

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 | Household Support Fund 2024/25 |
| Team/ Department | Resources |
| Executive Director | Fay Hammond |
| Cabinet Member | Cllr. Tim Leaver |
| Author(s) name(s) and contact details | Marc Pruis Marc.Pruis@enfield.gov.uk |
| Committee name and date of decision | |
| Date of EqIA completion | |

| | |
|---|------------|
| Date the EqIA was reviewed by the Corporate Strategy Service | |
| Name of Head of Service responsible for implementing the EqIA actions (if any) | Marc Pruis |
| Name of Director who has approved the EqIA | |

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?

On the 6 March 2024 in the Spring Budget the Chancellor announced that the Household Support Fund (HSF) would be extended for a further six months, from 1 April 2024 to 30 September 2024.

On Monday 26 March 2024 Local authorities received final confirmation of funding allocations (DWP Grant Determination Letter) and grant guidance (Household Support Fund: Guidance for County Councils and Unitary Authorities in England (1 April 2024 to 30 September 2024)), confirming a further £2,847,994.64 of funding.

The fund is intended to cover a wide range of low-income households in need including families with children of all ages, pensioners, unpaid carers, care leavers and people with disabilities. The expectation is that The Fund should be used to support households in the most need; particularly those who may not be eligible for the other support government has recently made available but who are nevertheless in need and who require crisis support. Councils have discretion on exactly how this funding is used within the scope set out in the accompanying grant determination and guidance.

The aim of this proposal, which responds to the new HSF grant allocation and amended guidance, is to use our experience gained so far and lessons learned to target the funding to those most in need and support the Council's budget sustainability.

There are range of considerations for the Council to ensure that the distribution of the funds is clear and transparent, but most importantly has maximum impact for those in financial hardship. The principles applied in developing the proposals below included:

- a) Targeting the funding to ensure that funds are allocated to those most in need,
- b) Ensuring that the proposed scheme allocates funding as quickly as possible,
- c) Administering the funds as simply as possible to minimise administration burden and cost, and to provide the required record keeping as set out in the grant conditions,
- d) Presenting a transparent scheme that can be readily explained to

- residents how the Council is spending the grant,
- e) Minimising the need to claim on an individual basis thus making it easier for those at risk to get the help they need directly with dignity.

The Council is proposing to distribute the funding against several key themes as summarised in the table below:

CTS = Council Tax Support

| Theme | Proposed Allocation |
|---|----------------------------|
| CTS Hardship Payments (wider essentials) | £ 550,000 |
| Temporary accommodation relocation | £ 500,000 |
| Application-based support (incl housing costs), Welfare advice officers x 2 and CAB officer | £ 264,859 |
| CTS 11,000 households previously protected x £125 each | £ 1,388,135.64 |
| Administration | £ 145,000 |
| TOTAL | £ 2,847,994.64 |

The proposal is that a targeted approach is applied to the distribution of the majority of the funding to individual households to ensure that funds are distributed to those households most in need. However, a mandatory claims process will also be set up

to ensure those most in need that didn't receive the targeted support can apply for support, giving the opportunity for benefit and debt advice with each claim made to ensure a more sustainable outcome. Residents will be signposted to the Council's Cost of Living webpage, which provides information on how they can access support with the cost of living. One of the tiles on the cost-of-living webpage refers to the Household Support, where information is available about the allocation of the fund, eligibility criteria and the application form.

This approach of distributing funding using a combination of targeted and discretionary funding is intended to cover a wide range of low-income households in need, including families with children of all ages, pensioners, unpaid carers, care leavers and disabled people.

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 care experience and 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.

Households in receipt of Council Tax Support (wider essentials)

This proposal will benefit all household types and all ages where the household receives Council Tax Support. Council Tax Support is means-tested; therefore recipients of Council Tax Support are low-income households. Application-based support will be available to households in receipt of Council Tax Support and facing exceptional financial hardship. All residents in receipt of Council Tax Support will be able to make a claim for additional support for an assessment of need.

Around 11,000 households who were previously protected from having to make a contribution towards Council Tax will receive a £125 credit. This will benefit those working age, as pensioners are automatically protected.

