

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	Mutual Exchange Policy
Team/ Department	Housing, Regeneration and Development
Executive Director	Joanne Drew,
Cabinet Member	Cllr Ayten Guzel - Cabinet Member for Housing
Author(s) name(s) and contact details	Jessie Hodges jessie.hodges@enfield.gov.uk
Committee name and date of decision	
Date of EqlA completion	

Date the EqlA was reviewed by the Corporate Strategy Service	
Name of Head of Service responsible for implementing the EqlA actions (if any)	
Name of Director who has approved the EqlA	Joanne Drew, Strategic Director of Housing and Regeneration

The completed EqlA 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 EqlA 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?

This policy details Enfield Council's approach to handling and promoting mutual exchange, a statutory right of social housing tenants under the 1985 Housing Act. It outlines the criteria for approving or refusing mutual exchange applications and the service standards tenants are entitled to. We have reviewed our existing Mutual Exchange Policy to develop this draft which responds to 2023 guidance issued by the Regulator for Social Housing.

Between 2021-2022, 541 mutual exchanges took place in London boroughs. 31 of these were in Enfield.¹

Between 1st April 2023 – 1st December 2023, there were 35 applications for mutual exchange in Enfield. 13 mutual exchanges have been completed in the same period.

The 2021 Census showed that 22% of people living in social rented accommodation in Enfield were living in properties with fewer bedrooms than required compared with 19% of the same group in London.² 25% of people living in social rented accommodation in both Enfield and London were living in properties with more bedrooms than required. A household's bedroom requirement was determined using the Bedroom Standard.³ Mutual Exchange addresses this over and under occupancy issue by enabling tenants to find a suitably sized home and thereby ensuring properties are best used according to need. This maximisation of the use of existing council stock supports homelessness reduction measures.

In a 2014 study on the implementation of mutual exchange services undertaken by the Department for Communities and Local Government, tenants who had undergone the process reported improvements in mental health, closer proximity to services and cost saving as a result of being closer to family who could provide childcare.⁴ The top three reasons for participating in mutual exchange from the 56

¹ [Dwellings let through mutual exchange](#), LGA Inform.

² [Overcrowding and under-occupancy by household characteristics, England and Wales: Census 2021 - Office for National Statistics \(ons.gov.uk\)](#)

³Used by the ONS and Enfield Council Allocation scheme for defining bedroom needs <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/adminbasedlevelsofovercrowdingusingthebedroomstandardandvaluationofficeagencyofbedroomsfeasibilityresearchenglandandwales/january2021>

⁴[Promoting mobility through mutual exchange Learning lessons from the housing mobility demonstration projects](#)

tenants interviewed for the study were overcrowding, wishing to be nearer to family/friends/services, and responding to welfare reform.

Mutual exchange offers those affected by the Bedroom Tax a means to downsize and therefore save costs.

This policy explains the responsibilities of Enfield Council staff and provides guidance for tenants undergoing mutual exchange. It applies to secure tenants, though in certain circumstances, the Council may change a non-secure tenancy to a secure tenancy, to facilitate a mutual exchange.

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)?

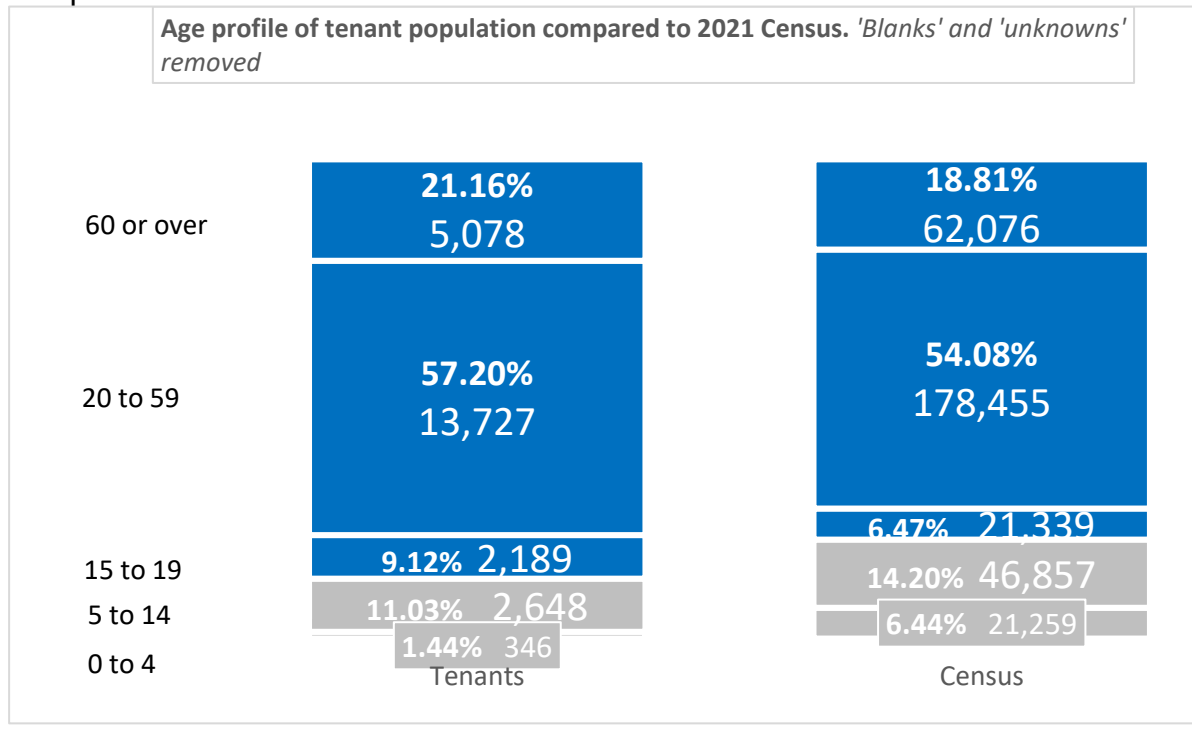
Please provide evidence to explain why this group may be particularly affected.

