

## 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>	TA Transfer Programme
<b>Team/ Department</b>	Housing Advisory Service
<b>Executive Director</b>	Joanne Drew
<b>Cabinet Member</b>	Cllr Savva
<b>Author(s) name(s) and contact details</b>	Richard Sorensen
<b>Committee name and date of decision</b>	Portfolio Decision October 2023

<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>	Richard Sorensen
<b>Name of Director who has approved the EqIA</b>	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?

1. We are proposing to change the way in which longer term temporary accommodation is managed to enable the service to focus on securing permanent homes and to reduce the cost to the Council.
2. Longer term temporary accommodation will be provided by Housing Gateway Ltd and Capital Letters. Residents will be issued with a license to occupy the property.
3. One of the key barriers faced by residents in moving out of temporary accommodation is the financial cost. Whilst they are in TA, residents are entitled to full Housing Benefit, and this is not means tested. When they move to the private rented sector their housing costs are met through Universal Credit and are means tested. The effect of this is that TA has become the lowest cost form of housing and the benefits system effectively traps people in TA.
4. Accommodation provided by Housing Gateway would not be regarded as TA for benefit purposes. This means that residents would be treated as though they are in the private rented sector whilst they are in these properties. This in turn would remove the financial barrier to moving to other more stable tenures.
5. Separating the housing management function from homelessness casework will ensure a greater focus on the quality of accommodation being offered and improve the overall experience of residents.
6. Equally the new arrangements will enable caseworkers to focus on supporting residents into permanent accommodation, without the distraction of raising repairs or liaising with temporary accommodation landlords.
7. Because residents will be treated as if they were in private rented accommodation an increased number of households will become subject to the benefit cap. There are currently 3189 households in temporary accommodation. Analysis is based on the 2489 households for whom we hold financial information. Of the 2489 households, 956 households are exempt from the benefit cap. 823 households are likely to be benefit capped with an average loss of income of £4 per week.

## 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 are exempt from the benefit cap as this only applies to working age households. There is therefore a disproportionate impact on households of working age.

**Mitigating actions to be taken**

Work with households affected by the benefit cap to secure employment and/or disability benefits.

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.

There is a positive differential impact on people with a physical or mental disability as they are not subject to the benefit cap, provided they are in receipt of disability benefits.

**Mitigating actions to be taken**

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. Analysis is based on the 2489 households in temporary accommodation for whom we hold financial information. Of the 2489 households, 14 people stated that their gender was different to that assigned at birth and a further 25 declined to answer the question.

8 people are affected by the benefit cap, and we do not hold the financial data on the remaining individuals. We will monitor the impact of the new management arrangements in order to minimise the potential impact.

### Mitigating actions to be taken

Ensure that data collection on households is strengthened and monitoring arrangements put in place to ensure that we have a better understanding on the impact of the new arrangements.

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 the status of their relationships. The benefits regulations do not distinguish between cohabitation, marriage and civil partnerships. This means that there is no differential impact between these groups.

New entrants to temporary accommodation:

In the first four months of 2023 the Council accepted a duty towards 1582 households. The

breakdown of these households is as follows:

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

Single parents make up over 85% of all households that have had their benefits capped, according to Department for Work and Pensions data. Single people with or without children also make up majority of households in temporary accommodation.

There are around 2900 households currently living in settled temporary accommodation. Of these, 629 are couples with the remainder being single people with or without children. Single people, with or without children, will therefore be disproportionately impacted by the change in management arrangements for temporary accommodation. The impact for single parents will be higher as they are more likely to be subject to the benefit cap.

**Mitigating actions to be taken**

Work with households affected by the benefit cap to secure employment and/or disability benefits.

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.

One household is potentially affected by the benefit cap.

### **Mitigating actions to be taken**

Work with households affected by the benefit cap to secure employment and/or disability benefits.

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

### **Ethnicity**

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 new policy will therefore 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.

The impact of the benefit cap is predominantly on larger households. There is considerable variation in the impact on different minority groups, but this is largely driven by the size of the household.

	No of Households	Not Exempt from the cap	Will become Benefit Capped	Average weekly loss
Not held	1559	773	343	-£11.00
Any other ethnic group	137	64	38	-£9.07
Asian or Asian British - Bangladeshi	23	10	4	-£5.48
Asian or Asian British - Indian	9	5	1	-£2.32
Asian or Asian British - Other	3	0	0	£0.00
Asian or Asian British - Pakistani	19	11	5	-£18.28
Black or Black British - African	375	180	90	-£9.17
Black or Black British - Caribbean	145	63	28	-£7.88
Black or Black British - Other	49	24	11	-£9.59
Don't know / refused	468	227	105	-£8.73
Mixed - Other	27	6	2	-£9.72
Mixed - White and Asian	5	2	1	-£23.83
Mixed - White and Black African	35	20	12	-£9.85
Mixed - White and Black Caribbean	29	12	7	-£10.42
Other ethnic group: Arab	19	10	5	-£6.69
White - British	220	104	37	-£8.95
White - Irish	1	0	0	£0.00
White Other - Greek/ Greek Cypriot	1	0	0	£0.00
White Other - Gypsy/Roma	7	4	3	-£4.58
White Other - Irish Traveller	1	0	0	£0.00
White Other - Kurdish	1	1	1	-£7.88
White Other - Other	30	4	3	-£4.55
White Other - Turkish	13	0	0	£0.00
White Other - Turkish/Cypriot	2	0	0	£0.00

There is a clear need to work with households affected by the cap to enable them to secure employment or disability benefits to mitigate the impact of the benefit cap.

#### **Mitigating actions to be taken**

Work with households affected by the benefit cap to secure employment and/or disability benefits.

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

**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 likely to be 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.

The data currently held is not sufficiently robust and we are unable to draw conclusions on the financial impact by religion or belief.

**Mitigating actions to be taken**

Increase the proportion of households for whom we hold data.

Work with households affected by the benefit cap to secure employment and/or disability benefits.

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.

73% (2357 households) of households living in temporary accommodation are headed by a woman.

There is therefore a disproportionate impact on women as women make up 52% of Enfield's population but 73% of those to whom the council has provided accommodation. 16% of households headed by a man are likely to become benefit capped whilst 23% of households headed by a woman are likely to become benefit capped.

There are several factors impacting on these figures. Couples with children are more likely to have a least one person in employment, exempting them from the benefit cap. Around a quarter of male households are single men without children meaning that they are unlikely to become capped.

**Mitigating actions to be taken**

Work with households affected by the benefit cap to secure employment and/or disability benefits.

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 identifiable differential impact on people with a particular sexual orientation.

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.

### **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.

There is therefore a disproportionate impact on low-income households in temporary accommodation.

Around 750 households will become benefit capped under the proposed changes.

However, only 250 households would be more than £10 per week worse off.

**Mitigating actions to be taken.**

Work with households affected by the benefit cap to secure employment and/or disability benefits.

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

## 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 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
Households who would be benefit capped	Employment support	Lucretia Thomas	Ongoing	Beam contract £64k pa	Jan 2024
Ongoing monitoring	Link equalities data to placement data to enable ongoing monitoring	Lian Brian Preacher	Ongoing	N/A	Monthly
Lack of robust data	Improve the collection of equalities data	Matthew Waldron	April 2024	N/A	Jan 2024