

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 EqlA 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	Revisions to the Estate Renewal Rehousing and Payments Policy
Service area	Housing and Growth
Officer completing assessment	Martin Gulliver
Equalities/ HR Advisor	Daisy Daventry
Cabinet meeting date (if applicable)	20 th June 2017
Director/Assistant Director	Lyn Garner / Dan Hawthorn

2. Summary of the proposal

The policy is an amendment to the Estate Renewal Rehousing and Payments Policy which was consulted on between Nov 2015 and Feb 2016 and approved by Cabinet in July 2016.

The new policy was consulted on in the summer of 2017, and will incorporate enhanced and expanded commitments to tenants and resident leaseholders or estate renewal schemes, including:

- A Right to Return to all secure/assured tenants (the previous policy set this as an 'aim')
- The right for all resident leaseholders/freeholders to purchase or otherwise obtain a new home in the area, and the possible ways of achieving this including:
 - Shared equity
 - Shared ownership
 - Offers of tenancies to those resident leaseholders who cannot afford to purchase at least a sufficient stake in a new property
- Extending the policy to assured tenants and resident leaseholders of Housing Associations where the Council is supporting the estate renewal

This policy is set to automatically apply to all schemes where 20 or more homes are being demolished

This policy should be understood in the context of the Housing Allocations Policy. This Policy gives residents on renewal sites the highest priority on the Choice Based Letting system, allowing residents the greatest opportunity to bid for properties in the local area should they wish to.

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	Internal data reports from Housing Management System ("OHMS") – existing information on customers Joint Strategic Needs Assessment (JSNA) http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment-jsna	This report does not have an impact on Haringey staff unless they are a tenant or leaseholder on an estate renewal scheme.
Gender Reassignment	None available	
Age	OHMS & JSNA ONS: Housing and home ownership in the UK http://visual.ons.gov.uk/uk-perspectives-housing-and-home-ownership-in-the-uk/ http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment-jsna	
Disability	OHMS & JSNA	
Race & Ethnicity	OHMS & JSNA	
Sexual Orientation	None available	
Religion or Belief (or No Belief)	None available	
Pregnancy & Maternity	None available	
Marriage and Civil Partnership	None available	

Outline the key findings of your data analysis.

Estate Renewal programmes are designed to replace poor quality housing and environments with improved housing and public space. They will therefore provide a long term positive benefit for those residents who remain in, or return to the area. Estate renewal will allow the Council to reduce inequalities caused by old, poorly designed properties, including community safety issues and access to open spaces. In some cases, they also have potential to increase the overall number of homes, where existing estates are built at lower density than the site could support.

However, we are aware that there will be short term negative impacts caused by the rehousing process which the Council will try to mitigate through this policy. The intention of this policy therefore is to ensure all tenants and resident leaseholders are given the opportunity to both retain or return to established support networks and communities and to experience the wider benefits of estate renewal.

Individuals and families will experience different positive and negative impacts based upon multiple protected characteristics. The effect of this policy will vary between individual estate renewal programmes. The revisions to the ERRPP seek to minimise these disturbances by giving secure and assured tenants and resident leaseholders a Right to Return to the renewal area.

Tenants will be able to move to, or return to a new property in the area on the same tenancy conditions and at an equivalent rent should they wish to do so, and resident leaseholders will be offered a range of options to purchase a new home in the renewal area. These options include an Equity Loan of up to 40% of the value of the property – with no rent or interest paid on the loan – and Shared Ownership for up to 75% - with no rent payable on the first 40% of the un-purchased share. The policy also sets out a sympathetic approach to assisting resident leaseholders who are unable to purchase at least 25%.

The policy also supports secure and assured tenants and resident leaseholders to leave the area should they wish to do so.

