

Enfield Council Predictive Equality Impact Assessment/Analysis

NB if there is likely to be an impact on different groups of staff as a result of this proposal, please also complete a restructuring predictive EQIA form

Department:	Chief Executive's Department	Service:	Policy, Partnership, Engagement and Consultation
Title of decision:	Preventing Homelessness and Rough Sleeping Strategy	Date completed:	22.08.19
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1	Type of change being proposed: (please tick)						
Service delivery change/ new service/cut in service		Policy change or new policy	x	Grants and commissioning		Budget change	

2 Describe the change, why it is needed, what is the objective of the change and what is the possible impact of the change:

Under the Homelessness Act 2002, all housing authorities must have in place a homelessness strategy that must be renewed every five years. The last strategy was implemented in 2013. Since 2013, homelessness in Enfield has increased significantly (250% since 2011/12). The Private Rented Sector has grown (which, in many cases, offers sub-standard accommodation) and more people on lower wages and those who rely on Housing Benefit are living in PRS accommodation, which can affect their ability to be financially resilient. Changes in legislation, such as the introduction of the Homeless Reduction Act 2017, means that the Council must focus on early identification and prevention work. The Act also extends duties in providing advice and information and putting in place support plans. Within this context, we have the opportunity to take a radical step-change in the way we prevent homelessness in Enfield.

The impact of the new strategy will be to prevent more people from becoming homeless and to give advice and information earlier, to help residents make positive decisions about their housing options. The impact will also be to facilitate more joined up working across council departments and with partners.

3 Do you carry out equalities monitoring of your service? If No please state why?

The Housing and Growth strategy is a high-level document that sets out the ambitions and long-term plans of the council to achieve more

and better homes in Enfield. Achieving equity will depend on the implementation of the strategy, where equality assessments will be carried out for specific projects. This equality impact assessment identifies anticipated positive impacts and also identifies where we do not have sufficient knowledge or evidence of the impact at this stage. The Housing Needs Assessment, which is currently being undertaken, will give us a detailed understanding and evidence base of need in the borough and will play an important role in delivering the aims of the strategy.

In order to develop a strategy which reflects the diverse needs of communities, including people of all protected characteristics, we undertook an extensive consultation on the draft strategy, and used the results of this to finalise our approach. We consulted with the following groups:

- Youth Parliament
- Faith Forum
- Parent Engagement Panel
- Leaseholders' Forum
- Customer Voice
- Over 50s Forum
- Kratos
- Ponders End Community Development Trust
- Voluntary Sector Strategic Group (which includes Enfield Women's Centre, Enfield LGBT Network, Enfield Carers Centre, Enfield Citizens Advice)
- Enfield Racial Equality Council

We received consultation responses from:

	Questionnaire	Email
Enfield residents	242	-
Individuals who do not live in the borough	8	-
Representatives from a wide range of support organisations	14	2
Other stakeholders	7	8
Private landlords	8	-
Other	6	1*

It is particularly encouraging that the demographics of the individual respondents to the questionnaire (that is, Enfield residents and those who do not live in the borough) were not dominated by any specific demographic groups. For example, there were a similar number of respondents from the south and east of the borough (89) compared to the west and north (106). In this instance, those from the south and east represent an unusually high proportion of respondents than usual.

The support organisations represented a wide range of people, including:

- Homeless residents or those at risk of homelessness
- Rough sleepers
- Those experiencing debt issues
- Families, children and young people
- People with additional support needs, disabilities, learning difficulties and health conditions or their carers
- Ethnic minority groups

- Women
- Older people
- LGBT+ community

	Total
Base: All	285
Are you completing the survey as...? Single choice	
An Enfield resident	85%
A representative of a voluntary/community organisation	4%
A public sector organisation representative	1%
A Registered Provider	1%
A non-resident out of Borough	3%
Private landlord	3%
A representative of a housing developer	1%
Other	2%

	Total
Base: Q1=2	11
Which stakeholders or residents does your voluntary/community organisation represent? Multiple choice	
Homeless residents or those at risk of homelessness	5
Rough Sleepers	6
Those experiencing debt issues	4
Families, children and young people	4
People with additional support needs, disabilities, learning difficulties and health conditions or their carers	5
Ethnic minority groups	4
Women	4
Older people	3
LGBT+ community	4
Other	5