The Mutual Exchange Policy is aimed at supporting all council housing residents wishing to participate in a mutual exchange regardless of age.

According to the 2021 Census, Enfield’s population in March 2021 was estimated to be 330,000 (rounded to the nearest hundred).⁵ It is estimated to have increased by around 17,500 (or 5.6%) between 2011 and 2021.

- Enfield has higher proportions of residents aged under 20 than regional and national averages.
- People aged 65 and over make up 13% of our population and this is forecasted to increase to 16% by 2030 – from 45,148 to 57,647⁶.

The chart below shows a breakdown of the ages of Enfield Council tenants compared to the census:

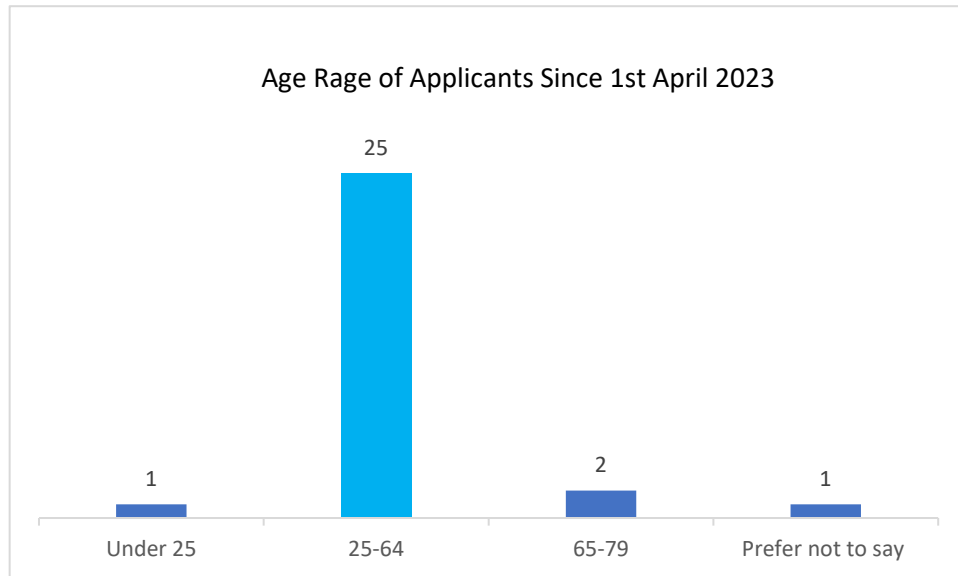


⁵ ONS, [Population and household estimates, England and Wales: Census 2021](#)

⁶ <https://data.london.gov.uk/dataset/projections>

- The majority of council housing tenants are aged 35 or over

The chart below shows the age range of tenants who have applied for a mutual exchange from 1st April – 1st December 2023 (blanks removed):



NB: The age bracket breakdown differs from the tenant profile. It is likely the 65-79 bracket for applicants (6%) are underrepresented compared to the tenant profile. The table below shows the occupancy rating of all household reference persons in social rented housing in England aged 16 and over as recorded in the 2011 census⁷:

Age of household reference persons (HRPs) aged 16 and over	Occupancy rating -1 or less % of the age group	Occupancy rating 0 % of the age group	Occupancy rating 1+ % of the age group	Occupancy rating +2 % of the age group
16 to 24 (212,398)	11%	63%	21%	4%
25 to 49 (1,698,572)	14%	56%	24%	5%
50 to 64 (907,665)	6%	45%	33%	16%
65 and over (1,084,460)	2%	50%	31%	16%

An occupancy rating of -1 or less denotes a person living in an overcrowded property with at least 1 bedroom less than is needed as determined by the bedroom standard. An occupancy rating of 1+ means a person lives in an underoccupied property with 1 or more bedrooms than is needed.

People aged 50 and over experience the highest proportion of underoccupancy and the lowest proportion of overcrowding.

⁷ [Census, 2011](#)

People aged 25 – 49 experience the highest proportion of overcrowding.

Though the Mutual Exchange Policy will support all council tenants regardless of age, from an occupancy perspective, these groups could be more likely to use the service if looking to swap their home for a property better sized for their needs.

Mitigating actions to be taken

Our policy is expected to have a positive impact on all residents regardless of age.

We are monitoring the protected characteristics of those who apply for, are granted and denied mutual exchange. This data will help us understand how protected groups use and interact with the mutual exchange service, how to best support them and address any negative impacts should they arise.

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.

