

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	Service:	Policy, Partnership, Engagement and Consultation
Title of decision:	Housing and Growth Strategy	Date completed:	14.10.19
Author:	Harriet Potemkin and Deanna Hobday	Contact details:	Deanna.hobday@enfield.gov.uk 020 813 21742

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:

Increasing homelessness; a growing private rented sector which in many cases is offering sub-standard accommodation; a growing population and ambitious new housing targets mean that we require a bold new approach to deliver more and better homes and achieve our Corporate ambition of good homes in well-connected neighbourhoods.

A new Housing and Growth Strategy is required to set out our approach for guiding future housing decisions, giving an overarching vision and guiding principles that will ensure consistency across relevant Council departments and set out how we will work in partnership to achieve our vision. The strategy provides the opportunity for new ways of working and increased partnership across the Council, with stakeholders and with local people in our communities.

The draft strategy takes a 'Health in all Policies' (HiAPT) approach by setting proposed principles for how we will improve health and wellbeing through housing and good growth.

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...? <i>Single choice</i>	
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%

Base: Q1=2	11
Which stakeholders or residents does your voluntary/community organisation represent? <i>Multiple choice</i>	
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
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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%

If Yes answered to questions 3-6 above – please describe the impact of the change (including any positive impact on equalities) and what the service will be doing to reduce the negative impact it will have.

*If you have ticked yes to discrimination, please state how this is justifiable under legislation.

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.¹

The numbers of people with learning disabilities is also predicted to increase to more than 1,250 people who will require health, care and support services by 2030.² We have committed to delivering tailored housing solutions for people with additional needs, working across health, social care and housing services to make homes and neighbourhoods in Enfield inclusive for everyone. We will work proactively with registered housing providers to achieve this, recognising that they are a trusted housing provider for vulnerable people. The strategy also includes the following commitments:

- We will increase high quality, flexible and accessible specialist housing with care options for adults with physical disabilities in line with borough need, including by commissioning specialist housing for younger adults with complex needs, including those with brain injury; and commissioning specialist housing with care for adults (45+) with physical and/or sensory disabilities.
- We will increase local access to high quality, flexible and affordable housing options for adults with mental health support needs in line with borough need, including by developing and commissioning a mental health framework for supported living, and commissioning an assessment flat for people with mental health support needs in crisis.
- We will prevent unnecessary hospital admissions of people with learning disabilities and provide proactive support / interventions in the community, including by commissioning a short stay 'Crash Pad' facility
- We will protect vulnerable adults at risk of exploitation in their homes by raising awareness of the risks of 'cuckooing,' increasing the security of vulnerable people's homes and strengthening our cross-council and whole-community response when this has occurred.
- In our role as a landlord, and through partnerships with our registered provider partners, we will connect residents to services, community networks and support to keep them safe; help them improve their health; maximise their income and access relevant education, training or employment.

As well as building new homes to high quality standards, we also have a programme of improvement works to our own housing stock. In all decisions we will apply the Enfield Housing Test, which includes ensuring the highest possible standards of environmental sustainability, such as improvements in energy efficiency measures which will in turn help to combat fuel poverty. This will have positive health benefits for those with disabilities and chronic

¹ <https://www.equalityhumanrights.com/en/our-work/news/disabled-people-housing-crisis>

² [PANSI 2019](#)

illnesses. The Enfield Housing Test also includes ensuring that homes and places are disability friendly which means that people can stay safe inside and outside their homes.

At this stage, we do not know how many disabled people (physically, with learning disabilities, or both) and people with chronic illnesses will be affected by housing developments. We will monitor the implementation of key actions in our housing strategy through the Housing Advisory Board. Specific work streams, such as the development of 3,500 new council homes, are subject to detailed programmes of resident engagement and reports to Cabinet, which will include equality assessments.