Households with children and pensioners can apply for support through the application-based support mechanism, as can any working age household. Data from the last round of HSF shows that those who applied for support, as part of the mandatory application-based support, around 50% were household with children. A smaller proportion were pensioner households, but this could be due to a wider range of support and protections being available to pensioners generally.

Those being relocated out of temporary accommodation are mainly of working age, many of whom include children as part of their household. Data from the last round of HSF shows that the vast majority of households benefiting from HSF allocation under this workstream were families with children.

In 2023/24, for the workstreams that are identical to 2024/25, the number of households receiving support are in the table below. This represents the **application-based cohort** and the cohort in **temporary accommodation** only:

| | Total number of households |
|-------------------|----------------------------|
| HOUSEHOLD | |
| Children | 1876 |
| Pensioners | 1318 |
| Disabled | 1437 |
| Other | 1462 |
| TOTAL | 6093 |

The workstreams that are identical will be allocated half the funding compared to last year and therefore the expected number of households to benefit from the HSF5 will be:

| | Total number of households |
|-------------------|----------------------------|
| HOUSEHOLD | |
| Children | 938 |
| Pensioners | 659 |
| Disabled | 719 |
| Other | 731 |
| TOTAL | 3047 |

Mitigating actions to be taken

No vouchers will be issued. All payments will be made through a third-party provider or by bank transfer. This will help those that are housebound or otherwise unable to redeem vouchers at the Post Office. Bank account details are checked against bank statements, which will be requested as part of the application process. Where residents are overdrawn, we can use alternative payment methods, such as paypoint, to ensure the funds reached the recipient.

In the last round of HSF, we worked closely with our comms team to promote the scheme. The scheme was promoted through:

- Enfield Council website updates
- Adverts in Council newsletter
- Electronic Notice boards across 20+ Council Housing Estates
- Staff Matters Newsletter
- Enfield Council Intranet
- Enfield School Traded Services 'The Hub' News page and newsletter to schools
- Weekly VCS and Faith Forum bulletins

Paper applications are available to those unable to complete or submit an

online form.

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.

Application-based support

Those with disabilities may be positively impacted as one of the proposals is to set up a mandatory claims process. This is intended to support those most in need that didn't receive targeted support, giving the opportunity for benefit and debt advice with each claim made to ensure a more sustainable outcome.

As part of the application-based support, the Welfare Advice and Debt Support team will carry out an income maximisation assessment, where residents with disabilities or caring responsibilities can be helped with emergency funding in the short term, but also with applying for disability or caring relating benefits to assist on the longer term. Data from the last round of HSF shows that those who applied for support, as part of the mandatory application-based support, around 25% were households with disabilities (other groups being pensioners, household with children and other households).

Households in receipt of Council Tax Support (wider essentials)

This proposal will benefit all household types and all ages where the household receives Council Tax Support or has an eligibility for these benefits. Council Tax Support is means-tested; therefore recipients of Council Tax Support are low-income households. Application-based support will be available to households in

receipt of Council Tax Support and facing exceptional financial hardship. All residents in receipt of Council Tax Support will be able to make a claim for additional support for an assessment of need.

Around 11,000 households who were previously protected from having to make a contribution towards Council Tax will receive a £125 credit. This will benefit those working age, as pensioners are automatically protected.

Households with children and pensioners can apply for support through the application-based support mechanism, as can any working age household. Data from the last round of HSF shows that those who applied for support, as part of the mandatory application-based support, around 50% were household with children. A smaller proportion were pensioner households, but this could be due to a wider range of support and protections being available to pensioners generally.

Those being relocated out of temporary accommodation are mainly of working age, many of whom include children as part of their household. Data from the last round of HSF shows that the vast majority of households benefiting from HSF allocation under this workstream were families with children.