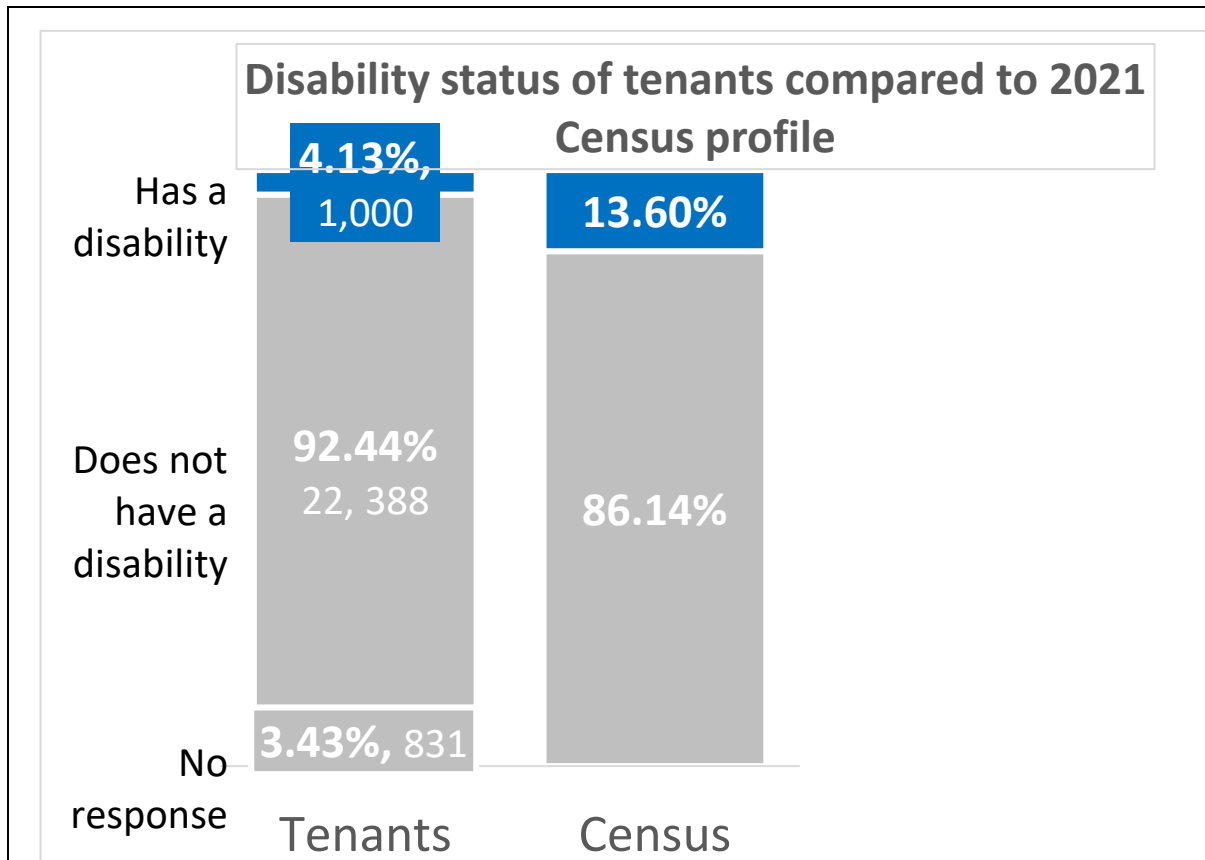
Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people with disabilities?

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

Just under 48,000 Enfield residents (all ages) had a disability as at the 2011 Census. Later estimates from the 2021 Census indicate that, among working-age people (aged 16-64 years), 50,300 had some level of disability – around 23% of the working-age population

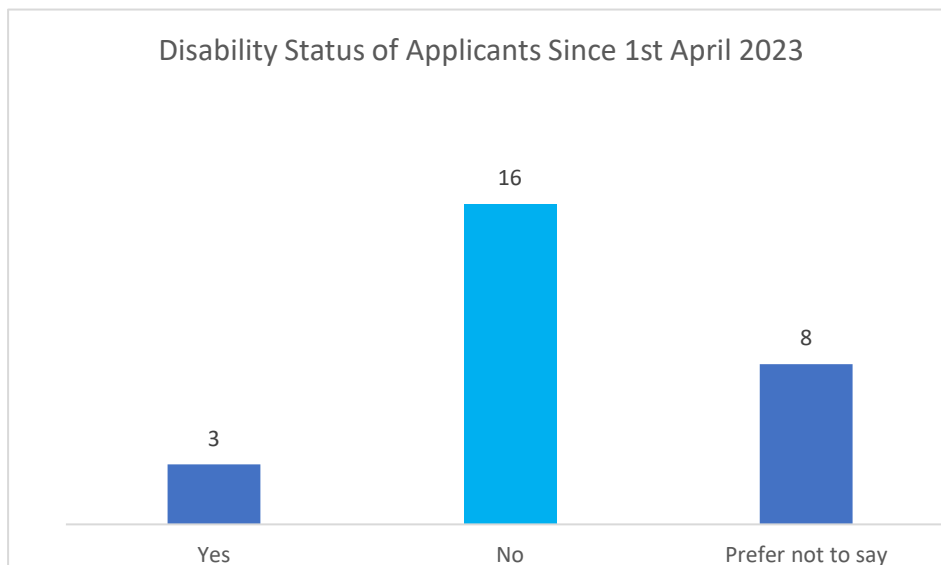
If correct, this represents an increase of nearly 100% on the Census estimates for this age group in 2011.

The chart below shows a breakdown of the disability statuses of Enfield Council tenant profile compared to the 2021 Census:



NB: If most tenants inform the Council of their disability status when applying for tenancy, it is probable that the number of tenants currently living with a disability is higher than what is recorded.

The chart below shows the disability status of tenants who have applied for a mutual exchange in Enfield from 1st April – 1st December 2023 (blanks removed):



Between April 2022 and March 2023, 210 accessible adaptations on council properties were completed out of 256 referrals (82% completion rate).

In accordance with the Housing Regulation Act 1985, the Mutual Exchange Policy prohibits a mutual exchange which would result in a tenant occupying an adapted property if they do not require those adaptations. The policy also clarifies that tenants with disabilities can exchange an adapted property for a non-adapted property if Occupational Health confirms the move will not have significant negative implications and that the adapted property is occupied by a person with suitable needs. This supports tenants with disabilities by ensuring housing stock best supports access needs and that there enough adapted properties for those who need them.

Tenants must accept properties in their current state. Therefore, tenants with disabilities cannot exchange an adapted property for a non-adapted one if they require the Council to modify the property they wish to move into. While such requests are unlikely, this could negatively impact tenants with disabilities by reducing the pool of properties available for them to exchange with compared to non-disabled tenants.

