

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 socioeconomic 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.

The completed EqlA 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 EqlA 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 1 – Equality Analysis Details

Title of service activity / policy/ strategy/ budget change/ decision that you are assessing	Loft Conversion and Home Extension Policy for Foster Carers
Lead officer(s) name(s) and contact details	Victoria Adnan, Strategy and Policy Manager, Corporate Strategy Service Victoria.adnan@enfield.gov.uk Debbie Michael, Service Manager, Fostering & Permanence Debbie.Michael@enfield.gov.uk
Team/ Department	Fostering & Permanence
Executive Director	Tony Theodoulou
Cabinet Member	Cllr Mahtab Uddin
Date of EqlA completion	26 August 2021

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?

Proposed decision:

A new Loft Conversion and Home Extension Policy for Foster carers is due to be presented to Cllr Mahtab Uddin, (Cabinet Portfolio Holder for Children’s Services, Education and Protection) for approval in late August/ September 2021.

Subject to successful approval, this Policy will then be adopted by Enfield Council, with implementation due to commence as soon as possible in 2021. This Equality Impact Assessment has been carried out to assess the differential impact of the Policy in relation to each protected characteristic.

Reason for the decision and intended outcomes:

On 3 February 2021, Enfield’s Fostering Service received approval from Cabinet for use of up to £270k in 21/22 and £210k per year from 22/23 to 2029/30, as part of an invest to save Council initiative.

The budget will be used to provide an “Additional Bedroom Grant” to a limited number of Foster carers each year. This will enable them to extend their homes, to provide an additional placement to a looked after child or young person in Enfield. The Loft Conversion and Home Extension Policy for Foster carers provides the framework to ensure the Additional Bedroom Grant can be effectively implemented.

The intended outcomes for Enfield’s Loft Conversion and Home Extension Policy for foster carers are as follows:

- The Council will successfully increase the capacity of between 2-4 foster families per year and they will provide at least one additional foster placement each.
- Foster families who are awarded the grant will continue to provide high standards of care and an additional placement(s) for at least 5 years (from the date of the first additional placement, made possible by an Additional Bedroom Grant).

- The Council will reduce its use of costly independent fostering agencies and increase the number of looked after children and young people that are placed with our existing foster families in the borough.

Who will this decision impact?

This Policy will have an impact on foster carers that are eligible to apply for the Additional Bedroom Grant, and Enfield children and young people that are looked after by foster carers. A child or young person is looked after, when they have been in the care of Enfield Council for more than 24 hours.

Grant Eligibility Criteria:

Foster carers must:

1. Be approved as a foster carer by Enfield Council;
2. Have at least 1-year of post approval experience caring for an Enfield Looked after Child or Young Person with no safeguarding or standard of care issues;
3. Remain a foster carer approved by Enfield, for a minimum of five years, from the start date of the additional placement made possible by the grant;
4. Be consistently available to accept and provide an additional ongoing placement within their family, for at least 5 years from the start date of the additional placement, made possible by an Additional Bedroom Grant.
5. Be owner-occupiers of the property they live in and have consent from all Title Holders of the property to apply for Additional Bedroom Grant.

Additional Information

The Policy sets out the grant conditions (please see page 10-11 of policy), which state that foster carers are required to repay the Additional Bedroom Grant in full or in part, if they are deregistered or are no longer able to provide the ongoing additional placement within their family, for five years. The expectation is that the foster carer is consistently available to accept and provide the ongoing additional placement for a period of 5 years. The five-year commitment to providing the additional placement, will commence on the first day of the placement made possible by the Additional Bedroom Grant. Deregistration occurs when a foster carer resigns, or the Fostering Service decides they are no longer suitable to foster. This decision will be made via a Fostering Panel and ADM process or an internal ADM process by the Fostering Service Manager. The length of the commitment, which is set at 5 years, has been based on benchmarking of 4 local authorities with similar schemes.

If the foster carer withdraws at any point from the award of the grant and within 1 year from the start of the additional placement, they are required to repay 100% of the funds.

As set out in the policy, foster carers are required to enter into the relevant legal agreements in order to receive the grant. This includes the foster carer agreeing to a legal charge being placed on their property, at the point the grant is awarded and to the total amount awarded. At the end of the 5-year commitment period the Council can remove the legal charge from the property at the request of the foster carer.

