



ADVANCE PUBLICATION OF REPORTS

This publication gives five clear working days' notice of the decisions listed below.

These decisions are due to be signed by individual Cabinet Members
and operational key decision makers.

Once signed all decisions will be published on the Council's
Publication of Decisions List.

- 1. APPROVAL TO ACQUIRE PROPERTY OR ENTER INTO OTHER
ARRANGEMENTS IN LINE WITH OUR NATIONAL PLACEMENT POLICY
FOR THE PURPOSE OF PROVIDING TEMPORARY ACCOMMODATION
(Pages 1 - 36)**

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London Borough of Enfield

Report Title	Approval to acquire property or enter into other arrangements in line with our national placement policy for the purpose of providing temporary accommodation.
Report to:	Cllr Caliskan, Leader of the Council
Date of Meeting:	March 2024
Cabinet Member:	Cllr Savva, Cabinet Member for Social Housing
Directors:	Joanne Drew, Strategic Director of Housing and Regeneration
Report Author:	Richard Sorensen Richard.sorensen@enfield.gov.uk
Ward(s) affected:	All
Key Decision Number	KD 5633
Classification:	Part 1 & 2 (Para 3)
Reason for exemption	Information relating to the financial or business affairs of any particular person (including the authority holding that information).

Purpose of Report

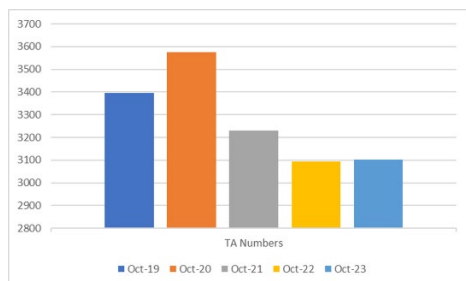
1. This report identifies the opportunity to secure 78 homes in the outer London area as an alternative to unsuitable and expensive temporary hotel accommodation. This report seeks approval from the Council, as Shareholder, for Housing Gateway Ltd (HGL) to enter into a 5 year lease arrangement and for the Council to enter into a nominations agreement with HGL.

Recommendations

1. The Council, in its position as HGL Shareholder, approves as a shareholder reserved matter, the proposal that agrees for HGL to enter into a 5 year lease for 78 flats as outlined in the confidential appendix. The signing of the lease will be completed via HGL's scheme of delegation.
2. Agree for the Council to enter into a nominations agreement with HGL and delegate negotiation of terms and sign off to the Strategic Director of Housing and Regeneration in consultation with the Director of Finance, Commercial.
3. Note that the terms of the proposed lease will be finalised and agreed by HGL, in consultation with the Strategic Director of Housing and Regeneration, with legal advice to be provided.
4. Note that the above recommendations are subject to a series of stringent conditions to ensure safety, legality, and habitability as set out in paragraph 21 of this report.

Background

5. The Council is experiencing unprecedented demand from residents losing their homes. This is at a time when the private rented sector is contracting, rents are rising and there is a severe shortage of affordable privately rented homes across the whole of the southeast of England.
6. This shortage of affordable accommodation within the Borough means that few households have the financial capacity and opportunity to move out of temporary accommodation.
7. The supply of temporary accommodation has also fallen, and landlords are exiting the temporary accommodation market as they can gain higher returns through privately renting their properties. This has led to the use of hotels as emergency accommodation.
8. This means that although the number of households in temporary accommodation has not increased, the cost of provision has risen.



9. The Council is currently accommodating 212 households in hotels. Whilst these numbers are reducing, the supply of temporary and private rented accommodation is not sufficient to eliminate the use of hotels quickly enough to address the budget challenge.

10. The impact on families staying for extended periods in hotels is immense and this places extreme pressure on both the families and officers. Whilst this type of accommodation should only be for emergencies the reality is that it is being used for extended periods of time and in excess of our statutory duty. This makes the procurement of accommodation an urgent priority and a range of solutions are required as outlined in the Accommodation Strategy agreed by Cabinet.
11. This is mirrored by the financial cost to the Council. A £17.5m deficit is projected for 2023-24, a significant element of which is caused by the cost of hotel accommodation and the impact of the welfare system of temporary accommodation.
12. Full details of the market factors impacting the availability of accommodation in Enfield can be found in the Cabinet paper "Homelessness in Enfield (5) – Housing residents where accommodation is affordable", KD 5625.

