

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	Compensation 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 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)	
Name of Director who has approved the EqIA	Joanne Drew, Strategic Director of Housing and Regeneration

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?

This policy outlines Enfield Council's approach to providing council tenants and leaseholders with compensation. By law, tenants are able to claim compensation for particular service failures. Both the legislative framework and criteria for approving or refusing compensation are explained in the policy. We have reviewed our existing Compensation Policy to develop this draft which clarifies the circumstances in which we will offer compensation and payment rates for loss of amenities and rooms.

Between January 2023 – January 2024, 49 people were paid compensation by Enfield Council Housing.

Out of 10 cases submitted to the Ombudsman, between April 2022 – March 2023, 10 orders were made for compensation which amounted to £3,408.

This updated policy will provide clarity on the criteria for which compensation may and may not be given, how payments are calculated, and the amount claimants can expect to receive depending on the circumstances of their claim. The policy outlines the responsibilities of Enfield Council staff and provides guidance to tenants claiming compensation. It applies to both Enfield Council tenants and leaseholders.

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.

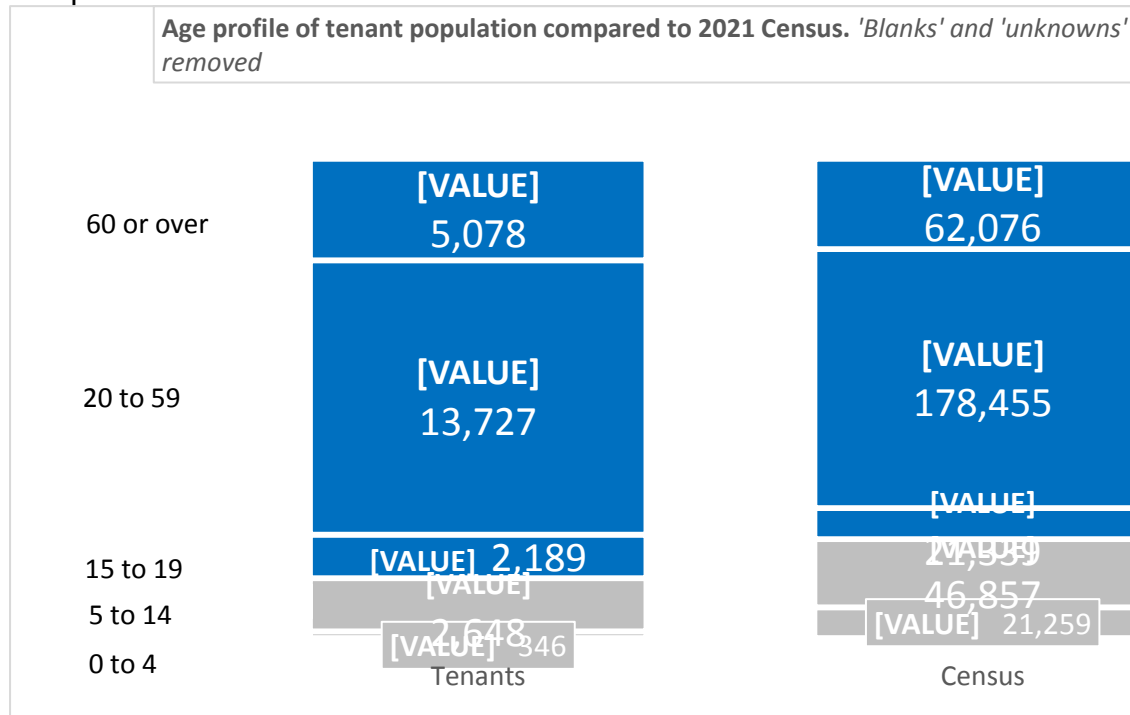
Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people of a specific age or age group (e.g. older or younger people)?

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

According to the 2021 Census, Enfield's population in March 2021 was estimated to be 330,000 (rounded to the nearest hundred).¹ 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 57,647².

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



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

¹ ONS, [Population and household estimates, England and Wales: Census 2021](#)

² <https://data.london.gov.uk/dataset/projections>

The policy specifies that the consideration of tenant vulnerabilities as part of assessing compensation claims includes taking age into account. This ensures that the service is tailored to individual need and that evaluations prevent negative impacts that would disproportionately affect a particular age bracket.

Mitigating actions to be taken

We will begin monitoring the protected characteristics of those who claim and receive compensation. This data will help us understand how protected groups use and interact with the compensation process, 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.

