

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.

This is the Public Sector Equality Duty

In addition the Council complies with the Marriage (same sex couples) Act 2013.

Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on protect characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

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.

When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.

Please read the Council’s Equality Impact Assessment Guidance before beginning the EqIA process.

1. Responsibility for the Equality Impact Assessment

Name of proposal	Commercial Property Business Plan (Haringey Development Vehicle Cabinet Report July 2017)
Service area	Commercial Property
Officer completing assessment	Laura Bridges
Equalities/ HR Advisor	Paul Green
Cabinet meeting date (if applicable)	3 rd July 2017
Director/Assistant Director	Vicky Clark, Assistant Director for Economic Development and Growth

2. Summary of the proposal

Please outline in no more than 3 paragraphs

- *The proposal which is being assessed*
- *The key stakeholders who may be affected by the policy or proposal*
- *The decision-making route being taken*

The HDV has a diverse commercial portfolio of high-street retail, industrial estates, office, childcare and some units that provide community facilities. This creates an exciting, progressive opportunity for HDV to utilise these assets as a catalyst for regeneration, creating employment space and homes and revitalising town centres to make them attractive places to live and work.

The HDV will benefit from Lendlease expertise in asset, property and investment management. Lendlease will act as overall asset manager to develop and deliver a plan that will secure enhanced social and economic outcomes alongside increasing capital value and income streams. The revenue generated from development opportunities and disposal of assets will support the ongoing operations of the HDV and be reinvested into the borough to meet HDV objectives. The commercial portfolio provides a critical platform for HDV to deliver immediate, short-term regeneration benefits and build a visible presence in the community.

The key stakeholders are the current businesses and leaseholders that occupy the properties in the commercial portfolio and the vast majority of them will benefit from proactive management and improvements made to each individual unit over time.

All lease transactions on commercial properties that yield £50,000 or less through annual rent will be delegated to Lendlease, as Asset Manager.

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?

Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis. Please include any gaps and how you will address these

This could include, for example, data on the Council’s workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national. For restructures, please complete the restructure EqIA which is available on the HR pages.

Protected group	Service users	Staff
Sex	Census 2011	N/A
Gender Reassignment	We do not hold this data. The Equality and Human Rights Commission have published a national estimate.	N/A
Age	Census 2011	N/A
Disability	Census 2011	N/A
Race & Ethnicity	Census 2011	N/A
Sexual Orientation	ONS Annual Population Data 2016	N/A
Religion or Belief (or No Belief)	Census 2011	N/A
Pregnancy & Maternity	Census 2011	N/A
Marriage and Civil Partnership	Census 2011	N/A

Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough’s demographic profile? Have any inequalities been identified?

Explain how you will overcome this within the proposal.

Further information on how to do data analysis can be found in the guidance.

The Commercial Portfolio will involve the transfer of non-housing properties to the HDV in order to manage them more effectively. We do not have equality data for leaseholders of individual units that will be in the portfolio. However, we understand the diversity of the borough, which are likely to use and benefit from the commercial properties in the portfolio, but we are aware it is likely that there will be a range of businesses, including retail businesses, such as cafes and restaurants offering cultural and ethnic traditions of different BAME groups.

The portfolio will include 5 children’s centres and 1 stay and play facility. Three community centres, including Northumberland Park resource centre, Broadwater Farm

based enterprise and community centre and the community centre based on Tiverton Road.

It will include childcare and nursery services, public sector buildings, charities and retail businesses that promote cultural aspects of the diverse local communities. The decision itself will not impact on these organisations as the HDV will take over the management of business leases and will not change any lease conditions at the point of transfer. It may have an initial positive impact as there will be improvements in management functions and lease services. It is likely that the conditions or rents of these properties will change when leases are renewed or the relevant review point in the lease occurs in order to meet the economic requirements.

Consideration will be needed before there is any change to these properties to ensure that any future lease policy takes into consideration the impact of leases that provide a public function, such as nurseries, charities and public sector services. The HDV, advised by the relevant council service, should undertake this analysis. This is to ensure the Council pays due regard to the PSED.

In particular, VAT will be introduced for all Commercial Properties which will impact on all public functions within the Commercial Portfolio, as well as small businesses, which are likely to be owned by protected groups, such as BAME communities. The HDV Board, advised by the Council, will develop a phased approach in order to reduce the impact for small businesses and public functions within the portfolio. An EqlA will be developed to inform the approach.

