

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	Temporary accommodation charges
Team/ Department	Housing Advisory Service
Executive Director	Joanne Drew
Cabinet Member	Cllr Guzel
Author(s) name(s) and contact details	Richard Sorensen Richard.sorensen@enfield.gov.uk
Committee name and date of decision	Portfolio decision
Date of EqIA completion	24/06/2024

Date the EqIA was reviewed by the Corporate Strategy Service	
Name of Head of Service responsible for implementing the EqIA actions (if any)	Richard Sorensen
Name of Director who has approved the EqIA	Joanne Drew

The completed EqIA should be included as an appendix to relevant EMT/ Delegated Authority/ Cabinet/ Council reports regarding the service activity/ policy/ strategy/ budget change/ decision. Decision-makers should be confident that a robust EqIA has taken place, that any necessary mitigating action has been taken and that there are robust arrangements in place to ensure any necessary ongoing actions are delivered.

Section 2 – Summary of proposal

Please give a brief summary of the proposed service change / policy/ strategy/ budget change/project plan/ key decision

Please summarise briefly:

What is the proposed decision or change?

What are the reasons for the decision or change?
What outcomes are you hoping to achieve from this change?
Who will be impacted by the project or change - staff, service users, or the wider community?

This impact assessment covers the proposals set out in Part 1 and Part 2 of the portfolio decision on temporary accommodation charges (KD5761). This sets out a new approach to the procurement and letting of temporary accommodation.

The primary impact on residents will be that temporary accommodation will be provided by the Council rather than Housing Gateway. The effect of this is that housing costs will be covered through Housing Benefit rather than Universal Credit. This will significantly reduce the number of households subject to the benefit cap and the under 35 single room rate.

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 proposal will mean that young people (including care leavers) under 35 years old will not be subject to the single room rate for temporary accommodation. This is a significant impact as it will bring parity between older and younger people. There is therefore a positive differential impact on young people under the age of 35.

There are around 2900 households in settled temporary accommodation. The breakdown of ages of the lead applicant for whom we hold data is set out below:

Age	No	%
18-25	179	6.26%
26-35	733	25.62%
36-45	936	32.72%
46-55	691	24.15%
56-65	252	8.81%
66-75	51	1.78%
75+	19	0.66%

In the 2021 Census, Enfield's age structure shows the working-age population to be 216,693 which is 65.7% of the population. People under the age of 16 represent 20.5% of the population, and over 65s represent 13.7% of the population.

There is a disproportionate positive impact on households of working age. This is because they are disproportionately represented within temporary accommodation and because the benefit cap only applies to households of working age.

Mitigating actions to be taken

None

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.

Increasing the supply of adapted properties will have a positive impact on disabled residents. There is a severe shortage of adapted properties and taking on a longer lease of the property will enable better and targeted use of Disabled Facilities Grants to ensure that the residents needs can be met.

There is no financial impact on households in receipt of disability benefits as they are already exempt from the benefit cap. We are currently unable to identify households with a disability, who are not in receipt of disability benefits. However, households in this situation will be covered as part of the wider mitigation for those affected by the benefit cap.

Mitigating actions to be taken

None

Gender Reassignment

This refers to people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex.

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

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

There is no differential impact on people who are or have reassigned their sex. Analysis is based on the 2489 households in temporary accommodation for whom we hold financial information. Of the 2489 households, 14 people stated that their gender was different to that assigned at birth and a further 25 declined to answer the question.

Eight people are affected by the benefit cap and there will therefore be a positive impact for these households. We do not hold the financial data on the remaining individuals. We will monitor the impact of the new arrangements.

Mitigating actions to be taken

None

Marriage and Civil Partnership

Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, where-as a marriage can be conducted through either religious or civil ceremonies. In the U.K both marriages and civil partnerships can be same sex or mixed sex. Civil partners must be treated the same as married couples on a wide range of legal matters.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people in a marriage or civil partnership?

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

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

In the first four months of 2023 the Council accepted a duty towards 1582 households. The breakdown of these households is as follows:

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

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

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

Mitigating actions to be taken

None

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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.

There is no differential impact on people who are pregnant or expecting a baby. The analysis is based on the 1582 households for whom the council has accepted a duty in the first four months of 2023. 107 women had had a baby in the previous 12 months and a further 95 were pregnant.

Mitigating actions to be taken

None

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.

