

Enfield's Housing Strategy 2012-2027

Predictive Equality Impact Assessment

February 2012

Predictive: assessing and analysing proposed changes to services, policies and budgets

Enfield Council

Predictive Equality Impact Assessment (EQIA) - Equality Analysis

**ENFIELD'S HOUSING
STRATEGY
2012-2027**

Proposed change to service/policy/budget	Enfield's Housing Strategy 2012-2027
Officer completing the assessment	Lee Badrick
Extension Number	6156
Service	Community Housing
Department	Health, Housing and Adult Social Care
Date impact assessment completed	23 February 2012

Section 1 – About the service, policy or budget, and proposed change

Q1. Please provide a brief description of the service/ policy/budget

Enfield's Housing Strategy sets the strategic vision and aims for housing and related services in the borough over the next 15 years. It will be delivered by the Council through partnership working with a range of organisations including government agencies, Housing Associations, developers, community and voluntary sector groups and local people.

Q2. Please provide a brief description of the proposed change(s) to the service/ policy/budget

This Strategy will replace the previous Housing Strategy (2005-2010) and sets a revised vision, aims and objectives for housing and related services of all types and tenure across the borough.

The vision is:

"increase the supply of well managed, good quality and affordable homes; promote housing choices and build strong neighbourhoods"

Aims and Objectives are:

Aim 1: Address housing need and promote personalised housing advice, options and choices

Our objectives to achieve this aim are:

1. Preventing homelessness
2. Addressing severe overcrowding
3. Delivering housing related support services

Aim 2: Increase housing supply to meet the needs of local people

Our objectives to achieve this aim are:

1. Increasing the number and mix of homes of all tenures including affordable and family sized homes
2. Providing the right type and number of accessible and specialist homes
3. Making the best use of our housing stock

Aim 3: Improve the quality of homes and neighbourhoods and contribute to strong communities

Our objectives to achieve this aim are:

1. Improving the quality and sustainability of existing homes and neighbourhoods
2. Improving standards and management of homes in the private rented sector
3. Delivering well designed, environmentally sustainable new homes and neighbourhoods
4. Addressing worklessness with a focus on the social rented sector

Q3. Does equalities monitoring of your service show that the beneficiaries in terms of the recipients of the service, policy or budget, and the proposed change, include people from the following groups?

R	Yes
D	Yes
G	Yes
A	Yes
F	
S	
T	
M	
P	

Q4. If you answered 'no' to any of the groups listed in Q3, please state why?

Currently, it is not deemed to be relevant or proportionate to carry out monitoring of the groups left blank above.

Q5. How will the proposed change eliminate discrimination, promote equality of opportunity, or promote good relations between groups in the community?

Overview of Equality and Diversity in Enfield's Housing Strategy

Equality and Diversity: A key principle of Enfield Housing Strategy

One of the overarching themes of Enfield's Housing Strategy is "promoting fairness, equality and diversity." It also acknowledges the Council's statutory duty to comply with the Equality Act 2010, including the public sector equalities duty to take proactive measures to bring about equality.

Enfield's Housing Strategy commits the Council's housing services to completing Equalities Impact Assessment on all relevant projects and policies which are set out in the Housing Strategy Delivery Plan.

Enfield Strategic Partnership and Housing Strategic Partnership

The Strategy has been developed with input from the Housing Strategic Partnership (HSP), a thematic action group of the Enfield Strategic Partnership (ESP). The ESP theme of creating cohesive communities has been adopted by the HSP and has been built into its key indicators and activities. The HSP will also support the delivery of Enfield's Housing Strategy.

Enfield's Housing Strategy supports the Council's Community Cohesion Strategy "Enfield Together." It aims to address inequality in the borough and promote equality of access and good relations between all our residents using the ESP and HSP as community leaders to share information and learning to help achieve this goal.