Shortage of Accommodation – Financial Impact

13. The Housing Advisory Service rely on properties that can be rented at Local Housing Allowance (LHA) levels so that they are affordable to residents. The supply of private rented properties at LHA rents has reduced by 90% since April 2021 and 84% since April 2022. LHA increased in April 2024 but there will still be a significant gap between average rents and LHA.
14. To address this the Council has moved to a national placement policy, securing accommodation for residents in parts of the country that are more affordable. This has increased the supply of private rented accommodation. However, the number of households approaching the Council for support has also increased. The net effect has been to slow the rate at which the Council can end the use of hotels.
15. This shortage of temporary accommodation means that the service has been dependent on commercial hotels and shared accommodation in recent months. This is not suitable for residents, particularly those with children, for any length of time.
16. The chart below shows the financial spend on commercial hotels during 2023-24.



17. The reduction in spend on hotels has been due in part to better management of the booking process. However, a key driver has been the reduction in the cost of hotel accommodation over the winter period. We anticipate that costs will begin to rise as we enter the spring and summer further driving the urgency to progress with this solution.
18. These pressures are not unique to Enfield and are being felt nationally. The problem is most acute in London and London Councils have been collating data from boroughs to monitor the effect of the current challenges. The table below shows the year-on-year changes to September 2023 across Greater London which demonstrates the pressures and inability to seek rehousing for residents across the wider London area.

Homelessness pressures

	September 2022	September 2023	Responses including substitutions
Total number of homelessness presentations	7,928	9,079	32
		+14.5% +1,151	
Total number of presentations stating the main reason for the loss of a settled home as 'required to leave accommodation provided by HO as asylum support'	108	380	29
		+251.9% +272	
Total number of households owed a prevention or relief duty	4,323	4,206	30
		-2.7% -117	
Total number owed a prevention and relief duty that stated the main reason their loss of settled home as 'required to leave accommodation provided by HO as asylum support'	95	236	29
		+148.4% +141	
Total number of households in TA	59,284	63,631	32
		+7.3% +4,347	
Total number of Children in TA	70,584	72,695	27
		+3% +2,111	
Families in Bed and breakfast (B&B) hotels (including shared annexes)	932	2,168	32
		+132.6% +1,236	
Families in B&B hotels (including shared annexes) for longer than 6 weeks	357	1,329	31
		+272.3% +972	

Strategy

19. The Council's aim is to end the use of hotel accommodation by the end of April 2024 and to deliver sustained reductions in the use of temporary accommodation thereafter. In order to deliver this, aim the Council has been reviewing opportunities which provide much needed, good quality accommodation quickly.
20. One of the opportunities identified is a permitted development of 78 flats. The building is being offered by a company specialising in sourcing accommodation. The Company will take a long lease on the building (c.30 years) and provide full management.
21. The acquisition of the units is subject to a series of stringent conditions to ensure safety, legality, and habitability. This includes the completion of a thorough property survey, obtaining building and planning approvals, securing a positive Fire Risk Assessment (FRA) report, and meeting Minimal Room Standards. Additionally, a Health and Housing Safety Rating System (HHSRS) inspection is mandatory to identify and mitigate any health and safety hazards. Compliance with established safety standards is further ensured by acquiring valid Gas and Electrical certificates. A comprehensive inventory of white goods (such as refrigerators, washing machines, and ovens) and other furniture to guarantee that the units are fully equipped and ready for occupancy.
22. Further details of the property, lease and sale terms can be found in the part 2 report.

Options

23. The Council has considered the following options to procure the block:

- a. The Council enters into a lease agreement with the Housing Gateway Ltd enter into a lease agreement with The Cooperative property Company who are Asset Managers operating under a Ltd company.

Option A - Council Lease the Building

24. It is possible for the Council to enter into this lease directly and use the flats as temporary accommodation. However, this would mean the flats remain as temporary accommodation and due to the Housing Benefit regulations, the Council would not be able to recover the full amount of Housing Benefit paid to tenants from central government.

25. As a result, this option delivers £440k pa less savings than option b.

26. Also, the Council's strategy is to minimise Temporary Accommodation use, which this option will not deliver.

Option B - Housing Gateway Ltd Leases the Building

27. HGL is the Council's housing company which was created in 2014 to provide the Council with housing solutions as an alternative to temporary accommodation. Since this time HGL has created a portfolio of 633 owned properties and 261 leased properties, delivering savings in excess of £13.2m to the Council.

28. HGL can enter into a lease with the agent. HGL would deliver the housing management and would be responsible for lease payments and income collection. The Council would be responsible for placing families in the flats.

29. The Council would need to create a nominations agreement and fee which would be payable to HGL. Without this arrangement, the proposal is not financially viable. The nominations agreement would formalise the expectations between the Council and HGL about accommodation availability and placing families in the building.

30. In this scenario the flats could either be classed as temporary accommodation or private rented accommodation dependent upon the Council discharging their housing duty.

31. With either option, the flats would be shielded from the TA Housing Benefit regulations. Therefore, this option would deliver the most savings to the Council.

