

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

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	Homes for Haringey Management Agreement
Service area	Housing Strategy and Commissioning
Officer completing assessment	Jennifer Dixon-Ashun
Cabinet meeting date (if applicable)	16 January 2018
Director/Assistant Director	Dan Hawthorn

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 proposal is to enter into a new Management Agreement with Homes for Haringey until 2026. Under this proposal, there will be no changes in the types of services residents currently receive from Homes for Haringey and no changes in any tenancy or leasehold terms and conditions. The Council will continue to be the landlord, and Homes for Haringey will continue to provide the same services such as housing (and leasehold) management, repairs and maintenance, estate management and rent/service charge collection.

This proposal is an outcome of the Future of Housing Review which considered in-depth the options for the future management of Haringey's housing stock. An Equality Impact Assessment was carried out as part of that review, which was considered by Cabinet in September 2015 when Cabinet decided it preferred to retain Homes for Haringey.

The stakeholders affected by this proposal are Council tenants and leaseholders. The primary method of engaging residents impacted by this proposal was to carry out a consultation with all tenants and leaseholders affected. This Equality Impact Assessment sets out the additional data collected as part of this consultation, alongside the analysis contained in the 2015 Equality Impact Assessment ([published here](#)).

A further decision on the proposal will be made by Cabinet in light of this further consultation.

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	Equalities profile of tenants and leaseholders (taken from 2015 EQIA)	This proposal only affects staff insofar as they may be Homes

	<p>Results of consultation with tenants and leaseholders</p> <p>Equalities profile of Haringey (census data)</p>	for Haringey tenants or leaseholders
Gender Reassignment	<p>Information on gender reassignment for the tenants and leaseholders impacted by this proposal is not held on the council's housing data system.</p> <p>The consultation on the proposal included an equal opportunities monitoring form which allowed respondents to tell us if their gender differed from their birth sex.</p>	This proposal only affects staff insofar as they may be Homes for Haringey tenants or leaseholders
Age	<p>Equalities profile of tenants and leaseholders (taken from 2015 EQIA)</p> <p>Results of consultation with tenants and leaseholders.</p> <p>Equalities profile of Haringey (census data)</p>	This proposal only affects staff insofar as they may be Homes for Haringey tenants or leaseholders
Disability	<p>Equalities profile of tenants and leaseholders (taken from 2015 EQIA)</p> <p>Results of consultation with tenants and leaseholders.</p> <p>Equalities profile of Haringey (census data)</p>	This proposal only affects staff insofar as they may be Homes for Haringey tenants or leaseholders
Race & Ethnicity	<p>Equalities profile of tenants and leaseholders (taken from 2015 EQIA)</p> <p>Results of consultation with tenants and leaseholders.</p> <p>Equalities profile of Haringey (census data)</p>	This proposal only affects staff insofar as they may be Homes for Haringey tenants or leaseholders

Sexual Orientation	<p>Information on the sexual orientation of tenants and leaseholders affected by this proposal is not held on the council's housing data system.</p> <p>The consultation on the proposal included an equal opportunities monitoring form which allowed respondents to tell us their sexual orientation.</p> <p>Equalities profile of Haringey (census data)</p>	This proposal only affects staff insofar as they may be Homes for Haringey tenants or leaseholders
Religion or Belief (or No Belief)	<p>Equalities profile of tenants and leaseholders (taken from 2015 EQIA)</p> <p>Results of consultation with tenants and leaseholders.</p> <p>Equalities profile of Haringey (census data)</p>	This proposal only affects staff insofar as they may be Homes for Haringey tenants or leaseholders
Pregnancy & Maternity	<p>Information on pregnancy/maternity regarding tenants and leaseholders affected by this proposal is not held on the council's housing data system.</p>	This proposal only affects staff insofar as they may be Homes for Haringey tenants or leaseholders
Marriage and Civil Partnership	<p>Information on marriage/civil partnership regarding tenants and leaseholders affected by this proposal is not held on the council's housing data system.</p> <p>The consultation on the proposal included an equal opportunities monitoring form which allowed respondents to tell us whether they were married or in a civil partnership.</p>	This proposal only affects staff insofar as they may be Homes for Haringey tenants or leaseholders