Fairness in Practice

The Health, Housing and Adult Social Care Department have implemented the Fairness in Practice Framework (FIPF) which sets out four service standards on access, rights and choice, involvement and influence and workforce. Each service within the department has reviewed itself against the FIPF. As part of delivering the Housing Strategy, housing services will continue to use this as a way of making sure equality standards are met and improvements to services are made.

Aims and Objectives

The Housing Strategy sets out the Council's ambition to address housing need and tackle inequality and how it seeks to achieve this. An aim of Enfield's Housing Strategy is to promote and provide accessible and individual housing advice, options and choices for all. This will be achieved by providing people in housing need with improved access to the advice they need through the development of a range of channels to enable them to make informed and planned choices to prevent homelessness.

Below are the Strategy aims and objectives that will help to eliminate discrimination, promote equality of opportunity and promote good relations between groups in the community:

Aim 1: Address housing need and promote personalised housing advice, options and choices

Objective 1: Preventing homelessness

Objective 2: Addressing severe overcrowding

Objective 3: Delivering housing related support services

Aim 2: Increase housing supply to meet the needs of local people

Objective 1: Increasing the number and mix of homes of all tenures, including affordable and family sized homes

Objective 2: Providing the right type and number of accessible and specialist homes

Aims 3: Improve the quality of homes and neighbourhoods and contribute to strong communities

Objective 1: Improving the quality and sustainability of existing homes and neighbourhoods

Objective 4: Addressing worklessness with a focus on the social rented sector

Engagement and Involvement

Local people have played an important role in shaping the Housing Strategy through consultation and engagement at a range of forums and events (see section 2 below).

Equalities Monitoring

Enfield's Housing Strategy commits housing services to continually collect and monitor equalities information. Monitoring will take place through the Council's Annual Housing Equalities Report and Action Plan and Community Housing Performance Board meetings. The equalities monitoring work of Enfield Homes, the Council's Arms Length Management Organisation which manages the Council's housing stock, will be combined with council monitoring processes to enable more joined-up and informative reporting.

Supporting Disadvantaged Groups

Race

Equalities monitoring¹ shows that compared to population estimates, black and minority ethnic households are over-represented on the Council's Housing Register. 81.5% of applicants on the Housing Register are from a non-white UK ethnic group. This compares with the lower figure of 55% of people in Enfield's population. Aim 1 to address housing need will therefore support BME households who are homeless or at risk of homelessness.

In addition, equalities monitoring shows that some BME households require larger properties and as they are in short supply have to wait longer to be housed. For example, 56% of Turkish households and 67% of Somali households have to wait more than 5 years to be housed (compared to 26.5% of White UK households). Aim 2 to increase housing supply, with a focus on providing more family sized homes will support larger BME households.

Disability

10% of all new homes built in the borough are required to be wheelchair accessible. Enfield Council works with Housing Associations to develop adaptable and wheelchair accessible affordable homes to meet the needs of disabled people. In 2010/11 53 wheelchair accessible

¹ Equalities Monitoring is set out in the Annual Housing Equalities Report 2010/11

units were delivered by Housing Associations in the borough. Aim 2 of Enfield's Housing Strategy has a focus on providing the right type and number of accessible and specialist homes to meet the needs of local people.

In addition, Enfield's Housing Strategy supports the continued delivery of housing related support services to enable people to live independently at home or provide suitable alternative accommodation and support.

Gender

Enfield's Housing Strategy seeks to safeguard vulnerable people. More women experience domestic violence (DV) than men. The Strategy seeks to support those who would like help to find alternative safe accommodation and to work with partners to support the survivor and their family. In 2010/11 36 women experiencing DV were supported by the Council to find alternative accommodation. However, this figure represents a small proportion of the total who received support as Enfield Homes, Housing Associations and community groups also provide services for this group.

Age

Most of the people on Enfield's Housing Register are between the ages of 25 to 35 (35%) and 36 to and 49 (35%). A smaller proportion are aged under 25 (14%) or over 50 (16%). This age profile demonstrates that aim 1 of Enfield's Housing Strategy to address homelessness and promote personalised housing advice, options and choices will benefit people of all ages. The Housing Strategy aims to ensure that no homeless person aged 16/17 is placed in Bed and Breakfast type accommodation.