A) Sex¹

	Female	Male
Haringey	50.5%	49.5%
London	50.9%	49.1%
England	50.8%	49.2%

As in common with national and regional trends, there are slightly more females than males.

	Female headed lone parent families	Male headed lone parent families
Haringey	93.8%	7.3%
London	92.5%	7.5%
England	90.3%	9.7%

Haringey has a higher proportion of female headed families compared to London and England. They are more likely to use services, such as childcare, health and advice services that could be in the Commercial Portfolio.

It is likely that the conditions or rents of Commercial Portfolio properties will change when leases are renewed or the relevant review point in the lease occurs in order to meet the economic requirements of the business case. An EqlA will be needed to be undertaken by the HDV, advised by the relevant council service at this point, to ensure that any future lease policy takes into consideration the impact of leases that provide a

¹ Census 2011

function disproportionately used by women and female headed lone parent families, such as childcare, health and advice services.

Gender reassignment

We do not hold data on the number of people who are seeking, receiving or have received gender reassignment surgery, and there is not national data collected for this protected characteristic. The Equality and Human Rights Commission estimate that there is between 300,000-500,000 transgender people in the UK². We will need to consider the inequalities and discrimination experienced for this protected group when the conditions or rents of these properties will change when leases are renewed or the relevant review point in the lease occurs, through undertaking individual EqlAs by the HDV, advised by the relevant Council service. For the purposes of this EqlA, we will use the inclusive term Trans* in order to represent the spectrum of transgender and gender variance.

B) Age ³

Population Statistics								
	Haringey (popn.)		Haringey (%)		London (%)		England and Wales (%)	
	2001	2011	2001	2011	2001	2011	2001	2011
All ages	216,511	254,900	216,511	254,900	7,172,091	8,173,900	52,041,916	56,075,900
0 – 4	14,734	18,100	6.8	7.1	6.7	7.2	5.9	6.2
5 – 9	13,680	15,800	6.3	6.2	6.3	5.9	6.4	5.6
10 – 14	13,634	15,200	6.3	6.0	6.1	5.6	6.6	5.8
15 – 19	12,974	14,300	6.0	5.6	5.8	5.8	6.2	6.3
20 – 24	18,313	18,800	8.5	7.4	7.4	7.7	6.0	6.8
25 – 29	23,263	28,100	10.7	11.0	9.7	10.2	6.6	6.8
30 – 34	23,066	28,500	10.7	11.2	9.7	9.7	7.7	6.6
35 – 39	21,121	22,700	9.8	8.9	8.8	8.1	7.9	6.7
40 – 44	15,575	20,100	7.2	7.9	7.1	7.5	7.0	7.3
45 – 49	11,856	17,700	5.5	6.9	5.8	6.8	6.3	7.3
50 – 54	10,846	13,400	5.0	5.3	5.7	5.6	6.9	6.4
55 – 59	8,453	10,600	3.9	4.2	4.5	4.5	5.7	5.7
60 – 64	7,817	9,200	3.6	3.6	3.9	4.2	4.9	6.0
65 – 69	6,805	6,700	3.1	2.6	3.5	3.1	4.4	4.8
70 – 74	5,171	5,900	2.4	2.3	3.1	2.6	4.0	3.9
75 – 79	4,041	4,500	1.9	1.8	2.6	2.2	3.4	3.2
80 – 84	2,656	2,900	1.2	1.1	1.7	1.6	2.3	2.4
85 – 89	1,645	1,600	0.8	0.6	1.1	1.0	1.3	1.5
90+	861	800	0.4	0.3	0.5	0.5	0.6	0.8

The proportion of the population aged 25-39 in Haringey is significantly higher than London (31.1% vs. 28.1%). Haringey's younger population has a similar age profile to London, with 24.9% of Haringey residents aged less than 20 years (compared with 24.5% in London). Those aged 20 – 64 make up 66.3% of the total population. The population of residents aged 65 and over in Haringey is 8.8%, much lower than 11.1% of residents in London. Consideration will be needed on public functions which benefit different age groups, such as nurseries and health services.

² <https://www.equalityhumanrights.com/en/trans-inequalities-reviewed/introduction-review>

³ Census 2011

It is likely that the conditions or rents of the properties will change when leases are renewed or the relevant review point in the lease occurs in order to meet the economic requirements of the business case. An EqIA will be needed to be undertaken by the HDV, advised by the relevant council service to ensure that any future lease policy takes into consideration the impact of lease, that provide a function disproportionately used by different age groups, such as childcare, health and advice services.