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 data analysis carried out as part of the 2015 Equality Impact Assessment identified that the following protected characteristics were more common amongst Council tenants than Haringey's wider population:

- Gender: Whereas the representation of males and females in Haringey's population is more or less the same, female Council tenants outnumber male Council tenants.
- Age: Council tenants in the age ranges of 16-24 and 24-44 are both under-represented compared with the general population whilst council tenants in ages range of 45 upwards are all over represented compared with the general population.
- Ethnicity: There are more Black and Other households in Council tenancies compared with their representation in Haringey's population. There are fewer Asian, White and Mixed households in Council tenancies compared with their representation in Haringey's population.
- Disability: 20% of Council tenants are recorded as being disabled, however data is not currently held for the majority of tenants. In Haringey's wider population around 20% are disabled, 20% not disabled and 60% unknown.

The evidence collected through the consultation (set out in more detail below) reinforces these findings, though suggests that a higher proportion of tenants have a disability than the data held suggests.

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 EqIA guidance

A full consultation has been carried out with tenants and leaseholders. The consultation methods were:

- 19,848 tenants and leaseholders were sent a hard copy of the paper questionnaire which contained a free paid envelope for them to return the questionnaire.
- The questionnaire was emailed out to 4,218 email recipients.
- A dedicated webpage explaining the consultation and access to an online version of the survey.
- Three drop in sessions were held at the following locations.
 - 19th October 2017, 4-7pm - Wood Green Library

- 2nd November 2017, 4-7pm - Marcus Garvey Library
- 9th November 2017, 4-7pm- Wood Green Library

In order to ensure that the consultation was accessible to all tenants and leaseholders, the paper questionnaire included a form allowing residents to request a copy in their language or in large print/braille etc.

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?

Just over 1,500 responses were received, of which just over 1,200 were from tenants. This is a response rate of around 8%. The findings of the consultation were:

All respondents

Q2: Do you agree with the Council's proposal?	Number	Percentage
Yes	1132	75%
No	349	23%
No response	20	1%

Haringey Council tenants

Q2: Do you agree with the Council's proposal?	Number	Percentage
Yes	987	81%
No	213	18%
No response	15	1%

Haringey Council Leaseholders

Q2: Do you agree with the Council's proposal?	Number	Percentage
Yes	109	49%
No	111	50%
No response	2	1%

Tenure not disclosed

Q2: Do you agree with the Council's proposal?	Number	Percentage

Yes	36	49%
No	25	50%
No response	3	1%

There was strong support for the proposal from tenants, whilst amongst leaseholders the results were much closer.

As part of the consultation, equality monitoring information was collected. The information pertinent to each protected characteristic is set out in section five below, but the main points to note are summarised below.

The monitoring shows that the respondents to the consultation were broadly representative of Council tenants based on the information held, however there was a higher response rate from certain groups. For example, 35% of Council tenants are Black/Black British whilst 28% of respondents were Black/Black British. 37% of tenants are White whilst 41% of consultation respondents were White. It should be noted that ethnicity information is not held for approximately 10% of households on the Council's systems.

The ages of respondents were broadly representative of the tenant population, with the following exceptions. In the 25-44 age group there was a response rate of 14% whereas the data shows that around 26% of tenants are in this age group. The response rate from tenants over the age of 65 (36%) was higher than the age profile of tenants (25%). The respondents under 24 (0.4%) was low, however less than 2% of tenants fall in this age range.

52% of consultation respondents told us that they had a disability. For the majority of tenants (58%) no information is held about disabilities on the Council's housing system, but where it is held around 20% are noted as being disabled and 22% not disabled. The response to the consultation does therefore not contradict the data held, and suggests that more tenants have disabilities than records show.

Response to the proposal

There was very little difference in the responses to the proposal from different groups.

For example, amongst those who told us there were Black/Black British 82% agreed with the proposal. Amongst those over 65, 76% agreed with the proposal and 76% of those aged 25-44 also agreed with the proposal. Amongst respondents who told us that they had a disability, 78% agreed with the proposal.

There was also very little difference between male and female respondents, with 79% of male respondents agreeing with the proposal and 78% of female respondents agreeing with the proposal.