Base: Q1=(1 , 5 or 8)	256
What is your current housing status?	
Private renter	14%
Home owner - Leaseholder	10%
Home owner - Freeholder	38%
Council tenant	18%
Housing association tenant	2%
Temporary accommodation tenant	4%
No fixed address	1%
Living with parents	8%
Other	4%

Base: Q1=(1 , 5 or 8)	203
In which postal district do you live? <i>(not set-up as a must response question)</i>	
EN1	18%
EN2	15%
EN3	19%
EN4	2%
EN6	0
EN8	0
N9	8%
N11	1%
N13	4%
N14	4%
N18	12%
N21	9%
N22	>0.5%
Other	5%
South and east	106 (52%)
West	89 (44%)

Base: Q1=(1 , 5 or 8)	256
How old are you (years)?	
19 or under	2%
20 -24	4%
25 - 29	4%
30 - 34	7%
35 - 39	6%
40 - 44	11%
45 - 49	9%
50 - 54	7%
55 - 59	14%
60 - 64	9%
65 - 69	11%
70 - 74	7%
75 - 79	3%
80 - 84	0
85 or older	1%
Prefer not to say	5%

Base: Q1=(1 , 5 or 8)	256
How would you describe your sex or gender?	
Male	33%
Female	60%
Transgender	1%
Prefer not to say	6%
Prefer to self-describe	0

Base: Q1=(1 , 5 or 8)	256
What is your ethnicity?	
WHITE - English/Welsh/Scottish/Northern Irish/British	50%
WHITE - Irish	4%
OTHER WHITE - Greek	0

OTHER WHITE - Greek Cypriot	3%
OTHER WHITE - Turkish	1%
OTHER WHITE - Turkish Cypriot	1%
OTHER WHITE - Italian	0
OTHER WHITE - Polish	1%
OTHER WHITE - Russian	0
OTHER WHITE - Other Eastern European	2%
OTHER WHITE - Kurdish	1%
OTHER WHITE - Gypsy/Irish Traveller	0
OTHER WHITE - Romany	0
MIXED - White and Black Caribbean	>0.5%
MIXED - White and Black African	1%
MIXED - White and Asian	>0.5%
MIXED - Mixed European	1%
MIXED - Multi ethnic islander	0
ASIAN OR ASIAN BRITISH - Indian	2%
ASIAN OR ASIAN BRITISH - Pakistani	>0.5%
ASIAN OR ASIAN BRITISH - Bangladeshi	2%
ASIAN OR ASIAN BRITISH - Sri Lankan	0
ASIAN OR ASIAN BRITISH - Chinese	1%
BLACK/AFRICAN/CARIBBEAN/BLACK BRITISH - Caribbean	6%
BLACK/AFRICAN/CARIBBEAN/BLACK BRITISH - Ghanaian	2%
BLACK/AFRICAN/CARIBBEAN/BLACK BRITISH - Somali	1%
BLACK/AFRICAN/CARIBBEAN/BLACK BRITISH - Nigerian	1%
BLACK/AFRICAN/CARIBBEAN/BLACK BRITISH - Other African	1%
OTHER ETHNIC GROUPS - Arab	0
Prefer not to say	11%
Other	7%

Base: Q1=(1 , 5 or 8)	256
Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?	
Yes - limited a lot	12%
Yes - limited a little	13%
No	69%
Prefer not to say	7%

4. Equalities Impact Indicate Yes, No or Not Known for each group	Disability	Sex	Age	Race	Religion & Belief	Sexual Orientation	Gender reassignment	Pregnancy & Maternity	Marriage & Civil Partnerships
	1. Does equalities monitoring of your service show people from the following groups benefit from your service? (recipients of the service, policy or budget, and the proposed change)	Yes	Yes	Yes	Yes	Not known	Not known	Not known	Not known
2. Does the service or policy contribute to eliminating discrimination, promote equality of opportunity, and foster good relations between different groups in the community?	Yes	Yes	Yes	Yes	Not known	Not known	Not known	Not known	Yes
3. Could the proposal discriminate, directly or indirectly these groups?	No	No	No	No	No	No	No	No	No
4. Could this proposal affect access to your service by different groups in the community?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
5. Could this proposal affect access <u>to information</u> about your service by different groups in the community?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes ¹
6. Could the proposal have an adverse impact on relations	No	No	No	No	No	No	No	No	No

between different groups?

