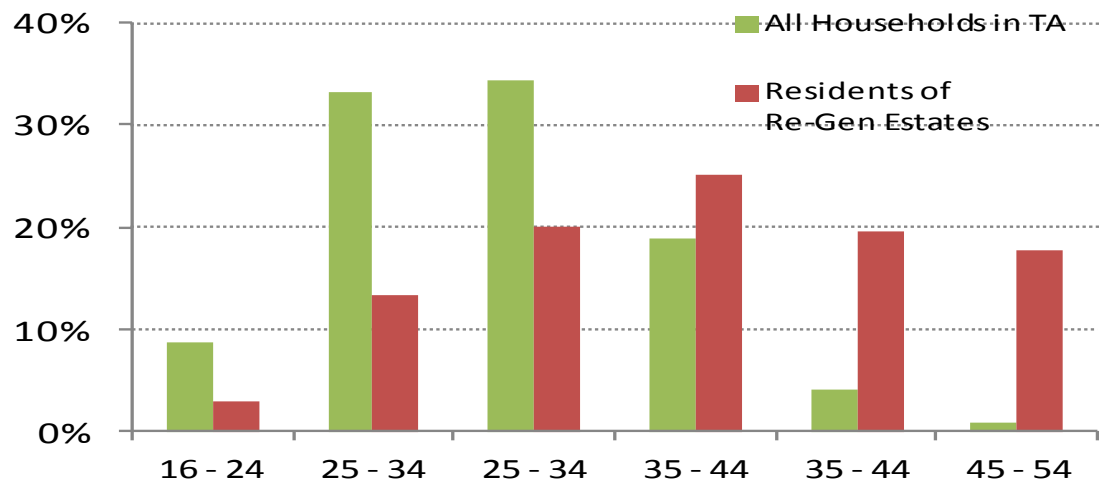


Although there is a decrease in the percentage of younger age groups, it is likely that younger parents will have greater support needs than older parents. It is also noted that despite there are generally more younger people meeting the priority criteria, there is an higher percentage of 16-24 year old lone females with dependant children who don't meet the priority criteria (from 7.2% of all in Temporary Accommodation to 9.4%).

Impact of Lettings Plan

Tenants on Regeneration estates have an older profile than those in Temporary Accommodation and allocating properties to decanted households will mean longer stays in Temporary Accommodation for the Homeless Households who have a younger profile.

Age Group	Measure	All Households in TA	Tenants on Re-Gen Estates
16 - 24	Number	278	60
	Percentage	8.8%	2.9%
25 - 34	Number	1,045	278
	Percentage	33.2%	13.4%
35 - 44	Number	1,078	417
	Percentage	34.3%	20.0%
45 - 54	Number	593	521
	Percentage	18.8%	25.0%
55 - 64	Number	126	406
	Percentage	4.0%	19.5%
65 and over	Number	26	371
	Percentage	0.8%	17.8%
Not Known	Number	-	29
Total	Number	3,146	2,082



The distribution of properties to decanted households will result in an increase in the time Homeless Households spend in Temporary Accommodation. However, in the medium term, the allocation of lettings to decants will also mean that new properties coming out of estate renewals programmes will be released to Homeless Households rather than used to decant households on the estate. It is also noted that these properties will provide more 2 and 3 bed units which are in currently in short supply. The delivery of these new properties will be delayed if assistance is not given to decanting the estate.

Disability

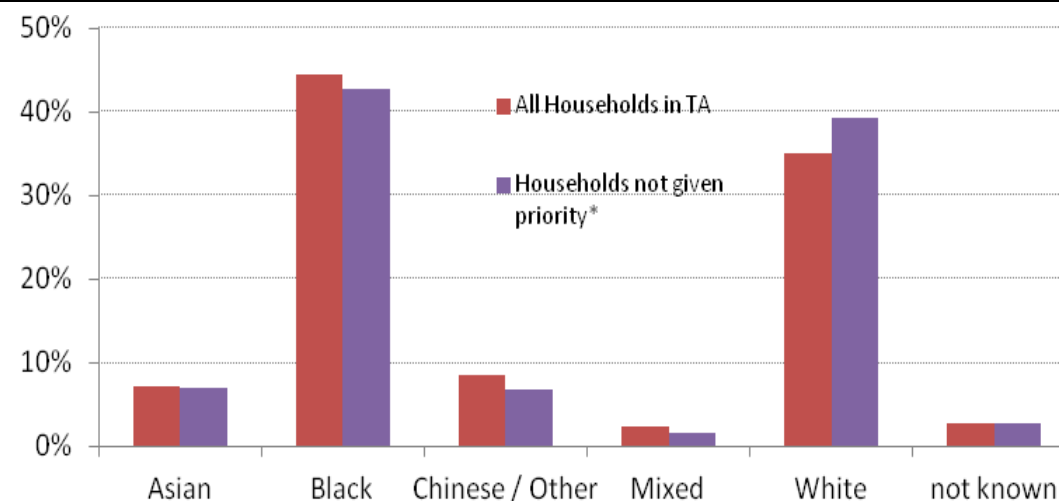
Impact of Temporary Accommodation Allocations Policy