Other Options Considered

32. The Council has the option of not using the block to house families and could continue to focus on leasing stock elsewhere. However, the evidence in this report shows that finding suitable accommodation is particularly challenging in the present market and whilst families remain in hotel accommodation there will continue to be large budget pressures for the Council.

Recommendation and Reasons for Recommendation

36. The preferred option is B: HGL leases the building.

33. Option A: Council lease the building, is not recommended as this option incurs additional costs to the Council through the Housing Benefit subsidy regulations.
34. Option B: HGL lease the building. This is the most cost-effective option, as this shields the flats from the TA Housing Benefit regulations without requiring a large capital outlay. Also, this is the most flexible option as it allows the flats to be used either as TA or as private rented accommodation.

Risks and Mitigations

35. As with all leases there are risks attached to the proposal. Whilst these risks cannot be removed altogether, steps have been taken to mitigate them.
36. Risk: There is a risk that not enough suitable tenants can be found to move to the accommodation.
Mitigation: The Council has a clear Placement Policy which sets out the criteria for prioritising residents for more local accommodation. The Policy sets out the expectation that almost all households will need to relocate. There are currently 3,100 families in TA who all have the potential to be moved to the accommodation and officers are already mobilised to review casework files for suitable tenants. Priority will be given to those families currently in hotel accommodation. If, in the unusual circumstance that the Council could not find homeless families to place in the building, it could be offered to other Boroughs, the Home Office or let at market rents.
37. In the event that the building was surplus to the Council's requirements before the end of the 5 year term, the flats could be let by HGL at market rates. There is a continuing gap between LHA and market rent levels. The table below sets out the LHA from April 2024 against market rents in Outer North East London according to [Home.co.uk](https://www.home.co.uk).

	LHA 2024	Average Rent
1 bed	£997.27	£1,452
2 bed	£1,246.57	£1,762
3 bed	£1,495.91	£2,198
4 bed	£1,795.08	£3,011

38. Risk: There is a risk that quality of accommodation will not be sufficient.
Mitigation: The property is a permitted development, converted to comply with all building regulations. Fixtures and fittings will all be new. Furthermore, the developer will have warranties for the work and HGL will be able to rely on these warranties.
39. Risk: The lessee is unable to provide vacant possession at the end of the lease term.
Mitigation: HGL / the Council will work collaboratively to ensure that all residents are assisted to find alternative accommodation at the end of the

lease. This will involve tailored case work to provide support and assistance for families to find alternative accommodation.

This risk will also be factored in to the financial model in the form of reduced income in year 5 to reflect the need to vacate units.

40. Risk: Delay to the building works leading to a delay to the proposed ready to let date

Mitigation: The lease will not commence until the building is ready for occupation therefore the Council & HGL will not be exposed to additional costs. However, any delay to occupation will impact the Council as families will be kept in hotel accommodation for longer increasing the budget pressure.

41. Risk: Financial modelling assumptions are not met.

This scheme is modelled using a number of assumptions, the most volatile of those being repairs, bad debt and lease up rate. Whilst reasonable assumptions have been included in the model, it is important to recognise the risks around these areas and plan to mitigate them.

Mitigations:

Repairs – The property will have a Property Management presence on site during working hours. This service will seek to build good relationships with residents and ensure any reported repairs are actioned quickly, minimising further damage. The managing agent employed will be contract managed by an in house officer via regular property visits and agreeing a schedule of rates.

Bad debt – Rent for these properties will be set in line with LHA rates ensuring that tenants who are in receipt of full benefits will not be required to make additional contributions to the rent. Also, HGL has an Income Team in place with robust recovery processes who will manage arrears accounts and work with residents to ensure any arrears are minimised.

Lease up rate – It is crucial that the property is let as quickly as possible to maximise rental income and minimise temporary accommodation costs. Enfield has identified suitable families to move to the block, ensuring that the accommodation is suitable for the families whilst also maximising savings for Enfield. Further details can be found in Part 2.

Relevance to Council Plans and Strategies

Good homes in well-connected neighbourhoods.

42. In seeking to provide quality accommodation for homeless families, the proposal will increase the number and quality of homes available to families who would otherwise be living in hotel accommodation.

Sustain strong and healthy communities.

43. Poor quality housing and homelessness have been identified as key factors in health inequality. Through reducing the number of households reaching crisis point and increasing the supply and quality of rented homes we will help to reduce the impact of homelessness and poor housing on the health and wellbeing of our residents.

Financial Implications

See Part 2 report.

Legal Implications

44. The Council has general powers of competence contained in section 1 Localism Act 2011 and is therefore able to engage with HGL in this transaction.
45. HGL is a separate legal entity to the Council albeit that the Council is a shareholder. It will therefore need to follow its authorised procedures for acquisition. The acquisition of this property is within a set of reserved matters which the Council needs to approve as shareholder.
46. It is noted that a nominations agreement is proposed between HGL and the Council. Such agreement must be approved by Legal Services on behalf of the Director of Law and Governance.