Gender

The housing strategy aims to increase the supply of housing across all tenures which will benefit both genders. While women-headed households are likely to earn less over the duration of their lifetimes, the housing strategy includes measures for the provision of housing for those on a range of incomes, including:

- To maximise housing delivery, we will use council assets and partner with other public sector organisations and registered providers to increase the supply of affordable homes.
- We will prioritise rented homes as part of mixed income communities, as evidence shows this is where we have the greatest and most immediate demand. These will be of the size and type that local people need, as informed by our housing needs register and Housing Needs Assessment.
- We will increase the supply of intermediate housing products, which currently makes up less than 1% of housing in Enfield. Intermediate housing provides homes that the majority of local people can afford, prioritising access for people working in essential services such as nurses, social workers, occupational therapists, police officers, teachers and utility workers. These will be of the size and type that local people need, as informed by our Housing Needs Assessment, and in locations where these 'key workers' require homes.
- We will cross-subsidise affordable housing through market sale and market rented homes, promoting Build to Rent offered at a range of rent levels. We will simultaneously call on Government to increase grant rates to assist us build more homes rented at the London affordable rent level and below.

People fleeing violence or abuse 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.³ People fleeing violence or abuse are more likely to be women. Ambition five of the strategy "accessible housing pathways and homes for everyone" will develop and improve housing pathways for vulnerable people including;

- We will increase the provision of appropriate and safe accommodation for people fleeing violence and abuse

Age

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 57,647.⁴ Our strategy commits us to providing suitable housing that meets their needs. This will mean an ambitious programme of delivering additional older people's

³ https://crisis.org.uk/media/237534/appg_for_ending_homelessness_report_2017_pdf.pdf

housing to meet targets (circa 2,376 units by 2029, based on the GLA London Plan target (Policy H15). It will also mean a new approach for Council sheltered housing schemes, which are currently not meeting local need, with many units unsuitable for people with mobility issues and upper floor flats often becoming difficult to let. The strategy commits to the following priorities, which will positively impact older people:

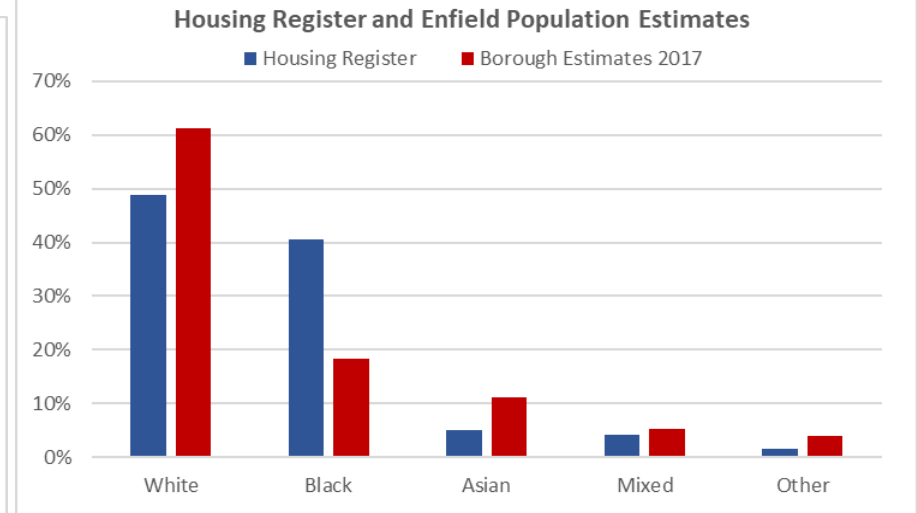
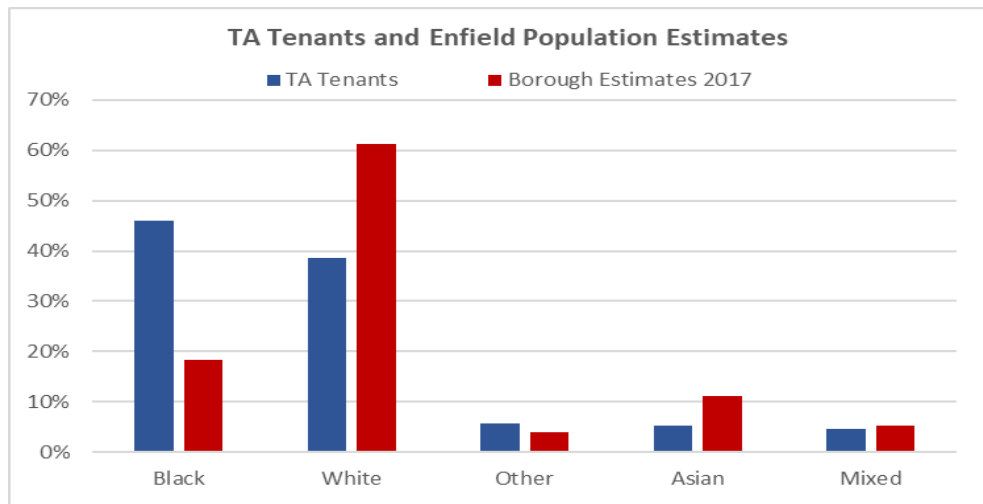
- We will increase access to high quality, flexible and specialist housing options for older people in the borough including retirement and extra care housing, across tenure type, in line with borough need. This will include facilitating market development of high-quality retirement housing across tenures as well as delivery through a proposed 300 new homes in an Enfield Care Village, consisting of new nursing home provision, extra care and a wider housing offer for later years living.
- We will modernise our sheltered housing service to ensure that it meets the needs and expectations for residents. We will review the existing sheltered housing schemes to ensure that they are fit for purpose and replace or upgrade where necessary.