Because the majority of households in temporary accommodation predate the establishment of the Housing Advisory Service, the data available to us is more limited. We currently hold data on 1697 households in this area. Of these households, 1461 are from minority ethnic groups and we hold financial information on 950 of these households.

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

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

There is therefore a positive differential impact on those households regardless of ethnicity. There is a clear need to work with households affected by the cap to enable them to secure employment or disability benefits to mitigate the impact of the benefit cap.

Mitigating actions to be taken

Work with households affected by the cap to enable them to secure employment or disability benefits to mitigate the impact of the benefit cap.

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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.

Data on households in temporary accommodation is scarce and there is insufficient data to draw a full conclusion. Many of the households in temporary accommodation have been living there since before the introduction of the Homelessness Reduction Act meaning that the equalities data was not collected in key areas.

For the households for whom we hold data, Christian households are the largest single group with 533 (33.7%) identifying as Christian. 397 households declined to answer (25.1%). The next largest groups are Muslim households with 373 (23.5%) identifying as Muslim, 198 (12.5%) stating that they had no religion, and 69 (4.4%) identifying with a religion not listed. Ten households identified as Hindu, Jewish, Sikh or Rastafarian (0.6%)

This compares with the 2021 census data which found that across the borough the breakdown of religious affiliation is as follows:

- Christian - 153,015 people or 46.4%
- Buddhist - 1,716 people or 0.5%
- Hindu - 10,231 people or 3.1%
- Jewish - 3,713 people or 1.1%
- Muslim - 61,477 people or 18.6%
- Sikh - 1,199 people or 0.4%
- Other - 98,633 people or 29.9%

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

Mitigating actions to be taken

Improve the quality of data collection and monitor

Sex

Sex refers to whether you are a female or male.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on females or males?

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

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

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

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

This means that there is a disproportionately positive impact on women.

Mitigating actions to be taken

None

Sexual Orientation

This refers to whether a person is sexually attracted to people of the same sex or a different sex to themselves. Please consider the impact on people who identify as heterosexual, bisexual, gay, lesbian, non-binary or asexual.

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

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

The analysis is based on the 1582 households for whom the council has accepted a duty in the first four months of 2023. During this period 5 people identified as not being heterosexual and another 25 decline to say. There is no identifiable differential impact on people with a particular sexual orientation.

Data on households in more settled forms of temporary accommodation is more scarce and there is insufficient data to draw a conclusion. Many of the households in temporary accommodation have been living there since before the introduction of the Homelessness Reduction Act meaning that the equalities data was not collected in key areas.

Mitigating actions to be taken

Improve the quality of data collection

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.

There is growing awareness and an increasing body of research regarding the additional barriers care-experienced young adults may face. Care leavers are often vulnerable young adults and are more likely to be over represented in socially excluded populations such as the prison population, the homeless population, more likely to suffer from mental health difficulties than their peers, and less likely to be in education, employment or training¹.

Care-experienced young adults are more likely to be socio-economically disadvantaged. Cycling and walking present a low-cost form of transport and can connect people safely and quickly to local centres, as well as to stations as part of multi-modal longer distance journeys (e.g. into inner London). As such, the active travel route is expected to have a positive impact on care-experienced young adults who will benefit from a key active travel link which will provide increased walking and cycling access for residents of Broxbourne and Enfield

Care-experienced young adults may be less likely to be able to afford to adapt to the measures (e.g. buying a new bike), therefore may not experience the full benefits of the scheme compared to those from higher income backgrounds. This may mean that those on higher incomes disproportionately benefit from the scheme.

The proposal will mean that young people (including care leavers) under 35 years

¹ [Ofsted, Equalities impact assessment: introducing a separate judgement about care leavers within the inspection of local authority children's services](#)

old will not be subject to the single room rate for temporary accommodation. This is a significant impact as it will bring parity between older and younger people.

Mitigating actions to be taken

None

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.

By its nature, homelessness disproportionately affects those who are disadvantaged, and this is reflected throughout this EQIA. The proposals will protect most households from the effects of the benefit cap and under 35s single room rate and there will therefore be a significant positive differential impact.

Mitigating actions to be taken.

None

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?

Actions will be monitored through the monthly performance challenge meetings for the Housing Advisory Service.

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
Improve the quality of data collected	Increase the quality of data collected	Lian Brian Preacher	Ongoing	None	January 2025
Households affected by the benefit cap	Work with households affected by the cap to enable them to secure employment or disability benefits to mitigate the impact of the benefit cap.	Lucretia Thomas	Ongoing	BAU	October 2024