Potential Impact on Groups

Disability

People with disabilities are at greater risk of poor housing conditions and have specific challenges when seeking safe, secure housing where they can protect and improve their health and wellbeing.² Research from the Social Market Foundation has suggested that by 2038, 188,000 private rented homes could be unfit and unsuitable for people older people or people with disabilities.³ We also know that rough sleepers are more likely to develop a physical or mental condition.⁴

The Housing Options and Advice service are dealing with more cases where people have multiple and complex needs. As part of the Homeless Reduction Act, we are required to put in place a Housing and Support Plan which considers the support that a household may need in addition to their housing need. We have committed to improving the service that people with additional care and support needs receive, as well as improving the information they receive so that they are aware of their housing options and can take appropriate responsibility for their housing needs.

The strategy includes the following commitments:

- Equip the Housing Options and Advice workforce to meet the needs of vulnerable people with multiple complex needs, through the development of a customer charter.
- Increase local access to high quality, flexible and affordable housing options for people with assessed care and support needs – including increasing the number of disabled facilities grants.
- Support people earlier to plan ahead and make positive housing choices, clearly communicating the different housing options for people in different stages of their lives and at key transition points.
- Strengthening links between homeless services and support services to provide a rapid response for rough sleepers.

Gender

Over 51% of Enfield's overall population is female. However, there are more males than females in Enfield in all ages up to 25 years.

Single parent households make up a third of Enfield's Housing Register; we know that 94% of single parents on our Housing Register are

² <https://www.equalityhumanrights.com/en/our-work/news/disabled-people-housing-crisis>

³ <https://www.insidehousing.co.uk/news/hundreds-of-thousands-to-face-homelessness-in-retirement-without-social-housing-boost-62324>

⁴ <https://www.crisis.org.uk/ending-homelessness/homelessness-knowledge-hub/types-of-homelessness/its-no-life-at-all-2016/>

mothers. Welfare reforms, such as the Benefit Cap, disproportionately affect lone parents, who are the group least able to work or increase their hours.⁵ This group has low financial resilience and are therefore at particular risk of homelessness. Our strategy aims to increase the financial resilience, as well as wider resilience, to prevent people from reaching a housing crisis in which they could become homeless. The strategy also focuses on intervening in the Private Rented Sector to work with landlords to improve conditions as well as increasing the supply and access to affordable private rented accommodation. We anticipate this will have a particularly positive affect on single mothers and their families.

Age

Children and Young People: Enfield has a growing younger population. There are proportionately more children and young people under 20 in Enfield than in London and England. National evidence suggests that children who are homeless or living in unsuitable accommodation have worse outcomes; this includes poorer educational attainment, higher absence from school and a higher likelihood of suffering from a mental health condition.⁶ 77% of our households in Temporary Accommodation have children and the majority of people on our Housing Register have at least one dependent.

The strategy aims to take a whole-family approach to preventing homelessness, by considering the needs of the whole family, and also by delivering on the following priorities:

- Encourage private landlords to offer greater security, certainty and stability for their tenants, especially families with children and vulnerable households and those with disabilities and additional support needs.
- Increase the range of advice and support given to all households approaching housing options and advice services, taking a targeted and person-centred approach by considering and responding to the needs of everyone in the household.
- Improve the support and advice we give to homeless households living in temporary accommodation in order to empower them to make positive choices about their future housing options and facilitate their transition to more permanent accommodation.

Older people: People aged 65 and over make up 13% of Enfield's population. By 2025, this is forecasted to increase by 23%, from 43,900 to 52,600. Over 50% of Enfield's 65 and over population has a disability. Research by the Social Market Foundation suggests that by 2038, 630,000 older people could be at risk of becoming homeless, due to insecurity and rising rents in the Private Rented Sector. The research also suggests that by 2038, 188,000 private rented homes could be unfit for older, disabled people.⁷

The strategy focuses on intervening in the Private Rented Sector to work with landlords to improve conditions as well as increasing the supply and access to affordable private rented accommodation. We expect this to have a positive impact on any older residents who are privately renting.