Age profile Haringey by ward

Ward	All ages	0-19	%	20-64	%	65+	%
Alexandra	11795	3048	25.8%	7575	64.2%	1172	9.9%
Bounds Green	13725	3115	22.7%	9341	68.1%	1269	9.2%
Bruce Grove	14483	4086	28.2%	9183	63.4%	1214	8.4%
Crouch End	12395	2274	18.3%	9013	72.7%	1108	8.9%
Fortis Green	12488	3151	25.2%	7965	63.8%	1372	11.0%
Harringay	13272	2363	17.8%	9909	74.7%	1000	7.5%
Highgate	11632	2101	18.1%	8175	70.3%	1356	11.7%
Hornsey	12659	2777	21.9%	8845	69.9%	1037	8.2%
Muswell Hill	10784	2337	21.7%	7143	66.2%	1304	12.1%
Noel Park	13939	3369	24.2%	9391	67.4%	1179	8.5%
Northumberland Park	14429	4726	32.8%	8565	59.4%	1138	7.9%
St Ann's	14638	3248	22.2%	10149	69.3%	1241	8.5%
Seven Sisters	15968	5068	31.7%	9730	60.9%	1170	7.3%
Stroud Green	11758	2298	19.5%	8653	73.6%	807	6.9%
Tottenham Green	14580	3710	25.4%	9675	66.4%	1195	8.2%
Tottenham Hale	15064	4508	29.9%	9384	62.3%	1172	7.8%
West Green	13372	3246	24.3%	8854	66.2%	1272	9.5%
White Hart Lane	13431	4532	33.7%	7769	57.8%	1130	8.4%
Woodside	14514	3417	23.5%	9864	68.0%	1233	8.5%

However, this age profile is not reflected consistently across the borough, with White Hart Lane with the highest proportion of 0-19 year olds at 33.7%, 20-65 year olds being disproportionately high in Haringey ward at 74.7% and Muswell Hill with the highest proportion of 65 years and older at 12.1%. Consideration will be needed on public functions which benefit different age groups, such as nurseries and health services.

It is likely that the conditions or rents of the properties will change when leases are renewed or the relevant review point in the lease occurs in order to meet the economic requirements of the business case. An EqIA will be needed to be undertaken by the HDV, advised by the relevant council service to ensure that any future lease policy takes into consideration the impact of lease that provide a function disproportionately used by different age groups, such as childcare, health and advice services. In particular, consideration for the local age profile will especially be important.

C) Disability⁴

	Haringey	London	England and Wales
Day-to-day activity limited a lot	6.8%	6.7%	8.3%
Day-to-day activity limited a little	7.2%	7.4%	9.3%
Day-to-day activity not limited	86.0%	85.8%	82.4%
Day-to-day activity limited a lot: Age 16-64	3.8%	3.4%	3.6%
Day-to-day activity limited a little: Age 16-64	4.6%	4.2%	4.6%
Day-to-day activity not limited: Age 16-64	62.4%	61.5%	56.5%

Haringey has roughly the same proportion of people where day-to-day activity is limited to some extent as London, but lower than the national average. Disabled people are more likely to use public functions that are in premises of the Commercial Portfolio, such as health and advice services.

It is likely that the conditions or rents of the properties will change when leases are renewed or the relevant review point in the lease occurs in order to meet the economic requirements of the business case. An EqIA will be needed to be undertaken by the HDV, advised by the relevant council service at this point to ensure that any future lease policy takes into consideration the impact of lease that provide a function disproportionately used by disabled people, such as health and advice services.

In addition, reasonable adjustments should be offered to any individual involved in this process, such as communicating with a disabled person who is a leaseholder of one of the properties.

⁴ Census 2011

D) Ethnicity

	Haringey	London	England
White; English/Welsh/Scottish/N.Irish/British	34.68%	44.89%	79.75%
White Irish	2.75%	2.15%	0.98%
White; Gypsy or Irish Traveller	0.15%	0.10%	0.10%
White; White Other	22.97%	12.65%	4.58%
Mixed; White and Black Caribbean	1.90%	1.46%	0.78%
Mixed; White and Black African	1.02%	0.80%	0.30%
Mixed; White and Asian	1.47%	1.21%	0.63%
Mixed; Other mixed	2.10%	1.45%	0.53%
Asian/Asian British; Indian	2.33%	6.64%	2.62%
Asian/Asian British; Pakistani	0.75%	2.74%	2.10%
Asian/Asian British; Bangladeshi	1.73%	2.72%	8.23%
Asian/Asian British; Chinese	1.47%	1.52%	0.72%
Asian/Asian British; Other Asian	3.19%	4.88%	1.55%
Black African	9.04%	7.02%	1.8%
Black Caribbean	7.10%	4.22%	1.1%
Black Other	2.63%	2.08%	0.52%
Other Ethnic group; Arab	0.87%	1.30%	0.42%
Other Ethnic group; Any Other Ethnic	3.85%	2.14%	0.62%

