

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 between those with a ‘relevant protected characteristic’ and those without one;
- Fostering good relations between those with a ‘relevant protected characteristic’ and those without one.

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	Tangmere and Northolt CPO
Service area	Housing, Regeneration and Planning
Officer completing assessment	Aaron Scorse
Equalities/ HR Advisor	Hugh Smith
Cabinet meeting date (if applicable)	13 th October 2020
Director/Assistant Director	David Joyce, Director of Housing, Regeneration and Planning

2. Summary of the proposal

Background

In June 2018, Haringey Cabinet agreed that its preferred option was to demolish and then rebuild the Tangmere and Northolt blocks on the Broadwater Farm Estate. The reasons for this were set out in the June Cabinet report and included the significant cost of the strengthening works, which do not represent value for money. It was also noted that the properties would still not be an acceptable standard (despite the significant cost) and that the disruption (residents needing to be rehoused for 12 months) to residents would not be justified by the final outcome. The decision was taken to undertake a Section 105 consultation on this preferred option, as well as the lettings and rehousing policy to be in place for decanting.

An EqlA was considered by Cabinet as part of making its decisions in June 2018 and is published here:

<https://www.minutes.haringey.gov.uk/documents/s102078/180626%20BWF%20EQIA%20final.pdf>

The June EqlA considered the equality impact of rehousing residents from Tangmere under the Tangmere Rehousing Priority Scheme, and the potential impacts of the proposed Rehousing and Payments Policy and proposed Local Lettings Plan which were to be put to consultation.

On 13th November 2018, Cabinet considered responses to the consultations on the Broadwater Farm estate and resolved to proceed with the demolition of Tangmere and Northolt blocks due to the serious structural failings. The consultations were on:

- S105 to proceed with demolition of Tangmere and Northolt and build new Council homes on the land
- The Broadwater Farm Rehousing and Payments Policy
- A Local Lettings Policy

This followed the consideration of the two main options: to carry out strengthening works or demolish the blocks and then rebuild the homes.

An updated EqlA was considered by Cabinet as part of its decisions in November 2018 and is published here:

<https://www.minutes.haringey.gov.uk/ieDecisionDetails.aspx?AllId=58796>

The November EqlA considered the decision to demolish, the final proposed Rehousing and Payments Policy, the rehousing of Northolt residents, and the final proposed Local Lettings Plan.

Impact

Since these decisions were taken, all secure tenants and the majority of leaseholders in Tangmere have been rehoused, with 6 remaining. In Northolt, 5 secure tenants and 13 leaseholders remain – with the majority having successfully been rehoused. Remaining leaseholders and secure tenants continue to be rehoused under the policies authorised by the June and November 2018 reports. Further to this, additional provisions were made by the acquisition strategy that was passed by Cabinet in July 2020. This is explained in more detail in later sections which expand on the mitigations made to ensure those with protected characteristics were not unfairly impacted by these decisions.

When rehousing residents, the Council has undertaken in-depth discussions with all affected parties to understand their housing need and rehousing preferences. Additional priority was given to those with local connections to allow them to remain in the area if they wished (as set out in the Tangmere Rehousing Priority Scheme, considered by Cabinet in June 2018).

Support has been available to tenants and leaseholders to help them through the viewing and moving process including a number of financial provisions to cover the costs of moving, such as:

- Disturbance payments
- Home loss payments
- Basic loss payments
- Under-occupation payments
- Legal and other additional costs (for resident leaseholders)

Both leaseholders and tenants are also guaranteed a right to return as part of the Broadwater Farm Rehousing and Payments Policy, meaning they will benefit from the new homes on the estate once they are built. To enable resident leaseholders to purchase a similar property in the local area if they wished, the Council has also offered equity loans of up to 40%. Since July 2020, this policy has been updated to allow for consideration of out of borough equity loans – giving resident leaseholders more options.