The Enfield Housing Test also details how housing decisions in the borough should be 'child friendly'. This includes children being able to access safe, outdoor play provision and the opportunity to use green spaces where they are protected from the affects of air pollution. The strategy also set the priority of improving housing pathways for children and young people, ensuring we continue to meet the housing needs of young people leaving care, and increasing the availability of good quality semi-independent housing for young people. We anticipate that these priorities will have a positive impact for children and young people on their health and wellbeing as well as their ability to access good housing as they more into adulthood.

Race

Data shows that black households are overrepresented in Temporary Accommodation and our Housing Needs Register (see graph below). The strategy aims to increase the supply of affordable and quality housing in Enfield; we anticipate that this would have a positive impact on those in Temporary Accommodation. The strategy also has the target of building 3,500 council owned homes over the next 10 years, which would have a positive impact on those who are on the Housing Needs Register.

⁴ <https://data.london.gov.uk/dataset/projections>



(as at 31.03.19)

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. Those who are victims of hate-crimes, such as people fleeing violence or abuse due to their religion, are at greater risk of poor housing conditions and homelessness.⁵

Ambition five of the strategy “accessible housing pathways and homes for everyone” will develop and improve housing pathways for vulnerable people, which we anticipate will have a positive impact on those experiencing abuse or violence due to their religion. This includes the priority to:

- Increase the provision of appropriate and safe accommodation for people fleeing violence and abuse

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.⁶

⁵ https://crisis.org.uk/media/237534/appg_for_ending_homelessness_report_2017_pdf.pdf

⁶ <https://www.akt.org.uk/Handlers/Download.ashx?IDMF=c0f29272-512a-45e8-9f9b-0b76e477baf1>

Victims of hate-crimes, such as people experiencing abuse due to their sexual orientation, are at greater risk of poor housing conditions and homelessness.⁷ Ambition five of the strategy “accessible housing pathways and homes for everyone” will develop and improve housing pathways for vulnerable people, which we anticipate will have a positive impact on those experiencing abuse or violence due to their sexual orientation. This includes the priority to:

- Increase the provision of appropriate and safe accommodation for people fleeing violence and abuse

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.⁸

Victims of hate-crimes, such as people experiencing abuse due to their gender reassignment, are at greater risk of poor housing conditions and homelessness.⁹ Ambition five of the strategy “accessible housing pathways and homes for everyone” will develop and improve housing pathways for vulnerable people, which we anticipate will have a positive impact on those experiencing abuse or violence due to being transgender. This includes the priority to:

- Increase the provision of appropriate and safe accommodation for people fleeing violence and abuse

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.

The strategy also has the target of building 3,500 council owned homes over the next 10 years, which would have a positive impact on those who are on the Housing Needs Register.

Alongside building more affordable homes, including council owned homes, the strategy seeks to improve housing in the borough by driving up standards in the private rented sector.