Enfield's Housing Strategy sets out specific interventions to support young people and older people with their housing need. For example, the Council supports the continuation of a youth homelessness project which is run in partnership between Housing Services and Enfield's Children's Services.

In addition, Enfield's Housing Strategy sets out our intention to develop an Older Persons Accommodation Strategy. This will involve working with Adult Social Care Services to ensure the housing needs of older people are understood and a strategy put in place to address them.

Pregnancy

The homelessness legislation provides a safety net for pregnant women at risk of homelessness who fall into a priority need group and will receive housing options and advice services.

Section 2 – Consultation and communication

Q6. Please list any recent consultation activity with disadvantaged groups carried out in relation to this proposal	
All Groups	<ul style="list-style-type: none"> • Housing Strategy Consultation Questionnaire (round 1 – Sep - Nov 2010) • Housing Strategy Consultation Questionnaire (round 2 –Jan to Apr 2012) • Presentation and engagement Council Tenants Conference (2010 and 2012) • Housing Strategic Partnership Housing Strategy Engagement Event • Marketing information sent via post and email to community groups, libraries, day centres, GP surgeries and Registered Social Landlords including groups
Race	<ul style="list-style-type: none"> • BME Housing Strategy Steering Group • Strategic Race & Equalities Forum (2 April 2012) • Marketing information sent to groups representing BME communities
Disability	<ul style="list-style-type: none"> • Housing Strategy Consultation Questionnaire (round 1), views were gathered at a Supporting People Service User event • Marketing information sent to groups representing disabled people
Gender	<ul style="list-style-type: none"> • Housing Strategy Consultation Questionnaire (round 2) views were gathered at International Women’s Day event • Marketing information sent to groups that represent and support women
Age	<ul style="list-style-type: none"> • Housing Strategy Consultation Questionnaire (round 2), views were gathered at the Older People Active Lifestyles Partnership Conference • Marketing information sent to groups representing older people (including Age UK) and young people (including youth centres)
Faith	<ul style="list-style-type: none"> • Marketing information sent to groups representing people of different faiths
Sexual Orientation	<ul style="list-style-type: none"> • Marketing information sent to the Enfield Lesbian Gay Bisexual and Transgender Network
Transgender	<ul style="list-style-type: none"> • Marketing information sent to the Enfield Lesbian Gay Bisexual and Transgender Network
Marriage	See all groups above
Pregnancy	See all groups above
Q7. Please state how you have publicised the results of these consultation exercises, and what action you have taken in response	
R	<p>Both of the Housing Strategy Consultations (round 1 and 2) were anonymous. It has therefore not been possible to feedback to respondents directly.</p> <p>Consultation responses to the Housing Strategy Consultation Questionnaire (round 1) have been collated and analysed and have shaped the vision, aims and objectives of Enfield’s Housing Strategy as published in the Strategy.</p> <p>Outcomes from the Housing Strategic Partnership Housing Strategy Engagement Event were collated, analysed and outcomes reported to all attendees via an Event Report.</p> <p>Consultation responses from the Housing Strategy Consultation Questionnaire (round 2) have been collated and analysed and have shaped the final version of the Enfield’s Housing Strategy.</p> <p>Discussions and outcomes from consultation with the BME Housing Steering</p>

	group have been reported back to the group through meeting minutes.
D	As above
G	As above
A	As above
F	As above
S	As above
T	As above
M	As above
P	As above

Section 3 – Assessment of impact

Q8. Please describe any other relevant research undertaken to determine any possible impact of the proposed change

See question 5 for how Enfield's Housing Strategy will eliminate discrimination, promote equality of opportunity and promote good relations between groups in the community.

National social housing and welfare benefit policy reforms

Enfield's Housing Strategy has been developed with regard to national policy and the Mayor's revised London Housing Strategy.