The impact of rehousing, as a result of the demolition required due to safety concerns, is recognised to potentially cause stress, disruption to existing communities and social networks, and disruption to access to public services and employment within the vicinity of the estate. As a result, the Council has a duty to mitigate any disproportionate impact on people with protected characteristics. It is important to note that, even if the decision to demolish was not taken, residents would need rehousing to allow for the strengthening and refurbishment works. Therefore, it is stressed that rehousing residents would have been necessary regardless and that all policies have been considered to ensure that those with protected characteristics are not disproportionately impacted by this difficult but necessary decision.

Previous EQIAs – considering the decision to demolish, the Broadwater Farm Rehousing and Payments Policy, the Local Lettings Plan, and the Tangmere and Northolt rehousing – have noted the mitigations put in place to ensure all residents and

leaseholders are supported through this period. These policies remain in place and negotiations will continue under these conditions.

This report considers the decision to begin the Compulsory Purchase Order (CPO) process to acquire the outstanding interests using compulsory purchase powers if necessary. The act of making a CPO does not change the end result of previous decisions (all residents have known for some time that they will need to be rehoused, and the majority have already successfully been rehoused) but will provide a fixed timeline to the rehousing of residents. Therefore, the mitigations discussed in the previous EQIAs are still the most relevant policies in place. One addition to be considered is the updated Acquisition Strategy that was adopted by Cabinet in July 2020. These updates demonstrate further mitigations and flexibility by the Council to enable all resident leaseholders to be rehoused according to the 3 main principles of the Estate Renewal Rehousing and Payments Policy:

1. No resident leaseholder or freeholder will be financially worse off as a result of estate renewal
2. All resident leaseholders and freeholders will have a guaranteed Right to Return on equivalent terms
3. All resident leaseholders and freeholders who wish to move away will be supported to do so

All tenants and leaseholders that have been rehoused so far have been rehoused according to the principles and policies mentioned above. These policies still apply for remaining leaseholders and tenants and the impact of these policies on those with protected characteristics have been explored in the previous reports, noted above.

This EQIA considers the impact of making a CPO for Tangmere and Northolt on the remaining leaseholders and tenants. Due to the small number of remaining leaseholders, it is difficult to specifically address the individuals with protected characteristics that may be impacted without potentially identifying them. This EQIA therefore demonstrates the mitigations in place for those with protected characteristics without risking identification of individuals.

As all residents – both tenants and leaseholders – were engaged on the decision to demolish and the overwhelming majority supported this decision, the Council have been clear throughout that this means that all residents will need to vacate the blocks. The making of a CPO at this stage is a continuation of the decision to demolish taken in November 2018, and as such many of the relevant equalities considerations were undertaken during that time. This EQIA builds on the earlier EQIAs with reference to previous policies that mitigate any discrimination, as well as the Acquisition Strategy from July 2020 which expands upon the policies already in place. Further, it considers the specific knowledge of the remaining 19 leaseholders and 5 secure tenants in the two blocks and any changes to individual circumstances.

Stapleford Wing

The wing of Stapleford block is directly next to Northolt. To access one section of this wing (containing 12 properties, with 1 leaseholder) there is a lift that is presently located in the Northolt block. Therefore, this access route will be re-provided as part of the

demolition. Housing officers have already undertaken an assessment of all residents in the wing to identify any vulnerable residents or residents with protected characteristics. It is recognised that the demolition will be disruptive to these residents, but access will be re-provided to ensure that these residents still maintain step free access to their properties.

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	Homes for Haringey housing data	N/A
Gender Reassignment	This data is not collected for residents	N/A
Age	Homes for Haringey housing data	N/A
Disability	Homes for Haringey housing data (when provided by the resident)	N/A
Race & Ethnicity	Homes for Haringey housing data (when provided by the resident)	N/A
Sexual Orientation	Homes for Haringey housing data (when provided by the resident)	N/A
Religion or Belief (or No Belief)	Homes for Haringey housing data (when provided by the resident)	N/A
Pregnancy & Maternity	Homes for Haringey housing data (when provided by the resident)	N/A
Marriage and Civil Partnership	This data is not collected for residents	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?

Sex

Of the remaining 19 leaseholders 50% are male and 50% are female. This is broadly in line with the borough average which is 49% female and 51% male.

Amongst the remaining 5 tenants there are 3 females and 2 males.

