

## **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

<b>Title of service activity / policy/ strategy/ budget change/ decision that you are assessing</b>	Holiday Activities & Food Programme (HAF)
<b>Team/ Department</b>	School & Early Years Improvement Service. People.
<b>Executive Director</b>	Tony Theodoulou
<b>Cabinet Member</b>	Cllr Abdullahi
<b>Author(s) name(s) and contact details</b>	Sharon Davies. Learning Consultant HAF, RSHE & Professional Learning
<b>Committee name and date of decision</b>	

<b>Date the EqIA was reviewed by the Corporate Strategy Service</b>	
<b>Name of Head of Service responsible for implementing the EqIA actions (if any)</b>	
<b>Name of Director who has approved the EqIA</b>	

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?

**What is the proposed decision or change?**

The proposed decision is to establish a suitable Framework Agreement for the provision of Enfield's Holiday Activities and Food Programme (HAF) and procure services from experienced and pre-qualified organisations to provider grant funded places at holiday clubs during the longer school holidays.

This funding will be dispensed from the Holiday Activities and Food (HAF) programme grant that has been allocated to London Borough of Enfield by the Department for Education (DfE).

**What are the reasons for the decision or change?**

Historically, HAF grant funding in Enfield has been distributed via a local competition outside of the London Tenders Portal. Moving to a framework will ensure procurement compliance and also enable the HAF team to work closely with a set number of providers to enhance provision across the borough.

**What outcomes are you hoping to achieve from this change?**

The Council requires a compliant HAF arrangement to provide a wide range of opportunities for eligible children and young people (CYP) to take part in, that are local to where they live, and could be:

- Face-to-face activities providing a range of activities; for at least four hours per day
- Provision could include 'open access' activities that do not require advance booking, providing that the activity is targeted to geographic areas of highest need for the age group
- An offer for children and young people who have Special Educational Needs and Disabilities (SEND); this could include more specialist provision that is exclusively for children and young people with SEND

Organisations will be able to apply to run provision exclusively for HAF eligible children or offer several places within an existing provision that also offers paid places.

HAF programmes take place during the Easter, Summer and Winter school holidays each year for a total of 6 weeks:

- Easter = 1 week (4 days)
- Summer = 4 weeks (16 days)
- Winter = 1 week (4 days)

Therefore, the Council requires a good range of suitably qualified providers to

cover locations across the borough of Enfield.

The minimum requirements which prospective bidders will have to satisfy for the purposes of compliance cover the following core elements:

- Food provision
- Enriching activities
- Physical activities
- Nutritional education
- Food education for families and carers
- Signposting/referrals
- Ofsted registration (if relevant)
- Safeguarding
- Staffing and volunteers

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

Children and young people who are eligible for the HAF programme who are in receipt of benefits related free school meals and in Reception to Year 11 inclusive. Families will also see wider benefits through signposting to other services and support and increasing awareness of healthy eating and healthy lifestyles.

Local authorities have discretion to use up to 15% of their funding to provide free or subsidised holiday club places for children and young people who are not in receipt of benefits-related FSM but who the local authority believe could benefit from HAF.

In deciding which children and young people should benefit from the 15% flexible funding, the Council ensures that these places are aligned to our local priorities.

School census data from May 2023 shows that 16,562 children and young people in Enfield are in receipt of benefits related free school meals. This is 29.3% of the total school population.

## 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.

The HAF programme will have a positive impact on school aged children from reception to year 11 (inclusive) who receive benefits-related free school meals (FSM) as well as the additional children who fall under the Council priorities (up to 15% of funding can be used for this cohort).

School census data from May 2023 shows that 16,562 children and young people in Enfield are in receipt of benefits related free school meals. This is 29.3% of the total school population. The table below shows the breakdown of FSM eligible children and young people by year group.

NC Year Group	FSM Eligible		Total on Roll
	No	Yes	
1	2844	1300	4144
2	2967	1372	4339
3	2876	1388	4264
4	2757	1422	4179
5	2902	1391	4293
6	3042	1417	4459
7	2846	1224	4070
8	2864	1267	4131
9	2893	1150	4043
10	2962	1090	4052
11	2932	1043	3975
12	1733	491	2224
13	1431	430	1861
14	36	38	74
E2	12	1	13
N1	332	27	359
N2	1658	324	1982
R	2880	1187	4067
<b>Total on Roll</b>	<b>39967</b>	<b>16562</b>	<b>56529</b>

Take up of HAF programme averages around 16% of the total Enfield FSM population. The percentage of take up continues to increase for each programme. The HAF programmes offer a good range of age and need appropriate

programmes for children and young people in both primary and secondary education. This includes working closely with the Youth Service to offer a range of programmes for secondary age young people through both the Youth Centre and schools.