Mitigating actions to be taken

The policy signposts the relevant legislation which causes potential differential treatment of disabled tenants. Ensuring adapted properties are occupied by those with access needs makes sure that there are enough adapted properties for tenants with disabilities.

To address the potential issue of tenants with disabilities struggling to find suitably adapted properties to exchange with, the Mutual Exchange Officer will support those with access needs to navigate the mutual exchange platform.

We are monitoring the protected characteristics of those who apply for, are granted and denied mutual exchange. This data will help us understand how protected groups use and interact with the mutual exchange service, how to best support them and address any negative impacts should they arise.

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 Census 2021 asked a voluntary question on gender identity to respondents aged 16 years or over - “Is the gender you identify with the same as your sex registered at birth?” and had of the option of selecting “Yes”, or “No” and adding their gender identity.⁸

91.42% of Enfield residents aged 16 years and over responded to the question. The table below shows this data:

Gender identity	Enfield population aged 16 years and over	Percentage of residents aged 16 years and over
Gender identity the same as their sex registered at birth	232,329	90.34%
Gender identity different from their sex registered at birth but no specific identity given	1,652	0.64%
Trans woman	518	0.2%
Trans man	486	0.19%
Non-binary	74	0.03%
Another gender identity	58	0.02%
Did not answer	22,065	8.58%

Reasons for mutual exchange pertaining to this protected characteristic in future may include proximity to gender reassignment clinics, but no data currently indicates this is the case. The implementation of our policy is expected to have a positive impact on all residents regardless of gender identity. The policy will support all residents according to individual need

Mitigating actions to be taken

Our policy is expected to have a positive impact on all residents regardless of gender identity.

⁸ ONS, [Gender identity, England and Wales: Census 2021](#)

We are monitoring the protected characteristics of those who apply for, are granted and denied mutual exchange. This data will help us understand how protected groups use and interact with the mutual exchange service, how to best support them and address any negative impacts should they arise.

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.

The implementation of the Mutual Exchange Policy is expected to have a positive impact on all residents regardless of marital status. The policy will support all residents according to individual need.

Mitigating actions to be taken

We are monitoring the protected characteristics of those who apply for, are granted and denied mutual exchange. This data will help us understand how protected groups use and interact with the mutual exchange service, how to best support them and address any negative impacts should they arise.

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 implementation of the Mutual Exchange Policy is expected to have a positive impact on all residents regardless of pregnancy and maternity status. The policy will support all residents according to individual need.

Mitigating actions to be taken

We are monitoring the protected characteristics of those who apply for, are granted and denied mutual exchange. This data will help us understand how protected groups use and interact with the mutual exchange service, how to best support them and address any negative impacts should they arise.

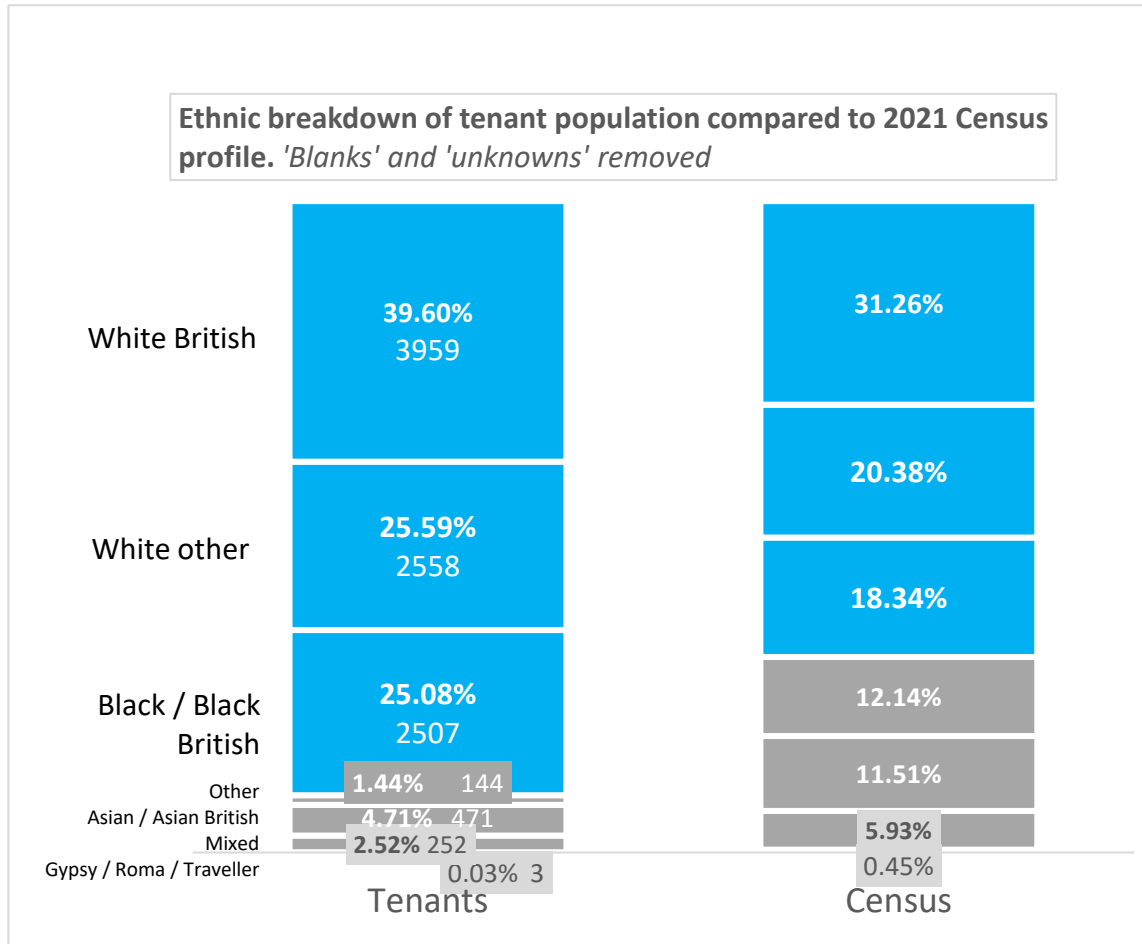
Race

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.