To ensure foster carers fully understand the conditions of the legal charge, they are required to seek independent legal advice. This will be reimbursed up to the cost of £300+VAT. Details relating to the grant conditions and repayment (should this be required) can be found on pages 10-11 of the policy.

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 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, where possible, 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.

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 Policy applies to all foster carers, and the Additional Bedroom Grant is open to all foster carers that meet the grant eligibility criteria and suitability to take on an additional placement.

There is no upper age limit for fostering in Enfield, however foster carers are required to be a minimum of 21 years of age in order to be eligible to Foster. As a result, foster carers will be over the age of 21 years when applying for the Additional Bedroom Grant. Regardless of their age, all foster carers that express interest in the grant will be supported by their Supervising Social Worker, to consider their family circumstances and suitability to take on an additional fostering placement before applying.

This assessment recognises that only foster carers who are Owner-Occupiers will be eligible for the grant. This is a necessary policy decision, as the foster carer is required to agree to a Legal Charge being placed on their property. In the UK, the average age of a first-time buyer is around 34 years¹. At present, the average age of a foster carer in Enfield (with at least one placement) is 53 years old. As a result, the requirement to be an Owner-Occupier could negatively impact younger foster carers, that are less likely to own their homes. However, due to the average age of foster carers in the borough, it is anticipated that this impact is limited.

When considering the differential impact on children and young people, at present Enfield has a higher proportion of older looked after children and young people aged 10-15 years and 16+ in care, when compared to other age groups. Children aged between 10–15 years, represent 37% of looked after children and young people and 27% are aged 16+. This is compared with 8% of looked after children and young people, aged between 0-1 years.

¹ [First-time buyer statistics: Average age to buy a house in the UK](#)

Children under the age of 3 years are not required to have their own room, providing the foster carer can comfortably fit a cot in their bedroom for the baby or young child to sleep in. It is therefore anticipated that children over the age of 3 are more likely to be placed with a family as a result of the Additional Bedroom Grant.

Furthermore, when applications are reviewed each year, the placement priorities of the Fostering Service and the needs of Children and young people at that time will be taken into consideration, alongside the Eligibility Criteria and a foster carer's suitability to take on an additional placement. Due to the higher rate of teenagers in care in the borough, it is probable that applicants that can provide a placement to an older looked after child or young person may be prioritised to some extent.

Mitigating actions to be taken

No further action required.

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 to day activities.

This could include:

Physical impairment, hearing impairment, visual impairment, learning difficulties, longstanding 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.

The Policy applies to all foster carers, and the Additional Bedroom Grant is open to all foster carers that meet the grant eligibility criteria and suitability to take on an additional placement, regardless of whether they have a disability. Foster carers will be supported by their Supervising Social Worker, to consider whether their disability or a member of the household's disability would impact their ability to take on an additional fostering placement, before applying for the grant.

At present, 11% of looked after children and young people have a disability in Enfield, and where required Social Services will arrange for the necessary assessments to be carried out, in line with Enfield's statutory duties. The required adaptations will be incorporated into the design, to ensure the identified needs of the child or young person are supported.

If existing member(s) of the household are disabled, Enfield Council’s Accessible housing and Adaptations Team (who are responsible for internal project management and delivery of the Additional Bedroom Grant), will also work with the foster carer and their Supervising Social Worker to ensure their needs are supported during the building phase of the project.

Finally, once a building project is completed, a foster carer’s Supervising Social Worker will work closely with their family to determine the most appropriate living arrangements for the household, once the new bedroom has been added to the property, to ensure the individual needs of the looked after children and young people in their care are supported and met.

Mitigating actions to be taken

- **Design phase** - Social Services will arrange for the necessary assessments; and required adaptations to be incorporated into the design.
- **Building phase** - Accessible housing and Adaptations Team to work with the foster carer and their Supervising Social Worker to ensure needs are supported.
- **Post-build phase** - Supervising Social Worker will work closely with their family to determine the most appropriate living arrangements for the household.
- **Grant Conditions:** In exceptional circumstances and at Enfield Council’s absolute discretion the requirement to repay may be waived.