The decision to award a framework will enable the Enfield HAF team to work closely in partnership with a set number of providers. Targeted training can take place and providers can monitor their cohorts each holiday programme and make adjustments to future programmes and marketing as appropriate to ensure equality of access.

**Mitigating actions to be taken**

Following the summer 2023 programme analysis of participation across all eligible age groups compared to the total FSM cohort will take place this will inform the activities on offer for future programmes and comms that need to take place if certain age groups are not taking up the offer.

**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 HAF programme is expected to have a positive impact on all children and young people accessing the scheme. There is an increasing demand for HAF spaces from families who have children and young people with SEND and applications from providers with specialist staff and resources have been limited.

Data from the January 2021 census shows that of 13,571 children and young people in receipt of free school meals, 990 of these had an EHCP and 1896 had some other SEND recorded. So far for summer 2023, 443 children and young people with SEND have taken part in the HAF programme. This is an increase from 265 children and young people with SEND who took part in Easter 2023.

There is some funding available for 1:1 support to work with children with more complex health needs. A process is in place for providers to access this funding.

We have provided training for HAF providers around how to support autistic children, Introduction to Positive Behaviour Support and Sensory Play and Basic

Communication and will continue to run regular training throughout the year.

All HAF providers in the borough provide up to 12% of their spaces for children who have low level SEND where no additional staffing support is required.

The demand is likely to continue increasing, given the cost-of-living crisis and more families needing support.

Progress has been made from 2021 to 2023, however work is still needed to secure the reach and number of children with a special educational need and / or disability, able to access HAF. To support this process the Council will be working with Enfield Joint Service for Disabled Children to increase the number of HAF spaces for children and young people with SEND by dovetailing programmes. The Council will also be working with the Enfield Disability Services and Our Voice to continue to enhance the Local Offer and provide specialist training for HAF providers.

**Mitigating actions to be taken**

Reasonable adjustments to be offered based on a child/young person's needs. This includes undertaking a risk assessment and tailoring activities accordingly.

**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.

The HAF programme is expected to have a positive impact on all children and young people accessing the scheme.

The Council does not collect data relating to gender reassignment and participation in the HAF programme. The HAF programme is accessible to all young people based on the DfE eligibility criteria (in receipt of benefits related free school meals and in Reception to year 11 inclusive) regardless of whether they are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex.



**Mitigating actions to be taken**

Reasonable adjustments to be offered on a case-by-case basis.

**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 impact anticipated as the legal age for marriage in the UK is 18. The HAF programme is only available to school aged children from reception to year 11 (inclusive) who receive benefits-related free school meals (FSM).

**Mitigating actions to be taken**

No mitigating actions identified

**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 HAF programme is expected to have a positive impact on all children and young people accessing the scheme.

The HAF programme is accessible to all young people who are eligible for the programme (in receipt of benefits related free school meals and in Reception to year 11 inclusive).

Tailored support would be offered on a case-by-case basis by undertaking a risk assessment, if a young person taking part in the scheme is pregnant or has recently had a baby.

**Mitigating actions to be taken**

Reasonable adjustments to be offered on a case-by-case basis by undertaking a risk assessment, tailoring activities accordingly and signposting to local support.

**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.

The HAF programme is expected to have a positive impact on all children and young people accessing the scheme.

The HAF programme is accessible to all children and young people who are eligible for the programme (in receipt of benefits related free school meals and in Reception to year 11 inclusive), regardless of their ethnicity.

Ethnicity data is not required by the DfE so has not yet been collected. However, the HAF programme from Summer 2023 uses a new central booking system which now collects this data and can be analysed for each programme and overall, across the borough. We will then be considering this data against the ethnicity profile of those eligible for FMS in Enfield. This will ensure we can identify and address potential barriers to service access.

Providers are encouraged to ensure that their programmes are culturally diverse, and activities have been commissioned from local providers across Enfield to ensure that local communities needs are met.

**Mitigating actions to be taken**

Following the summer 2023 programme analysis of participation across all ethnicities compared to the total FSM cohort will take place.

**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.

The HAF programme is expected to have a positive impact on all children and young people accessing the scheme.

The HAF programme is accessible to all children and young people who are eligible for the programme (in receipt of benefits related free school meals and in Reception to year 11 inclusive), regardless of their religion or beliefs.