Significant social housing and welfare benefit policy changes have been implemented at a national and regional level with change being brought about through the Localism Act.

National EQIAs have been carried out on the impact of some of these changes which Enfield's Housing Strategy seeks to interpret at a local level.

Housing reforms include:

- The introduction of fixed term tenancies of a minimum of two years:
 - Affordable Rent Tenancy (ART) for tenants of private registered providers, predominantly housing associations, where rent can be charged at up to 80% of market rents
 - Flexible Tenancies for tenants of council housing
- The ability for local authorities to discharge their homelessness duty to the private sector without their permission; previously this could only be done when the household was housed in the social housing sector
- More flexibility about who the local authority accepts on their register of people waiting for a council or housing association home (housing register)
- The introduction of a new tenant mobility scheme

Welfare benefit reforms include:

- Changes to Housing Benefit for private tenants (Local Housing Allowance (LHA)):
 - National caps depending on the size of home (April 2011)
 - Local caps whereby 3 out of 10 homes will be affordable to those in receipt of LHA, as opposed to 5 out of 10 homes previously
 - The single room only rent will be extended to under 35s, from under 25s (January 2012)
 - non-dependants deductions (that is, deductions from an applicant's housing benefit entitlement for a non-dependent, usually an adult, living with them) from Housing Benefit /LHA entitlements are to be increased (April 2011)
- Housing Benefit cuts for social rented tenants living in homes bigger than they need (under-occupying households)

- The introduction of Universal Credit with a total household benefit cap of £26k per year

Government Reforms and Enfield's Housing Strategy

Enfield Council continues to undertake research and analysis into the possible impacts of these reforms on Enfield residents, and to identify groups of people most likely to be affected. This research has informed Enfield's Housing Strategy. Delivery Plan actions have been developed to provide information about these changes to those identified as likely to be affected.

Delivery Plan actions to implement these changes will be subject to separate equalities impact assessments, for example Enfield's revised Allocations Scheme. The Housing Strategy Delivery plan will be regularly reviewed as the reforms are fully implemented to take account of impacts on local people as they emerge.

For details of local research and analysis carried out so far contact Lee Badrick (lee.badrick@enfield.gov.uk)

Enfield's Housing Strategy Evidence Base

An evidence base setting out the local position on demographic change, housing demand, supply, quality and affordability has been developed. This has informed the development of the housing strategy aims and objectives which seek to promote equality and facilitate access to the housing and related support through aims such as preventing homelessness, addressing severe overcrowding and increasing the supply of affordable homes. The Housing Strategy Evidence Base identifies the need to review housing options for older people, a requirement based on demographic data showing a predicted growth in the number of older people living in the borough.

Q9. Please list any other evidence you have that the proposed change may have an adverse impact on different disadvantaged groups in the community

R	None
D	None
G	None
A	None
F	None
S	None
T	None
M	None
P	None

Q10. Could the proposal discriminate, directly or indirectly, and if so, is it justifiable under legislation? Please refer to the guidance notes under the heading, 7. Useful Definitions

No

Q11. Could the proposal have an adverse impact on relations between different groups? If so, please describe

No

Q12. How could this proposal affect access to your service by different groups in the community?

All Groups	<p>Improving customer service and customer access is a key principle of Enfield's Housing Strategy. The Strategy aims to develop customer engagement and involvement models for shaping housing services. Examples of how access to services will be improved for all groups are:</p> <ul style="list-style-type: none"> • As part of aim 1 the range of available customer service access channels will be improved e.g. on-line self-service as well as by telephone or face to face • As part of aim 2 the marketing of affordable home ownership products will be improved. • As part of aim 3 information, advice and guidance for out of work tenants will become more easily available <p>The Council has a Customer Access Strategy in place which will be observed when creating new projects and services. This will be supported by outcomes of the Customer First Review of Community Housing Services.</p>
R	As above
D	As above
G	As above
A	As above
F	As above
S	As above
nT	As above
M	As above
P	As above

Q13. How could this proposal affect access to information about your service by different groups in the community?

