

## 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

<b>Name of proposal</b>	Housing Allocations Scheme
<b>Service area</b>	Housing & Commissioning
<b>Officer completing assessment</b>	Martin Gulliver
<b>Equalities/ HR Advisor</b>	Daisy Daventry
<b>Cabinet meeting date</b>	April 2017
<b>Director/Assistant Director</b>	Dan Hawthorn - Director of Housing & Growth

## 2. Summary of the proposal

The new Allocations Policy will be setting out options on the management of the housing register banding system and thus the allocation of social housing. These changes include the following proposals

### 1) Changes to who can join the Housing Register

- Introduction of income thresholds as set out below and savings threshold of £100,000

Size	Income Threshold
1 bedroom	£33,000
2 bedroom	£42,250
3 bedroom	£52,000
4 + bedrooms	£64,200

### 2) Review of Housing Needs Bands

- For tenants who need to move as part of regeneration, set their application date as the date of their tenancy of their current property commenced.
- Give Band A to all under-occupying households

The proposed changes will impact on households currently register for social housing in Haringey, and also future housing applicants.

A decision is required by the Council's Cabinet as it is a key 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	EqlA Profile on Harinet Housing Register Information Internal report TA0181 Households in TA	The proposed Allocations Strategy does not impact on Haringey Council employees unless they are or are likely to become a tenant of Haringey Council or are residents of the borough and are also homeless or likely to become homeless).
Gender Reassignment	EqlA Profile on Harinet	
Age	See data sources as listed under 'sex'	
Disability	See data sources as listed under 'sex'	
Race & Ethnicity	See data sources as listed under 'sex' Weekly disposable household income by ethnicity, tax years 1994/1995 to 2012/2013,UK <a href="https://www.gov.uk/government/publications/weekly-disposable-household-income-by-ethnicity-tax-years-19941995-to-20122013uk">https://www.gov.uk/government/publications/weekly-disposable-household-income-by-ethnicity-tax-years-19941995-to-20122013uk</a>	
Sexual Orientation	EqlA Profile on Harinet	
Religion or Belief (or No Belief)	EqlA Profile on Harinet	
Pregnancy & Maternity	See data sources as listed under 'sex'	
Marriage and Civil Partnership	EqlA Profile on Harinet	

## Outline the key findings of your data analysis.

The policy proposals presented are intended to make the housing allocations system fairer and ensure that limited allocations are targeted at those with the greatest need. The final combination of proposals should therefore have a positive impact for certain groups, such as those on low incomes, ensuring higher priority in the allocations process.

Under some of the proposed changes, certain groups would have lower priority within the allocations process.

### **Sex / Gender**

With lower gross incomes (£537/wk compared to £610/wk), single female households are less likely than males to have an income over the proposed income thresholds and so will be less likely to be affected by this policy.

### **Gender Reassignment**

Information on gender reassignment is not available.

### **Age**

Under-occupiers more likely to be from the 45-65 age group as children leave home. However, the groups affected by this change are currently 10 years younger and some will currently be aged 25 to 44.

The majority of households (61%) on the Housing Register have a head of household who is 25 to 44 years old. 25% are aged 45-65 and 11% are aged 18 to 24. The remaining 3% are over 65, and 0.2% are under 18.

### **Disability**

3% of applicants on the Housing Register have declared a disability on their application. This compares with 6.8% of the general population reporting a long-term health condition which affects their day-to-day activities a lot.

### **Race / Ethnicity**

With lower gross households incomes (£372/wk in 2012/13 for black households compared to £455/wk for white households), black households are less likely to be to have an income over the £40,000 threshold.

A fifth (20%) of households on the Housing Register have a Black African ethnicity, 10% are Black Caribbean, 10% are White British and 11% are "Other White European".

### **Religion or belief**

Information on religion is not available on the housing register. However, the 2011 Census reports that 45% of residents were Christian, 14% were Muslim and 3% Jewish. There were low numbers of Hindu (1.8%) and Sikh (0.3%) residents. A quarter of Haringey residents stated that they did not have a religion,

## Sexual Orientation

LGBT comprise up to 24% of the young homeless population nationally. Integrated Household Survey (2013) reported that 3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual.

## Pregnancy or maternity

There is no information on pregnancy on the Housing Register. However, around 2% of all homeless households are pregnant at any time.

## Marriage and civil partnership

There is no information on marriage/civil partnership status but the Census in 2011 found 50% were single, 34% were married or in a civil partnership, and 16% were separated, divorced or widowed.

The proposals present options for changes to be incorporated into the final allocations policy.

- Banding Changes

The impact of changes in increased banding will benefit older tenants who may be under occupying homes.

- Income & savings thresholds for eligibility for social housing

The introduction of income and savings thresholds have been set at a level that enables households to obtain suitable housing in the private sector. There will be some groups of people who may be unable to obtain such housing with their options perhaps due to their reliance on support or inability to obtain further income eg due to their disability, mental health or physical medical conditions. However such cases would need to be determined on an individual basis as schemes may exist for intermediate housing. The policy is anticipated to recognise the exemptions through the consultation process.