Haringey has less 'White British' population than London and England, and has a significant 'White Other' population compared to London and England. This includes Turkish and East European communities. There is also a significant Black African and Black Caribbean compared to the national and regional average. BAME communities are more likely to use specific public functions, such as health and advice services, as well as visit restaurants and cafes related to their ethnic background. The Commercial Portfolio is likely to contain some of these types of premises.

It is likely that the conditions or rents of the properties will change when leases are renewed or the relevant review point in the lease occurs in order to meet the economic requirements of the business case. An EqIA will be needed to be undertaken by the HDV, advised by the relevant council service at this point to ensure that any future lease policy takes into consideration the impact of lease that provide a function disproportionately used by BAME people, such as health and advice services. In addition, consideration will be needed within the EqIA on the impact on different communities in regards to socialising through cafes and restaurants and therefore fostering good relationships between different communities.

E) Sexual Orientation

We do not hold ward or borough level data on sexual orientation, and it is not collected nationally through the Census. However, the ONS estimates that 3.7% of Haringey's population are lesbian, gay or bisexual (LGB), which is the 15th largest LGB community

in the country⁵. We will need to ensure that we consider the inequalities and discrimination experienced by LGB people are considered throughout this EqIA. We will need to consider the inequalities and discrimination experienced for this protected group when the conditions or rents of these properties will change when leases are renewed or the relevant review point in the lease occurs, through undertaking individual EqIAs.

F) Religion

	<i>Haringey</i>	<i>London</i>	<i>England and Wales</i>
Christian	45.0%	48.4%	59.3%
Buddhist	1.1%	1.0%	0.4%
Hindu	1.8%	5.0%	1.5%
Jewish	3.0%	1.8%	0.5%
Muslim	14.2%	12.4%	4.8%
Sikh	0.3%	1.5%	0.8%
Other religion	0.5%	0.6%	0.4%
No religion	25.2%	20.7%	25.1%
Religion not stated	8.9%	8.5%	7.2%

Haringey has a lower than average Christian community compared to the regional and national average, but has larger Jewish and Muslim populations. Haringey has a larger population who do not have a religion.

It is likely that the conditions or rents of the Commercial Portfolio properties will change when leases are renewed or the relevant review point in the lease occurs in order to meet the economic requirements of the business case. If the Commercial Portfolio obtains a place of worship and there is a change in the lease, an EqIA will be needed to be undertaken by the HDV, advised by the relevant council service, at this point to ensure that any future lease policy takes into consideration the impact of lease change.

G) Pregnancy and maternity

The proportion of 0-4 year olds in the Census 2011:

	Number of 0-4 year olds
Haringey	7.1%
London	7.2%
England and Wales	6.2%

Haringey has a higher proportion compared to the England and Wales average, but is marginally below the London average.

Dependent Children

	Proportion of households with dependent children
Haringey	31.4%
London	30.9%
England and Wales	29.1%

⁵<https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/articles/subnationalsexualidentityestimates/uk2013to2015#introduction>

Haringey have a larger proportion of households with dependent children in compared to the regional and national average. Therefore, it is likely that there will be a relatively large proportion of women who are considered under the pregnancy and maternity protected characteristic. In addition, as identified in the 'Sex' protected characteristic, there is a large proportion of female headed lone parent families. They are more likely to use services, such as childcare, health and advice services that could be in the commercial portfolio.

It is likely that the conditions or rents of Commercial Portfolio properties will change when leases are renewed or the relevant review point in the lease occurs in order to meet the economic requirements of the business case. An EqIA will be needed to be undertaken by the HDV, advised by the relevant council service, to ensure that any future lease policy takes into consideration the impact of lease that provide a function disproportionately used by women who are pregnant or recently given birth, such as childcare, health and advice services.

H) Marital and civil partnership status⁶

	Married (heterosexual couples)	Civil Partnership
Haringey	32.2%	0.6%
London	40%	0.4%
England and Wales	47%	0.2%

The number of married people (only available to heterosexual couples at the time) is significantly lower than in London and England. However, the proportion of people in civil partnerships is higher in the area compared to the London and England and Wales average. All elements of the Commercial Portfolio will treat a couple in a civil partnership the same as a couple in a marriage.

