

## EQUALITY IMPACT ASSESSMENT

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

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity for those with 'protected characteristics' and those without them
- Fostering good relations between those with 'protected characteristics' and those without them.

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

### Stage 1 - Screening

### Stage 2 – Full Equality Impact Assessment

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

#### 1. Responsibility for the Equality Impact Assessment

<b>Name of proposal</b>	Setting up a Community Benefit Society to deliver temporary accommodation solutions
<b>Service area</b>	Housing and Growth
<b>Officer completing assessment</b>	Laura Wilson/Martin Gulliver
<b>Equalities/ HR Advisor</b>	Ashley Hibben
<b>Cabinet meeting date (if applicable)</b>	17 July 2018
<b>Director/Assistant Director</b>	Helen Fisher/ Dan Hawthorn

#### 2. Summary of the proposal

##### The Proposal

The proposal is to set up two companies. The first is the Haringey Community Benefit Society (HCBS), which will fund the initial purchase of 100 residential units and agree the principle that up to 400 units may be purchased subject to subsequent cabinet capital spend approval. The HCBS would be registered under the Co-operative and Community Benefit Societies Act 2014. This will have the explicit aim of providing affordable homes for sub-market rent to households nominated by the Council. Properties will be purchased by the Council using a combination of Right to Buy Receipts, Council borrowing and grants or loans from any other body that the Council deems it appropriate for the CBS to access. To prevent this entity being a Wholly Owned Company of the council (which would rule out the use of RTB receipts) the Council must not have a controlling interest in the society.

The paper also requests approval for officers to continue working on procuring a Purchase and Repair Agent for a potential Joint Venture partner. This will purchase and repair existing poor quality market homes, primarily in the bottom end of the private rented sector. The partnership will bring these properties back into use and manage them as affordable housing, to which the Council has nomination rights. At the end of the nominations agreement the homes will become Council owned, so it is in effect municipalising these homes. Rather than the Council providing capital funding or assets, the core business model

is that the Council will guarantee to provide tenants, that is taking the void risk. It would be for the partner to take any other risks of unpaid rent etc.

The housing delivery companies proposed will deliver up to 800 new units over a two to three-year period, which will substantially alleviate the human and financial costs of homelessness and temporary accommodation. A key principle is that one company is set specifically to utilise the Council's capital and assets, the other specifically to be a revenue based vehicle. Other options were taken into consideration, however, were unable to deliver the benefits of implementing these two companies, which are as follows:

- The homes acquired will be better quality,
- The tenancies will be more secure,
- The housing management will be by a registered partner or Homes for Haringey,
- The costs of these homes to the Council will be lower,
- The costs of these homes to the tenants will be lower
- The Council will ultimately take ownership of these homes

The two housing delivery companies will aim to do the following four key things:

- To increase Housing Supply for Temporary Accommodation.
- To deliver better quality housing options for those presenting as homeless
- To make use of retained RTB receipts, the HCBS explicitly in this case.
- To make significant short and long-term savings in Temporary Accommodation budgets.

### Background

Where an eligible household has been accepted as un-intentionally homeless and in priority need, the Council has statutory duty to provide them with interim temporary accommodation until duty is discharged – usually through an offer of settled accommodation.

As of 1 July 2017, the Council provided 3,070 households with temporary accommodation following either acceptance of a homelessness application or where their case was to be determined.

Around half of these (1,500 households) were placed in self-contained nightly paid accommodation, and a third (1,107 households) were placed in accommodation leased to the Council. As there is a declining number of Council and Housing Association lets, the remaining lets are generally allocated to pre-localism cases who can only be permanently housed using these properties. The remaining households are, generally, housing in private sector tenancies.

### Effects of the policy

Where the new properties are used to provide new interim accommodation, this will be used as an alternative to the most expensive accommodation. This is usually nightly paid accommodation which the council currently subsidises these by up approximately £4,000 per unit per year. This accommodation is rented on a short-term basis and though these placements frequently last several years, the landlord can terminate the contract at short notice and require the household to be placed in alternative accommodation.