In 2023/24, for the workstreams that are identical to 2024/25, the number of households receiving support are in the table below. This represents the application-based cohort and the cohort in temporary accommodation only:

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| Children | 1876 |
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| Disabled | 1437 |
| Other | 1462 |
| TOTAL | 6093 |

The allocation for the workstreams that are identical is the same proportion-wise for 2024/25 and therefore the expected number of households to benefit from the HSF5 will be:

| | Total number of households |
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| HOUSEHOLD | |
| Children | 938 |
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| Disabled | 719 |
| Other | 731 |

| | |
|--------------|------|
| TOTAL | 3047 |
|--------------|------|

Targeted support – CTS claimants

This proposal will positively impact those with disabilities where the household is in receipt of Council Tax Support. Around 11,000 households with disabilities and / or caring responsibilities will benefit from a direct credit to their council tax of £125.

The application is available on-line, where residents can complete a fillable PDF and submit their supporting documents online. The application caters for a friend, family member or other representative to complete the form on behalf of the applicant. Paper applications are available to those unable to complete or submit the form online. A designated mailbox has been set up for any queries or assistance required in relation to the application process.

Mitigating actions to be taken

No vouchers will be issued. All payments will be made through a third-party provider or by bank transfer. This will help those that are housebound or otherwise unable to redeem vouchers at the Post Office. Bank account details are checked against bank statements, which will be requested as part of the application process. Where residents are overdrawn, we can use alternative payment methods, such as paypoint, to ensure the funds reached the recipient.

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| |
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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.

This proposal will benefit all eligible households.

The application-based process of applying for financial assistance is open to all eligible households, 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

No vouchers will be issued. All payments will be made through a third-party provider or by bank transfer. This will help those that are housebound or otherwise unable to redeem vouchers at the Post Office. Bank account details are checked against bank statements, which will be requested as part of the application process. Where residents are overdrawn, we can use alternative payment methods, such as paypoint, to ensure the funds reached the recipient.

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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.

This proposal will benefit all household types, including those in marriage and civil partnerships. Same sex or mixed sex claims are awarded Council Tax Support in the same way. The proposals do not have a differential impact on people in a marriage or civil partnership.

The application-based process of applying for financial assistance is open to all households in need, regardless of whether they are married or in a civil partnership.

Mitigating actions to be taken

No vouchers will be issued. All payments will be made through a third-party provider or by bank transfer. This will help those that are housebound or otherwise unable to redeem vouchers at the Post Office. Bank account details are checked against bank statements, which will be requested as part of the application process. Where residents are overdrawn, we can use alternative payment methods, such as paypoint, to ensure the funds reached the recipient.

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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.

This proposal will benefit all eligible households, including those who are pregnant or have given birth in the last 26 weeks. Some of those targeted in receipt of Council Tax Support will be pregnant and claiming maternity allowance / maternity pay. This group is not differentially impacted by the proposals.

The application-based process of applying for financial assistance is open to all households in need, this includes those expecting a baby.

Mitigating actions to be taken

No vouchers will be issued. All payments will be made through a third-party provider or by bank transfer. This will help those that are housebound or otherwise unable to redeem vouchers at the Post Office. Bank account details are checked against bank statements, which will be requested as part of the application process. Where residents are overdrawn, we can use alternative payment methods, such as paypoint, to ensure the funds reached the recipient.

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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.

2021 Census data reveals that Enfield has the largest numbers of Greek, Greek Cypriot, Kurdish, Turkish and Turkish Cypriot residents of all local authority areas in England and Wales¹. Ethnicity breakdown in the borough is as follows:

| Ethnicity | Percentage of borough total (%) |
|--------------------------|---------------------------------|
| White British | 31.3 |
| White Irish | 1.9 |
| Gypsy or Irish Traveller | 0.1 |
| Greek | 1.1 |
| Greek Cypriot | 3.0 |
| Turkish | 5.3 |
| Turkish Cypriot | 2.3 |
| Kurdish | 1.7 |
| Bulgarian | 1.6 |