Gender reassignment

The council does not have local data regarding this protected characteristic, however, individual needs assessments to date have not identified any of the remaining residents as belonging to this protected group. There is no reason to believe that there will be specific impacts for this protected group and the Council will ensure that discrimination, harassment and victimisation is tackled based upon this and any other protected group.

Age

It was noted in the November 2018 EQIA that older residents were overrepresented in Tangmere and Northolt blocks. This is still the case amongst remaining leaseholders, with 57% being over 50 and none being younger than 40.

It is noted that of the 5 remaining tenants 3 are older than 65.

It is noted that several of the residents who access Stapleford via Northolt are elderly.

Disability

There are a number of remaining leaseholders and tenants who have disabilities. Some residents do not disclose if they have a disability. However, where adapted properties are needed this information will have been provided to the rehousing team for the purpose of undertaking negotiations and finding suitable new properties. Many of the remaining secure tenants in Northolt have additional needs whilst those with disabilities are over-represented amongst remaining leaseholders.

It is noted that several of the residents who access Stapleford via Northolt have disabilities.

Race and ethnicity

As noted in the November 2018 EQIA, the blocks have an overrepresentation (compared to the borough average) of Black and minority ethnic residents. This remains the case with the remaining leaseholders and secure tenants.

Sexual Orientation

Sexuality is frequently under-reported, with only half of original residents in these blocks declaring this information. It is difficult to re-analyse this data without identifying

individual residents. On the limited data that was available for original residents, there were similar proportions of Gay, Lesbian and Bisexual people as the general population.

Religion and belief (or no belief)

As noted in the November 2018 EQIA, 46% of residents did not declare their religion. However, the limited data available showed an overrepresentation of Christians and Muslims in the two blocks compared to the borough population. Other religions, such as Judaism, Buddhism, and Hinduism were underrepresented in the blocks.

Pregnancy and maternity

The council does not hold data on pregnancy and maternity among its tenants and leaseholders and so this is unknown for Northolt and Tangmere residents. However, if and when this is identified through housing assessments and interviews with officers, the Council will ensure that it considers the inequalities and discrimination experienced by those who are pregnant or new mothers.

Marriage and Civil Partnership

The council does not hold data on marriage and civil partnership among its residents. There is no reason to believe that there will be specific impacts for this protected group and the Council will ensure that discrimination, harassment and victimisation is tackled based upon this and any other protected group.

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?

During the spring of 2018, Homes for Haringey undertook considerable engagement with residents over the safety and inspection of these blocks.

Following the Cabinet decision in June 2018 to approve the rehousing of Tangmere residents, there was further engagement to enable them to be rehoused as quickly and efficiently as possible, taking into account the circumstances of each household.

In addition to this informal engagement, the Council also carried out four consultations between 11 September and 10th October 2018;

- Section 105 consultation on the future of Tangmere
- Section 105 consultation on the future of Northolt
- Consultation on the draft Broadwater Farm Rehousing and Payments Policy
- Consultation on the draft Broadwater Farm Local Lettings Policy

As part of these consultations, a letter/information pack was sent to all residents in Tangmere and Northolt and was made available in Turkish and in other languages, large print and Braille on request.

During the consultations, a number of events were arranged for residents to find out more about the decision options and policies. Translators were available at all sessions and others were arranged where necessary.

The Council also undertook door-knocking exercises in both blocks and discussed the consultations with Tangmere tenants. Further work with was also undertaken by the Independent Tenant Leaseholder Advisor who also held drop-in sessions and undertook their own door-knocking.

A total of 108 responses were received from 105 of the 206 properties (51%). However, response rates varied between Tangmere (42 out of 104 properties or 40%) and Northolt (63 out of 102 properties or 62%).

In addition to these formal consultations, residents have been kept up to date through regular newsletters, ad-hoc drop-in sessions, housing officers 1-1 support, written communications, the Homes for Haringey and Council websites, and the Broadwater Farm team have been accessible and responsive throughout.

The updated acquisition strategy has also been communicated to remaining leaseholders – with several taking their cases to the discretion panel for consideration.