Where the new properties are used to provide settled accommodation, these will discharge

the homelessness duty and so reduce the need for expensive TA. With loss of PRS tenancies remaining the most common reason for homelessness, it is clear that in the private sector is currently an unstable means of accommodation for some of Haringey's more vulnerable residents as evidenced in the table below. With the HCBS offering sub-market rent this will benefit those who may struggle to maintain a private rented sector tenancy due to financial pressures.

Reason for approach	13/14	14/15	15/16	16/17
Loss of PRS tenancy	349	270	362	370
DV / other viol	13	13	12	9
Asked to leave by fam / friend	212	156	165	184
Other	188	218	64	120

### Demographics

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

The individual households allocated to these properties will be set in line with the TA Placements Policy (where used as TA) or Allocations Policy (where used as settled accommodation).

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

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

Protected group	Service users	Staff
Sex	P1E Homelessness data <a href="https://www.gov.uk/government/collections/homelessness-statistics">https://www.gov.uk/government/collections/homelessness-statistics</a> Internal data from homelessness and temporary accommodation	The proposed changes will not impact on Haringey Council employees (unless residents of the borough and are also homeless or likely to become homeless and thus included below).
Gender Reassignment	Joint Strategic Needs Assessment (JSNA) <a href="http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment-jsna">http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment-jsna</a>	
Age	P1E Homelessness data <a href="https://www.gov.uk/government/collections/homelessness-statistics">https://www.gov.uk/government/collections/homelessness-statistics</a> Internal data from homelessness and temporary accommodation	
Disability	As above	
Race & Ethnicity	As above	

	<p>Census data:  <a href="https://www.nomisweb.co.uk/query/select/getdatasetbytheme.asp?opt=3&amp;theme=&amp;subgrp=">https://www.nomisweb.co.uk/query/select/getdatasetbytheme.asp?opt=3&amp;theme=&amp;subgrp=</a></p> <p>GLA latest population projections (ethnicity at the bottom):  <a href="https://data.london.gov.uk/dataset/projections">https://data.london.gov.uk/dataset/projections</a></p> <p>Combined Homeless Information Network  <a href="https://data.london.gov.uk/dataset/chain-reports">https://data.london.gov.uk/dataset/chain-reports</a></p>	
Sexual Orientation	<p>Joint Strategic Needs Assessment (JSNA)  <a href="http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment-jsna">http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment-jsna</a></p> <p>EqlA Profile on Harinet</p> <p>Albert Kennedy Trust: “LGBT Youth Homelessness”  <a href="http://www.akt.org.uk/webtop/modules/_repository/documents/AlbertKennedy_researchreport_FINALinteractive.pdf">http://www.akt.org.uk/webtop/modules/_repository/documents/AlbertKennedy_researchreport_FINALinteractive.pdf</a></p>	
Religion or Belief (or No Belief)	<p>Joint Strategic Needs Assessment (JSNA)  <a href="http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment-jsna">http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment-jsna</a></p> <p>EqlA Profile on Harinet</p>	
Pregnancy & Maternity	<p>Internal data from homelessness and temporary accommodation</p> <p>EqlA Profile on Harinet</p> <p>P1E Homelessness data  <a href="https://www.gov.uk/government/collections/homelessness-statistics">https://www.gov.uk/government/collections/homelessness-statistics</a></p>	
Marriage and Civil Partnership	<p>Internal data from homelessness and temporary accommodation</p>	

**Outline the key findings of your data analysis.**

**Sex, pregnancy & maternity**

Data shows that women are disproportionately likely to approach homelessness services for support. The table below outlines that a female applicant headed 73% of homeless acceptances, with a large proportion being lone single parents. In addition, of the 10,000 people in temporary accommodation, 5,000 are children.

With the proposals set to deliver longer term, stable temporary accommodation it is reasonable to infer that women and children will disproportionately, but positively, benefit from the implementation of the proposal.

The demographics of applicants are also provided for comparison.