All Groups	<p>The consultation process undertaken for Enfield's Housing Strategy has already begun to provide information and raise awareness of the work of the Council and its partners do in terms of housing in the borough and requests for information have been responded to.</p> <p>As part of the Housing Strategy Questionnaire, we asked people how they would like to be kept informed of progress against our housing aims and have new ideas about how people would most like to receive information.</p> <p>The Council's Housing Services has a detailed communications and marketing campaign in place for major projects and services changes. Tenants living in Temporary Accommodation receive a regular newsletter and council tenants and leaseholders receive a quarterly magazine called 'Housing News.' Housing Services also regularly use the Council's borough wide resident's magazine 'Our Enfield' post relevant articles and news, as well a making press releases when relevant.</p> <p>The Council's Housing Service works with the Corporate Communications Team to produce information material for tenants, leaseholders and residents to raise awareness of the services available. It also regularly reviews the content of its website to make sure it is accessible and up to date.</p>
R	As above

D	As above
G	As above
A	As above
F	As above
S	As above
T	As above
M	As above
P	As above

Section 5 – Tackling socio-economic inequality

Q14. Will the proposal in any way specifically impact on communities disadvantaged through the following socio-economic factors? Please explain below. If it does not, please state how you intend to remedy this (if applicable to your service), and include it in the action plan

Communities living in deprived wards/areas

Enfield's Housing Strategy acknowledges the growing deprivation gap between wards in the east and west of the borough. The Strategy has overarching themes to promote fairness, equality and diversity and to deliver value for money and attract inward investment. In addition, aim 3 is to improve the quality of homes and neighbourhoods and contribute to strong communities. All of these ambitions will help to tackle socio-economic inequality and are applicable to all of the categories under Q 14.

The Strategy has close links with neighbourhood regeneration plans which are mostly focused in deprived priority areas which face the greatest challenges and where regeneration activities will benefit the whole borough. It also covers Estate Regeneration plans which are currently focussed at bringing investment and improvement to areas in the east of the borough.

People not in employment, education or training

Enfield's Housing Strategy has a specific objective to address worklessness in the social rented sector and sets out a range of initiatives and actions to be taken by the **Council** and its partners to support social housing tenants into employment and/ or training (see aims 3, objective 4)

People with low academic qualifications

As above

People living in social housing

Enfield's Housing Strategy contains a number of objectives which will support people living in social housing, they include:

- Addressing severe overcrowding
- Delivering housing related support services
- Making the best use of our housing stock
- Improving the quality of existing homes and neighbourhoods
- Addressing worklessness in the social rented sector

Lone parents

Enfield's Housing Strategy aims to increase housing supply to meet the needs of local people, this includes lone parents through a focus on the provision of more affordable homes and family sized (3 bedrooms or more) homes.

People on low incomes

Enfield's Housing Strategy aims to improve the support we provide to people who are on low incomes or receive housing benefit by providing personalised housing advice to people in housing need, including keeping people informed of the changes being made to welfare benefits which may affect their housing situation.

In addition, Enfield's Housing Strategy aims to provide affordable homes in the borough and to promote home ownership schemes for people who can not afford to buy a home in the private market.

It also aims to support older people by developing an Older Persons Accommodation Strategy with a focus on supporting older people who own their home but are in housing need due to low income. In addition, it will set out plans to encourage people to consider their housing options at an early stage for when they are older.

People in poor health

Enfield's Housing Strategy aims to promote personalised housing advice, options and choices. This includes delivering housing related support services to help people with care and support needs to live independently at home. In addition, there are plans to increase the number of accessible and specialist homes, and improve the quality of existing and new homes so they are safe and healthy for people to live in, focussing on meeting the needs of those in poor health.

Any other socio-economic factor

N/A

Section 6 – Impact on staff

Q15. How have you consulted, or otherwise engaged with, all relevant staff about this proposal (including any staff on sickness or maternity leave)?