The possibility of making a CPO was referenced directly in the November 2018 Cabinet report. The making of a CPO does not immediately change tenants or leaseholders circumstances, as all remaining leaseholders are already in negotiation for acquisition by agreement and these negotiations will continue as normal and remaining tenants are being supported in finding suitable properties. However, the making of a CPO, if approved, gives certainty to the acquisition strategy and rehousing by providing a clear date by which all acquisitions will be completed. In turn this will ensure programmes reliant on it, such as demolition and the building of new homes, can progress.

As all residents – both tenants and leaseholders – were engaged on the decision to demolish and the overwhelming majority supported this decision, the Council have been clear throughout that this means that all residents will need to vacate the blocks. The making of a CPO at this stage is a continuation of the decision to demolish taken in November 2018, and as such many of the relevant equalities considerations were undertaken during that time. This EQIA builds on the earlier EQIAs with reference to previous policies that mitigate any discrimination, as well as the Acquisition Strategy from July 2020 which expands upon the policies already in place. Further, it considers the specific knowledge of the remaining 19 leaseholders and 5 secure tenants in the two blocks and any changes to individual circumstances.

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

A full description of the consultation outcomes is provided in the consultation report from November 2018 Cabinet, which is available here: <https://www.minutes.haringey.gov.uk/ieDecisionDetails.aspx?AllId=58796>. In general, the proposals set out in the four consultations were strongly supported, with few respondents disagreeing with the proposals. A similar rate of tenants with protected characteristics supported the proposals, with no significant variation among tenants who share any particular protected characteristic. Due to the high rate of support there is limited value in analysing responses by protected characteristics and there is a danger with several that such analysis may reveal the responses of individuals.

In terms of response rates for protected groups, these were largely in line with the known demographics of the blocks, though it is noted that there was a slightly lower proportion of respondents between 45 and 65 (38%) compared with the population of the two blocks (47%) and higher among those 65 and over (29% compared with 27%).

Further direct engagement with remaining leaseholders resulted in the updated Acquisition Strategy passed by Cabinet in July 2020. This Acquisition Strategy responded to the concerns raised by remaining leaseholders by including the option for out of borough equity loans and the option for social tenancies to replace a leaseholder's interest. This strategy is a reflection of the Council's desire to acquire remaining leasehold interests by agreement and avoid the formal use of CPO powers if possible.

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	Y	Neutral impact		Unknown Impact	
----------	---	----------	---	----------------	--	----------------	--

There are equal numbers of men and women amongst the remaining leaseholders in the two blocks.

3 of the remaining secure tenants are female, and 2 are male.

The Council recognises that the rehousing of single mothers can be a particularly negative experience for those individuals and their families due to support networks that often exist in the local area, along with access to local facilities and proximity to places of work. As noted in the EQIA for demolition in November 2018, 92% of lone-parent households in West Green were headed by women.

To offset these potential negative impacts a number of important mitigations have been made:

- Financial assistance set out in the Broadwater Farm Rehousing and Payments Policy (explored in the November 2018 EQIA)
- Equity loans – enabling leaseholders to purchase similar properties in the local area
- Social tenancies as set out in the Acquisition Strategy from July 2020
- Practical support in finding a new property
- Flexibility and a discretion panel to consider requests outside of the current policies, to find suitable solutions for those particularly ill affected by rehousing

Further to this, those with a member of the household attending a local school, or with support services only available in the local area, are priority 2 under the Broadwater Farm Rehousing and Payments Policy.

This support has and will continue to mitigate any disproportionate impact on people with this protected characteristic.

In the long-term the CPO will have a positive impact as it will move people out of unsafe properties, removing the risk of harm.

Stapleford wing

Lift access to Stapleford wing will be re-provided as part of the demolition. Residents in the affected section of Stapleford wing with this protected characteristic will not be disproportionately impacted by the making of the CPO.

2. Gender reassignment

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

The Council does not hold local data regarding this protected characteristic and it is not believed that anyone with this protected characteristic is amongst the group of remaining leaseholders in either block. There is no reason to believe that there would be any specific impact on this group as a result of the CPO. The mitigations in place to help people remain in the local area – enabling continued access to the same healthcare and support networks – apply equally to this protected group and therefore mitigate any potential negative impacts.