Conclusion

Overall, the main points to note from the consultation is that the response rate from Black/Black British tenants and from tenants aged 25-44 was lower than the tenant

profile. However there isn't evidence that the consultation was not accessible for any particular group of tenants, and overall the equality profile of the consultation respondents does not show that any group of tenants with particular protected characteristics were excluded from the consultation.

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 EqIA guidance

1. Sex (Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)

In the consultation, the vast majority of both male and female respondents agreed with the proposal.

The impact on this group is considered to be neutral, as the proposal is to continue with the existing service delivery model.

The proposed new Management Agreement requires Homes for Haringey to comply with the Council's Equal Opportunities Policy, which makes existing practice a contractual requirement.

Positive		Negative		Neutral impact	X	Unknown Impact	
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2. Gender reassignment (Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)

In the consultation, five respondents told us that their gender differs from their birth sex. Of these respondents, 4 agreed with the proposal whilst one disagreed, so there was no significant difference with the overall response to the consultation.

The impact on this group is considered to be neutral, as the proposal is to continue with the existing service delivery model.

The proposed new Management Agreement requires Homes for Haringey to comply with the Council's Equal Opportunities Policy, which makes existing practice a contractual requirement.

Positive		Negative		Neutral impact	X	Unknown Impact	
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3. Age *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

In the consultation, there was no significant variance in the response from residents in different age groups. As noted above, there was a lower response rate from residents aged 25-44 than the tenant age profile, whilst the response rate from older tenants was higher. Only a small number of respondents were younger than 24, and whilst there are fewer tenants in this age group than any other, this still represents a low response rate.

The impact on this group is considered to be neutral, as the proposal is to continue with the existing service delivery model.

The proposed new Management Agreement requires Homes for Haringey to comply with the Council's Equal Opportunities Policy, which makes existing practice a contractual requirement.

Positive		Negative		Neutral impact	X	Unknown Impact	
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4. Disability *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

More than half the respondents to the consultation told us that they had a disability, which is significantly higher than the tenant profile data, though as noted above this data has significant gaps. This suggests that the consultation respondents may more accurately reflect the tenant profile than the data held. The responses from disabled residents were similar to the overall response to the consultation.

The impact on this group is considered to be neutral, as the proposal is to continue with the existing service delivery model.

The proposed new Management Agreement requires Homes for Haringey to comply with the Council's Equal Opportunities Policy, which makes existing practice a contractual requirement.

Positive		Negative		Neutral impact	X	Unknown Impact	
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5. Race and ethnicity *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

As noted above, the consultation monitoring data suggests that there was a lower response rate from Black/Black British tenants than the tenant profile would suggest, however the response rate is still sufficiently high (28% of all respondents) to be included within the analysis.

13% of respondents were Greek/Kurdish/Turkish/Greek Cypriot or Turkish Cypriot. Complete Information on these ethnicities is not held on the Council's system. Again, there was no significant divergence in the response compared to the overall result (80% agreed with the proposal).

The impact on this group is considered to be neutral, as the proposal is to continue with the existing service delivery model.

The proposed new Management Agreement requires Homes for Haringey to comply with the Council's Equal Opportunities Policy, which makes existing practice a contractual requirement.

Positive		Negative		Neutral impact	X	Unknown Impact	
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6. Sexual orientation (Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)

25 respondents told us that they were either gay, lesbian or bisexual. This suggests a low response rate, however comparative data is not held on the Council's systems. It should be noted that 28% of respondents either did not answer this question or said that they preferred not to say.

The impact on this group is considered to be neutral, as the proposal is to continue with the existing service delivery model.

The proposed new Management Agreement requires Homes for Haringey to comply with the Council's Equal Opportunities Policy, which makes existing practice a contractual requirement.

Positive		Negative		Neutral impact	X	Unknown Impact	
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7. Religion or belief (or no belief) (Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)

The data held on religion on the Council's housing system is incomplete (data is not held for 56% of tenants). Where it is held, 27% are Christian, 9% are Muslim with other religions less than 1%. In the consultation, 63% told us they were Christian and 14%

Muslim. There was no divergence from the overall response pattern for any religious or belief group.

The impact on this group is considered to be neutral, as the proposal is to continue with the existing service delivery model.