Equalities Implications

37. The decision to lease or purchase the property does not have any direct equalities implications. The impact on protected groups derives from the Placement Policy (approved by Cabinet on 7 June). This sets out the methodology used to allocate both temporary accommodation and privately rented homes and is designed to protect the most vulnerable residents. The policy will be used for the allocation of homes procured in London and other parts of the country.
38. An Equalities Impact Assessment has been completed. This found that although there was a differential impact on groups with protected characteristics, the impact of increasing the supply of local temporary accommodation was positive. The Placement Policy sets out the criteria that will be used to prioritise the most vulnerable households for the extremely limited supply of more local accommodation. The key impacts on groups with protected characteristics are as follows:

Socio-Economic Deprivation

39. The biggest differential impact was in socio economic deprivation which reflects the link between poverty and homelessness. The widening gap between benefit levels and rents across the Southeast is both driving increases in homelessness and limiting the supply of properties that can be used as an affordable solution either as temporary accommodation or as a permanent home. Increasing the supply of more local temporary accommodation will therefore have a positive impact on this group.

Ethnicity and Religion

40. Just 14% of households for whom the Council has accepted a duty described themselves as 'White British', compared with 52% of Enfield's wider population. The area is a multicultural area which celebrates many different ethnicities. However, it will be important to connect residents with their new communities. This issue was also identified as applicable for religious groups. Increasing the supply of more local temporary accommodation will therefore have a positive impact on this group.

Marriage and Civil Partnership and Pregnancy and Maternity

41. There is also an impact around marriage and civil partnership and pregnancy and maternity. For single parent households and new parents who are more dependent on local support networks, relocation to a new area will be challenging. The Placement Policy will prioritise the more vulnerable households for local accommodation. Increasing the supply of more local temporary accommodation will therefore have a positive impact on this group.

Disability

42. Households with a disabled member of the family are more likely to be dependent on local support networks and services. The Placement Policy is designed to ensure that the most vulnerable households will be prioritised for local accommodation. Increasing the supply of more local temporary accommodation will therefore have a positive impact on this group.
43. We will need to continue to monitor the impact of the policy to ensure that there are no unintended consequences.

HR and Workforce Implications

44. There are no HR and workforce implications for this report.

Public Health Implications

45. Poor quality housing and homelessness have been identified as key factors in health inequality. Through reducing the number of households reaching crisis point and increasing the supply and quality of rented homes we will help to reduce the impact of homelessness and poor housing on the health and wellbeing of our residents.
46. The effects on households in hotel accommodation are extreme as there are no cooking facilities or private areas. The health implications are therefore that residents are dependent on takeaway food which is both unhealthy and expensive.

Safeguarding Implications

47. Safeguarding is a key concern for the service. Keeping households in hotel accommodation for extended periods is a key safeguarding risk. There are currently 32 children in hotel accommodation where Children and Family Services are actively involved, and the nature of the accommodation is interfering with our ability to fulfil our statutory obligations. Moving families to self-contained accommodation will reduce the risks to vulnerable households and residents.
48. We will assess the needs of each household to be relocated against the Placement Policy. This prioritises the most vulnerable households for the extremely limited supply of local accommodation.
49. We will ensure a coordinated approach with Children and Family Services to ensure that the welfare of children and families is paramount.

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Appendices
Part 2 Report
EQIA

Background Papers
None.

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is Restricted

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Enfield Equality Impact Assessment (EqIA)

Introduction

The purpose of an Equality Impact Assessment (EqIA) is to help Enfield Council make sure it does not discriminate against service users, residents and staff, and that we promote equality where possible. Completing the assessment is a way to make sure everyone involved in a decision or activity thinks carefully about the likely impact of their work and that we take appropriate action in response to this analysis.

The EqIA provides a way to systematically assess and record the likely equality impact of an activity, policy, strategy, budget change or any other decision.

The assessment helps us to focus on the impact on people who share one of the different nine protected characteristics as defined by the Equality Act 2010 as well as on people who are disadvantaged due to socio-economic factors. The assessment involves anticipating the consequences of the activity or decision on different groups of people and making sure that:

- unlawful discrimination is eliminated
- opportunities for advancing equal opportunities are maximised
- opportunities for fostering good relations are maximised.

The EqIA is carried out by completing this form. To complete it you will need to:

- use local or national research which relates to how the activity/ policy/ strategy/ budget change or decision being made may impact on different people in different ways based on their protected characteristic or socio-economic status;
- where possible, analyse any equality data we have on the people in Enfield who will be affected eg equality data on service users and/or equality data on the Enfield population;
- refer to the engagement and/ or consultation you have carried out with stakeholders, including the community and/or voluntary and community sector groups you consulted and their views. Consider what this engagement showed us about the likely impact of the activity/ policy/ strategy/ budget change or decision on different groups.