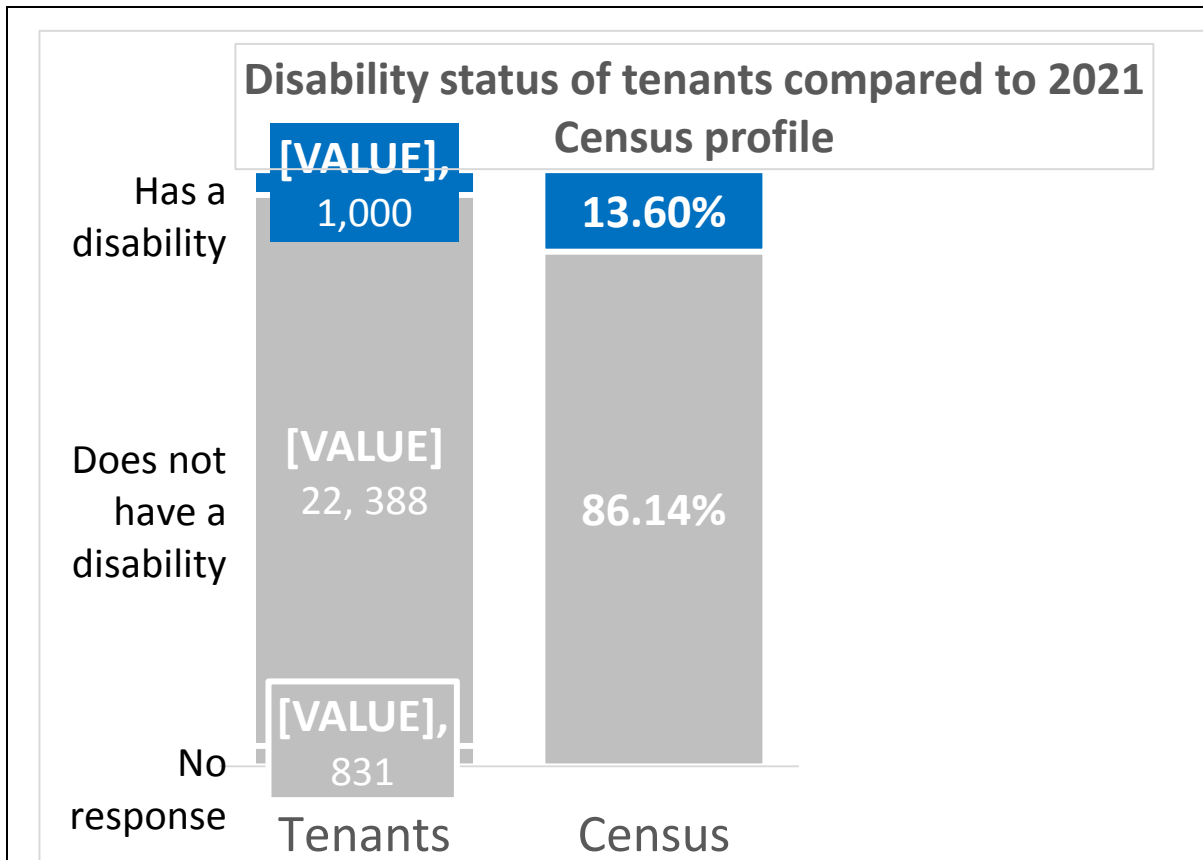
Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people with disabilities?

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 first applying for tenancy, it is likely that the number of tenants currently living with a disability is higher than what is recorded here. This is because some tenants may have developed a disability after first applying and informing the Council of their status.

The Corporate Complaints policy specifies that assistance can be given to those who are unable to navigate the online submissions platform. Communications concerning the outcome of a complaint, which includes compensation, will be tailored to individual need and circumstance, and will include telephone and face to face conversations should the tenant require them.

The Compensation policy also specifies that the consideration of tenant vulnerabilities as part of assessing compensation claims includes known disabilities. This aims to ensure that offers of compensation will address and rectify any negative impacts of service failure on disabled people.

Mitigating actions to be taken

We will begin monitoring the protected characteristics of those who claim and receive compensation. This data will help us understand how protected groups use and interact with the compensation process, how to best support them and address any negative impacts should they arise.

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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.

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.³

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%

The implementation of our policy is expected to have a positive impact on all

³ ONS, [Gender identity, England and Wales: Census 2021](#)

residents regardless of gender identity. The policy will support all residents according to individual need.

Mitigating actions to be taken

We will begin monitoring the protected characteristics of those who claim and receive compensation. This data will help us understand how protected groups use and interact with the compensation process, 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 Compensation 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 will begin monitoring the protected characteristics of those who claim and receive compensation. This data will help us understand how protected groups use and interact with the compensation process, 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 Compensation Policy is expected to have a positive impact on all residents regardless of pregnancy and maternity status.