The strategy also intends to deliver on the following priorities:

⁵ https://www.crisis.org.uk/media/240419/the_homelessness_monitor_england_2019.pdf

⁶ https://england.shelter.org.uk/_data/assets/pdf_file/0016/39202/Chance_of_a_Lifetime.pdf

⁷ <https://www.insidehousing.co.uk/news/hundreds-of-thousands-to-face-homelessness-in-retirement-without-social-housing-boost-62324>

- Increase local access to high quality, flexible and affordable housing options for people with assessed care and support needs – including increasing access to disabled facility grants.
- Encourage private landlords to offer greater security, certainty and stability for their tenants, especially families with children and vulnerable households and those with disabilities and additional support needs.

Race

As data shows, black households are overrepresented in Temporary Accommodation and our Housing Needs Register. This strategy aims to reduce the number of households in Temporary Accommodation, reduce the time spent in TA and prevent people from going into TA in the first place, whilst also securing the best quality and value TA in the borough. The aim of the strategy is to improve outcomes for those living in Temporary Accommodation, of which black households make up a significant proportion.

Specific priorities in the strategy include:

- Improve the support and advice we give to homeless households living in temporary accommodation in order to empower them to make positive choices about their future housing options and facilitate their transition to more permanent accommodation.
- Increase the availability of quality best value temporary accommodation available in Enfield.

Religion and belief

As shown by the 2017 compiled by the ONS, Enfield has high proportions in all the main non-Christian religions except Sikh, compared to national averages. Compared to the London average, Enfield has both a large Muslim population (15.2%) and a slightly larger Christian population (51.3%), compared to the London average of (14.3%) and (46.4%) respectively. Victims of hate-crimes, such as people experiencing abuse due to their religion, are particularly at risk of homelessness. This strategy aims to make it safe for those experiencing abuse to stay in their homes but where that is not possible, it commits to ensuring that victims of abuse have a safe place to stay.

The aim of the strategy is to have a cultural shift for the organisation, which means that housing is not dealt in isolation. The aim is to link people up with other support services and organisations which can support the resident to address the underlying causes of homelessness. We anticipate that this will have a positive impact people of specific religions or beliefs.

Sexual Orientation

Good data on sexual orientation is difficult to find at both local and national levels. The ONS 2017 Annual Population Survey estimated that 93.2% of the UK population identified as heterosexual or straight and 2.0% of the population identified as lesbian, gay or bisexual. Research from the Albert Kennedy Trust suggests that young LGB people are overrepresented in youth homeless statistics.⁸

Victims of hate-crimes, such as people experiencing abuse due to their sexual orientation, are particularly at risk of homelessness. This strategy aims to make it safe for those experiencing abuse to stay in their homes but where that is not possible, it commits to ensuring that victims of abuse have a safe place to stay. The strategy also seeks to improve the offer that is provided to single homeless people, which

⁸ <https://www.akt.org.uk/Handlers/Download.ashx?IDMF=c0f29272-512a-45e8-9f9b-0b76e477baf1>

we anticipate would have a positive impact on homeless LGB people.

The aim of the strategy is to have a cultural shift for the organisation, which means that housing is not dealt in isolation. The aim is to link people up with other support services and organisations which can support the resident to address the underlying causes of homelessness. We anticipate that this will have a positive impact on LGB people.

Gender Reassignment

GIRES estimates that in the UK around 650,000 people, 1% of the population, are estimated to experience some degree of gender non-conformity. If these numbers are correct, and if Enfield's population of 333,869 were exactly typical of that population, this will equate to 3,339 individuals with some degree of gender non-conformity. People in the process of gender reassignment can face discrimination in local communities. Research from the Albert Kennedy Trust suggests that young transgender people are overrepresented in youth homeless statistics.⁹

Victims of hate-crimes, such as people experiencing abuse due to their gender reassignment, are particularly at risk of homelessness. This strategy aims to make it safe for those experiencing abuse to stay in their homes but where that is not possible, it commits to ensuring that victims of abuse have a safe place to stay. The strategy also seeks to improve the offer that is provided to single homeless people, which we anticipate would have a positive impact on homeless transgender people.

The aim of the strategy is to have a cultural shift for the organisation, which means that housing is not dealt in isolation. The aim is to link people up with other support services and organisations which can support the resident to address the underlying causes of homelessness. We anticipate that this will have a positive impact on transgender people.

Pregnancy and maternity

Single parent households make up a third of Enfield's Housing Register; we know that 94% of single parents on our Housing Register are mothers. We have a legal duty to provide accommodation for eligible pregnant people and families with children.