Gender	Current households in TA (31 July 2018)	Accepted households in Q2 of 2017/18
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Female	2301 (75%)	77 (73%)
Male	769 (25%)	28 (27%)

### **Sexual Orientation**

LGBTQ+ people comprise up to 24% of the young homeless population nationally though Haringey does not collect this data. Sexual orientation data specific to Haringey is not available but nationally, 69% of LGBT homeless young people have experienced familial rejection, abuse and violence. With the proposal set to improve the lives of those who are in temporary accommodation those vulnerable to homelessness, it will inevitably have a positive impact on the young LGBTQ+ community.

### **Age**

The table below outlines a disproportionate number of 25-59 year olds in temporary accommodation. In addition, as mentioned previously, of the 10,000 people in temporary accommodation, 5,000 are children. With the proposal set to deliver longer term, stable temporary accommodation it is reasonable to infer that those below the age of 18 and aged between 25 and 59 will disproportionately, but positively, benefit from the implementation of the proposal.

<b>Age</b>	<b>Current households in TA (31 July 2018)</b>	<b>Accepted households in Q2 of 2017/18</b>
16-24	198 (6%)	16 (15%)
25-44	2047 (67%)	64 (61%)
45-59	750 (24%)	23 (22%)
60-64	40 (1%)	2 ( 2%)
65 or over	35 (1%)	<i>none</i>

### **Race & ethnicity**

There is evidence to suggest in the east of the borough, where the average income is generally lower; there is a high concentration of Haringey's black residents. Therefore, with it being known that those on a lower income are more likely to be vulnerable to homelessness, it is reasonable to infer that those who identify as black are more vulnerable to being homeless and therefore will be disproportionately but positively impacted by the implementation of the proposal. This is evidenced further when considering 44% of households in temporary accommodation identifying as black, as evidenced in the table below.

<b>Ward</b>	<b>Population (GLA Projection 2017)</b>	<b>Medium income</b>	<b>% of the ward population who are black</b>
Northumberland Park	16,611	£25,090	40.3%
White Hart Lane	13,903	£27,010	28.3%
Tottenham Hale	18,511	£27,340	32.7%
Tottenham Green	16,769	£28,920	28.8%
Bruce Grove	15,490	£30,340	31.9%
Noel Park	15,443	£30,620	19.8%
West Green	14,540	£31,110	23.8%
Woodside	16,025	£32,010	16.9%
St Ann's	17,751	£32,460	20.2%
Seven Sisters	15,945	£33,500	21.2%
Bounds Green	15,118	£34,550	17.2%

Harringay	14,681	£37,150	11.8%
Hornsey	13,442	£40,260	13.2%
Stroud Green	12,761	£44,780	11.3%
Fortis Green	13,915	£49,950	4.8%
Alexandra	12,758	£51,450	5.5%
Crouch End	13,632	£52,070	4.3%
Highgate	12,864	£53,710	4.5%
Muswell Hill	12,218	£53,910	4.6%

Ethnicity	Current households in TA (31 July 2018)	Accepted households in Q2 of 2017/18
Asian	235 (8%)	4 (4%)
Black	1336 (44%)	46 (44%)
Chinese or other	260 (8%)	11 (10%)
Mixed	128 (4%)	3 (3%)
White	1017 (33%)	31 (30%)
Refused or unknown	94 (3%)	10 (10%)

### Disability/Mental Health

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

### Religion

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 is no sufficient evidence to suggest that one particular religious group will be disproportionately affected by the adoption of the proposal. All homelessness services are allocated based on the need and therefore it is reasonable to infer that no religious group will be disproportionately impacted.

### Users who will benefit from the proposed changes

The proposed policy will benefit households in temporary accommodation by either providing new longer term and stable temporary accommodation, or to provide a more

stable tenancy with a Community Benefit Society instead of a private sector landlord.

In practice, where the properties are used as TA, the majority of the new properties will not be used to house newly accepted households rather than move existing residents of TA. The proposal will therefore have the greatest impact on new applicants but will also affect those in currently in TA who are offered a new home.