The revised policy will not prevent disruption caused if residents and resident leaseholders are required to be rehoused during major renewal works. Secure/Assured tenants who are required to move are given an application date equal to their tenancy start date, and so will have the highest priority when selecting a new property. Households will therefore be supported to move into properties within the local area near to the renewal site, mitigating the potential disruption caused if they move out of the area.

The need to rehouse residents will be kept to a minimum through planned phasing of works, and any subsequent disruption will be considered in the Equalities Impact Assessment for each scheme.

The policy will not prevent tenants choosing to live permanently in their temporary replacement home, or leaving the area if they have a wish to do so. Similarly, leaseholders will be able to purchase elsewhere should they wish to do so.

The revisions also seek to apply the policy to all schemes where 20 or more homes are being demolished, and to extend these rights to assured tenants and resident leaseholders of housing associations where the Council is supporting the renewal scheme.

This policy will benefit residents on Council and Housing Association estates including protected groups including BAME ethnicities, older tenants, and women who are over-represented among secure and assured tenants.

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?

The existing Estate Renewal Rehousing and Payments Policy was developed in 2015 and was subject to consultation between Nov 2015 and Feb 2016, and was approved by Cabinet in July 2016. The consultation was widely advertised and included seven public meetings with written and emailed invites to nearly 3,000 residents.

In total, 91 responses were received either through the website and online survey, or in paper form. In addition, there were specific comments from the meetings, and some individuals who commented directly to the Council through the Council's Strategy inbox.

The revised policy was also subject to extensive discussion and formal consultation with stakeholders and in particular potentially affected tenants, leaseholders and freeholders and their advisors. The formal consultation on the draft policy started on 3 July 2017 and closed on 10 September 2017.

A consultation booklet and questionnaire were distributed at meetings with resident groups and drop-ins, and made available on the Council's website. A letter from Councillor Strickland inviting residents to take part in the consultation was e-mailed/posted to all council housing residents associations in the Borough and to over 7000 tenants and leaseholders whose e-mail addresses we hold.

In addition, those estates already identified as estates that might be the subject of estate renewal were targeted with letters inviting them to take part in the consultation meetings, so that tenants and residents most likely to be affected by the proposals would have the opportunity to comment on the proposals. Those estates were Woodside Avenue, Tunnel Gardens and Blake Road, Park Grove and Durnsford Avenue, Leabank, Lemsford and Groveland's, Reynardson Court, Turner Avenue, Barbara Hucklesberry Close and Watts Close, Imperial Wharf, Page High and Sky City. Articles were also placed in newsletters for Northumberland Park, Love Lane and Broadwater Farm.

An article was also placed in the Bridge Renewal Trust's weekly Community Impact Bulletin for the duration of the consultation which is received by over 700 Voluntary and Community Sector organisations in the Borough.

A total of 105 questionnaires were completed in response to the revised policy and returned either on paper or online. In addition, officers attended seven consultation meetings and events to discuss the proposals with residents.

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

There was overwhelming support in the consultation responses for each of the main commitments, with between 75-90% support for each main commitment. The Consultation resulted in no major changes to the rights proposed in the policy; however, a set of changes and clarifications were made to the draft policy following the consultation, including:

- Under-occupiers will only be required to give up one spare bedroom when moving off the estate, in line with the existing Housing Allocations Policy. But those who remain on, or return to, the scheme will be offered property according to Housing Need. All households downsizing will be eligible for Under-Occupation incentives apart from the removal costs which are already covered by the Disturbance Payments.

Older people who choose to remain or return to the renewal area are more likely to be impacted by the measure as they are more likely to be under-occupying accommodation once their children leave home. The council is seeking to mitigate this by offering tenants the incentives that are offered to all under-occupying households under Under-Occupying Incentive Scheme. The policy also allows tenants to use the housing allocations scheme rules on under-occupation moves which allows tenants to retain spare bedrooms so long as they are still downsizing.

- Where specialist housing such as sheltered housing is demolished and not replaced on a scheme, secure or assured tenants in that scheme will have the option of moving or returning to a general needs tenancy in the renewal area with appropriate floating support or can be given priority to move to the nearest specialist accommodation.