This strategy seeks to prevent people getting to a crisis point in which they require temporary accommodation. We want to intervene much earlier and this strategy intends to prevent and reduce homelessness by improving conditions in the private rented sector; eviction from the private rented sector is the biggest cause of homelessness in Enfield. We want to encourage private landlords to offer greater security, certainty and stability for their tenants, especially families with children. We anticipate that this approach will have a positive impact on mothers and mothers to be. Ambition 3 of the strategy "supporting residents to plan for their lifetime housing needs" will particularly benefit mothers and mothers to be, by giving them the tools they need to be informed and take responsibility for their housing options, recognising how these options might change if they have a child or have more children.

Marriage and civil partnership

Our approach to preventing homelessness will benefit all communities in Enfield, irrespective of their relationship status. Same-sex couples may be discriminated against in the private rented sector and in some local communities. Our focus on driving up standards in the private rented sector and working with landlords to promote good landlordism could positively impact people who are discriminated on the

⁹ <https://www.akt.org.uk/Handlers/Download.ashx?IDMF=c0f29272-512a-45e8-9f9b-0b76e477baf1>

basis of their relationship status. Furthermore, the strategy takes a whole-family approach, in which the needs of all members of a household are considered.

5. Tackling Socio-economic inequality

Indicate Yes, No or Not Known for each group

	Communities living in deprived wards/areas	People not in employment, education or training	People with low academic qualifications	People living in social housing	Lone parents	People on low incomes	People in poor health	Any other socio-economic factor Please state;
Will the proposal specifically impact on communities disadvantaged through the following socio-economic factors?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Homeless households and rough sleepers
Does the service or policy contribute to eliminating discrimination, promote equality of opportunity, and foster good relations between different groups in the community?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Homeless households and rough sleepers
Could this proposal affect access to your service by different groups in the community?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Homeless households and rough sleepers

If Yes answered above – please describe the impact (including any positive impact on social economic inequality) and any mitigation if applicable.

Enfield is a low-income borough with a high proportion of Housing Benefit claimants. Enfield's median household income is £34,000 which is the 11th lowest in London and 16.7% of households in Enfield have an annual gross income under £15,000 – this percentage is higher than London and outer London average. As of August 2018, there were 33,060 resident households in the borough receiving Housing Benefit – over half of whom are living in the Private Rented Sector. Enfield has the 5th highest proportion of child living in low-income families in London. Low financial resilience makes residents turn to the Council and access to benefits, and effectively dealing with debt and rent arrears can play a critical role in whether someone becomes homeless or not.

The aim of the strategy is to take a whole-systems and holistic approach to tackling homelessness. It recognises that socio-economic factors such as deprivation, training and education, worklessness and poor health all contribute to homelessness and must be addressed together to truly prevent homelessness.

Priorities and commitments in the strategy include:

- Create a network of services and support for people within their communities, taking a whole-person approach to preventing homelessness by tackling worklessness, debt and poor health outcomes, maximising income and building literacy and ICT skills
- Build on existing partnership work with Enfield Citizens Advice and the Department for Work and Pensions (DWP) to support people early with financial issues, by strengthening our early prevention and help offer for residents.
- Use data smartly to understand the needs of our residents, identify who could be at risk of homelessness and take proactive action to prevent this at the earliest stage possible.
- Make housing advice more easily accessible and readily available to all residents, including improving our online offer and ensuring it is understandable to people whose first language is not English and for those with learning difficulties.
- Strengthen partnership working between council housing and homeless prevention services as well as housing associations. This focus on tenancy sustainment will positively impact residents in social housing. This is in addition to providing tenancy sustainment support and intervention for all types of rented accommodation, including social housing.

6. Review

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

The strategy and action plan will be reviewed quarterly with an annual equalities monitoring report.

Enfield Council Predictive Equality Impact Assessment/Analysis

NB if there is likely to be an impact on different groups of staff as a result of this proposal, please also complete a restructuring predictive EQIA form

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

Title of decision:.....

Team:..... Department:.....

Service manager:.....

Identified Issue	Action Required	Lead Officer	Timescale/ By When	Costs	Review Date/ Comments

Please insert additional rows if needed

Date to be Reviewed:

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

This form should be emailed to joanne.stacey@enfield.gov.uk and be appended to any decision report that follows.