To the extent that people with this protected characteristic are represented among leaseholders, the CPO will have a long-term positive impact as it will move people out of unsafe properties, removing the risk of harm.

Stapleford wing

Lift access to Stapleford wing will be re-provided as part of the demolition. Residents in the affected section of Stapleford wing with this protected characteristic will not be disproportionately impacted by the making of the CPO.

3. Age

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

Older residents are overrepresented amongst the remaining residents when compared to the borough averages. Therefore, the CPO will have a short-term negative impact on this group due to the disruption associated with re-housing.

The mitigations in place, through the Broadwater Farm Rehousing and Payments Policy from November 2018 and the Acquisition Strategy adopted in July 2020, will positively impact this group by helping them find and afford a new property in the local area if they wish to and by introducing other options such as the social tenancy and discretion panel. These options are intended to give remaining leaseholders the best chance of finding new properties that suit their needs. This means taking into consideration elderly leaseholders’ health and care needs as well as practical and financial support to make moving easier. Therefore, on balance this group will not be disproportionately impacted by the making of the CPO.

Remaining secure tenants are being supported by the Broadwater Farm Rehousing and Payments policy. This policy positively impacts people by guaranteeing them a right to return to the estate – either to existing properties as they become available or to the new homes once they are built. They are also supported through the moving process, with housing officers undertaking individual needs assessments and directly supporting them. This includes with payments for under-occupation and priority rehousing for those who are vulnerable under the Broadwater Farm Rehousing and Payments Policy.

In the long-term the CPO will have a positive impact as it will move people out of unsafe properties, removing the risk of harm.

Stapleford wing

There are several elderly residents residing in the section of Stapleford wing that requires lift access via Northolt. Elderly residents are more likely to require the use of lifts to access their properties. This lift access to Stapleford wing will be re-provided as part of the demolition. Due to this mitigation, residents in the affected section of Stapleford wing with this protected characteristic will not be disproportionately impacted by the making of the CPO.

4. Disability

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

Specific data on disabilities is unknown for remaining leaseholders, with this data generally being under-reported by residents. Similarly, the data is underreported amongst tenants. However, where residents have a disability this has been identified by rehousing officers in 1-1 assessments, who support residents in finding a suitable property. Further to this, those tenants who are vulnerable (including disability) are priority 1 for rehousing under the Broadwater Farm Rehousing and Payments Policy.

The making of a CPO will not have specific impacts on disabled residents. However, the continued need to be rehoused does. This was considered in the EQIA that accompanied the November 2018 Cabinet decision to demolish. It is recognised by the Council that moving can be particularly difficult for those with physical and mental disabilities, particularly if a property with specific adaptations is needed. The Rehousing and Payments Policy and the Acquisition Strategy are intended to enable flexibility so all residents can find a new and suitable property of similar size and quality. Dedicated rehousing officers have also been and will continue to give practical support that will enable residents with disabilities to find a suitable property.

The local lettings policy, which guarantees leaseholders a right to return once the new homes are built and ensuring that these properties are suitable, will also benefit leaseholders with disabilities – ensuring that they can get a new and suitable property on the estate once they are built if they wish.

In the long-term the CPO will have a positive impact as it will move people out of unsafe properties, removing the risk of harm.

Stapleford wing

There are several disabled residents residing in the section of Stapleford wing that requires lift access via Northolt. Disabled residents are more likely to require the use of lifts to access their properties. This lift access to Stapleford wing will be re-provided as part of the demolition. Due to this mitigation, residents in the affected section of Stapleford wing with this protected characteristic will not be disproportionately impacted by the making of the CPO.

5. Race and ethnicity

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

The data in section 3 notes that Black and other BAME groups are overrepresented in the Tangmere and Northolt blocks compared to the borough average. This is also the case amongst remaining leaseholders and secure tenants.