The results of the EqIA should be used to inform the proposal/ recommended decision and changes should be made to the proposal/ recommended decision as a result of the assessment where required. Any ongoing/ future mitigating actions required should be set out in the action plan at the end of the assessment.

Section 1 – Equality analysis details

Title of service activity / policy/ strategy/ budget change/ decision that you are assessing	Approval to acquire property or enter into other arrangements in line with our national placement policy for the purpose of providing temporary accommodation.
Team/ Department	Housing Advisory Service
Executive Director	Joanne Drew
Cabinet Member	Cllr Savva
Author(s) name(s) and contact details	Richard Sorensen
Committee name and date of decision	Portfolio report of Cllr Caliskan, Leader of the Council

Date the EqIA was reviewed by the Corporate Strategy Service	
Name of Head of Service responsible for implementing the EqIA actions (if any)	Richard Sorensen
Name of Director who has approved the EqIA	Joanne Drew

The completed EqIA should be included as an appendix to relevant EMT/ Delegated Authority/ Cabinet/ Council reports regarding the service activity/ policy/ strategy/ budget change/ decision. Decision-makers should be confident that a robust EqIA has taken place, that any necessary mitigating action has been taken and that there are robust arrangements in place to ensure any necessary ongoing actions are delivered.

Section 2 – Summary of proposal

Please give a brief summary of the proposed service change / policy/ strategy/
budget change/project plan/ key decision

Please summarise briefly:

What is the proposed decision or change?

What are the reasons for the decision or change?

What outcomes are you hoping to achieve from this change?

Who will be impacted by the project or change - staff, service users, or the wider community?

The report identifies the opportunity to secure 78 homes in the outer London area as an alternative to unsuitable and expensive temporary hotel accommodation. The report seeks approval from the Council, as Shareholder, for Housing Gateway Ltd (HGL) to enter into a 5 year lease arrangement and for the Council to enter into a nominations agreement with HGL.

The impact of the proposal will be to provide suitable temporary accommodation to households who have been assessed as needing to remain within 90 minutes travel of Enfield. Currently these households are in hotel accommodation, which is inherently unsuitable for families.

The allocation of the homes will be determined by the Placement Policy which was approved in November 2023. The Placement Policy sets out the criteria that will be used prioritise vulnerable residents for the extremely scarce supply of more local private rented accommodation and temporary accommodation. Accommodation procured locally is reserved for the most vulnerable households. Other households are expected to relocate out of the area.

A full EQIA was carried out prior to the introduction of the Placement Policy. Supporting HGL to acquire a five year lease on 78 homes does not have a direct impact in relation to the Council's duties under the Equality Act 2010. There is however an indirect impact. The allocation of properties will be determined by the Placement Policy and so the analysis carried out for the EQIA for the Policy is valid for this proposal.

The impact of the proposal will be to provide suitable accommodation for homeless households with an assessed need to remain within 90 minutes travel to Enfield. There is no impact on other households.

The impact of the proposal will be on two primary groups:

- Those households in hotel accommodation
- Those households in more settled temporary accommodation

There is an immediate benefit for households currently in hotel accommodation as they will move to a self-contained home.

Most households in temporary accommodation live in nightly paid properties where there is little or no security of tenure. There is therefore a positive impact for these households in that it will provide a more secure home.

The analysis is based on the 1582 households (2798 people) for whom the council has accepted a duty in the first four months of 2023.

Section 3 – Equality analysis

This section asks you to consider the potential differential impact of the proposed decision or change on different protected characteristics, and what mitigating actions should be taken to avoid or counteract any negative impact.

According to the Equality Act 2010, protected characteristics are aspects of a person's identity that make them who they are. The law defines 9 protected characteristics:

1. Age
2. Disability
3. Gender reassignment.
4. Marriage and civil partnership.
5. Pregnancy and maternity.
6. Race
7. Religion or belief.
8. Sex
9. Sexual orientation.

At Enfield Council, we also consider socio-economic status as an additional characteristic.

“Differential impact” means that people of a particular protected characteristic (eg people of a particular age, people with a disability, people of a particular gender, or people from a particular race and religion) will be significantly more affected by the change than other groups. Please consider both potential positive and negative impacts and provide evidence to explain why this group might be particularly affected. If there is no differential impact for that group, briefly explain why this is not applicable.

Please consider how the proposed change will affect staff, service users or members of the wider community who share one of the following protected characteristics.

Detailed information and guidance on how to carry out an Equality Impact Assessment is available [here](#). (link to guidance document once approved)

Age

This can refer to people of a specific age e.g. 18-year olds, or age range e.g. 0-18 year olds.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people of a specific age or age group (e.g. older or younger people)?