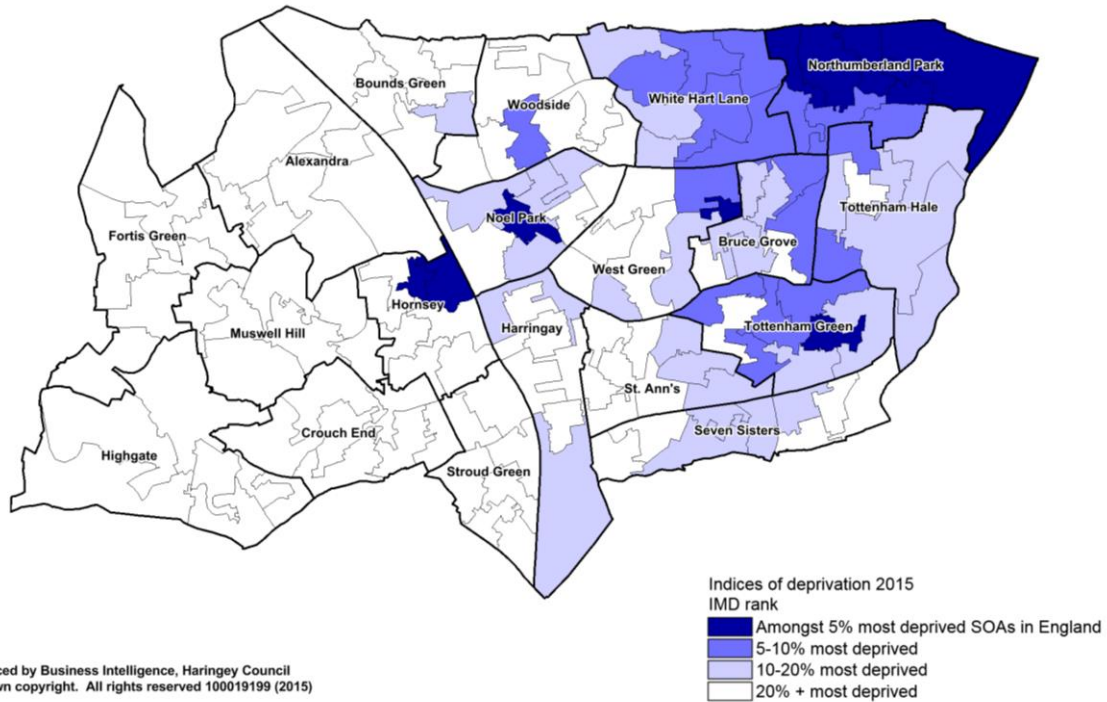
⁶ Census 2011

2. Wider Inequalities

It will also provide opportunities to tackle inequalities experienced in Haringey. This includes:

