

Appendix 1: Equality Impact Assessment (EqIA)

KD 5640 Homelessness in Enfield (6) Homelessness Housing Schemes

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	Housing Homelessness Schemes
Team/ Department	Housing & Regeneration
Executive Director	Sarah Cary
Cabinet Member	Cllr George Savva (Social Housing)
Author(s) name(s) and contact details	Martha Dallyn martha.dallyn@enfield.gov.uk
Committee name and date of decision	Cabinet, September 2023

Date the EqIA was reviewed by the Corporate Strategy Service	
Name of Head of Service responsible for implementing the EqIA actions (if any)	Nnenna Urum-Eke
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 proposal sets out a strategy for the provision of accommodation to prevent homelessness and to meet our statutory homelessness duties. It supports the revised Placement Policy agreed by Cabinet in June and considers a number of potential delivery options for constructing new Temporary Accommodation in Enfield, to address the rising issue of families being housed in commercial hotel rooms and B&Bs, which are inappropriate for families and carry a great cost to the council.

The considered options including repurposing general needs housing schemes for temporary accommodation use, building new homes using modular techniques, extending existing TA blocks, disposal of assets and acquiring stalled schemes in the borough.

The change would impact homeless households in Enfield who are currently being placed in commercial hotel and B&B rooms due to the lack of appropriate accommodation. It will also reduce the pressure on the council's budget – potentially reducing the extent of efficiency savings required of staff and enabling other projects and services that benefit the wider community to progress.

The following equalities analysis is based on the 1582 households (2798 people) for whom the council has accepted a homelessness duty in the first four months of 2023. As the proposed temporary accommodation solutions will be delivered across the borough, Enfield-wide data is used instead of ward-specific.

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. Within the 1582 households for whom the council has accepted a homelessness duty in the first four months of 2023, the following ages were recorded:

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

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 all households, giving them access to more stable, better quality temporary accommodation. Given the above spread it can therefore be concluded that new temporary accommodation will have a positive impact on all age groups.

It is worth noting that there is a positive differential impact on households with children as there is a greater shortage of supply of affordable family sized accommodation locally, and accommodation of this size will be prioritized for the new supply according to need.

Mitigating actions to be taken

No mitigating actions are deemed necessary.

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.
<p>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.</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.</p> <p>There is therefore a positive differential impact on people with a physical, mental or learning disability as they will have greater access to more stable, better quality temporary accommodation that is more accessible than hotel accommodation.</p>
Mitigating actions to be taken
No mitigating actions are deemed necessary.

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.
<p>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.</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.</p>

Transgender people suffer higher rates of physical and emotional abuse than cisgender people, and will therefore benefit from the improved privacy and stability in good quality temporary accommodation, in comparison to hotel accommodation.

There is therefore a positive differential impact on people who are or have reassigned their sex.

Mitigating actions to be taken

No mitigating actions are deemed necessary.

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.

Within the 1582 households for whom the Council has accepted a duty in the first four months of 2023, the following relationship statuses were reported:

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

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.

Improved temporary accommodation supply will therefore have a positive differential impact on single adults with or without children due to their high representation on the temporary accommodation list.

Mitigating actions to be taken

No mitigating actions are deemed necessary.

--

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.

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.

Under the current arrangements households entering temporary accommodation are housed in hotel accommodation due to the shortage of both private rented and TA.

Security and stability are particularly important to pregnant people and new parents. They will benefit from the improved privacy and stability in good quality temporary accommodation, in comparison to hotel accommodation.

There is therefore a positive differential impact on people who are pregnant or have recently given birth.

Mitigating actions to be taken

No mitigating actions are deemed necessary.

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 positive 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.

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	25%
Black Caribbean	12%
White UK	11%
Turkish	10%
White Other	6%
Other Ethnic	5%
Somalian	4%
Kurdish	3%

Improved temporary accommodation supply will therefore have a positive differential impact on non-white groups due to their high representation on the temporary accommodation list.

Mitigating actions to be taken

No mitigating actions are deemed necessary.

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 borough census data which found:

	No	%
Christian	153,015	46.4%
Other	98,633	29.9%
Muslim	61,477	18.6%
Hindu	10,231	3.1%
Jewish	3,713	1.1%
Buddhist	1,716	0.5%
Sikh	1,199	0.4%

There is therefore a slight differential impact on Muslim households due to their slightly higher representation on the temporary accommodation list compared to the borough average.

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, giving them access to more stable, better quality temporary accommodation.

Mitigating actions to be taken

No mitigating actions are deemed necessary.

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 slight differential 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. The proposed change in approach will therefore have a positive impact on women and women-led households, giving them access to more stable, better quality temporary accommodation.

Mitigating actions to be taken

No mitigating actions are deemed necessary.

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.

Data on households in more settled forms of temporary accommodation is more scarce and there is insufficient data to draw a conclusion. Many of the households in temporary accommodation have been living there since before the introduction of the Homelessness Reduction Act meaning that the equalities data was not collected in key areas.

People that are not heterosexual suffer higher rates of physical and emotional abuse than heterosexual people, and will therefore benefit from the improved privacy and stability in good quality temporary accommodation, in comparison to hotel accommodation.

There is therefore a positive differential impact on with a particular sexual orientation.

Mitigating actions to be taken

No mitigating actions are deemed necessary.

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%

There is therefore a disproportionate impact on low-income households both in hotel accommodation and temporary 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, giving them access to more stable, better quality temporary accommodation.

Mitigating actions to be taken.

No mitigating actions are deemed necessary.

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?

The equalities impact of individual disposals, acquisitions, procurements and contracts will be assessed at the point of approval by the relevant Executive Director.

Monitoring outcomes for households 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 and monitored through the performance challenge meetings.

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