The policy specifies that the vulnerability of the tenant will be considered for providing compensation based on any distress, frustration or anxiety caused by service failure. This accounts for pregnant people, ensuring that evaluations are tailored to individual need and that any stress which may have more of an adverse impact on someone who is pregnant compared to someone who is not is rightfully compensated.

Mitigating actions to be taken

We will begin monitoring the protected characteristics of those who claim and receive compensation. This data will help us understand how protected groups use and interact with the compensation process, how to best support them and address any negative impacts should they arise.

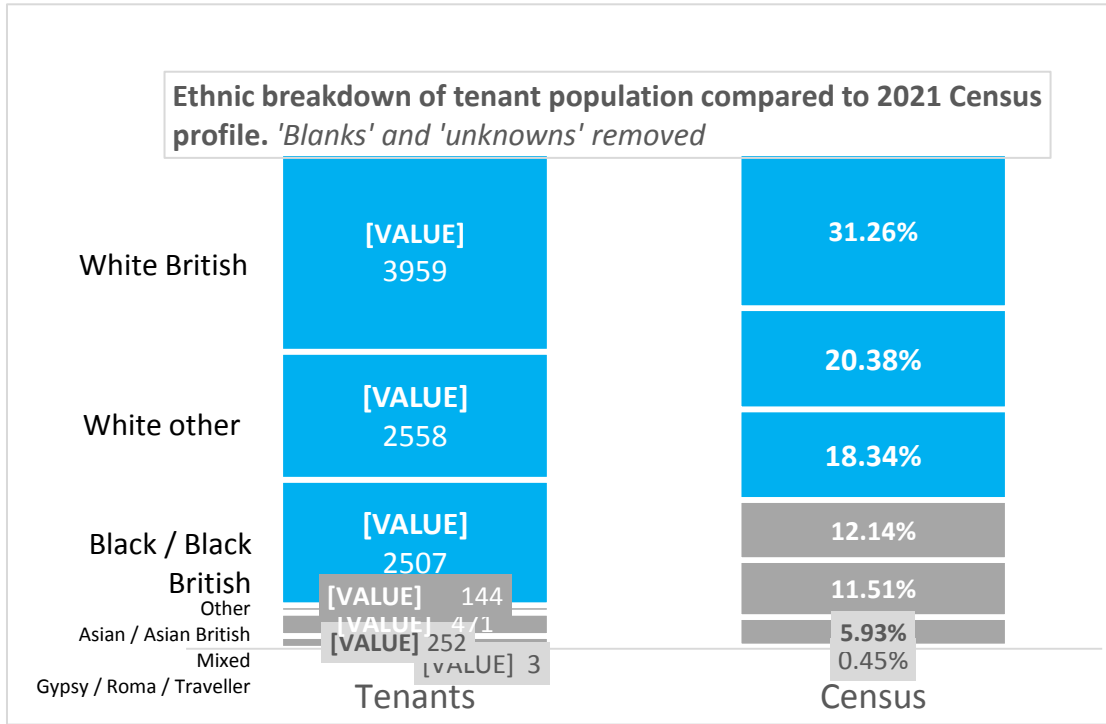
Race

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 Compensation policy aims to support all tenants and leaseholders claiming compensation regardless of race or ethnicity.⁴ The chart below shows the 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 implementation of the Compensation Policy is expected to have a positive impact on all residents regardless of race or ethnicity. The policy will support all residents according to individual need.

Mitigating actions to be taken

We will begin monitoring the protected characteristics of those who claim and receive compensation. This data will help us understand how protected groups use and interact with the compensation process, how to best support them and address any negative impacts should they arise.

⁴ The council profile uses 'ethnicity' rather than 'race' to account for Gypsy/Roma/Traveller

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 profile⁵. This is broadly reflective of the religious profile of council housing tenants.

Religion	Proportion of Enfield population
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 implementation of the Compensation Policy is expected to have a positive impact on all residents regardless of religion or belief. The policy will support all residents according to individual need.

Mitigating actions to be taken

We will begin monitoring the protected characteristics of those who claim and receive compensation. This data will help us understand how protected groups use and interact with the compensation process, how to best support them and address any negative impacts should they arise.