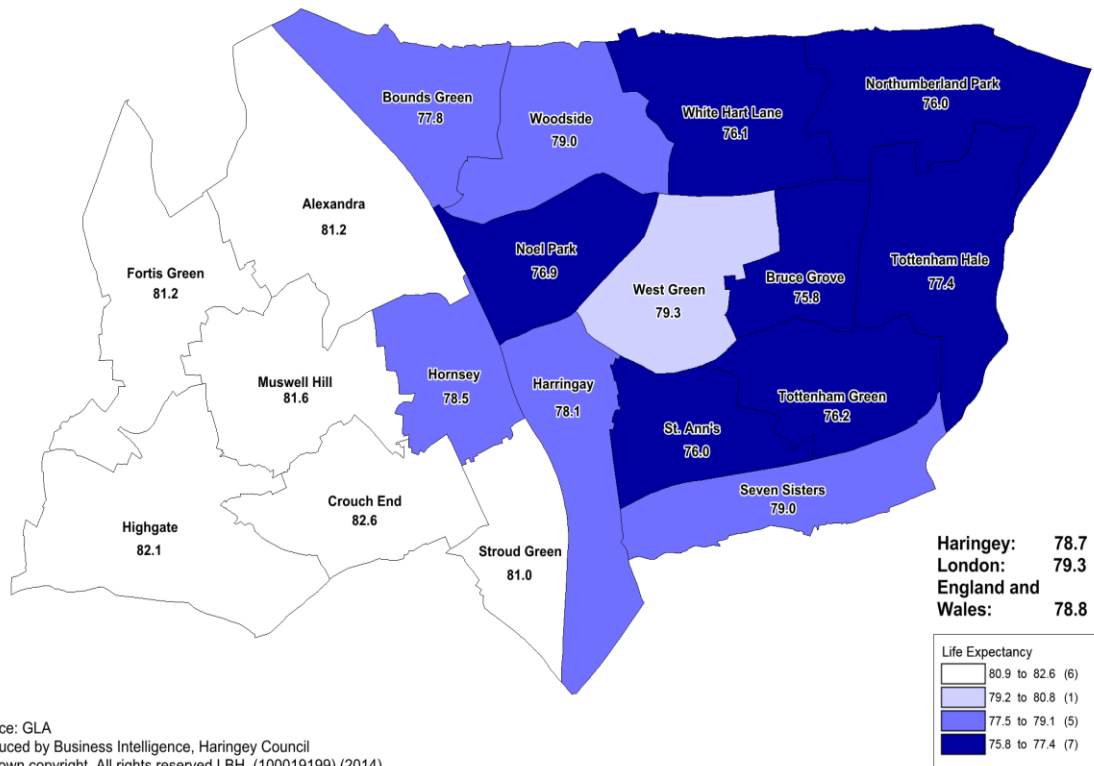
1. Better Prospects

Indices of Multiple Deprivation 2015
Rank of IMD
Haringey SOAs



There is a clear gap between the East and the West of the borough in regards to deprivation experienced. This is likely to include younger people and BAME communities. The development of commercial space will allow for new local businesses to create jobs as well as opportunities to temporarily or permanently locations of businesses that are moved as a result of regeneration programmes.

2. Healthier Living



There is a clear life expectancy inequality between the east and the west of the borough, which is likely to create inequalities for younger people and BAME communities who are more likely to live in the east of the borough. In managing the leases of properties, the HDV will be able to use vacant properties and their lease policy to promote healthy eating and life styles and create preventative measures to reduce health inequalities, such as obesity and strokes.

3. Community Pride

The Commercial Portfolio will provide longer term opportunities to provide space for some housing development which will help meet the housing demand for particular protected groups, as outlined in the [Housing Strategy and EqIA](#).

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?

Please outline which groups you may target and how you will have targeted them

Further information on consultation is contained within accompanying EqlA guidance

Two separate correspondence letters have been issued to all tenants in the commercial portfolio (even those not now proposed to transfer) to date providing information to confirm that their leases may transfer to the HDV if the decision is taken by the council's cabinet.

The first letter brought to tenants' attention a decision taken by Cabinet in November 2016 that the Council would be embarking on a procurement process seeking a partner with a view to setting up a new joint venture – the HDV. It also set out that the 146 properties listed in the associated Cabinet papers may potentially be transferred to the HDV. The letter also provided a link to the Cabinet Minutes and the supporting appendices as well as contact details.

The second letter updated tenants on the procurement process to select a preferred bidder announcing that Lendlease had been selected as the proposed joint venture partner for the HDV. It also informed them that the Council would be visiting their properties to carry out an inspection to assist the Council to finalise the list of properties that may transfer to the HDV. The letter also provided a link to new dedicated HDV webpages on the Council's website as well as providing contact details.

We will continue to keep tenants updated at every stage of the process and will always provide them with contact details so they are able to speak to someone for any questions they may have.

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

Explain how will the consultation's findings will shape and inform your proposal and the decision making process, and any modifications made?

The Commercial Portfolio will adopt an approach to community and stakeholder engagement that is consistent with the HDV framework, as outlined in the HDV Community Engagement and Communication Strategy in the HDV Strategic Business Plan.

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

Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.

Further information on assessing impact on different groups is contained within accompanying EqlA guidance

1. Sex

The Commercial Portfolio will not initially impact upon the different protected characteristics as it will be just transferring the ownership and management of commercial properties' leases to the HDV to manage. It may have an initial positive impact as there will be improvements in management functions and lease services.

When a lease has expired or a relevant review or break point in the lease is reached for an individual property, an EqlA will be needed to be undertaken by the HDV, advised by the relevant council service, at this point to ensure that any future lease policy takes into consideration the impact of the lease change.

VAT will be introduced for all Commercial Properties which will impact on all public functions, including child centres and nurseries, within the Commercial Portfolio, as well as small businesses. The HDV Board, advised by the Council, will develop a phased approach in order to reduce the impact for small businesses and public functions within the portfolio. An EqlA will be developed to inform the approach.