Relevant staff have continually been involved in the development of the Housing Strategy and Delivery Plan. Details are set out below:

- Interviews with 22 senior officers from across departments (Aug – Sept 2010)
- Invitation to officers from across departments to comment on pre-consultation version of the Housing Strategy (Apr 2011)
- Meeting with Supporting People Colleagues – June 2011
- Detailed feedback from Adult Social Care Policy Manager– July 2011
- Meeting with Adult Social Care Commissioning colleagues – July 2011
- Meeting with Assistant Director for Public health – Aug 2011
- Officer stakeholder meeting involving (Aug 2011):
 - HHASC Director and AD
 - Planning Policy
 - Adult Social Care
 - Neighbourhood Regeneration
 - Housing Service Performance
 - Housing Development and Estate Renewal
 - Follow-up meeting with Planning Policy and Neighbourhood Regeneration colleagues – Sept 2011
- Email notification of public consultation to involved and affected staff – Feb 2012
- Further meeting with Planning Policy regarding Delivery Plan – March 2012
- Staff Matters Email

Q.16 If your proposal involves a staff restructuring, how have you discussed this with relevant trade unions?

N/A

Q17. Does job matching of existing staff against the new proposed staff structure, following any assimilation process, indicate that any particular groups of staff are adversely affected more than others?

R	N/A
D	N/A
G	N/A
A	N/A
F	N/A
S	N/A
T	N/A
M	N/A
P	N/A

Q.18 Are there any proposed changes to working hours, work locations or duties likely to have a negative impact on particular groups of staff?

R	N/A
D	N/A
G	N/A
A	N/A
F	N/A
S	N/A
T	N/A
M	N/A
P	N/A

Section 7 - Miscellaneous

Q19. Do you plan to publicise the results of this assessment? Please describe how you plan to do this

This assessment will be published as an appendix to Enfield's Housing Strategy and headlines will be included in the Cabinet Report.

It will also be listed in the Council's Equality and Diversity Scheme Annual Report and published on the Council's website.

Q20. How and when will you monitor and review the effects of this proposal?

Enfield's Housing Strategy Delivery Plan will be reviewed and monitored annually.

The Housing Strategy will also be reviewed as part of the next retrospective equality impact assessment/analysis of Community Housing Services that is due to be undertaken in 2012/13 as part of the Council's three-year rolling programme.

14. Action plan template for proposed changes to service, policy or budget

Proposed change to, or new, service, policy or budget Enfield Housing Strategy 2012-2027.....

Team: Strategic Development Team, Community Housing Services Department: HHASC.....

Service manager: Susan Sharry....

Issue	Action required	Lead officer	Timescale	Costs	Comments
Government social housing and welfare benefit reforms may have an adverse impact on disadvantaged groups as they are implemented	Continue to monitor the impact of these reforms, advise the business and develop policy accordingly and communicate changes to affected customers	Head of Housing Options and Advice/ Head of Temporary Accommodation/ Head of Strategic Development	2011 – 2015	(To be confirmed)	
Ensure that discrimination does not arise from the actions within Enfield's Housing Strategy and take remedial steps if necessary	Enfield's Housing Strategy will be monitored on a regular basis. This will include monitoring this Impact Assessment as part of ongoing arrangements.	Housing Strategy Manager	Ongoing from May 2012	Not applicable	
Ensure that monitoring information on service users in relation to race, age, gender, disability, faith and sexual orientation is kept up to date	Production of Annual Housing Equalities Monitoring	Head of Strategic Development/ Performance Management & Quality Assurance Officer	Year end annually	(To be confirmed)	

Carry out EQIAs for all relevant projects and policies contained in Enfield's Housing Strategy Delivery Plan	Production of EQIAs	Project Manager/ Lead Officer as identified in the Delivery Plan	2012 – 2027	(To be confirmed)	

Please insert additional rows if needed

APPROVAL BY THE RELEVANT ASSISTANT DIRECTOR - NAME.....SIGNATURE.....