Please provide evidence to explain why this group may be particularly affected.

There is no differential impact on any particular age group. There is a differential impact on households with children as there is a greater shortage of supply of affordable family sized accommodation locally. Within the 1582 households the following ages were recorded:

Age	No
0-4	1
12-15	9
16-17	82
18-20	147
21-24	219
25-29	265
30-44	710
45-59	365
5-7	1
60-64	63
65-74	60
75-84	7
85-89	2
90 and over	3

In the 2021 Census, Enfield's age structure shows the working-age population to be 216,693 which is 65.7% of the population. People under the age of 16 represent 20.5% of the population, and over 65s represent 13.7% of the population.

This means that there is a disproportionate impact on working age households and older people are underrepresented within the households approaching the Council for assistance.

There are around 2900 households in more settled temporary accommodation. The breakdown of ages of the lead applicant for whom we hold data is set out below:

Age	No	%
18-25	179	6.26%
26-35	733	25.62%
36-45	936	32.72%
46-55	691	24.15%
56-65	252	8.81%
66-75	51	1.78%
75+	19	0.66%

Older people may have a greater dependency on local support networks to enable them to live independently. The Placement Policy is designed to ensure that those residents who are dependent on local support networks are prioritised for the limited supply of more local
EqIA template approved by EMT 16th June 2020

accommodation. Increasing the supply of more local temporary accommodation will therefore have a differentially positive impact on this group.

Mitigating actions to be taken

Ensure that the Placement Policy is correctly applied to enable those people who are dependent on local support networks to be prioritised for local accommodation.

Ongoing monitoring of the impact of the new policy and a review after six months

Disability

A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on the person's ability to carry out normal day-day activities.

This could include: physical impairment, hearing impairment, visual impairment, learning difficulties, long-standing illness or health condition, mental illness, substance abuse or other impairments.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people with disabilities?

Please provide evidence to explain why this group may be particularly affected.

The analysis is based on the 1582 households for whom the council has accepted a duty in the first four months of 2023. During this period 198 households included someone with a physical disability, 32 had a learning disability and 210 had disabilities caused by their mental health.

Under the current arrangements households entering temporary accommodation are housed in hotel accommodation due to the shortage of both private rented and TA. The proposed change in approach will therefore have a positive impact on these households, enabling them to secure a permanent, affordable, home.

There is a positive differential impact on people with a physical or mental disability as they will have greater access to more local suitable temporary accommodation. More vulnerable residents will also be prioritised for the limited supply of local accommodation through the Placement Policy, and this will disproportionately benefit both those in hotels and more settled forms of temporary accommodation. Increasing the supply of more local temporary accommodation will therefore have a positive impact on this group.

Mitigating actions to be taken

Ensure that the Placement Policy is correctly applied to enable residents who are dependent on local health services and support networks are prioritised for local accommodation.

Where local accommodation is not possible, ensure that similar services are available to the residents in a new location and that support with the transition is available.

Ongoing monitoring of the impact of the new policy and a review after six months

Gender Reassignment

This refers to people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on transgender people?

Please provide evidence to explain why this group may be particularly affected.

There is no differential impact on people who are or have reassigned their sex. The analysis is based on the 1582 households for whom the council has accepted a duty in the first four months of 2023. During this period 14 people stated that their gender was different to that assigned at birth and a further 25 declined to answer the question.

Under the current arrangements households entering temporary accommodation are housed in hotel accommodation due to the shortage of both private rented and TA. The proposed change in approach will therefore have a positive impact on these households, enabling them to secure a permanent, affordable, home.

People undergoing gender reassignment are often dependent on local support networks and health services. The Placement Policy is designed to ensure that people who are dependent on local health and support networks are prioritised for more local accommodation. Increasing the supply of more local temporary accommodation will therefore have a differentially positive impact on this group.

Mitigating actions to be taken

Ensure that the Placement Policy is correctly applied to enable residents who are dependent on local health services and support networks are prioritised for local accommodation.

Where local accommodation is not possible, ensure that similar services are available to the residents in a new location and that support with the transition is available.

Ongoing monitoring of the impact of the new policy and a review after six months

Marriage and Civil Partnership

Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, where-as a marriage can be conducted through either religious or civil ceremonies. In the U.K both marriages and civil partnerships can be same sex or mixed sex. Civil partners must be treated the same as married couples on a wide range of legal matters.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people in a marriage or civil partnership?

Please provide evidence to explain why this group may be particularly affected.

There is no differential impact on households based on their relationships.

Within the 1582 households for whom the Council has accepted a duty there were:

Co-habiting	49
Divorced	28
Married	188
Separated	39
Single	724
Widowed	7

Single people, with or without children, will therefore disproportionately benefit from the new policy.