Positive	X	Negative	X	Neutral impact		Unknown Impact	
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2. Gender reassignment

We do not hold data on the number of people who are seeking, receiving or have received gender reassignment surgery, and there is not national data collected for this protected characteristic.

We will need to consider the inequalities and discrimination experienced for this protected group when the conditions or rents of these properties will change when leases are renewed or the relevant review point in the lease occurs through undertaking individual EqlAs. We do not believe there are LGBT advice or support services within the Commercial Portfolio at present.

Positive		Negative		Neutral impact		Unknown Impact	X
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3. Age

The Commercial Portfolio will not initially impact upon the different protected characteristics as it will be just transferring the management of commercial properties' leases to the HDV to manage. It may have an initial positive impact as there will be improvements in management functions and lease services.

When a lease has expired or a relevant review or break point in the lease is reached for an individual property, an EqIA will be needed to be undertaken by the HDV, advised by the relevant council service, at this point to ensure that any future lease policy takes into consideration the impact of the lease change.

VAT will be introduced for all Commercial Properties which will impact on all public functions, including child centres and advice services, within the portfolio, as well as small businesses. The HDV Board, advised by the Council, will develop a phased approach in order to reduce the impact for small businesses and public functions within the portfolio. An EqIA will be developed to inform the approach.

Positive	X	Negative	X	Neutral impact		Unknown Impact	
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4. Disability

The Commercial Portfolio will not initially impact upon the different protected characteristics as it will be just transferring the management of commercial properties' leases to the HDV to manage. It may have an initial positive impact as there will be improvements in management functions and lease services.

When a lease has expired or a relevant review or break point in the lease is reached for an individual property, an EqIA will be needed to be undertaken by the HDV, advised by the relevant council service, at this point to ensure that any future lease policy takes into consideration the impact of the lease change.

VAT will be introduced for all Commercial Properties which will impact on all public functions, including services disproportionately used by disabled people, within the Commercial Portfolio, as well as small businesses. The HDV Board, advised by the Council, will develop a phased approach in order to reduce the impact for small businesses and public functions within the portfolio. An EqIA will be developed to inform the approach.

In managing commercial properties run by disabled people, reasonable adjustments will be provided.

Positive	X	Negative	X	Neutral impact		Unknown Impact	
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5. Race and ethnicity

The Commercial Portfolio will not initially impact upon the different protected characteristics as it will be just transferring the management of commercial properties' leases to the HDV to manage. It may have an initial positive impact as there will be improvements in management functions and lease services.

When a lease has expired or a relevant review or break point in the lease is reached for an individual property, an EqIA will be needed to be undertaken by the HDV, advised by the relevant council service, at this point to ensure that any future lease policy takes into consideration the impact of the lease change.

VAT will be introduced for all Commercial Properties which will impact on all public functions, including services disproportionately used by BAME communities such as advice services and charities, within the portfolio, as well as small businesses run by members of BAME communities such as cultural retail and restaurants. The HDV Board, advised by the Council, will develop a phased approach in order to reduce the impact for small businesses and public functions within the portfolio. An EqIA will be developed to inform the approach.

Positive	X	Negative	X	Neutral impact		Unknown Impact	
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6. Sexual orientation

We do not hold data on sexual orientation, and there is not national data collected for this protected characteristic.

We will need to consider the inequalities and discrimination experienced for this protected group when the conditions or rents of these properties will change when leases are renewed or the relevant review point in the lease occurs, through undertaking individual EqIAs. We do not believe there are LGBT advice or support services within the Commercial Portfolio at present.

Positive		Negative		Neutral impact		Unknown Impact	X
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7. Religion or belief (or no belief)

The Commercial Portfolio will not initially impact upon the different protected characteristics as it will be just transferring the management of commercial properties' leases to the HDV to manage. It may have an initial positive impact as there will be improvements in management functions and lease services.

When a lease has expired or a relevant review or break point in the lease is reached for an individual property, an EqIA will be needed to be undertaken by the HDV, advised by the relevant council service, at this point to ensure that any future lease policy takes into consideration the impact of the lease change.

VAT will be introduced for all Commercial Properties which will impact on all public functions, potentially including places of worship within the portfolio, as well as small businesses. The HDV Board, advised by the Council, will develop a phased approach in order to reduce the impact for small businesses and public functions within the portfolio. An EqIA will be developed to inform the approach.

Positive	X	Negative	X	Neutral impact		Unknown Impact	
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8. Pregnancy and maternity

The Commercial Portfolio will not initially impact upon the different protected characteristics as it will be just transferring the ownership and management of commercial properties' leases to the HDV to manage. It may have an initial positive impact as there will be improvements in management functions and lease services.