- We will support and work with landlords to improve standards of management within Enfield’s private rented sector, whilst also taking a strong approach to tackling poor conditions and stopping rogue landlords and managing/letting agents. This will include taking enforcement action if landlords do not bring properties up to the minimum legal Minimum Energy Efficiency Standard (MEES).

⁷ https://crisis.org.uk/media/237534/appg_for_ending_homelessness_report_2017_pdf.pdf

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

⁹ https://crisis.org.uk/media/237534/appg_for_ending_homelessness_report_2017_pdf.pdf

- We will use our powers as the local planning authority to set quality standards in the private housing sector. This will include adopting new policies in our emerging Local Plan and providing a positive and responsive service to support people making planning applications. It will also involve proactive enforcement against people who breach planning permission or develop without the necessary approvals, and through considered use of 'Article 4 direction' to control substandard housing delivered without the need for planning permission using 'Permitted Development' rights.¹⁰
- We will lead standards of quality housing management and lettings in the private sector through exemplar standards set by Housing Gateway, with an increasing portfolio of homes in Enfield, delivering a range of products to meet local need.
- We will explore how we can improve standards of local estate agents by researching options to deliver a Council-owned venture which can deliver a trusted, ethical and value service for local people looking to find a home to rent in the private market.

Marriage and civil partnership

The strategy vision is to ensure that housing growth benefits all communities in Enfield. This includes benefiting 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 basis of their relationship status.

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	
Does the service or policy contribute to eliminating discrimination, promote equality of opportunity, and foster good relations between	Yes	Yes	Yes	Yes	Yes	Yes	Yes	

¹⁰ An [article 4 direction](#) is made by the [local planning authority](#). It restricts the scope of [permitted development rights](#) either in relation to a particular area or site, or type of development anywhere in the authority's area. Where an article 4 direction is in effect, a planning application may be required for development that would otherwise have been permitted development.

different groups in the community?								
Could this proposal affect access to your service by different groups in the community?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	

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 access a decent home which they can afford.

The Housing and Growth strategy seeks to increase the supply of affordable housing, improve social housing we already have, and drive up standards in the private rented sector.

1. We will prioritise an increase in rented homes as part of mixed income communities, as evidence shows this is where we have the greatest and most immediate demand. These will be of the size and type that local people need, as informed by our housing needs register and Housing Needs Assessment.
2. We will use our powers as the local planning authority - through planning policies and development management processes - to ensure that all new homes, of all tenures, are built to the highest standards of quality and design and where there is no differentiation in quality or communal areas between market sale, market rent or affordable housing products.
3. To bring all our existing homes up to a standard fit for now and for the future, incorporating new standards from Government, we will take a balanced approach between investing to keep our existing housing stock; and replacing stock where this is the most financially viable option to bring homes up to the desired standard.
4. We will lead standards of quality housing management and lettings in the private sector through exemplar standards set by Housing Gateway, with an increasing portfolio of homes in Enfield, delivering a range of products to meet local need.
5. We will explore how we can improve standards of local estate agents by researching options to deliver a Council-owned venture which can deliver a trusted, ethical and value service for local people looking to find a home to rent in the private market.
6. We will support and work with landlords to improve standards of management within Enfield's private rented sector, whilst also taking a strong approach to tackling poor conditions and stopping rogue landlords and managing/letting agents. This will include taking enforcement action if landlords do not bring properties up to the minimum legal Minimum Energy Efficiency Standard (MEES).

7. We will use our powers as the local planning authority to set quality standards in the private housing sector. This will include adopting new policies in our emerging Local Plan and providing a positive and responsive service to support people making planning applications. It will also involve proactive enforcement against people who breach planning permission or develop without the necessary approvals, and through considered use of 'Article 4 direction' to control substandard housing delivered without the need for planning permission using 'Permitted Development' rights.¹¹

6. Review

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

The strategy and accompanying action plan will be reviewed a minimum of six-monthly at the Housing Advisory Group.

¹¹ An [article 4 direction](#) is made by the [local planning authority](#). It restricts the scope of [permitted development rights](#) either in relation to a particular area or site, or type of development anywhere in the authority's area. Where an article 4 direction is in effect, a planning application may be required for development that would otherwise have been permitted development.

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.