The Temporary Accommodation Allocation 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>Priority is also given to households containing a child with SEN receiving education or support in Haringey.</p> <p>The policy does allow some with disabilities 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> <p><u>Impact of Lettings Plan</u></p> <p>The impact of the prioritising decants over homeless households will have a positive impact on disabled households on the Love Lane Estate as they will be waiting a shorter period of time for a new home which meets their need. However, this policy will also cause longer stays in temporary accommodation.</p> <p>Rehousing is likely to have a higher impact on those in Temporary Accommodation than those who are already have permanent tenancies as those housed in permanent housing are more likely to have established support networks. However, as Temporary Accommodation is allocated with regard to need, Temporary Accommodation is more likely to be suitable than long term residents of estates who may not have not requested more suitable accommodation and/or are awaiting transfers .</p> <p>With regard to the profiles of those likely to be rehoused and those on the decant estates, there are similar profiles between these two populations with 17% of households in band A of Housing Register having a disability against 16.7% of people in Northumberland Park ward who a long term limiting illness and 7.2% who describe their health as bad or very bad</p> <p>Within each Lettings Plan, lettings are allocated for Critical and Serious medical/welfare cases, and these can be reviewed and/or amended annually which can amend the priority to those with higher needs.</p>	
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Race & Ethnicity		✓	<u>Impact of Temporary Accommodation Allocations Policy</u>
			Given the high proportion of black households in TA, the location of offers will disproportionately affect black households who make up 44.4% of all households.
			The proportion of households affected by the criteria is broadly in line with the proportion of these households in temporary accommodation, although a slightly higher proportion of white households are affected (from 34.9% of all households in TA to 39.2% of those who would not be prioritised)
			As discussed above in gender, the majority of households who don't meet the priorities for local placements will have dependant children. It is noted that of the 264 Black Households who might be placed out of the borough, 213 will be single females with dependant children.



In addition to the impact on families, placement out of London placement may have an adverse affect on access to cultural facilities and links to established communities.

Impact of Lettings Plan

The populations of re-generation estates and those in Temporary Accommodation are broadly similar though there are more Asian and mixed households on the estate and slightly more white households. However, there is a high proportion of black households and white households currently in Temporary Accommodation and therefore these households will be predominantly affected by the policy. If the Lettings Plan increases the distribution of properties to decants then these households will spend longer waiting in temporary accommodation.

Ethnicity	Measure	All Households in TA	Residents of Re-Gen Estates
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			<table><tr><td>Asian</td><td>Number</td><td>224</td><td>89</td></tr><tr><td>Asian</td><td>Percentage</td><td>7.1%</td><td>4.3%</td></tr><tr><td>Black</td><td>Number</td><td>1,396</td><td>905</td></tr><tr><td>Black</td><td>Percentage</td><td>44.4%</td><td>43.5%</td></tr><tr><td>Chinese / Other</td><td>Number</td><td>268</td><td>161</td></tr><tr><td>Chinese / Other</td><td>Percentage</td><td>8.5%</td><td>7.7%</td></tr><tr><td>Mixed</td><td>Number</td><td>74</td><td>19</td></tr><tr><td>Mixed</td><td>Percentage</td><td>2.4%</td><td>0.9%</td></tr><tr><td>White</td><td>Number</td><td>1,099</td><td>767</td></tr><tr><td>White</td><td>Percentage</td><td>34.9%</td><td>36.8%</td></tr><tr><td>not known</td><td>Number</td><td>85</td><td>141</td></tr><tr><td>not known</td><td>Percentage</td><td>2.7%</td><td>6.8%</td></tr><tr><td>Total</td><td>Number</td><td>3,146</td><td>2,082</td></tr></table> <div><table><caption>Ethnic Group Percentage Comparison</caption><thead><tr><th>Ethnic Group</th><th>All Households in TA (%)</th><th>Residents of Re-Gen Estates (%)</th></tr></thead><tbody><tr><td>Asian</td><td>7.1%</td><td>4.3%</td></tr><tr><td>Black</td><td>44.4%</td><td>43.5%</td></tr><tr><td>Chinese / Other</td><td>8.5%</td><td>7.7%</td></tr><tr><td>Mixed</td><td>2.4%</td><td>0.9%</td></tr><tr><td>White</td><td>34.9%</td><td>36.8%</td></tr><tr><td>not known</td><td>2.7%</td><td>6.8%</td></tr></tbody></table></div>	Asian	Number	224	89	Asian	Percentage	7.1%	4.3%	Black	Number	1,396	905	Black	Percentage	44.4%	43.5%	Chinese / Other	Number	268	161	Chinese / Other	Percentage	8.5%	7.7%	Mixed	Number	74	19	Mixed	Percentage	2.4%	0.9%	White	Number	1,099	767	White	Percentage	34.9%	36.8%	not known	Number	85	141	not known	Percentage	2.7%	6.8%	Total	Number	3,146	2,082	Ethnic Group	All Households in TA (%)	Residents of Re-Gen Estates (%)	Asian	7.1%	4.3%	Black	44.4%	43.5%	Chinese / Other	8.5%	7.7%	Mixed	2.4%	0.9%	White	34.9%	36.8%	not known	2.7%	6.8%	
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Sexual Orientation			<u>Impact of Temporary Accommodation Allocations Policy and Lettings Plan</u>																																																																										

