

## **Equalities Impact Assessment (EqIA)**

EqIAs make services better for everyone and support value for money by getting services right first time.

EqIAs enable us to consider all the information about a service, policy or strategy from an equalities perspective and then create an action plan to get the best outcomes for service users and staff<sup>1</sup>. They analyse how all our work as a council might impact differently on different groups protected from discrimination by the Equality Act 2010<sup>2</sup>. They help us make good decisions and evidence how we have reached them.<sup>3</sup>

An EqIA needs to be started as a project starts to identify and consider possible differential impacts on people and their lives, inform project planning and, where appropriate, identify mitigating actions. A full EqIA must be completed before any decisions are made or policy agreed so that the EqIA informs that decision or policy. It is also a live document; you should review and update it along with your project plan throughout.

You should first consider whether you need to complete this full EqIA<sup>4</sup>.

### Other key points to note:

- Full guidance notes to help you are embedded in this form see the End Notes or hover the mouse over the numbered notes.
- Please share your EqIA with your Equalities Champion and the final/updated version at the end of the project.
- Major EqIAs should be reviewed by the relevant Head of Service.
- Examples of completed EqIAs can be found on the Equalities Hub

1. Responsibility for the EqIA		
Title of proposal <sup>5</sup>	Housing Strategy Review	
Name and job title of completing officer	Laura Giles, Head of Strategy and Compliance (The Barnet Group)	
Head of service area responsible	Susan Curran, Head of Housing and Regeneration	
Equalities Champion supporting the EqIA	Rosie Evangelou, Consultation and Engagement Manager	
Performance Management rep	n/a	
HR rep (for employment related issues)	n/a	
Representative (s) from external stakeholders	n/a	

2. Description of proposal				
Is this a: (Please tick all that apply)				
New policy /strategy / function / procedure / service	Review of Policy /strategy / function / procedure / service			
Budget Saving	Other			
If budget saving please specify value below:	If other please specify below:			
The proposal being assessed is the review of the council's Housing Strat	egy			
The Housing Strategy has been revised to focus on the priorities for the administration that were established in the Labour Group's local election manifesto in 2022, and to address the challenges and opportunities identified in the review of the current context, performance, and resident aspirations. It focuses on five main themes and is principally supported by the Homelessness and Rough Sleeping Strategy:				
Prevent homelessness and support rough sleepers off the streets.				

- Deliver the right homes in the right places.
- Ensure safe, sustainable council housing.
- Raise quality and standards in the private rented sector.
- Support living well by promoting healthy homes and wellbeing.

### 3. Supporting evidence

What existing data informs 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

# Protected group

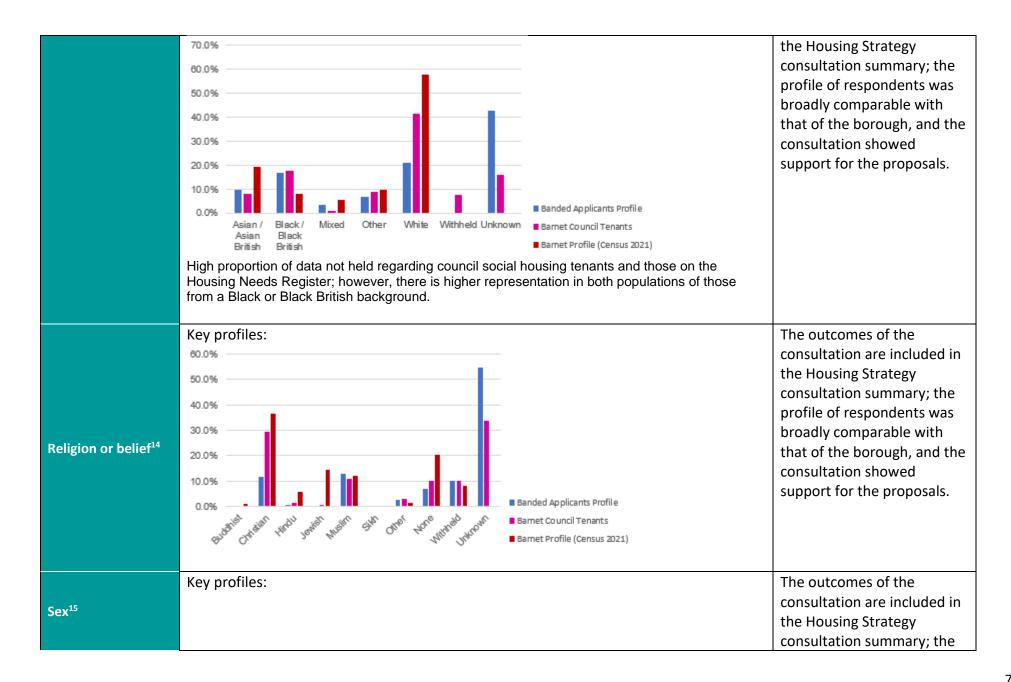
What does the data tell you<sup>6</sup>?

