

EQUALITY IMPACT ASSESSMENT

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

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity for 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.

Stage 1 - Screening

Stage 2 – Full Equality Impact Assessment

An EqIA provides evidence for meeting the Council's commitment to equality and the responsibilities under the Public Sector Equality Duty.

1. Responsibility for the Equality Impact Assessment

Name of proposal	TA Storage and Removals charges
Service area	Housing and Growth
Officer completing assessment	Martin Gulliver
Equalities/ HR Advisor	Daisy Daventry
Cabinet meeting date (if applicable)	Cabinet member signing - proposed 11 July
Director/Assistant Director	Lyn Garner / Dan Hawthorn

2. Summary of the proposal

The Council has a statutory duty to provide storage and removal service to households who approach the Council as homeless and who are unable to make any alternative arrangements for their property. The Council currently charges 50% of the costs of most of the services provided and with just over half of customers holding items in storage for over 2 years, has allowed arrears to accumulate for these customers.

The proposal is to introduce a revised charging policy approach, which both supports households and ensures that the Council is able to deliver a financially sustainable service. The proposed new policy is to provide the collection, storage and return of property at no cost to the household while their homelessness application is being assessed.

While a decision is being made on their homelessness application, households will not be charged for the collection or storage of their property. It is also proposed that users are permitted one free use of the 'once only' delivery and return to storage of their property during this time.

After a homelessness decision has been made, the household who are not accepted as homeless will be served with a formal notice giving them a month to provide an address to which their stored items will be delivered. Where a homeless decision accepts a duty,

households will be served with notices when they have been rehoused into self-contained property if they have not accepted delivery of their property. It is proposed that there are no fees for the service during the notice period.

Once the formal notice has expired, the household will be asked to pay for additional storage in advance, or agree to the items being disposed of.

The proposed policy will result in lower charges for users up until the expiry of the notice, but higher costs for those who wish to continue using the service.

Existing users will be subject to the same charging policy – that is, they will be served with a formal notice giving them a period of a month to make alternative arrangements. There will be no cost before the expiry of a formal notice, but costs will apply following the month's notice period. The service of the notices will be rolled out over the next 6 months..

The demographics of those using the service will reflect the type of households who seek assistance for housing and are vulnerable to becoming homeless, particularly lone parent households, and BME households.

The proposal is to seek authorisation by a Cabinet Member Decision.

3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?

Protected group	Service users	Staff
Sex	P1E Homelessness data https://www.gov.uk/government/collections/homelessness-statistics Internal data from homelessness and temporary accommodation	The proposed charges will not impact on Haringey Council employees (unless residents of the borough and are also homeless or likely to become homeless and thus included below).
Gender Reassignment	Joint Strategic Needs Assessment (JSNA) http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment-jsna	
Age	P1E Homelessness data https://www.gov.uk/government/collections/homelessness-statistics Internal data from homelessness and temporary accommodation	
Disability	As above	
Race & Ethnicity	As above	
Sexual Orientation	Joint Strategic Needs Assessment (JSNA) http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment-jsna EqIA Profile on Harinet Albert Kennedy Trust: "LGBT Youth Homelessness" http://www.akt.org.uk/webtop/modules/repository/documents/AlbertKennedy_researchreport_FINALinteractive.pdf	

Religion or Belief (or No Belief)	Joint Strategic Needs Assessment (JSNA) http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment-jsna	
Pregnancy & Maternity	EqIA Profile on Harinet Internal data from homelessness and temporary accommodation EqIA Profile on Harinet P1E Homelessness data https://www.gov.uk/government/collections/homelessness-statistics	
Marriage and Civil Partnership	Internal data from homelessness and temporary accommodation	

Outline the key findings of your data analysis.

Users who will benefit from the proposed changes

The proposed charging policy will benefit new users, as the current re-charge of 50% of costs will be removed until the expiry of a one month notice period. Where a homelessness duty is accepted will be served with a notice when they have been moved into self-contained accommodation. Where a homelessness duty is not accepted, households will be served with a formal notice with their decision letter. This period should give sufficient time for these households to have found alternative accommodation.

The proposed charging policy will have a mixed effect on existing users. The policy allows free storage and delivery until the months notice period has elapsed after households have been served with a notice. However, those users who wish to continue using the service after the expiry of the notices will face increased costs equivalent to a 100% recharge of the costs.

Groups who seek housing assistance

There is limited data on the current users of the storage service and complete records are only available for 120 of the current users giving the following demographics. The demographics of applicants are also provided for comparison.