Although this data is not currently collected, religious beliefs are always considered in the HAF programme, particularly with food. All HAF providers ask about religious beliefs in relation to food at point of booking. All HAF providers are required to cater for religious beliefs.

If HAF programmes fall during Ramadan and young people are fasting, then food parcels are provided to take home and activities are tailored accordingly to conserve energy levels.

**Mitigating actions to be taken**

**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.

The HAF programme is expected to have a positive impact on all children and young people accessing the scheme.

The HAF programme is accessible to all children and young people who are eligible for the programme (in receipt of benefits related free school meals and in Reception to year 11 inclusive), regardless of their sex.

Currently, this data is not required by the DfE so has not been collated to date. The HAF programme has however from Summer 2023 used a new central booking system which is collecting this data and can be analysed for each programme and overall, across the borough.

4 out of 6 weeks of the summer 2023 programme are complete and so far, these are the overall statistics of children and young people who have taken part in the HAF programme.

53% males  
46% females  
Less than 1% prefer not to say  
Less than 1% other

During quality assurance visits it is evident that some of the programmes aimed at secondary age young people attract more males than females especially if the programme has more of a sport focus.

**Mitigating actions to be taken**

Analysis after the summer 2023 programme will take place for each provider and future programmes will consider the sports being offered and ensure that they are attractive for all. We will work with the youth service to carry out consultation with young people and provide training where possible to introduce a variety of sports and physical activities.

**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 HAF programme is expected to have a positive impact on all children and young people accessing the scheme.

This data is not currently collected.

The HAF programme is accessible to all children and young people based on the DfE eligibility criteria (in receipt of benefits related free school meals and in Reception to year 11 inclusive) regardless of their sexual orientation.

**Mitigating actions to be taken**

**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.

The HAF programme is available to all families who have children and young people in receipt of benefits related free school meals. Families who receive a qualifying benefit and have a child in primary or secondary school, may be eligible for free school meals. Registering for free school meals can help schools receive extra funding from the government through the pupil premium. This could support areas such as extra tuition, teacher development and after school activities.

The demand for this is likely to continue to increase particularly during the cost-of-living crisis. Since HAF began in April 2021 FSM figures have gone from 13,571 to 16,562 from the May school census.

Many parents / carers of children in Reception, Year 1 and Year 2 who are in receipt of Universal free school meals have not applied for benefits related free school meals and therefore the HAF programme has highlighted the associated

benefits of applying.

**Mitigating actions to be taken.**

Joint comms with the free school meal team and schools to ensure parents / carers understand the benefits of applying for free school meals.

## 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?

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

Monitoring the effects of this proposal will take place after each holiday period as well as comparisons to previous holiday periods.

A review of the EqIA will take place annually or sooner if any significant changes to the programme take place.

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

The HAF coordinator will be responsible for monitoring following each holiday period.

The Learning Consultant for HAF, RSHE and Professional Learning, the HAF Strategic Lead and the HAF steering group will be responsible for reviewing the monitoring and implementing resulting actions.

## 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
Following the summer 2023 programme analysis of participation across all eligible age groups compared to the total FSM cohort will take place this will inform the activities on offer for future programmes and comms that need to take place if certain age groups are not taking up the offer.	Analysis of age group participation of summer 2023 programmes. Actions to be updated following analysis.	Sharon Davies / Rajay Williams	October 2023	No cost	
Following the summer 2023 programme analysis of participation across all ethnicities compared to the total FSM cohort will take place.	Analysis of participation across ethnicities for all summer 2023 programmes. Actions to be updated following analysis.	Sharon Davies / Rajay Williams	October 2023	No cost	



<p>Analysis after the summer 2023 programme will take place for each provider and future programmes will consider the sports being offered and ensure that they are attractive for all. We will work with the youth service to carry out consultation with young people and provide training where possible to introduce a variety of sports and physical activities.</p>	<p>Analysis of male / female participation of summer 2023 programmes. Actions to be updated following analysis.</p>	<p>Sharon Davies / Rajay Williams</p>	<p>October 2023</p>	<p>No cost</p>	
<p>Joint comms with the free school meal team and schools to ensure parents / carers understand the benefits of applying for free school meals.</p>	<p>Communication plan to be devised.</p>	<p>Sharon Davies / Rajay Williams / Free school meal team</p>	<p>September 2023 – July 2024</p>	<p>Potential marketing costs TBC covered through the HAF grant</p>	