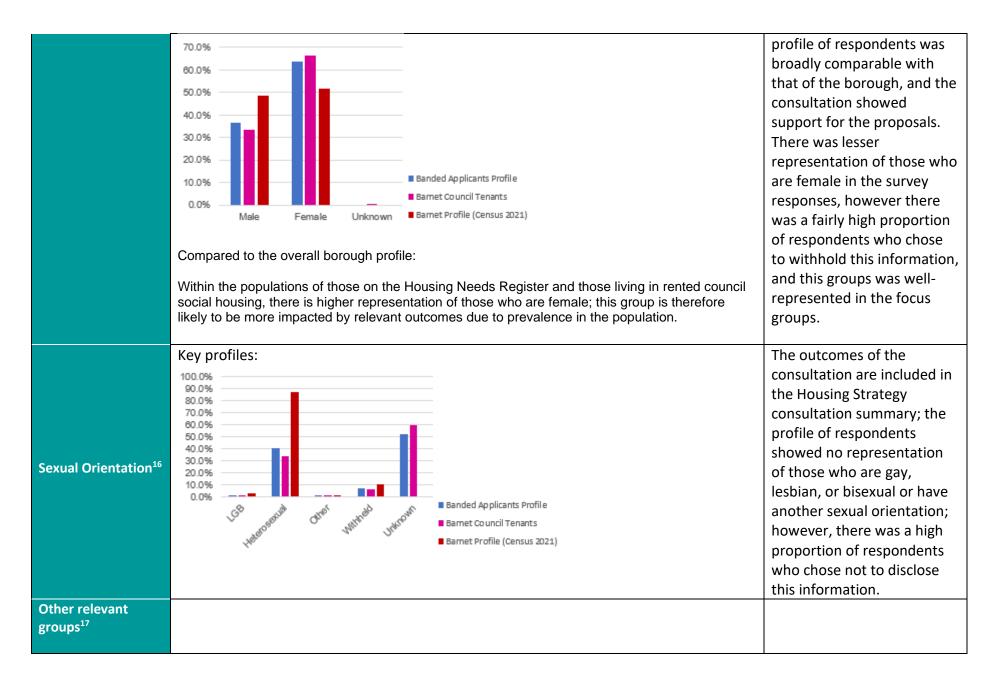
Provide a summary of any relevant demographic data about the borough's population from the Joint Strategic Needs Assessment, or data about the council's workforce

What do people tell you <sup>7</sup>? Provide a summary of relevant consultation and engagement including surveys and other research with stakeholders, newspaper articles correspondence etc.

Age <sup>8</sup>	Rey profiles:  30.0%  25.0%  20.0%  10.0%  25.0%  20.0%  10.0%  10.0%  25.0%  20.0%  10.0%  25.0%  20.0%  10.0%  25.0%  26.0%  27.0%  28.0%  2	The outcomes of the consultation are included in the Housing Strategy consultation summary; the profile of respondents was broadly comparable with that of the borough, and the consultation showed support for the proposals. There was lesser representation of those who are younger (aged 16-34) in the survey responses; however, these groups were more highly represented in the focus groups.
Disability <sup>9</sup>	Key profiles:	The outcomes of the consultation are included in the Housing Strategy