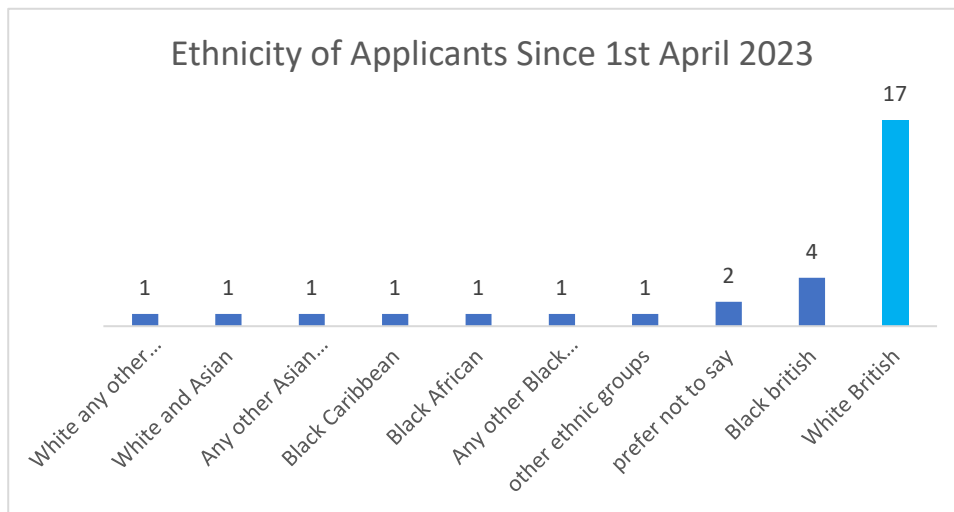
The Mutual Exchange Policy aims at supporting all council tenants wishing to participate in mutual exchange regardless of race or ethnicity.⁹ The chart below shows a breakdown by ethnicity of Enfield Council tenants compared to the 2021 Census:



The tenant profile shows an over representation of White British, White other and Black / Black British compared to the Census.

The chart below shows the ethnicity of all mutual exchange applicants in Enfield from 1st April – 1st December 2023 (blanks removed):

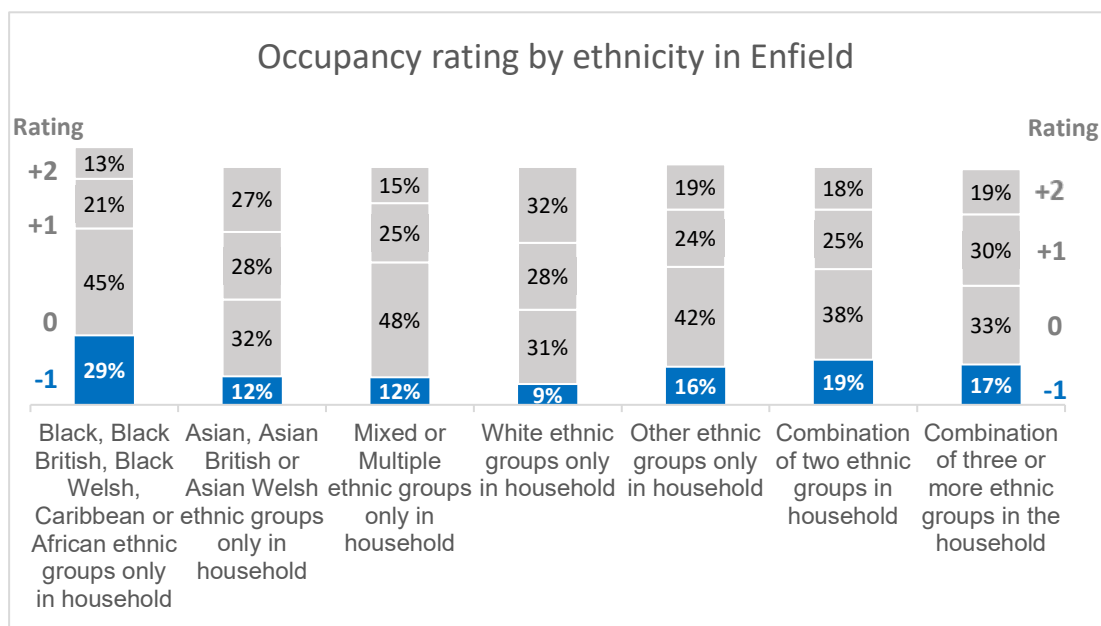
⁹ The council profile uses 'ethnicity' rather than 'race' to account for Gypsy/Roma/Traveller



Combining all Black applicants as the tenant profile does gives a total of 7 (23%), which is just below the proportion of Black/Black British residents in the tenant profile.

56% of applicants are White British, which is an overrepresentation when compared to the tenant profile.

The chart below shows the occupancy rating by ethnicity in Enfield as recorded in the 2021 census¹⁰:



NB: This census data refers to all tenures and does not account for Gypsy/Roma/ Traveller as Enfield Council's tenant profile does.

An occupancy rating of -1 or less denotes a person living in an overcrowded property with at least 1 bedroom less than is needed as determined by the

¹⁰ Census, 2021

bedroom standard. An occupancy rating of 1+ means a person lives in an underoccupied property with 1 or more bedrooms than is needed.