The proposed new Management Agreement requires Homes for Haringey to comply with the Council's Equal Opportunities Policy, which makes existing practice a contractual requirement.

Positive		Negative		Neutral impact	X	Unknown Impact	
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8. Pregnancy and maternity (*Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic*)

Up-to-date data on pregnancy and maternity is not held, and this was not collected as part of the consultation monitoring as it was considered that the impact of the proposal on this protected characteristic is small.

The impact on this group is considered to be neutral, as the proposal is to continue with the existing service delivery model.

The proposed new Management Agreement requires Homes for Haringey to comply with the Council's Equal Opportunities Policy, which makes existing practice a contractual requirement.

Positive		Negative		Neutral impact	X	Unknown Impact	
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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*)

The majority of respondents told us whether they were married or in a civil partnership, and the responses did not show a divergence from the overall response rate or between those married compared to those in a civil partnership.

The impact on this group is considered to be neutral, as the proposal is to continue with the existing service delivery model.

The proposed new Management Agreement requires Homes for Haringey to comply with the Council's Equal Opportunities Policy, which makes existing practice a contractual requirement.

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

In terms of the consultation, the area where there is less strong evidence of residents' views are any equality strand combined with younger people. This is because there are approximately 270 Council tenants under the age of 30, and whilst the response rate of around 10% (26 respondents) was broadly typical for a survey of this kind, this does mean that there was a very low response rate from, for example, young black women and young black men as well as other races and ethnicities.

It is not, however, considered that the impact of the proposal on these groups is any more than the impact on other groups.

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?

It is not considered that the proposal will have a negative impact on any particular protected characteristics for the following reasons and mitigations:

- The proposal is for Homes for Haringey to continue to provide the housing services they have provided since 2006, therefore no changes are proposed which would negatively impact tenants and leaseholders
- Under the proposed new Management Agreement, Homes for Haringey will be contractually obliged to comply with the Council's Equal Opportunities Policy and associated documents, and any successor policies, which makes existing practice a contractual requirement.
- Homes for Haringey are required to carry out Equality Impact Assessments on any changes in policy/delivery models and to carry out Equalities Monitoring.
- The Council already has in place a framework to regularly monitor the performance of Homes for Haringey and its compliance with the Management Agreement.
- Homes for Haringey has in place its own governance arrangements to oversee performance and compliance, and its Board includes three Council-nominated members. The Homes for Haringey Board Member

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- The Council already has in place a framework to regularly monitor the performance of Homes for Haringey and its compliance with the Management Agreement.
- Homes for Haringey has in place its own governance arrangements to oversee performance and compliance, and its Board includes three Council-nominated members. The Homes for Haringey Board Member Code of Conduct requires board members to reflect Homes for Haringey's commitment to equal opportunities.
- In the consultation, there was clear support for the proposal with no clear divergence in this view from any particular group.

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 EqIA guidance

Outcome	Y/N
No major change to the proposal: the EqIA 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>	Y
Adjust the proposal: the EqIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below	N
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.	N

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

Lack of data held on some protected characteristics	Review data collection methods to ensure that relevant information is captured about tenants	Michael Westbrook/Homes for Haringey	6 months
Lack of compliance with equality measures in Management Agreement	Monitor Homes for Haringey compliance with the Management Agreement	Michael Westbrook	Ongoing
Risk that certain groups cannot access consultations on housing policies	Learn lessons from consultation to ensure that all groups continue to be adequately represented	Jennifer Dixon-Ashun	Ongoing

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.

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

- Under the proposed new Management Agreement, Homes for Haringey will be contractually obliged to comply with the Council's Equal Opportunities Policy and associated documents, and any successor policies, which makes existing practice a contractual requirement.
- The Council already has in place a framework to regularly monitor the performance of Homes for Haringey and its compliance with the Management Agreement.
- Homes for Haringey's has in place its own governance arrangements to oversee performance and compliance, and its Board includes three Council members. The Homes for Haringey Board Member Code of Conduct requires board members to reflect Homes for Haringey's commitment to equal opportunities.

7. Authorisation

EqlA approved by


 (Assistant Director/ Director)

Date

5 Jan 2018

8. Publication