	100.0% 90.0% 80.0% 70.0% 60.0% 50.0%	consultation summary; the profile of respondents was broadly comparable with that of the borough, and the consultation showed
	30.0% 20.0% 10.0% 10.0% Yes No Withheld Unknown Barnet Profile (Census 2021)  Compared to the overall borough profile:	support for the proposals.
	Within the populations of those on the Housing Needs Register and to a lesser extent those living in rented council social housing, there is higher representation of those who are disabled; this group is therefore likely to be more impacted by relevant outcomes due to prevalence in the population.	
Gender reassignment <sup>10</sup>	Information currently not captured	The outcomes of the consultation are included in the Housing Strategy consultation summary; the profile of respondents from the survey showed no responses from individuals whose sex is different to the sex they were assigned at birth.
Marriage and Civil Partnership <sup>11</sup>	Protected characteristic only relevant regarding employment matters	
Pregnancy and Maternity <sup>12</sup>	Information currently not captured	
Race/ Ethnicity <sup>13</sup>	Key profiles:	The outcomes of the consultation are included in





Protected characteristic	For <b>each</b> protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Is there an impact on service		Negative impact		act
	deliver? Is there an impact on customer satisfaction?  Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	Minor	Major	No impact
Age	<ul> <li>Due to affordability challenges and social trends, home ownership tends to be skewed towards older groups and away from younger ones, who tend to rely on rented accommodation and in particular the private rented sector. Poor standards in the private rented sector may therefore be more likely to affect younger people.</li> <li>The council has corporate parenting duties to young people leaving care.</li> <li>Due to higher or lower representation in the council social housing and/or Housing Needs Register populations, some groups will be more / less commonly affected by both the risk of homelessness and/or higher levels of housing need, and the outcomes of the strategy. Those who are not of working age may be more reliant on benefits.</li> <li>Population increases shown in the 2021 Census show increases in people aged 70 and over and school age children; this has implications for the Housing Strategy in terms of the type of homes that are built and potential housing-related support that is needed.</li> <li>Positive impact expected as a result of the strategy, with a focus on:</li> <li>Improving access to and options regarding affordable housing, whether social, private rented, or home ownership, including ensuring specific housing and housing-related support needs are met through Adult Social Care housing provision.</li> <li>Improving understanding of housing needs in the borough in respect of property sizes.</li> <li>Delivering homes that meet higher standards of accessibility.</li> <li>Improving renting conditions in both council social housing and private rented accommodation.</li> </ul>				
Disability	<ul> <li>People who are disabled often require accessible housing and, in some cases, additional support.</li> </ul>	$\boxtimes$			

	<ul> <li>Due to higher representation in the council social housing and/or Housing Needs Register populations, those who are disabled are likely to be more commonly affected by both the risk of homelessness and/or higher levels of housing need, and the outcomes of the strategy.</li> <li>Those in receipt of adult social care services are more likely to be disabled, which could result in higher needs for adapted or accessible properties.</li> <li>As the number of older people increases there could be increasing age related disability in the population as a whole in the future.</li> <li>Positive impact expected as a result of the strategy, with a focus on:</li> <li>Improving access to and options regarding affordable housing, whether social, private rented, or home ownership.</li> <li>Improving renting conditions in both council social housing and private rented accommodation.</li> <li>Delivering homes that meet higher standards of accessibility.</li> <li>Working towards healthy homes across the borough.</li> <li>Working to create vibrant, cohesive, viable communities.</li> <li>Providing housing-related support services to support and enable residents to live well and achieve improved financial, employment, educational, and social outcomes.</li> <li>Using the council's voice to advocate for residents locally and nationally on housing-related issues.</li> <li>Supporting people to stay in their homes for longer by exploring wats to make it easier for homes to be adapted to ensure independent and safe living.</li> </ul>			
Gender reassignment	No impact identified as information not captured.  We may reasonably expect a broad positive impact on this group in line with the overall positive impact on all protected characteristics.			$\boxtimes$
Marriage and Civil Partnership	No impact identified as information not captured as the protected characteristic is only relevant regarding employment matters; however, we may reasonably expect single people to be more likely to live in a House of Multiple Occupancy in the private rented sector than those who are married.  We may reasonably expect a broad positive impact on this group in line with the overall positive impact on all protected characteristics, and for a positive impact	×		