Black / Black British occupant only households in Enfield experience the highest proportion of overcrowding compared to other ethnic groups, **9%** higher than the London-wide rate. White occupant only households have the highest proportion of underoccupancy.

In terms of occupancy rating, Black / Black British only and White only households are most likely to benefit from mutual exchange by finding a suitably sized property. As these ethnic groups are also overrepresented in the tenant profile, the mutual exchange policy is particularly likely to be relevant to them.

Mitigating actions to be taken

Our policy is expected to have a positive impact on all residents regardless of race.

We are monitoring the protected characteristics of those who apply for, are granted and denied mutual exchange. This data will help us understand how protected groups use and interact with the mutual exchange service, how to best support them and address any negative impacts should they arise.

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.

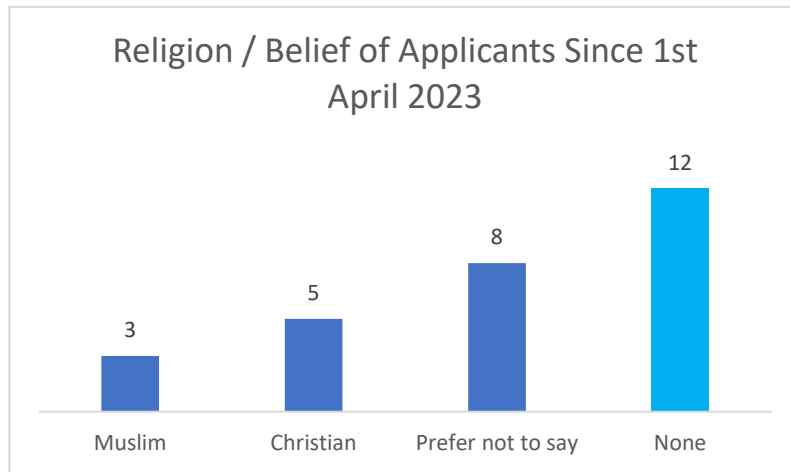
The table below shows Enfield's religious profile¹¹. This is broadly reflective of the religious profile of council housing tenants.

Religion	Proportion of Enfield population
-----------------	---

¹¹ Census, 2021

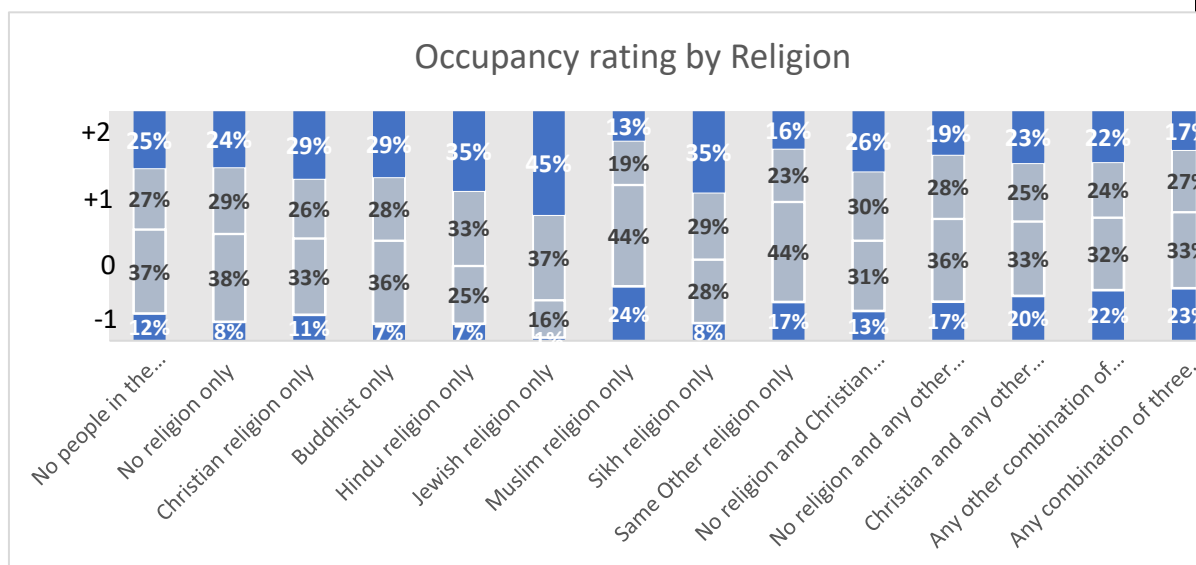
Christian	46.4%
Buddhist	0.5%
Hindu	3.1%
Jewish	1.1%
Muslim	18.6%
Sikh	0.4%
Other religion	3.1%
No religion	19.8%
Religion not stated	7.0%

The chart below shows the religion / belief of mutual exchange applicants in Enfield from 1st April – 1st December 2023 (blanks removed):



People with no religion are overrepresented in mutual exchange applications.

The chart below shows occupancy rating by religion in Enfield (blanks removed)¹²:



¹² Census 2021

NB: This census data accounts for people of all tenures.
An occupancy rating of -1 or less denotes a person living in an overcrowded property with at least 1 bedroom less than is needed as determined by the bedroom standard. An occupancy rating of 1+ means a person lives in an underoccupied property with 1 or more bedrooms than is needed.

Muslim only households face the highest proportion of overcrowding.

Mitigating actions to be taken

Our policy is expected to have a positive impact on council tenants regardless of religion.

We are monitoring the protected characteristics of those who apply for, are granted and denied mutual exchange. This data will help us understand how protected groups use and interact with the mutual exchange service, how to best support them and address any negative impacts should they arise.