It is recognised that there may be specific cultural ties, such as businesses that cater for the cultural needs of specific groups, in the local area that the remaining leaseholders may want to remain close to. The support being offered to all households

is intended to enable leaseholders to find a new and similar property in the local area. The provisions for equity loans, for example, will help leaseholders on low incomes – a group where BAME individuals are overrepresented. Home loss payments and equity loans are also intended to make finding a new property in the local area possible. The right to return to the estate will also have a positive impact on BAME leaseholders and secure tenants.

Any residents with language needs, which have been identified through individual assessments, are provided with translated communication materials and the option of translators at meetings if they require.

Therefore, the making of a CPO will have both positive and negative consequences for people with this protected characteristic – but the mitigations in place ensure that this impact is not disproportionate.

In the long-term the CPO will have a positive impact as it will move people out of unsafe properties, removing the risk of harm.

Stapleford wing

Lift access to Stapleford wing will be re-provided as part of the demolition. Residents in the affected section of Stapleford wing with this protected characteristic will not be disproportionately impacted by the making of the CPO.

6. Sexual orientation

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

As noted in section 3, data on sexual orientation is frequently under-reported. Similarly, it was noted in the June and November 2018 EQIA that this data was under reported in the two blocks. The impact on this group is unknown, however, there are no reasons identified to believe that making the CPO would have a disproportionate impact on people with this protected characteristic.

The mitigations in place – around finances, practical support, and advice will also benefit individuals with this protected characteristic. There is no reason to believe that the proportions of residents with this protected characteristic are different now than at the time of considering the June or November 2018 EQIAs. Therefore, there will not be a disproportionate impact on residents with this protected characteristic.

In the long-term the CPO will have a positive impact as it will move people out of unsafe properties, removing the risk of harm.

Stapleford wing

Lift access to Stapleford wing will be re-provided as part of the demolition. Residents in the affected section of Stapleford wing with this protected characteristic will not be disproportionately impacted by the making of the CPO.

7. Religion or belief (or no belief)

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

There is limited data on the religion of remaining residents, and this is unknown unless it is explicitly declared. It is recognised that moving away may have a specific negative affect on those who attend religious institutions in their local area. However, residents with these protected characteristics are positively impacted by the mitigations that have been put in place to enable leaseholders to purchase a property in the local area. Additional to this, there is the provision to allow for leaseholders and secure tenants to return to the estate once the new properties are built or if a property becomes available in the meantime.

The Council believes that there will not be a disproportionate impact on this group due to the making of the CPO and that the mitigations in place are robust enough to ensure that there is adequate support for people with this protected characteristic.

In the long-term the CPO will have a positive impact as it will move people out of unsafe properties, removing the risk of harm.

Stapleford wing

Lift access to Stapleford wing will be re-provided as part of the demolition. Residents in the affected section of Stapleford wing with this protected characteristic will not be disproportionately impacted by the making of the CPO.

8. Pregnancy and maternity

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

The data on remaining leaseholders suggests that 50% are women. Similarly, 3 of the remaining tenants are women. The Council holds no local data on pregnancy and maternity for residents. However, if an individual presents themselves as pregnant to the rehousing team support and advice would be provided. It is recognised that moving to a new house whilst pregnant would be particularly stressful and the Council is mindful of the negative impact this may have. To remove as much stress as possible generous financial and practical support is available to all residents required to move due to the demolition. This is intended to enable people to remain in the local area if they wish, which will benefit pregnant individuals who have local support and health networks. The right to return to the estate will also positively impact this group in the long term.

In the long-term the CPO will have a positive impact as it will move people out of unsafe properties, removing the risk of harm.

Stapleford wing

Lift access to Stapleford wing will be re-provided as part of the demolition. Residents in the affected section of Stapleford wing with this protected characteristic will not be disproportionately impacted by the making of the CPO.

9. Marriage and Civil Partnership

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

People who are in a civil partnership will be treated the same as people who are married in all respects.

In the long-term the CPO will have a positive impact as it will move people out of unsafe properties, removing the risk of harm.

Stapleford wing

Lift access to Stapleford wing will be re-provided as part of the demolition. Residents in the affected section of Stapleford wing with this protected characteristic will not be disproportionately impacted by the making of the CPO.