Where the renewal scheme results in the non-replacement of specialist housing such as sheltered housing or housing with on-site support, there is more likely to be an impact on older people; and people with a disability, including people with physical disability, mental illness or learning disability. The Council is seeking to partially mitigate this by providing either a general needs tenancy with floating support, or priority to move to the nearest specialist accommodation.

- Intensive support should be provided to leaseholders who need practical support and advice in the purchase of a new property, including the Council purchasing a new property on the leaseholder's behalf for subsequent re-sale or lease to the leaseholder.

This proposal will have a positive impact on all leaseholders affected by renewal schemes, including those with protected characteristics.

- The exclusion of those who have an interest in another property from the Equity Loan and Shared Ownership options will be removed as long as they meet the residency requirements.

This proposal will have a positive impact on the leaseholders affected, including those with protected characteristics.

- All schemes in Haringey will absolutely be required to abide by these guarantees, unless the residents themselves decide to waive them on an individual scheme.

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	
----------	---	----------	--	----------------	--	----------------	--

The Council is keen to ensure Haringey is a place with good housing, safe streets and strong communities, especially in the East of the borough, where the impact of inequality is particularly pronounced. In order to achieve this, there may be short term negative impacts experienced by the individuals and families in the renewal area by the need to move home through rehousing. This policy is seeking to mitigate these impacts, providing tenant and resident leaseholders a Right to Return to the estate if they wish, as well as financial and practical support to assist relocation.

Women are over-represented among both general needs tenants (64%) and resident leaseholders (54%), and so are more likely to be affected by estate renewal. Although no data is available on single parents in Haringey housing, single female parent households are likely to be overrepresented.

Women will receive positive benefit from the right to return, as summarised below:

- Single mothers may have support networks in place in the local area, including established relationships with their neighbours for childcare, and live close to family members who provide them with care and support with their families. They may benefit

from local facilities aimed at parents, including single parent households and being close to existing work arrangements. This policy will support residents to remain in the local area – either to remain or return to the renewal area, or to be rehoused temporarily or permanently in the local area if they so wish.

- The decision to support existing resident leaseholders to buy homes within the regenerated estate by offering them affordable home ownership will help home owners on lower incomes including single parent households.
- The under-occupation policy will provide additional family size units which will largely be used to house homeless households which have an over-representation of female headed households.

2. Gender reassignment

Positive		Negative		Neutral impact		Unknown Impact	Y
----------	--	----------	--	----------------	--	----------------	---

The Council is keen to ensure Haringey is a place with good housing, safe streets and strong communities, especially in the East of the borough where the impact of inequality is particularly pronounced. In order to achieve this, there may be short term negative impacts experienced by the individuals and families in the renewal area by the need to move home through rehousing. This policy is seeking to mitigate these impacts and one of the mechanisms is this policy, providing tenant and resident leaseholders a Right to Return to the estate if they wish and financial and practical support to assist relocation.

We do not have data on gender reassignment but there is no reason to believe that this protected characteristic will be disproportionately impacted by this decision.

3. Age

Positive	Y	Negative		Neutral impact	Y	Unknown Impact	
----------	---	----------	--	----------------	---	----------------	--

The Council is keen to ensure Haringey is a place with good housing, safe streets and strong communities, especially in the East of the borough where the impact of inequality is particularly pronounced. In order to achieve this, there may be short term negative impacts experienced by the individuals and families in the renewal area through rehousing. This policy is seeking to mitigate these impacts and one of the mechanisms is this policy, providing tenant and resident leaseholders a Right to Return to the estate if they wish and financial and practical support to assist relocation.

Older residents are more likely to have mental health difficulties and physical disabilities. They may find moving to a new home more difficult, especially if moved outside their current area - and households that require adaptations to their home may find it more difficult to bid for temporary properties in the local area. These needs must to be taken into account in the Equality Impact Assessment for each scheme.