There are around 2900 other households currently living in more settled temporary accommodation. There are 629 couples living in temporary accommodation with the remainder being single people with or without children. Single adults with or without children will therefore disproportionately benefit from an increased supply of privately rented accommodation.

However, for single parent households who are more dependent on local support networks, relocation to a new area will be challenging. Whilst the Placement Policy will prioritise the more vulnerable households for local accommodation there will be a need to ensure that women have access to local support networks and are provided with links to local community groups. Increasing the supply of more local temporary accommodation will therefore have a differentially positive impact on this group.

Mitigating actions to be taken

Ensure that the Placement Policy is correctly applied to enable residents who are dependent on local health services and support networks are prioritised for local accommodation.

Where local accommodation is not possible, ensure that similar services are available to the residents in a new location and that support with the transition is available.

Ongoing monitoring of the impact of the new policy and a review after six months

Pregnancy and maternity

Pregnancy refers to the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on pregnancy and maternity?

Please provide evidence to explain why this group may be particularly affected.

There is no differential impact on people who are pregnant or expecting a baby. The analysis is based on the 1582 households for whom the council has accepted a duty in the first four months of 2023. 107 women had had a baby in the previous 12 months and a further 95 were pregnant.

For expectant and new mothers, support networks are particularly important. The need for support is one of the factors to be considered as part of the placement policy, with more vulnerable households being prioritised for the limited supply of local accommodation.

Under the current arrangements households entering temporary accommodation are housed in hotel accommodation due to the shortage of both private rented and TA. The proposed change in approach will therefore have a positive impact on these households, enabling them to secure a permanent, affordable, home. Increasing the supply of more local temporary accommodation will therefore have a differentially positive impact on this group.

Mitigating actions to be taken

Ensure that the Placement Policy is correctly applied to enable residents who are dependent on local health services and support networks are prioritised for local accommodation.

Where local accommodation is not possible, ensure that similar services are available to the residents in a new location and that support with the transition is available.

Race

This refers to a group of people defined by their race, colour, and nationality (including citizenship), ethnic or national origins.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people of a certain race?

Please provide evidence to explain why this group may be particularly affected.

In the first four months of 2023, the Council accepted a duty towards 1582 households. The largest groups by ethnic background are as follows:

Black or Black British - African	24%
White Other - Other	17%
White - British	14%
Black or Black British - Caribbean	8%
White Other - Turkish	6%
Any other ethnic group	6%
Mixed - Other	5%
Black or Black British - Other	3%
Don't know / refused	3%
Asian or Asian British - Bangladeshi	2%
Mixed - White and Black African	2%
Mixed - White and Black Caribbean	2%

The new policy will therefore have a differential impact on minority ethnic groups with only 14% of households being white British. This compares against the 2021 Census data where 52% of Enfield's population is white. Under the current arrangements households entering temporary accommodation are housed in hotel accommodation due to the shortage of both private rented and TA. The proposed change in approach will therefore have a positive impact on these households, enabling them to secure a permanent, affordable, home.

There are around 2900 other households currently living in more settled temporary accommodation. Of these households we hold ethnicity data on 1471 households. This reflects the fact that many households have been living in temporary accommodation before the implementation of the Homelessness Reduction Act.

There are a wide range of ethnicities within the households living in temporary accommodation. The largest groups are:

BLACK AFRICAN	24.61%
BLACK CARIBBEAN	11.83%
WHITE UK	11.01%
TURKISH	10.40%
WHITE OTHER	6.19%
OTHER ETHNIC	5.37%
SOMALIAN	4.42%
KURDISH	3.13%

Most households in temporary accommodation live in nightly paid properties where there is little or no security of tenure. Increasing the supply of more local temporary accommodation will therefore have a positive impact on this group.

Mitigating actions to be taken

We will need to ensure that we procure properties in areas where there are established minority groups to ensure that residents are not isolated in their new communities.

Religion and belief

Religion refers to a person's faith (e.g. Buddhism, Islam, Christianity, Judaism, Sikhism, Hinduism). Belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who follow a religion or belief, including lack of belief?

Please provide evidence to explain why this group may be particularly affected.

Christian households are the largest single group with 533 (33.7%) identifying as Christian. 397 households declined to answer (25.1%). The next largest groups are Muslim households with 373 (23.5%) identifying as Muslim, and 198 (12.5%) stating that they had no religion.

	No	%
Christian	533	33.7%
Prefer not to say	397	25.1%
Muslim	373	23.6%
No Religion	198	12.5%
Other	69	4.4%
Hindu	4	0.3%
Jewish	2	0.1%
Sikh	2	0.1%
Rastafarian	2	0.1%

This compares with the 2021 census data which found:

Christian - 153,015 people or 46.4%

Buddhist - 1,716 people or 0.5%

Hindu - 10,231 people or 3.1%

Jewish - 3,713 people or 1.1%

Muslim - 61,477 people or 18.6%

Sikh - 1,199 people or 0.4%

Other - 98,633 people or 29.9%

There is therefore a slightly greater impact on Muslim households as they are more likely to be in need of accommodation and a slightly lower impact on Christian households.