¹ Enfield Update Census Special 3 – December 2022

| | |
|--|-----|
| Polish | 1.5 |
| Romanian | 1.4 |
| Albanian | 1.0 |
| Roma/Romany Gypsy | 0.3 |
| White Other | 7.5 |
| Mixed: White/Black Caribbean | 1.6 |
| Mixed: White/Other Black (incl. Black British) | 0.1 |
| Mixed: White/Asian | 1.2 |
| Mixed: Black/Asian | 0.1 |
| Mixed: White/Black African | 0.9 |
| Mixed: Other | 2.0 |
| Indian | 3.6 |
| Pakistani | 1.1 |
| Bangladeshi | 2.5 |
| Chinese | 0.8 |
| Other Asian | 3.5 |
| Somali | 2.5 |
| Ghanaian | 1.5 |
| Nigerian | 1.5 |
| Other Black African | 5.3 |
| Black Caribbean | 5.1 |
| Other Black | 0.8 |
| Other Ethnic Group: Arab | 0.8 |
| Other Ethnic Group | 3.1 |

Enfield has a diverse population, and a large proportion (35%) of people who were born overseas. Enfield has the highest numbers nationally of Turkish, Greek, Bulgarian and Albanian speakers (where this is their main or only language). According to the 2021 Census, although 82% of Enfield households have at least one resident adult who speaks English as their main language, 13% of households contain no members with English as a main language.

We are operating in one of the wards facing the greatest inequalities in the borough, and one of the highest numbers of people from Global Majority backgrounds. The Welfare Advice and Debt Support team, who administer the applications for support through the Household Support Fund, can offer assistance and advice in different languages. Information on our website about the Household Support Fund will be available in many languages.

All residents in receipt Council Tax Support, regardless of their race will be able to make a claim for additional support for an assessment of need.

Mitigating actions to be taken

In the last round of HSF, we worked closely with our comms team to promote the scheme. The scheme was promoted through:

- Enfield Council website updates
- Adverts in Council newsletter
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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.

All residents in receipt Council Tax Support, regardless of their religion and belief will be able to make a claim for additional support for an assessment of need.

Mitigating actions to be taken

In the last round of HSF, we worked closely with our comms team to promote the scheme. The scheme was promoted through:

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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.

This proposal will benefit all eligible households, regardless of sex. All residents in receipt Council Tax Support, regardless of their sex will be able to make a claim for additional support for an assessment of need. Those targeted in receipt of Council Tax Support can be male or female and are not differentially impacted. They will be credited with £125 based on financial hardship linked to disability and / or caring responsibilities irrespective of their sex.

Mitigating actions to be taken

In the last round of HSF, we worked closely with our comms team to promote the scheme. The scheme was promoted through:

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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.

This proposal will benefit all eligible households, regardless of sexual orientation. We would not be aware of someone's sexual orientation when targeting support or when assessing applications for support. Eligibility for targeted support is based on if a household is in receipt of Council Tax Support.

Mitigating actions to be taken

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Care Experience

This refers to a person who has spent 13 weeks or more in local authority care.

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

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

This proposal will benefit all household types, including care leavers. A referral process has been established to support care leavers to be referred by the Leaving Care Team to the Financial Assessment Service. The Leaving Care team will receive communications and will be made aware of when the application process opens to care leavers. Care leavers are eligible to apply for a Council Tax hardship payment funded by the HSF5, and they can also apply for financial assistance and welfare advice through the application process.