	expected due to priorities within the private rented sector theme, including improving renting conditions.			
Pregnancy and Maternity	No impact identified as information not captured, however affected individuals may be more likely to require family-sized / larger homes rather than single bedroom homes.  We may reasonably expect a broad positive impact on this group in line with the overall positive impact on all protected characteristics, and for a positive impact expected as a result of the strategy due to focus on providing more larger properties for social housing.	$\boxtimes$		
Race/ Ethnicity	<ul> <li>Overall, the Census shows that Barnet is becoming more diverse.</li> <li>Due to higher representation in the council social housing and/or Housing Needs Register populations, those from a Black or Black British background will be more commonly affected by both the risk of homelessness and/or higher levels of housing need, and the outcomes of the strategy.</li> <li>Positive impact expected as a result of the strategy, with a focus on:</li> <li>Improving access to and options regarding affordable housing, whether social, private rented, or home ownership.</li> <li>Improving renting conditions in both council social housing and private rented accommodation.</li> <li>Working towards healthy homes across the borough.</li> <li>Working to create vibrant, cohesive, viable communities.</li> <li>Providing housing-related support services to support and enable residents to live well and achieve improved financial, employment, educational, and social outcomes.</li> <li>Using the council's voice to advocate for residents locally and nationally on housing-related issues.</li> </ul>	$\boxtimes$		
Religion or belief	The Housing Needs Register and council social housing tenants populations tend to see larger family sizes for those from a Muslim background, resulting in more need for larger properties.  Positive impact expected as a result of the strategy, with a focus on:			

	<ul> <li>Improving access to and options regarding affordable housing, whether social, private rented, or home ownership.</li> <li>Improving renting conditions in both council social housing and private rented accommodation.</li> <li>Focus on providing more larger properties for social housing.</li> <li>Working towards healthy homes across the borough.</li> <li>Working to create vibrant, cohesive, viable communities.</li> <li>Providing housing-related support services to support and enable residents to live well and achieve improved financial, employment, educational, and social outcomes.</li> <li>Using the council's voice to advocate for residents locally and nationally on housing-related issues.</li> </ul>		
Sex	<ul> <li>No particular housing impact anticipated, however we may reasonably expect a general positive impact on this group in line with the overall positive impact on all protected characteristics.</li> <li>Positive impact expected as a result of the strategy, with a focus on:</li> <li>Improving access to and options regarding affordable housing, whether social, private rented, or home ownership.</li> <li>Improving renting conditions in both council social housing and private rented accommodation.</li> <li>Working towards healthy homes across the borough.</li> <li>Working to create vibrant, cohesive, viable communities.</li> <li>Providing housing-related support services to support and enable residents to live well and achieve improved financial, employment, educational, and social outcomes.</li> <li>Using the council's voice to advocate for residents locally and nationally on housing-related issues.</li> </ul>		
Sexual Orientation	<ul> <li>No particular housing impact anticipated, however we may reasonably expect a general positive impact on this group in line with the overall positive impact on all protected characteristics.</li> <li>Positive impact expected as a result of the strategy, with a focus on:</li> <li>Improving access to and options regarding affordable housing, whether social, private rented, or home ownership.</li> </ul>		

Improving renting conditions in both council social housing and private rented
accommodation.
Working towards healthy homes across the borough.
Working to create vibrant, cohesive, viable communities.
Providing housing-related support services to support and enable residents to live well and achieve improved financial, employment, educational, and social outcomes.
Using the council's voice to advocate for residents locally and nationally on housing-related issues.

## 5. Other key groups

Are there any other vulnerable groups that might be affected by the proposal?

These could include carers, people in receipt of care, lone parents, people with low incomes or unemployed

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Positive impact	Minor	Major	No im

Key groups	<ul> <li>Families and lone parents, people with a low income, people not in employment, education, or training, carers.</li> <li>All of these groups may come into contact with housing services in Barnet.</li> <li>Due to affordability challenges and social trends, home ownership tends to be skewed towards older groups and away from younger ones, who tend to rely on rented accommodation and in particular the private rented sector.</li> <li>Due to higher or lower representation in the council social housing and/or Housing Needs Register populations, some groups will be more / less commonly affected by both the risk of homelessness and/or higher levels of housing need, and the outcomes of the strategy.</li> <li>Affordability challenges, with average property prices 15 times the average income, and median monthly rents £1,365; compared to Outer London's median of £1,300</li> <li>In 2022, Barnet's unemployment rate was 5.3%; unemployment can increase the risk of homelessness.</li> <li>Young people who are not in employment, education, or training are at more risk of becoming homeless.</li> <li>Positive impact expected as a result of the strategy, with a focus on:</li> <li>Improving access to and options regarding affordable housing, whether social, private rented, or home ownership.</li> <li>Improving renting conditions in both council social housing and private rented accommodation.</li> </ul>			
	private rented, or home ownership.  • Improving renting conditions in both council social housing and private rented			