**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?**

Homeless households have been consulted on two new policies in the last 18 months including a consultation on TA Placements Policy which was held between 13 July and 7 September 2016.

This policy set out the criteria for placement of households both in terms of the size of accommodation and the location.

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

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

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

**1. Sex**

Positive	Y	Negative		Neutral impact		Unknown Impact	
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Lone parent households headed by a female are over-represented among current residents of TA (67%). In addition, of the 10,000 residents in Temporary Accommodation, 5,000 are children. Therefore, we can infer women and children will benefit from more stable TA placements and/or from a Community Benefit Society instead of a private sector landlord.

**2. Gender reassignment**

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

We have no cause to think that people with this protected characteristic will be disproportionately impacted by this decision.

### 3. Age

Positive	Y	Negative		Neutral impact		Unknown Impact	
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Adults aged 25-54 are over-represented among current users. However, this group is of working age and less likely to be vulnerable. Those below the age of 18 account for half of the 10,000 individuals residing in temporary accommodation in the borough. Therefore, it is reasonable to infer that these groups will benefit from more stable TA placements and/or from a Community Benefit Society instead of a private sector landlord.

### 4. Disability

Positive		Negative		Neutral impact	Y	Unknown Impact	
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Most users with a disability presenting as homeless are referred through our supported housing pathways. Where this does not occur - and the overall numbers presenting as homeless due to their disability are very low – therefore the implementation of this policy is likely to have a neutral impact on this group.

### 5. Race and ethnicity

Positive	Y	Negative		Neutral impact		Unknown Impact	
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Black households are over-represented amongst households making homelessness applications and residing in temporary accommodation. They will benefit from more stable TA placements and/or from a Community Benefit Society instead of a private sector landlord.

### 6. Sexual orientation

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

There is insufficient data available to assess the impact on this protected group but where they are using this service, they will benefit from more stable TA placements and/or from a Community Benefit Society instead of a private sector landlord.

### 7. Religion or belief (or no belief)

Positive		Negative		Neutral		Unknown	Y
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There is insufficient data available to assess the impact on this protected group but where they are using this service, they will benefit from more stable TA placements and/or from a Community Benefit Society instead of a private sector landlord.

**8. Pregnancy and maternity**

Positive	Y	Negative		Neutral impact		Unknown Impact	
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Women who are pregnant or have a new born child represent a small proportion of those making a homelessness application, with 6 households out of 105 having a pregnant woman in Quarter 2 of 2017. They will benefit from more stable TA placements and/or from a Community Benefit Society instead of a private sector landlord.

**9. Marriage and Civil Partnership**

Positive		Negative		Neutral Impact	Y	Unknown Impact	
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It is not anticipated the proposal will have an impact for married people or people who are civil partners so will not have an impact with regard to this protected characteristic but will benefit from more stable TA placements and/or from a Community Benefit Society instead of a private sector landlord.

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

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

As will all other groups, they will benefit from more stable TA placements and/or from a Community Benefit Society instead of a private sector landlord.

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

The proposal will have a positive impact on residents, as it will provide new opportunities to for those who are vulnerable to homelessness, particularly women, children and in particular black single mothers who are over represented in approaching homelessness services and as residents residing in Temporary Accommodation. The proposal will provide both better quality and stable accommodation whether it be temporary or intended for a longer period.

6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?	
Outcome	
<b>No major change to the proposal:</b>	Y
Adjust the proposal:	
Stop and remove the proposal:	

6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty			
Impact	Action	Lead officer	Timescale
The new accommodation may not be suitable for all client groups.	Any special needs or requirements will be assessed with these placements as with placement into existing TA/private sector tenancies. These are set out in the TA Placement Policy.	Allocations Manager	Immediate and ongoing

6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:
The placement of households is monitored by Homes for Haringey (Jasper South)

7. Authorisation	
EqlA approved by Dan Hawthorn	Date 9 July 2018

8. Publication

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