## 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?

Consultation on four housing policies took place between 14 November 2016 and 29 January 2017, and was promoted online, through Haringey Council web communications, and by a series of emails to Haringey residents, households on the Housing Register, and Homeless Households. A series of events for stakeholders were held during the consultation period.

There were 328 responses to the consultation with an average 69% support for the changes proposed in the report in this paper. Demographically, overall support ranged from 67% from Black respondents to 78% from the Asian respondents. The majority of respondents also supported each of the main proposals both generally and by ethnic

groupings, with the one exception of White households where only 44% supported the introduction of income thresholds for the housing register.

In addition to the proposals put forward in the paper, the consultation also asked about four other policies which are not being taken forward in this paper and will be considered when further analysis has been completed. Although there was also general support for these policies, there was limited support (45%) for proposal of only making one direct offer to homeless households, and only 39% support from Black respondents.

The consultation was an open consultation and over 11,000 Council tenants, temporary accommodation residents, and households on Housing Register were contacted directly. A report on the overall consultation was presented to the Council’s Overview & Scrutiny Committee on 9 February 2017.

**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**

The majority of respondents supported the Allocations Scheme proposals including introducing an income and savings threshold for residents wishing to join the council’s Housing Register. However, half of respondents (50%) disagreed that there are some people who should be exempt from the thresholds and still be allowed to register, even if they have a higher income or large amount of savings. Support for exemptions ranged from 40% from Black respondents to 67% from Asian respondents.

The outcome of the consultation was also reported to the Overview and Scrutiny Committee on 9 February 2017 who resolved that ‘the proposed change to the definition of a household was not appropriate, particular mindful of multi-generational households in some communities’. This proposal has been removed from the changes and the definition of a household will remain the same.

**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	X	Negative		Neutral impact		Unknown Impact	
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If the increased banding for under-occupying social housing tenants generates additional family homes, this will benefit homeless households. This would therefore benefit female headed households who are over-represented among parents living in temporary accommodation.

**2. Gender reassignment**

Positive		Negative		Neutral impact		Unknown Impact	X
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There is very little information available nationally or locally on the number of households joining the housing register and 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 low.

### 3. Age

Positive	X	Negative		Neutral impact		Unknown Impact	
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The increased priority for under-occupiers will benefit those households headed by an older resident who are generally over-represented among this group..

### 4. Disability

Positive		Negative		Neutral impact	X	Unknown Impact	
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Most housing register applicants with a disability will be assessed and housed through the supported housing pathways. There may be some potential impact due to the income thresholds, and exceptions to the policy will be considered on an exceptional basis on possible options including intermediate housing.

### 5. Race and ethnicity

Positive	X	Negative		Neutral impact		Unknown Impact	
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If the increased banding for under-occupying social housing tenants generates additional family homes, this will benefit homeless households. This would therefore benefit BAME households who are over-represented among parents living in temporary accommodation.

### 6. Sexual orientation

Positive		Negative		Neutral impact	X	Unknown Impact	
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69% of LGBT homeless young people have experienced familial rejection, abuse and violence. All offers will therefore need to be suitable.

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

Positive		Negative		Neutral impact		Unknown Impact	X
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Religion is not recorded on the Housing Applications and we do not know if there are particular religious groups who are over represented on Haringey's Housing Register. The net impact on these groups is therefore unknown.

## 8. Pregnancy and maternity

Positive	X	Negative		Neutral impact		Unknown Impact	
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The expected increase in supply identified under 'Sex' will also benefit pregnant women. Women who are pregnant or have a new born child represent a small proportion of those making a homelessness application, with 22 households with a pregnant woman applying in the twelve months to 31 December 2016.

## 9. Marriage and Civil Partnership

Positive		Negative		Neutral impact	X	Unknown Impact	
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It is not anticipated the proposals will have an impact for married people or people who are civil partners.

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

Any additional supply of family homes will benefit those who are over-represented on the Housing Register which includes single young black women.

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

The policy proposals outlined have been subject to public consultation and the overall response has been positive for all the changes proposed in the paper, was also supported by each ethnic group with the exception of the White respondents support for introduction of income thresholds (44%). The aims of these changes are to alleviate the pressures on the housing register and to manage expectations of those who apply and seek rehousing. They are therefore generally designed to devote the limited and reducing number of social lets to those in most need. The policy may also be mitigated by the Housing Decision panel who can make exceptions to the application of this policy.

The impacts on protected groups have been identified above, and the mitigation put in place will seek to minimise the impact.

### 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	N
Stop and remove the proposal:	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
None			

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.

None

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

All applications are now completed online. At end of each municipal year, the number of applications made, and rejected, and the reasons for rejection can be monitored – either through the Annual Lettings Plan or through a separate performance report.

**7. Authorisation**

<p>EqlA approved by Dan Hawthorn</p>  <p>Director of Housing &amp; Growth</p>	<p>Date 29 March 2017</p>
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**8. Publication**  
*Please ensure the completed EqlA is published in accordance with the Council's policy.*

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