Older People

The age breakdown for Haringey General Needs tenants is as follows.

under 18	18-24	25-34	35-44	45-54	55-64	Over 64	Unknown
0.1%	1.6%	8.5%	17.2%	29.5%	21.4%	21.4%	0.3%

Although there is no Haringey or Council Leaseholder specific data, 'Housing and home ownership in the UK' reported that home ownership levels are significantly higher in older populations. It is likely that similar pattern of home ownership would apply in social housing.

Percentage of population who are home owners

Year	16-24	25-34	35-44	45-64	65-74	75+
2011/12	10%	42.8%	63.6%	73.7%	78.2%	72.9%

Older people will receive the following positive benefits from the right to return:

- Older people may have support networks in place in the local area, including established relationships with their neighbours, and live close to family members who provide them with care and support. They will be acquainted with the community facilities for older residents available locally. This policy will support residents to remain in the local area – either to remain or return to the renewal area, or to be rehoused temporarily or permanently in the local area and therefore retain or return to these networks and facilities following a temporary move during estate renewal.

However, some older people will not receive the full benefit of the right to return due to the following:

- Older people are more likely to be impacted by the policy allocating properties according to household need, including requiring households to downsize by at least one bedroom where a property is under-occupied. Older people are more likely to be under-occupying accommodation once their children leave home. The council will partially mitigate the impact on older people by offering tenants the incentives that are offered to under-occupying households under the housing allocations scheme. This policy will also release family size units which will benefit households which are over-crowded or in temporary accommodation. These are likely to be households with children, who are over-represented within over-crowded households and temporary accommodation.
- In addition, older people are more likely to be impacted where sheltered housing is not replaced. The council will seek to mitigate this through not re-letting vacant properties in sheltered housing in the run up to renewal and, for remaining tenants, the Council will seek to mitigate the effects by providing either a general needs tenancy with floating support, or priority to move to the nearest specialist accommodation.

Children and Young People

Children will receive the following positive benefits from the right to return:

- The downsizing policy for under-occupied properties will release family size units which will benefit households which are over-crowded or in temporary accommodation. This will benefit households with children and young people, who are over-represented within over-crowded households and temporary accommodation.
- Children and young people will benefit from their family's established support networks in place in the local area. This policy will support residents, including families with children, to remain in the local area – either to remain or return to the renewal area, or to be rehoused temporarily or permanently in the local area if they so wish.

4. Disability

Positive	Y	Negative		Neutral impact	Y	Unknown Impact	
----------	---	----------	--	----------------	---	----------------	--

The Council is keen to ensure Haringey is a place with good housing, safe streets and strong communities, especially in the East of the borough where the impact of inequality is particularly pronounced. In order to achieve this, there may be short term negative impacts experienced by the individuals and families in the renewal area through rehousing. This policy is seeking to mitigate these impacts and one of the mechanisms is this policy, providing tenant and resident leaseholders a Right to Return to the estate if they wish and financial and practical support to assist relocation.

Residents with mental health needs and learning disabilities may find moving to a new home more difficult, especially if moved outside their current area and households that require adaptations to their home may find it more difficult to bid for temporary properties in the local area. These needs must to be taken into account in the Equality Impact Assessment for each scheme.

Disabled people will receive the following positive benefits from the right to return:

- A household with disabled members may have developed local support links with family, friends and neighbours. They may also take advantage of local facilities targeted to benefit disabled residents. This policy will support residents to remain in the local area – either to remain or return to the renewal area, or to be rehoused temporarily or permanently in the local area.
- People with mobility needs will benefit from the new homes built on the replacement estate which will be designed and built to planning requirements, which include a target for wheelchair-accessible homes. The policy also commits to covering the cost of any adaptations within a leaseholder's home, and the cost of their replacement for tenants in new or temporary replacement homes.
- Disabled households are more likely to have restricted incomes. The decision to support existing resident leaseholders to buy homes within the regenerated estate by offering them affordable home ownership will help resident leaseholders on restricted incomes.