Age	Current Users	Applicants
16-24	2%	14%
25-44	61%	64%
45-59	33%	19%
60-64	2%	2%
65 or over	2%	1%

Gender	Current Users	Applicants
Female	77%	71%
Male	23%	29%

Ethnicity	Current Users	Applicants
Asian	6%	6%
Black	51%	41%
Chinese or other	12%	11%
Mixed	0%	5%
White	28%	34%
Refused	3%	3%

From government data on Homelessness applicants across the country, it is clear lone female headed households are over-represented among potential users, representing 71% of households who make homelessness applications. All but 5 of the 120 households have children.

There is also limited data on disability among those making applications for storage. There is only data on disability in homelessness applications if it is their priority need. In 2015/16, 3% of accepted households had a physical impairment as their priority need and 2 cases had a mental health issue or learning disability as their priority need. These rates are relatively low compared to the general population as there are Disability and Mental Health Pathways which help these households into suitable housing so that they do not need to make homelessness applications.

Adults aged 25-54 are also over-represented in homelessness services as they form 78% of all households making a homelessness application. However, it is important to note that with families this will represent the head of the household and that households may contain other members of differing ages.

LGBT people comprise up to 24% of the young homeless population nationally though this data is not collected by Haringey.

The Council does not hold data on the religion of its tenants or resident leaseholders, but the borough profile by religion is as follows;

Religion in Haringey	Percentage
Christian	45.0%
Buddhist	1.1%
Hindu	1.8%
Jewish	3.0%
Muslim	14.2%
Sikh	0.3%
Other religion	0.5%
No religion	25.2%
Not stated	8.9%

The proposed policy will benefit Households, particularly new applicants, who only use the storage as a short term option, as the service will be free to use. However the proposed policy may have a negative impact on households that choose to continue using the service for long term storage after the free-of-charge month's notice period, as they will have to pay the full costs of storage.

Examples of the financial affect on new and current users

Scenario 1: New Users who take Items back within one month notice period

<i>Current charging structure</i>	<i>Collection</i>	<i>Storage (Wk 1-11)</i>	<i>Return</i>
Unit Cost	£50	£30	£50
Cumulative Costs	£50	£80	£120

Proposed charging structure

Unit Cost	£0	£0	£0
Cumulative Costs	£0	£0	£0

Scenario 2: New Users who keep items in storage after the end of the one month notice period

<i>Current charging structure</i>	<i>Collection</i>	<i>Storage (Wk 1-11)</i>	<i>Storage (Wk 12-15)</i>	<i>Storage (Wk 16-19)</i>	<i>Storage (Wk 20-23)</i>	<i>Storage (Wk 24-27)</i>
Unit Cost	£50	£30	£10	£10	£10	£10
Cumulative Costs	£50	£80	£90	£100	£110	£120

4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

This is a demand led service, and most households in temporary accommodation will not require use of the service. Demand has been declining - it reduced from an average of 13 new cases per month in 2015, to 3 for the last six months of 2017/18.

Homeless households have been consulted on two new policies in the last eight months. Given the low numbers of users, and to avoid consultation fatigue, it was proposed that it would be proportionate for consultation to be undertaken with our partners on the Homelessness Forum, who are best placed to understand the impact of the increased recharge on service users. This took place between 1 and 10 March inclusive. No responses were received.

However this consultation took place on the principle of charging 50% for all new service users, whilst the existing users would be subject to continuing rates. The new approach set out here is to provide a free service to all new users, whilst charging a new rate for all existing users for storage.

In view of the lack of response for the first consultation, a revised consultation would not be considered necessary.

4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

As set out in section 4(a) above, no additional consultation has been undertaken.

5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

1. Sex

Positive	Y	Negative		Neutral impact		Unknown Impact	
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Lone parent households headed by a female are over-represented among current users (67%). They will benefit from the removal of the initial costs of collection, storage and return. However, in the longer term, they may find it harder to find alternative storage after the month period has elapsed, because they may not have family networks and/or a lower income.

2. Gender reassignment

Positive		Negative		Neutral impact		Unknown Impact	Y
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There is very little information available nationally on the proportion of homeless people undergoing gender reassignment. Overall the numbers of households or persons who have undergone gender reassignment and present as homeless or residing in temporary accommodation are expected to be in line with their proportion of the general population.

We have no cause to think that people with this protected characteristic will be disproportionately impacted by this decision. As with other groups, they will benefit from the removal of the initial costs of collection, storage and return..