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

Due to BAME and elderly groups being overrepresented amongst remaining leaseholders the making of a CPO will potentially have a negative impact on older BAME people. This group are also more likely to have other vulnerabilities, such as poor physical or mental health. These inter-connected protected characteristics require a tailored approach that recognises the specific needs of individuals and households. This is why throughout the negotiations rehousing officers have worked hard to develop relationships with residents and respond to their specific needs and concerns. The option to take requests to an independent discretion panel also ensures that where multiple protected characteristics intersect specific and appropriate measures can be taken to ensure there are no disproportionate impacts.

The other relevant policies such as the Broadwater Farm Rehousing and Payments Policy and the Acquisition Strategy will also benefit residents with multiple protected characteristics and ensure that any negative impacts are not disproportionate.

In the long-term the CPO will have a positive impact as it will move people out of unsafe properties, removing the risk of harm.

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

The Council has a duty to have due regard for the need to eliminate discrimination, harassment, and victimisation. The approach taken to the CPO, as set out in this report, with a range of mitigations in place that will seek to provide support for leaseholders based on their individual needs will ensure that no discrimination based on any of the protected characteristics occurs.

The Council has a duty to have due regard for the need to advance equality of opportunity for individuals and groups of people who share the protected characteristics. This includes enabling participation in public life and access to public services. The greatest impact of these proposals in this sense will be on those who are dependent on local support networks and public services such as schooling, including children, parents, single parents, and older people. This is because any move away from Broadwater Farm caused by rehousing may make it more difficult for these residents to maintain these support networks and continue to access services.

Leaseholders have been in negotiation with the rehousing team since 2018 and have long been aware that they will be moving. The enacting of a CPO does not change this immediate reality for the remaining leaseholders, although it does give more certainty to the date by which they will need to be rehoused. Further to this, a number of mitigations have been built into policies – and updated and expanded as required, such as with the Acquisition Strategy adopted by Cabinet in July 2020 – to do everything to enable leaseholders to purchase a new property in the local area or to get a social tenancy if they wish. The right to return will also have a positive impact on all leaseholders and secure tenants, including those with protected characteristics.

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 relevant protected characteristics are impacted?	Action	Lead officer	Timescale
Loss of local healthcare, support networks and increased distance from schools affects: <ul style="list-style-type: none"> • Females (with children) • Pregnancy 	<ul style="list-style-type: none"> - Rehousing and Payments Policy, agreed in 2018, provides financial and practical support for leaseholders and secure tenants 	Director of Housing, Regeneration and Planning	<i>These policies are ongoing and will remain in place until all interests have been acquired and all</i>

<ul style="list-style-type: none"> • Disabled residents • Elderly residents • Religious residents • Gender reassignment 	<ul style="list-style-type: none"> - Local Lettings Policy, agreed in 2018, guarantees a right to return to the estate for leaseholders and secure tenants - Acquisition Strategy – agreed in July 2020, expands equity loans and introduces social tenancies as an option and offers more flexibility via the discretion panel - Broadwater Farm Rehousing and Payments Policy – prioritised vulnerable tenants for rehousing and introduced measures to enable leaseholders to afford similar properties in the local area 		<p><i>tenants and leaseholders rehoused.</i></p>
---	---	--	--

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.

Where there is a need for a household to move to a different part of the borough, Homes for Haringey staff will work with households and provide support if new arrangements to access public services such as healthcare and education need to be made. Financial assistance will also be provided to cover the costs of moving home. If any of the remaining leaseholders cannot afford a suitable property with the equity loan and generous offer, the Acquisition Strategy from July 2020 enables them to request a social tenancy.

To mitigate the longer-term impact of rehousing, the Rehousing Policy offers residents the Right to Return to the estate, if they wish to.

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

Ongoing monitoring of these policies will be undertaken as households are interviewed, moved and, if they desire, return to the estate.

Rehousing officers will continue to work with leaseholders and the discretion panel will continue to consider provisions that can be made outside of the policies in place as and when necessary.

7. Authorisation

EqIA approved by (Assistant Director/ Director)	Date
--	---------------

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.