⁵ Census, 2021

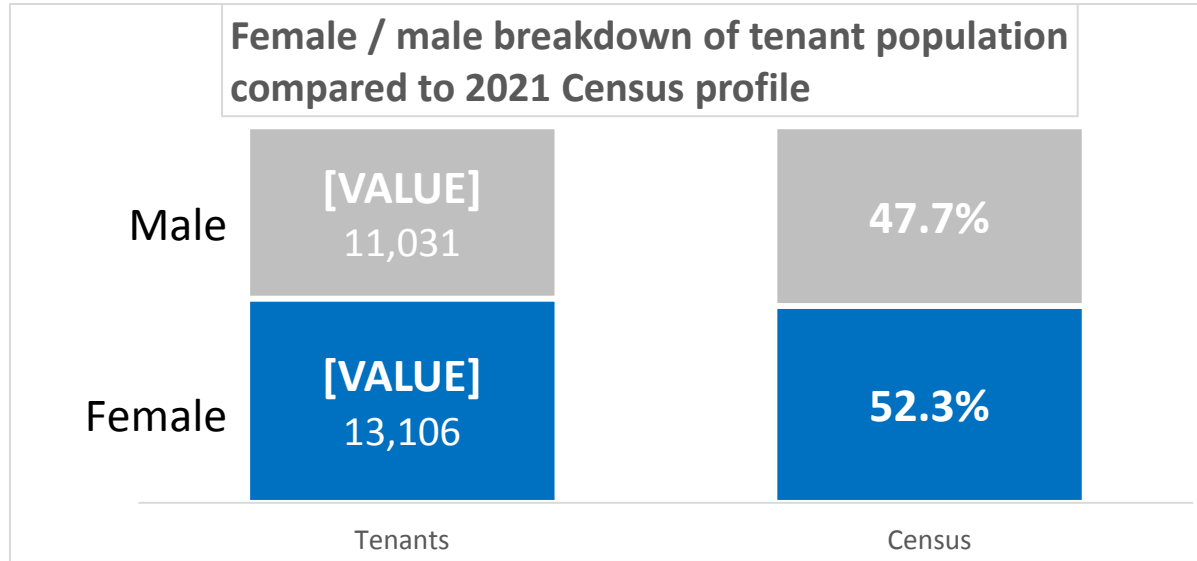
Sex

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 compared to the Census.

The implementation of the Compensation Policy is expected to have a positive impact on all residents regardless of sex. The policy will support all residents according to individual need.

Mitigating actions to be taken

We will begin monitoring the protected characteristics of those who claim and receive compensation. This data will help us understand how protected groups use and interact with the compensation process, 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.⁶ 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%

⁶ ONS, [Sexual orientation, England and Wales: Census 2021](#)

Bisexual	0.3%
Other	0.1%
Prefer not to say	10.1%

The implementation of the Compensation 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

We will begin monitoring the protected characteristics of those who claim and receive compensation. This data will help us understand how protected groups use and interact with the compensation process, 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.
care census

Between March 2022 – March 2023, 83,840 children in England were assessed as being in need. Of these, 78110 were adopted or placed in care. There were 82, 690 care leavers aged 17 – 21.⁷ The Census does not request information on care experience from every respondent, which makes recording the total number of people with care experience difficult.

The implementation of the Compensation 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

⁷ <https://explore-education-statistics.service.gov.uk/data-catalogue/children-looked-after-in-england-including-adoptions/2023>

We will begin monitoring the protected characteristics of those who claim and receive compensation. This data will help us understand how protected groups use and interact with the compensation process, 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.⁸

Enfield's median household income for 2023 was £44,000, the 8th lowest of the 33 London Boroughs and lower than the London average.

According to the 2021 census, 10% of households in Enfield live in local authority owned properties, and 7% live in registered provider homes.⁹

The implementation of the Compensation Policy is expected to have a positive impact on all residents regardless of socio-economic disadvantage. Although it specifies that Enfield Council will not compensate residents for lost earnings, which could potentially impact those on a lower income, assessments consider inconvenience suffered and individual circumstance. Offers of compensation would therefore account for significant impact on living costs due to service failure.

Mitigating actions to be taken.

⁸ [English indices of deprivation 2019 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019)

⁹ [Housing, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/housing)

We will begin monitoring the protected characteristics of those who claim and receive compensation. This data will help us understand how protected groups use and interact with the compensation process, how to best support them and address any negative impacts should they arise.

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 reviewed on an annual basis unless there is a change in legislation or regulation, in which case the policy will be reviewed within 3 months of the legislation coming into effect. Compensation payments will be monitored by the Head of Housing Management.

The council housing service will begin collecting data on the protected characteristics of those who claim and are paid compensation. Any findings will be acted upon to ensure that we are providing 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
No current data on those who claim or are paid compensation.	Begin collecting equalities data.	Customer Service & Feedback Manager	Three months after policy approval	None	Next review: February 2025