3. Age

Positive	Y	Negative		Neutral impact		Unknown Impact	
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Adults aged 25-54 are over-represented among current users. However this group is of working age and less likely to be vulnerable. Users will benefit from the removal of the initial costs of collection, storage and return

4. Disability

Positive	Y	Negative		Neutral impact		Unknown Impact	
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Most users with a disability presenting as homeless are referred through our supported housing pathways. Where this does not occur - and the overall numbers presenting as homeless due to their disability are very low - they will benefit from the removal of the initial costs of collection, storage and return

It is possible that households with a disabled person are likely to have more equipment and may need more space within their home to manoeuvre, which can't therefore be given over to storage. However, providing space within the home for the storage of equipment will be taken into account in their initial and subsequent placements in temporary accommodation.

5. Race and ethnicity

Positive	Y	Negative		Neutral impact		Unknown Impact	
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BME households are over-represented amongst households making homelessness applications and are therefore likely to be over-represented among service users. Some groups, such as families of Somali origin, tend to have more children. The lack of storage options may be one that has greatest impact on larger families as they may have more belongings due to their size. They will benefit from the removal of the initial costs of collection, storage and return. However, if they choose to continue to make use of the storage facility in the long term, they will incur additional charges.

6. Sexual orientation

Positive		Negative		Neutral impact		Unknown Impact	Y
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69% of LGBT homeless young people have experienced familial rejection, abuse and violence and therefore they're less likely to have family networks that can assist with storing belongings. While they are also more likely to have a low or no income due to their age, for the same reason they are also less likely to have accumulated furniture and other larger belongings which will require storage.

The overall numbers of households making a homelessness application who identify as other than heterosexual are expected to be in line with their proportion of the general population.

There is insufficient data available to assess the impact on this protected group but where they are using this service, they will benefit from the removal of the initial costs of collection, storage and return.. If they choose to continue to make use of the storage facility in the long term, they will incur additional charges.

7. Religion or belief (or no belief)

Positive		Negative		Neutral impact		Unknown Impact	Y
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Strictly Orthodox Jewish households and some Muslim households, such as households of Bangladeshi origin, tend to be larger as they include more children and therefore have more possessions. However this information is not recorded among service users.

There is insufficient data available to assess the impact on this protected group but where they are using this service, they will benefit from the removal of the initial costs of collection, storage and return. If they choose to continue to make use of the storage facility in the long term, they will incur additional charges.

8. Pregnancy and maternity

Positive	Y	Negative		Neutral impact		Unknown Impact	
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Women who are pregnant or have a new born child represent a small proportion of those making a homelessness application, with no pregnant users in February 2016, and only 22 households with a pregnant woman making homelessness applications in the twelve months to 31 December 2016. As new mothers are more likely to have higher storage needs, they will benefit from the removal of the initial costs of collection, storage. If they choose to continue to make use of the storage facility in the long term, they will incur additional charges.

9. Marriage and Civil Partnership

Positive		Negative		Neutral Impact	Y	Unknown Impact	
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It is not anticipated the proposal will have an impact for married people or people who are civil partners so will not have an impact with regard to this protected characteristic but where they are using this service, they will benefit from the removal of the initial costs of collection, storage and return. If they choose to continue to make use of the storage facility in the long term, they will incur additional charges.

10. Groups that cross two or more equality strands e.g. young black women

Members of protected groups are over-represented among users of this service, and homeless households generally – and as such, there are many users who have multiple protected characteristics. However, there are not anticipated to be any compounding impacts associated with being a member of more than one protected group.

Outline the overall impact of the policy for the Public Sector Equality Duty:

The revised charging policy impacts all potential users. Demand for the service is from homeless households who are unable to secure their belongings whilst being housed in temporary accommodation. This group forms a small proportion of households seeking housing from the local authority.

Any impact of increased charges will be upon the vulnerable groups over represented amongst homeless households. The mitigating steps outlined above should help to minimise this impact.

6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?

	Outcome	
No major change to the proposal:		Y
Adjust the proposal:		
Stop and remove the proposal:		

6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty

Impact	Action	Lead officer	Timescale
Where vulnerable households choose to continue use of the service for long term storage following the expiry of the month notice they will incur higher charges.	<p>The council will seek to place homelessness applicants in stage 2 accommodation that is unfurnished, allowing applicants to use and store their belongings in their home.</p> <p>All households will be provided with advice on different options for storage or for disposal of their belongings. It will include a free service to allow households the choice to pick and choose belongings to keep, with free disposal of the remaining items.</p>	Contracts & Payments Team Manager (Homes for Haringey)	Immediate and ongoing

6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:

We will commence quarterly monitoring of the service users in terms of key demographic data. We will analyse if the rent account is fully paid or in arrears as a result of the charges and review whether this has a disproportionate impact on a protected group.

7. Authorisation

EqlA approved by  Date 27 June 2017

8. Publication

Please contact the Policy & Strategy Team for any feedback on the EqlA process.