However, some disabled people will not receive the full benefit of the right to return due to the following:

- People with a disability, including people with a physical disability, mental illness or a learning disability will not benefit from the policy if they are resident in specialist housing which is demolished but not replaced. In cases where specialist housing is not re-provided the Council is seeking to mitigate this impact further by offering either a general needs tenancy with floating support, or priority to move to the nearest specialist accommodation. The council will also reduce the potential for impact on residents reducing the creation of new tenancies in the renewal area before renewal begins, especially in Supported Housing that is not Sheltered, which have average tenancies of around 2-3 years.

5. Race and ethnicity

Positive	Y	Negative		Neutral impact		Unknown Impact	
----------	---	----------	--	----------------	--	----------------	--

The Council is keen to ensure Haringey is a place with good housing, safe streets and strong communities, especially in the East of the borough where the impact of inequality is particularly pronounced. In order to achieve this, there may be short term negative impacts experienced by the individuals and families in the renewal area through rehousing. This policy is seeking to mitigate these impacts and one of the mechanisms is this policy, providing tenant and resident leaseholders a Right to Return to the estate if they wish and financial and practical support to assist relocation.

The ethnicity of all Council tenants is as follows:

Ethnicity of tenants	Percentage
Asian	5%
Black	32%
Chinese or other	8%
Mixed	2%
White	41%
Refused	12%

We understand that BAME communities are disproportionately represented in tenant and leaseholder populations and individual estates will have different communities.

There may be specific cultural ties, such as businesses locally that cater for specific cultural needs of residents of a particular race or ethnicity, such as providing certain kinds of food, hairdressing and so on. This policy will support residents to remain in the local area – either to remain or return to the renewal area, or to be rehoused temporarily or permanently in the local area if they so wish.

A Right to Return will give residents the opportunity to return to an area following any temporary moves and therefore return to these services. It may also reduce the long term impact on local businesses and community facilities if residents of a particular community remain in the area in the long term.

BAME households are more likely to have lower incomes. The decision to support existing resident leaseholders to buy homes within the regenerated estate by offering them

affordable home ownership will help home owners on restricted incomes.

The under-occupation policy will also provide additional family size units which will largely be used to house homeless households which have an over-representation of BAME households.

6. Sexual orientation

Positive	Y	Negative		Neutral impact		Unknown Impact	
----------	---	----------	--	----------------	--	----------------	--

The Council is keen to ensure Haringey is a place with good housing, safe streets and strong communities, especially in the East of the borough where the impact of inequality is particularly pronounced. In order to achieve this, there may be short term negative impacts experienced by the individuals and families in the renewal area through rehousing. This policy is seeking to mitigate these impacts and one of the mechanisms is this policy, providing tenant and resident leaseholders a Right to Return to the estate if they wish and financial and practical support to assist relocation.

The policy is expected to have a net positive impact on residents of estate renewal areas as it will improve the quality of their housing and public spaces. There is insufficient data available to assess the impact on this protected group.

7. Religion or belief (or no belief)

Positive	Y	Negative		Neutral impact		Unknown Impact	
----------	---	----------	--	----------------	--	----------------	--

The Council is keen to ensure Haringey is a place with good housing, safe streets and strong communities, especially in the East of the borough where the impact of inequality is particularly pronounced. In order to achieve this, there may be short term negative impacts experienced by the individuals and families in the renewal area through rehousing. This policy is seeking to mitigate these impacts and one of the mechanisms is this policy, providing tenant and resident leaseholders a Right to Return to the estate if they wish and financial and practical support to assist relocation.