Mitigating actions to be taken

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Socio-economic deprivation

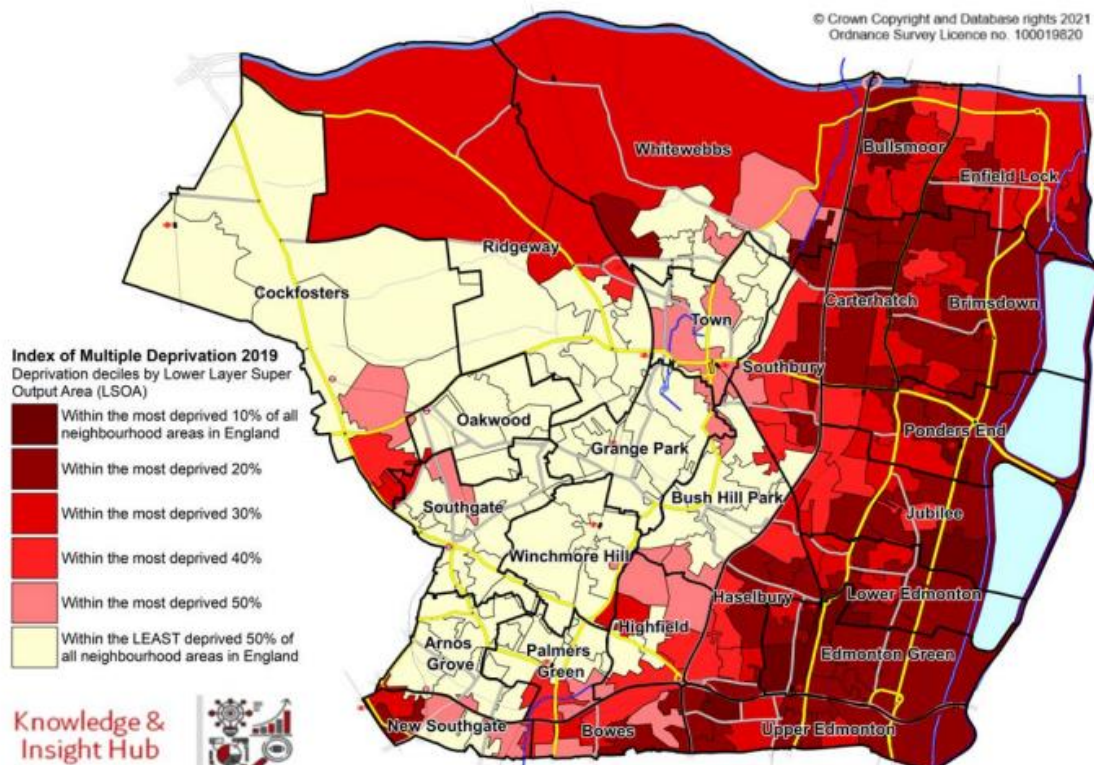
This refers to people who are disadvantaged due to socio-economic factors e.g. unemployment, low income, low academic qualifications or living in a deprived area, social housing, or unstable housing.

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.

Enfield is the 74th most deprived local authority in England. In recent years, it has become relatively more deprived when compared with other London boroughs: in 2015, Enfield was the 12th most deprived borough, while in 2019 it was the 9th². Enfield scores particularly low regarding barriers to housing and services, income deprivation, crime, and living environment.

However, deprivation in Enfield is not equally distributed, but is concentrated in the southeast and eastern corridor of the borough, as shown by the map below:



This proposal focuses on supporting those on a low income who facing exceptional financial hardship with emergency payments and advice. This is expected to have a positive impact this group. Targeting those the most need and the Welfare Advice and Debt Support Team providing emergency support with food, fuel, wider essentials, housing costs and help with resettlement will serve to improve the outlook for those in socio-economic deprivation. Short term and long-term benefit advice and income maximisation is offered alongside providing emergency support, and this includes helping residents apply for the correct benefits.

² Enfield Borough Profile, 2022.

Mitigating actions to be taken.

No vouchers will be issued. All payments will be made through a third-party provider or by bank transfer. This will help those that are housebound or otherwise unable to redeem vouchers at the Post Office. Bank account details are checked against bank statements, which will be requested as part of the application process. Where residents are overdrawn, we can use alternative payment methods, such as paypoint, to ensure the funds reached the recipient.

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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?

For all workstreams, the type of household is recorded, and this will capture whether the recipient is a pensioner, a disabled person, a person with caring responsibilities, of working age or family unit with children. Monthly reports with these details are submitted, recorded, and reviewed. These details are subsequently included on two MI reports to the DWP.

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 |
|---|--|------------------------------|-------------------|-------|---|
| No access to bank account / account overdrawn | Alternative ways to pay: Paypoint | Marc Pruis / Josephine Mytil | Complete | | Paypoint account prefunded |
| No access to online form | Paper form available | Marc Pruis / Josephine Mytil | Complete | | Paper form already available |
| Unable to complete the form | Representative can complete the form on behalf of customer, or Welfare Advice and Debt Support team can assist | Josephine Mytil | Complete | | Application form caters for representative to complete the form. Designated mailbox for WADS team already set up |