Religious groups are supported by the communities that they live in, and it is important to ensure that in making out of area placements the communities that we are placing into are supportive and sufficiently diverse.

Under the current arrangements households entering temporary accommodation are housed in hotel accommodation due to the shortage of both private rented and TA. Increasing the supply of more local temporary accommodation will therefore have a positive impact on this group.

Mitigating actions to be taken

We will need to ensure that we procure properties in areas where there are established religious groups to ensure that residents are not isolated in their new communities.

Ongoing monitoring of the impact of the new policy and a review after six months

Sex

Sex refers to whether you are a female or male.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on females or males?

Please provide evidence to explain why this group may be particularly affected.

Within the 1540 households for whom the Council has accepted a duty the following genders were recorded:

Gender	No
Female	1093
Male	739
Not known / Other	1
Prefer not to say	7

There is therefore a disproportionate impact on women as women make up 52% of Enfield's population but 59% of those to whom the council has accepted a duty.

Within the more settled temporary accommodation, 64% of households living in temporary accommodation are single women or single women with children.

Under the current arrangements households entering temporary accommodation are housed in hotel accommodation due to the shortage of both private rented and TA. Increasing the supply of more local temporary accommodation will therefore have a positive impact on this group.

Mitigating actions to be taken

Ongoing monitoring of the impact of the new policy and a review after six months

Sexual Orientation

This refers to whether a person is sexually attracted to people of the same sex or a different sex to themselves. Please consider the impact on people who identify as heterosexual, bisexual, gay, lesbian, non-binary or asexual.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people with a particular sexual orientation?

Please provide evidence to explain why this group may be particularly affected.

The analysis is based on the 1582 households for whom the council has accepted a duty in the first four months of 2023. During this period 5 people identified as not being heterosexual and another 25 decline to say. There is no differential impact on people with a particular sexual orientation.

Mitigating actions to be taken

We are in the process of implementing a new case management system. A core aspect of this is to improve the collection and use of equalities data including for sexual orientation.

Ongoing monitoring of the impact of the new policy and a review after six months

Socio-economic deprivation

This refers to people who are disadvantaged due to socio-economic factors e.g. unemployment, low income, low academic qualifications or living in a deprived area, social housing or unstable housing.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who are socio-economically disadvantaged?

Please provide evidence to explain why this group may be particularly affected.

Homeless households are largely at the bottom end of the income spectrum. This means that households in temporary accommodation are largely dependent on benefits. The freeze on Local Housing Allowance has meant that the local private rented sector is unaffordable for the majority of households. The growing gap between benefits and rents is set out below.

	1 bed	2 bed	3 bed	4 bed	5 bed
LHA 2020	£1,067	£1,296	£1,596	£1,895	£1,895
Average Rent 2021	£1,000	£1,400	£1,780	£2,090	£2,780
Average Rent 2022	£1,070	£1,510	£2,000	£2,490	£3,060

Annual change	6.80%	7.60%	12.00%	18.90%	10.10%
<p>There is therefore a disproportionate impact on low-income households.</p> <p>Under the current arrangements households entering temporary accommodation are housed in hotel accommodation due to the shortage of both private rented and TA. Increasing the supply of more local temporary accommodation will therefore have a positive impact on this group.</p>					
<p>Mitigating actions to be taken.</p>					
<p>Identify and support households likely to be benefit capped following a move to the private rented sector. Offers of accommodation will need to be linked to employment opportunities for these households</p>					

Section 4 – Monitoring and review

How do you intend to monitor and review the effects of this proposal?

Who will be responsible for assessing the effects of this proposal?

Monitoring outcomes for households affected by the Benefit Cap will form part of the monthly performance challenge meetings for the Housing Advisory Service.

Equalities data will be linked to data on placements to ensure that there are no unintended consequences.

A review of the Placement Policy will be carried out in June 2024 to evaluate its impact and whether further changes are required.

Section 5 – Action plan for mitigating actions

Any actions that are already completed should be captured in the equality analysis section above. Any actions that will be implemented once the decision has been made should be captured here.

Identified Issue	Action Required	Lead officer	Timescale/By When	Costs	Review Date/ Comments
Households who would be benefit capped following a move out of TA	Employment support	Lucretia Thomas	Ongoing	Beam contract £64k pa	Ongoing
Ongoing monitoring	Link equalities data to placement data to enable ongoing monitoring	Lian Brian Preacher	June 2024	N/A	Monthly
Review of the placement policy	Review of the placement policy	Richard Sorensen	June 2024	N/A	

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