			<p>The supply strategy and Temporary Accommodation placements policy are not anticipated to have a disproportionate impact on this protected group.</p> <p>However, information on sexual orientation is not available in relation to the proportion of households presenting as homeless, accessing temporary accommodation or on the council's housing register. Similarly, information is not available for tenants on the possible estate renewal sites</p>										
Religion or Belief (or No Belief)			<p><u>Impact of Temporary Accommodation Allocations Policy and Lettings Plan</u></p> <p>Information on religion is not available for those in temporary accommodation and only partial for those on estates. However, it is noted that for those in Temporary Accommodation who may be moved out of the borough may be isolated in terms of being near religious institutions and appropriate cultural facilities. These factors should be taken into account when assessing each client</p>										
Pregnancy & Maternity			<p><u>Impact of Temporary Accommodation Allocations Policy</u></p> <p>The Placements policy gives priority to those who are on maternity leave and so those on maternity leave will be excluded. There is also a significant decrease in the number of pregnant women and these factors and support levels will be considered with the assessment of each household</p> <table><tr><th>Measure</th><th>All Households in TA</th><th>Households not given priority*</th></tr><tr><td>Number</td><td>22</td><td>1</td></tr><tr><td>Percentage</td><td>0.7%</td><td>0.2%</td></tr></table> <p><u>Impact of Lettings Plan</u></p> <p>There is no information on pregnancy on housing estates, but the Lettings plans are not anticipated to have a significant impact on those who are pregnant.</p>	Measure	All Households in TA	Households not given priority*	Number	22	1	Percentage	0.7%	0.2%	
Measure	All Households in TA	Households not given priority*											
Number	22	1											
Percentage	0.7%	0.2%											

Marriage and Civil Partnership (note this only applies in relation to eliminating unlawful discrimination (limb 1))			<p>There is no information for either temporary accommodation or the lettings plan held on marriage and civil partnership. However, Temporary accommodation figures indicate a high proportion of single households will be affected. These households may have greater need of local support networks which could be disrupted by out of borough placement.</p>	<p>See note to left</p>
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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				The proposals will not impact on staff
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
<p>Temporary Accommodation Allocations Policy</p> <p>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.</p> <p>The allocations 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. Those with dependent children will be particularly affected and represent 87% of those who won't meet the priority criteria. 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.</p>	<p>Temporary Accommodation Allocations Policy</p> <p>The Temporary Accommodation Allocations Policy 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.</p> <p>Homes for Haringey will be commissioned to develop a package of support to be introduced in conjunction with the Temporary Accommodation Allocations Policy. Possible support measures that will be considered include:</p> <ul style="list-style-type: none"> • Assistance on the placement of children in local schools • Subsidised travel back to the local borough for set periods • Assistance in registering with local health, social services and other support agencies. • Working with the local authorities to generate additional support packages <p>The outcomes of the Temporary Accommodation Allocations 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 accomodaiton in neighbouring broughs and, exceptionally, out of London. The policy and the annual monitoring reports will be publically available</p> <p>Lettings Plan</p>

<p>Lettings Plan</p> <p>The effect of the Lettings Plan and in particular, the tension between decanting properties and housing homeless households will affect the length of time households spend in temporary accommodation.</p> <p>The proposal put to members is to offer limited support to the decant programme to start each renewal scheme. This will allow each scheme to start but will allow homeless households to continue to be housed. However, this will mean that newer properties will be allocated to current tenants at the expense of homeless households.</p>	<p>The extension of time in Temporary Accommodation will be reduced if a limit is agreed on the support for decant placements. For those who are currently in Temporary Accommodation, current support packages will continue.</p> <p>The impact on protected groups will be assessed annually when setting the Lettings Plan for the following year, and will include a review the allocation of lettings between the decant programme and homeless households.</p>
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Stage 7 - Consultation and follow up data from actions set above	
Data Source (include link where published)	What does this data include?
<p>There is no statutory requirement to consult on this policy and given the transient population of those in Temporary Accommodation and the considerable testing of policies through the court, such consultation is likely to be of limited value.</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 non exam age children. Under the proposed Temporary Accommodation procurement plan, 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 case 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.