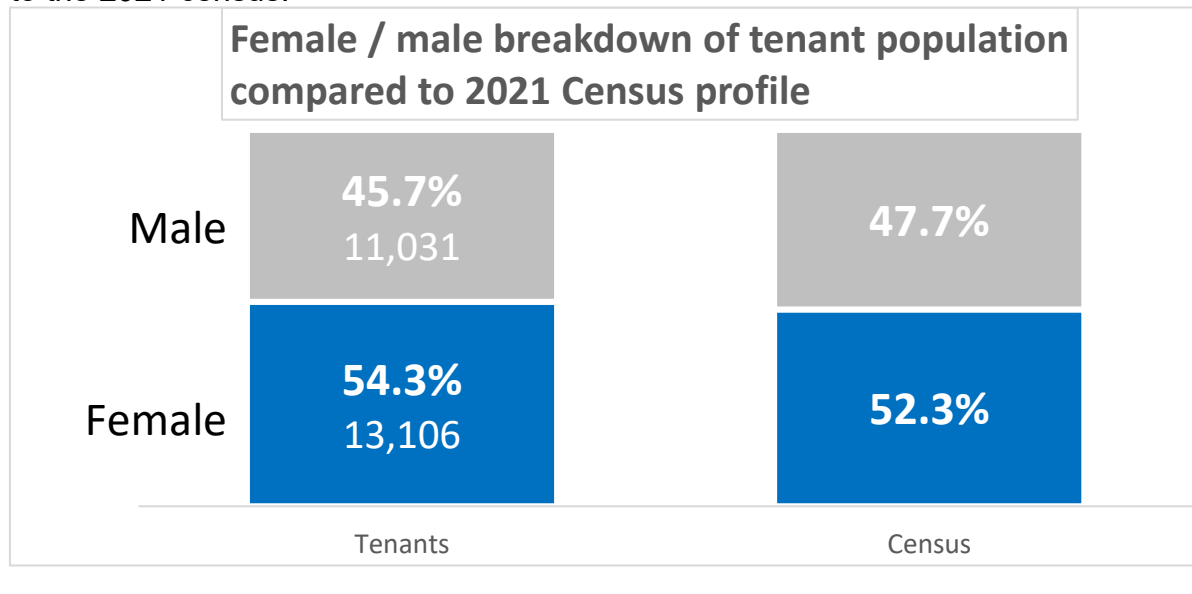
Sex

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?

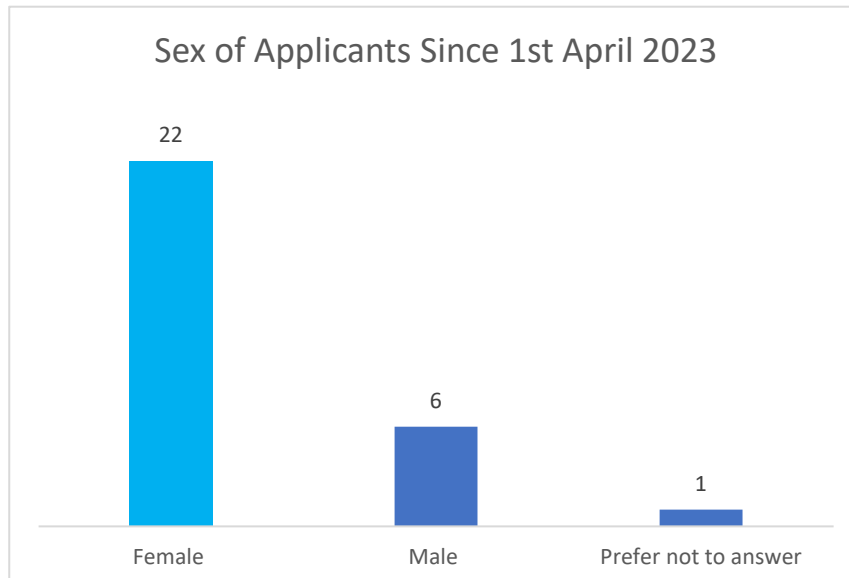
Please provide evidence to explain why this group may be particularly affected.

The chart below shows the breakdown of Enfield Council tenants by sex compared to the 2021 census:



Female tenants are slightly overrepresented in the tenant profile.

The chart below shows a breakdown of mutual exchange applicants by sex from 1st April – 1st December 2023 (blanks removed):



Female tenants (75% of applicants) are largely overrepresented in mutual exchange applicants.

Our policy is expected to have a positive impact on tenants regardless of sex.

Mitigating actions to be taken

Our policy is expected to have a positive impact on tenants regardless of sex. We are monitoring the protected characteristics of those who apply for, are granted and denied mutual exchange. This data will help us understand how protected groups use and interact with the mutual exchange service, how to best support them and address any negative impacts should they arise.

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 Census 2021 included a voluntary question on sexual orientation for all respondents aged 16 and over.¹³ The response options were:

- Straight or heterosexual
- Gay or lesbian
- Bisexual
- Other sexual orientation (respondents were then asked to write in the sexual orientation with which they identified)

In Enfield, 90.3% of residents aged 16 and over responded to this question.