6. Cumulative impact <sup>19</sup> Considering what else is happening within the council and Barnet could your proposal contribute to a cumulative impact on groups with protected characteristics?
□ Yes No ⊠
If you clicked the Yes box, which groups with protected characteristics could be affected and what is the potential impact? Include details in the space below

## 7. Actions to mitigate or remove negative impact

Only complete this section if your proposals may have a negative impact on groups with protected characteristics. These need to be included in the relevant service plan for mainstreaming and performance management purposes.

Group affected	Potential negative impact	Mitigation measures <sup>20</sup> If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.	Monitoring <sup>21</sup> How will you assess whether these measures are successfully mitigating the impact?	Deadline date	Lead Officer

8. Outcome of the Equalities Impact Assessment (EqIA) 22 Please select one of the following four outcomes
Proceed with no changes  The EqIA has not identified any potential for a disproportionate impact and all opportunities to advance equality of opportunity are being addressed
Proceed with adjustments  Adjustments are required to remove/mitigate negative impacts identified by the assessment
Negative impact but proceed anyway  This EqIA has identified negative impacts that are not possible to mitigate. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below
Do not proceed  This EqIA has identified negative impacts that cannot be mitigated and it is not possible to continue. Outline the reasons for this and the information used

### **Reasons for decision**

to reach this decision in the space below

The Housing Strategy has been revised to focus on the priorities for the administration that were established in the Labour Group's local election manifesto in 2022, and to address the challenges and opportunities identified in the review of the current context, performance, and resident aspirations. It focuses on five main themes and is principally supported by the Homelessness and Rough Sleeping Strategy:

- Prevent homelessness and support rough sleepers off the streets.
- Deliver the right homes in the right places.

- Ensure safe, sustainable council housing.
- Raise quality and standards in the private rented sector.
- Support living well by promoting healthy homes and wellbeing.

Consideration has been given to the overall profile of residents in the borough; tenants living in Barnet Council's social housing stock and those who are registered on the Housing Needs Register are also expected to be significantly affected, and the profiles of these groups are included for comparison purposes. Those who rent in the private rented sector are also expected to be significantly affected by the outcomes of the Housing Strategy, although the profile of this group is not known.

The overall impact of the Housing Strategy on the protected groups under the Equality Act 2010 is expected to be positive. This is based on the evidence above and the supporting evidence base for the strategy.

There are a number of significant challenges relating to housing in Barnet, some of which disproportionately affect the protected groups due to their tendency to live in the social housing sector. The strategy is expected to improve this, which gives it a positive impact as a result. The impact is expected to be minimal as the strategy will benefit all residents, rather than being targeted at the protected groups unless otherwise stated.

## Sign-off

9.Sign off and approval by Head of Service / Strategic lead <sup>23</sup>						
Name	Job title	bb title				
Susan Curran Head of Housing and Rege		neration				
Tick this box to indicate that you have approved this EqIA	Date of approval: 03/07/23					
Tick this box to indicate if EqIA has been published						
Date EqIA was published:	Date of next review:					
Embed link to published EqIA:						

### Footnotes: guidance for completing the EqIA template

<sup>1</sup> The following principles explain what we must do to fulfil our duties under the Equality Act when considering any new policy or change to services. They must all be met or the EqIA (and any decision based on it) may be open to challenge:

- **Knowledge:** everyone working for the council must be aware of our equality duties and apply them appropriately
- Timeliness: the duty applies at the time of considering proposals and before a final decision is taken
- **Real Consideration:** the duty must be an integral and rigorous part of your decision-making and must influence the process.
- **Sufficient Information:** you must assess what information you have and what is needed to give proper consideration.
- **No delegation:** the council is responsible for ensuring that anyone who provides services on our behalf complies with the equality duty.
- Review: the equality duty is a continuing duty it continues after proposals are implemented/reviewed.
- Proper Record Keeping: we must keep records of the process and the impacts identified.