When a lease has expired or a relevant review or break point in the lease is reached for an individual property, an EqIA will be needed to be undertaken by the HDV, advised by the relevant council service, at this point to ensure that any future lease policy takes into consideration the impact of the lease change.

VAT will be introduced for all Commercial Properties which will impact on all public functions, including child centres and health services used by pregnant women and women with young children, within the portfolio, as well as small businesses. The HDV Board, advised by the Council, will develop a phased approach in order to reduce the impact for small businesses and public functions within the portfolio. An EqIA will be developed to inform the approach.

Positive	X	Negative	X	Neutral impact		Unknown Impact	
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9. Marriage and Civil Partnership

In managing leases within the Commercial Portfolio, anyone who is in a civil partnership will be treated the same as if they were in a marriage.

Positive		Negative		Neutral impact	X	Unknown Impact	
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10. Groups that cross two or more equality strands e.g. young black women

We expect that the Commercial Portfolio will contain a number of intersectionary issues and benefits for different protected groups. In particular, the protected groups of age, sex, race and disability maybe specifically impacted with any change of public function. These may be cross cutting between protected groups, such as young black women may be more likely to use public functions that could be impacted by the CPBP.

When a lease has expired or a relevant review or break point in the lease is reached for an individual property, an EqIA will be needed to be undertaken by the HDV, advised by the relevant council service, should undertake this analysis at this point to ensure that any future lease policy takes into consideration the impact of the lease change. In addition, in introducing VAT, an EqIA on the impact on public functions which are disproportionately used by different protected groups will be undertaken.

VAT will be introduced for all Commercial Properties which will impact on all public functions within the portfolio, as well as small businesses. The HDV Board, advised by the Council, will develop a phased approach in order to reduce the impact for small businesses and public functions within the portfolio. An EqIA will be developed to inform the approach.

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

- Could the proposal result in any direct/indirect discrimination for any group that shares the protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a protected characteristic and those who do not?

This includes:

- a) Remove or minimise disadvantage suffered by persons protected under the Equality Act

- b) Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups
- c) Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low
- Will the proposal help to foster good relations between groups who share a protected characteristic and those who do not?

The HDV managing the commercial properties will ensure that discrimination, harassment and victimisation will be prevented when managing the properties.

In renewing leases, there will need to be an analysis of the impact on a case-by-case basis, especially in regards to a service that is considered a public function, businesses that provide cultural retail services for different ethnic groups and buildings used for religious worship. This should include understanding the protected groups of leaseholders.

VAT will be introduced for all Commercial Properties which will impact on all public functions within the portfolio, as well as small businesses. The HDV Board, advised by the Council, will develop a phased approach in order to reduce the impact for small businesses and public functions within the portfolio. An EqlA will be developed to inform the approach.

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

Further information on responding to identified impacts is contained within accompanying EqlA guidance

Outcome	Y/N
No major change to the proposal: the EqlA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <u>If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them.</u>	
Adjust the proposal: the EqlA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. <u>Clearly set out below the key adjustments you plan to make to the policy.</u> If there are any adverse impacts you cannot mitigate, please provide a compelling reason below	Y
Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.	

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 and which protected characteristics are impacted?	Action	Lead officer	Timescale
In renewing leases, there could be negative impacts for leases who offer public functions, cultural services and places of worship (all protected groups)	A full EqIA should be undertaken before any review of leases or disposal of properties to ensure all potential negative impacts are mitigated when possible	The HDV Asset Management Team; Advised by the relevant Council service depending on function of the property	When there is a review of a lease or a disposal of a property that is considered a public function, cultural service or place of worship.
VAT will be introduced for all Commercial Properties which will impact on all public functions within the portfolio, as well as small businesses.	A phased approach will be taken in order to reduce the impact for small businesses and public functions within the portfolio. An EqIA will be developed to inform the approach.	The HDV Board, advised by the Council.	TBC

Please outline any areas you have identified where negative impacts will happen as a result of the proposal but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.

See mitigating actions

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

Any mitigating actions will be monitored during the implementation of the business plan through the governance structure of the HDV. This should also be incorporated in reporting to Cabinet and planning processes and will use the Council's internal EqIA process.

7. Authorisation

EqIA approved by: Vicky Clark, Assistant Director
Economic Development and Growth

Date 22 June 2017

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8. Publication
Please ensure the completed EqIA is published in accordance with the Council's policy.

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