Sexual orientation	Enfield population aged 16 years and over	Percentage of Enfield residents aged 16 years and over
Straight or heterosexual	226,705	88.15%
Gay or lesbian	2,342	0.91%
Bisexual	2,073	0.81%
Pansexual	944	0.37%
Asexual	74	0.03%
Queer	35	0.01%
All other sexual orientations	151	0.06%
Not answered	24,858	9.67%

Our tenant profile based on 6,229 tenants:

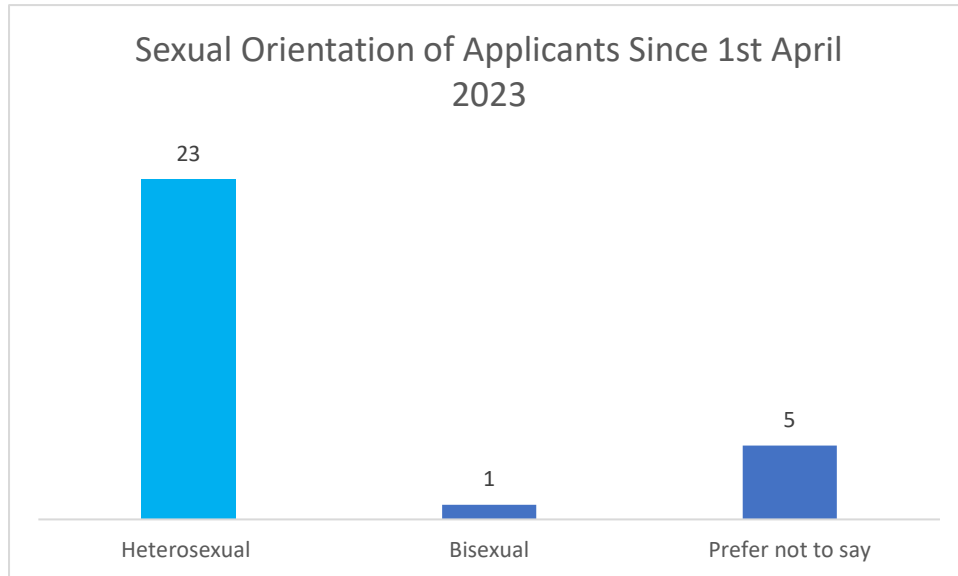
Sexual orientation	Percentage of council housing tenants
Straight or heterosexual	89.1%
Gay or lesbian	0.4%
Bisexual	0.3%
Other	0.1%
Prefer not to say	10.1%

Of those who answered the question in the 2021 census, the group with the highest proportion of overcrowding are those living in mixed sexual orientation households (LGB+). Households where all members identified as Straight or heterosexual have the highest proportion of underoccupancy.¹⁴

¹³ ONS, [Sexual orientation, England and Wales: Census 2021](#)

¹⁴ Census, 2021

The chart below shows the breakdown of mutual exchange applicants from 1st April -1st December 2023 (blanks removed):



The implementation of our policy is expected to have a positive impact on all residents regardless of sexual orientation. The policy will support all residents according to individual need.

Mitigating actions to be taken

The implementation of our policy is expected to have a positive impact on all residents regardless of sexual orientation.

We are monitoring the protected characteristics of those who apply for, are granted and denied mutual exchange. This data will help us understand how protected groups use and interact with the mutual exchange service, how to best support them and address any negative impacts should they arise.

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.

The implementation of the Mutual Exchange Policy is expected to have a positive impact on all residents regardless of care experience. The policy will support all residents according to individual need.

Mitigating actions to be taken

We are monitoring the protected characteristics of those who apply for, are granted and denied mutual exchange. This data will help us understand how protected groups use and interact with the mutual exchange service, how to best support them and address any negative impacts should they arise.

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 of 317 local authorities in England according to the Multiple Indices of Deprivation 2019, putting it amongst the 25% most deprived districts. Although Enfield's average deprivation score has not worsened since 2015, levels of deprivation relative to other London boroughs has worsened. In 2015, Enfield was the 12th most deprived London borough; in 2019 it was the 9th most deprived.¹⁵

According to the 2021 census, 10% of households in Enfield live in local authority owned properties, and 7% live in registered provider homes.¹⁶

As of August 2023, **55.04%** of housing benefit recipients in Enfield live in social rented accommodation.¹⁷ The Bedroom Tax, which charges a housing benefit recipient living in a social rented property deemed too large for their needs as outlined by the bedroom standard, could therefore be or become relevant to more than half of housing benefit recipients in Enfield.

¹⁵ [English indices of deprivation 2019 - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

¹⁶ [Housing, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

¹⁷ [LGA inform proportion of housing benefit recipients in Social Rented Sector](#)

A 2014 Joseph Rowntree Foundation report found that all of the 16 housing associations surveyed viewed mutual exchange as a means to address welfare reform.¹⁸ All housing associations were attempting to expand their mutual exchange service to partner with other social landlords to achieve this end.

The implementation of our policy is expected to positively affect council housing tenants looking to participate in mutual exchange regardless of socio-economic status. By facilitating those affected by The Bedroom Tax with a means to downsize, it could have a particularly positive impact on those who are currently disadvantaged by welfare reform. The policy will support all council tenants according to individual need.

Mitigating actions to be taken.

The implementation of our policy is expected to have a positive impact on all residents regardless of socio-economic status.

We are monitoring the protected characteristics of those who apply for, are granted and denied mutual exchange. This data will help us understand how protected groups use and interact with the mutual exchange service, how to best support them and address any negative impacts should they arise.

¹⁸ [JRF: The Impact of Welfare Reform on Social Landlords and Tenants](#)

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 policy will be monitored through the following performance indicators collected quarterly and annually:

- The number of households making a Mutual Exchange application.
- The number of households where mutual exchanges are approved or refused.
- The percentage of application decisions reached and communicated in writing to applicants within the statutory timescales of 42 calendar days.
- The protected characteristics of applicants and tenants involved in a Mutual Exchange.

The council housing service will review performance against our targets to inform service improvement.

Both applications and mutual exchange cases will be monitored by protected characteristics and any findings will be acted upon to ensure that we are delivering inclusive and non-discriminatory services.

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
Potential for disabled tenants requiring adapted properties to have fewer to swap with.	If this issue arises, Mutual exchange officer to provide additional support with navigating the platform.	Mutual Exchange Officer	To be completed as part of the 42 day window in response to any arising applications	None	