### <sup>2</sup> Our duties under the Equality Act 2010

The council has a legal duty under this Act to show that we have identified and considered the impact and potential impact of our activities on all people with 'protected characteristics' (see end notes 9-19 for details of the nine protected characteristics). This applies to policies, services (including commissioned services), and our employees.

We use this template to do this and evidence our consideration. You must give 'due regard' (pay conscious attention) to the need to:

- Avoid, reduce or minimise negative impact: if you identify unlawful discrimination, including victimisation and harassment, you must stop the action and take advice immediately.
- Promote equality of opportunity: by
  - Removing or minimising disadvantages suffered by people with a protected characteristic
  - Taking steps to meet the needs of these groups
  - Encouraging people with protected characteristics to participate in public life or any other activity where participation is disproportionately low
  - Consider if there is a need to treat disabled people differently, including more favourable treatment where necessary
- Foster good relations between people who share a protected characteristic and those who don't: e.g. by promoting understanding.

### <sup>3</sup> EqIAs should always be proportionate to:

- The size of the service or scope of the policy/strategy
- The resources involved
- The size of the likely impact e.g. the numbers of people affected and their vulnerability

The greater the potential adverse impact of the proposal on a protected group (e.g. disabled people) and the more vulnerable the group is, the more thorough and demanding the process required by the Act will be. Unless they contain sensitive data – EqIAs are public documents. They are published with Cabinet papers, Panel papers and public consultations. They are available on request.

### <sup>4</sup> When to complete an EqIA:

- When developing a new policy, strategy, or service
- When reviewing an existing service, policy or strategy

- When making changes that will affect front-line services
- When amending budgets which may affect front-line services
- When changing the way services are funded and this may impact the quality of the service and who can access it
- When making a decision that could have a different impact on different groups of people
- When making staff redundant or changing their roles

Wherever possible, build the EqIA into your usual planning and review processes.

#### Also consider:

- Is the policy, decision or service likely to be relevant to any people because of their protected characteristics?
- How many people is it likely to affect?
- How significant are its impacts?
- Does it relate to an area where there are known inequalities?
- How vulnerable are the people who will be affected?

If there are potential impacts on people but you decide <u>not</u> to complete an EqIA you should document your reasons why.

<sup>5</sup> Title of EqIA: This should clearly explain what service / policy / strategy / change you are assessing.

<sup>6</sup> Data & Information: Your EqIA needs to be informed by data. You should consider the following:

- What data is relevant to the impact on protected groups is available? (is there an existing EqIA?, local service data, national data, community data, similar proposal in another local authority).
- What further evidence is needed and how can you get it? (e.g. further research or engagement with the affected groups).
- What do you know from service/local data about needs, access and outcomes? Focus on each characteristic in turn.
- What might any local demographic changes or trends mean for the service or function? Also consider national data if appropriate.
- Does data/monitoring show that any policies or practices create particular problems or difficulties for any group(s)?
- Is the service having a positive or negative effect on particular people or groups in the community?

#### <sup>7</sup> What have people told you about the service, function, area?

- Use service user feedback, complaints, audits
- Conduct specific consultation or engagement and use the results
- Are there patterns or differences in what people from different groups tell you?
- Remember, you must consult appropriately and in an inclusive way with those likely to be affected to fulfil the
  equality duty.
- You can read LBB <u>Consultation and Engagement toolkit</u> for full advice or contact the Consultation and Research Manager, <u>rosie.evangelou@barnet.gov.uk</u> for further advise

<sup>8</sup> **Age**: People of all ages, but consider in particular children and young people, older people and carers, looked after children and young people leaving care. Also consider working age people.

<sup>9</sup> **Disability**: When looking at disability, consideration should be given to people with different types of impairments: physical (including mobility), learning, aural or sensory (including hearing and vision impairment), visible and non-visible impairment. Consideration should also be given to: people with HIV, people with mental health needs and people with drug and alcohol problems. People with conditions such as diabetes and cancer and some other health conditions also have protection under the Equality Act 2010.