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%

There may be a place of worship or religious community facilities available to people living

locally. This policy will support residents to remain in the local area – either to remain or return to the renewal area, or to be rehoused temporarily or permanently in the local area if they so wish. It may also reduce the long term impact on local businesses and community facilities if residents of a particular community remain in the area in the long term.

8. Pregnancy and maternity

Positive	Y	Negative		Neutral impact		Unknown Impact	
----------	---	----------	--	----------------	--	----------------	--

The Council is keen to ensure Haringey is a place with good housing, safe streets and strong communities, especially in the East of the borough where the impact of inequality is particularly pronounced. In order to achieve this, there may be short term negative impacts experienced by the individuals and families in the renewal area through rehousing. This policy is seeking to mitigate these impacts and one of the mechanisms is this policy, providing tenant and resident leaseholders a Right to Return to the estate if they wish and financial and practical support to assist relocation.

Pregnant women and young parents may rely on family members and friends living locally to provide care and support. This policy will support residents to remain in the local area – either to remain or return to the renewal area, or to be rehoused temporarily or permanently in the local area if they so wish. All residents, including pregnant women and mothers of young babies, will be provided with financial and practical support to assist relocation.

9. Marriage and Civil Partnership (*Consideration is only needed to ensure there is no discrimination between people in a marriage and people in a civil partnership*)

Positive	Y	Negative		Neutral impact		Unknown Impact	
----------	---	----------	--	----------------	--	----------------	--

This policy will apply to couples in a civil partnership in exactly the same way as a couple who are in a marriage.

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

This policy will affect residents on Haringey's estates including residents who cross two or more equality strands. Young black women are the largest group crossing several strands. The Right to Return will allow these tenants to remain in the area (if they wish) and retain established support networks. The policy says that if a household exercises their right to return, they will be offered a household based on their housing need. This will have an indirect positive affect on homeless households as it will increase the supply of family units. Young black women are also over-represented amongst these households.

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

As part of our duty to advance equality of opportunity, we have to consider the following:

- Remove or minimise disadvantage suffered by people with a protected characteristic
- Take steps to meet the needs of people with different protected characteristics when

- they are different to the wider population
- Encourage people from protected groups to participate in public life when their participation is low.

The Council is keen to ensure Haringey is a place with good housing, safe streets and strong communities, especially in the East of the borough where the impact of inequality is particularly pronounced. In order to achieve this, there may be short term negative impacts experienced by the individuals and families in the renewal area through rehousing. This policy is seeking to mitigate these impacts and one of the mechanisms is this policy, providing tenant and resident leaseholders a Right to Return to the estate if they wish and financial and practical support to assist relocation.

The Right to Return allows residents to remain in, or return to, the area in which they were previously living. This will allow them to return to the support networks, facilities and services that are available to them in this locality. This policy will support residents to remain in the local area – either to remain or return to the renewal area, or to be rehoused temporarily or permanently in the local area if they so wish and ensure that the Council has taken steps to meet the needs of residents and resident leaseholders from the protected groups.

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

Outcome	Y/N
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 and which protected characteristics are impacted?	Action	Lead officer	Timescale
<i>None identified</i>	The EqIA for each estate renewal programme that is undertaken will address how permanent and temporary moves, and the Right to Return are implemented to ensure that the impact of any temporary moves while renewal works are taking place is mitigated.	Programme Officers	

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.

It is not possible to prevent resident leaseholders and tenants being required to move while renewal works take place. This is a necessary part of carrying out major works to a site, the results of which will deliver better housing and public spaces to residents in the borough. However, this policy is seeking to mitigate these impacts and one of the mechanisms is this policy, providing tenant and resident leaseholders a Right to Return [DN] to the estate if they wish and financial and practical support to assist relocation.

None identified

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

Each estate renewal scheme will have its own EqlA measuring the overall impact on residents affected by the scheme. The impact of this policy – which is intended to be positive - will be measured within those EqlAs.

7. Authorisation

EqlA approved by
(Assistant Director/ Director)

Date

8. Publication

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