19

Barnet Council Equalities Impact Assessment Template - July 2019

- <sup>10</sup> **Gender Reassignment:** In the Act, a transgender person is someone who proposes to, starts or has completed a process to change their gender. A person does not need to be under medical supervision to be protected. Consider transgender people, transsexual people and transvestites.
- <sup>11</sup> Marriage and Civil Partnership: consider married people and civil partners.
- <sup>12</sup> **Pregnancy and Maternity:** When looking at pregnancy and maternity, give consideration to pregnant women, breastfeeding mothers, part-time workers, women with caring responsibilities, women who are lone parents and parents on low incomes, women on maternity leave and 'keeping in touch' days.
- <sup>13</sup> Race/Ethnicity: Apart from the common ethnic groups, consideration should also be given to Traveller communities, people of other nationalities outside Britain who reside here, refugees and asylum seekers and speakers of other languages.
- <sup>14</sup> **Religion and Belief:** Religion includes any religion with a clear structure and belief system. As a minimum you should consider the most common religious groups (Christian, Muslim, Hindu, Jews, Sikh, Buddhist) and people with no religion or philosophical beliefs.
- <sup>15</sup> **Sex/Gender:** Consider girls and women, boys and men, married people, civil partners, part-time workers, carers (both of children with disabilities and older cares), parents (mothers and fathers), in particular lone parents and parents on low incomes.
- <sup>16</sup> Sexual Orientation: The Act protects bisexual, heterosexual, gay and lesbian people.
- <sup>17</sup> Other relevant groups: You should consider the impact on our service users in other related areas.
- <sup>18</sup> **Impact:** Your EqIA must consider fully and properly actual and potential impacts against each protected characteristic:
- The equality duty does not stop changes, but means we must fully consider and address the anticipated impacts on people.
- Be accurate and transparent, but also realistic: don't exaggerate speculative risks and negative impacts.
- Be detailed and specific where you can so decision-makers have a concrete sense of potential effects.
- Questions to ask when assessing whether and how the proposals impact on service users, staff and the wider community:
- Are one or more protected groups affected differently and/or disadvantaged? How, and to what extent?
- Is there evidence of higher/lower uptake of a service among different groups? Which, and to what extent?
- Does the project relate to an area with known inequalities (where national evidence or previous research is available)?
- If there are likely to be different impacts on different groups, is that consistent with the overall objective?
- If there is negative differential impact, how can you minimise that while taking into account your overall aims?
- Do the effects amount to unlawful discrimination? If so the plan **must** be modified.
- Does it relate to an area where equality objectives have been set by LBB in our <u>Barnet 2024 Plan</u> and our <u>Strategic Equality Objective</u>?

### <sup>19</sup> Cumulative Impact

You will need to look at whether a single decision or series of decisions might have a greater negative impact on a specific group and at ways in which negative impacts across the council might be minimised or avoided.

<sup>&</sup>lt;sup>20</sup> Mitigating actions

- Consider mitigating actions that specifically address the impacts you've identified and show how they will remove, reduce or avoid any negative impacts
- Explain clearly what any mitigating measures are, and the extent to which you think they will reduce or remove the adverse effect
- Will you need to communicate or provide services in different ways for different groups in order to create a 'level playing field'?
- State how you can maximise any positive impacts or advance equality of opportunity.
- If you do not have sufficient equality information, state how you can fill the gaps.

### <sup>22</sup> Outcome:

- Make a frank and realistic assessment of the overall extent to which the negative impacts can be reduced or avoided by the mitigating measures. Also explain what positive impacts will result from the actions and how you can make the most of these.
- Make it clear if a change is needed to the proposal itself. Is further engagement, research or monitoring needed?
- Make it clear if, as a result of the analysis, the policy/proposal should be stopped.

<sup>&</sup>lt;sup>21</sup> **Monitoring:** The Equality Duty is an ongoing duty: policies must be kept under review, continuing to give 'due regard' to the duty. If an assessment of a broad proposal leads to more specific proposals, then further monitoring, equality assessment, and consultation are needed.

<sup>&</sup>lt;sup>23</sup> **Sign off:** Your will need to ensure the EqIA is signed off by your Head of Service, agree whether the EqIA will be published, and agree when the next review date for the EqIA will be.