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 impact anticipated.

The Policy applies to all foster carers, and the Additional Bedroom Grant is open to all foster carers that meet the grant eligibility criteria and suitability to take on an additional placement.

A foster family’s Supervising Social Worker will work closely with their family to support the individual needs of the looked after children and young people in their care.

Mitigating actions to be taken

No further action required.

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 impact anticipated.

The Policy applies to all foster carers, and the Additional Bedroom Grant is open to all foster carers that meet the grant eligibility criteria and suitability to take on an additional placement, regardless of their marital/ civil partnership status.

A foster family's Supervising Social Worker will work closely with the family to support the individual needs of the looked after children and young people in their care.

Mitigating actions to be taken

No further action required.

Pregnancy and maternity

Pregnancy refers to the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

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

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

The Policy applies to all foster carers, and the Additional Bedroom Grant is open to all foster carers that meet the grant eligibility criteria and suitability to take on an additional placement, regardless of whether they are pregnant or expecting a baby. A foster carer's Supervising Social Worker will work closely with them, to support them to consider their

family circumstances and suitability to take on an additional fostering placement before applying for the grant.

Should a foster carer be awarded the grant, they are expected to remain a foster carer approved by Enfield; and be consistently available to accept and provide an additional ongoing placement within their family for a minimum of five years, from the start date of the additional placement made possible by the grant. Should a foster carer no longer be able to consistently provide the additional placement within their family during the 5-year commitment, they would be subject to the repayment conditions outlined in the policy and associated legal agreements. In exceptional circumstances and at Enfield Council's absolute discretion the requirement to repay may be waived. This would be considered on a case by case basis.

Young parents sometimes need support to help raise their children and under these circumstances, Foster carers may provide a placement to care for both parent and child. As with all placements, the Supervising Social Worker will work closely with foster carer and their family to support the individual needs of the looked after children and young people in their care.

Mitigating actions to be taken

- In exceptional circumstances and at Enfield Council's absolute discretion the requirement to repay may be waived

Race

This refers to a group of people defined by their race, colour, and nationality (including citizenship), ethnic or national origins.

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

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

The Policy applies to all foster carers, and the Additional Bedroom Grant is open to all foster carers that meet the grant eligibility criteria and suitability to take on an additional placement, regardless of their race.

When considering the differential impact on people of a certain race. We know that locally 46% of looked after children and young people are White, 34% are Black, 13% are from Mixed backgrounds or Multiple Ethnic Groups, and 4% are Asian.

Although children and young people entering into care are more likely to be White, it is not known at this time whether this policy will have a greater impact on children and young people of a certain race in the foster care system.

Mitigating actions to be taken

No further action required at this time. Retrospective EqIA following year 2 implementation is recommended.

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.

There is no impact anticipated.

The Policy applies to all foster carers, and the Additional Bedroom Grant is open to all foster carers that meet the grant eligibility criteria and suitability to take on an additional placement, regardless of their religion and belief.

A foster family's Supervising Social Worker will work closely with the family to support the individual needs of the looked after children and young people in their care.

Mitigating actions to be taken

No further action required.

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.

There is no impact anticipated.

The Policy applies to all foster carers, and the Additional Bedroom Grant is open to all foster carers that meet the grant eligibility criteria and suitability to take on an additional placement, regardless of their sex.

When considering the differential impact on male and female looked after children and young people, we know nationally that males are more likely to be looked after than females in England. As at 31 March 2020, 56% of looked after children and young people were male and 44% were female in England.² At present in Enfield, 54% of looked after children and young people are male and 46% are female.

Although children and young people entering into care are more likely to be male in Enfield, it is not known at this time whether this policy will have a greater impact on male children and young people in the foster care system.

Mitigating actions to be taken

No further action required at this time. A retrospective EqIA following year 2 implementation is recommended.

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.

² Children looked after in England including adoptions - [Characteristics of children looked after](#)

There is no impact anticipated.

The Policy applies to all foster carers, and the Additional Bedroom Grant is open to all foster carers that meet the grant eligibility criteria and suitability to take on an additional placement, regardless of their sexual orientation.

A foster family's Supervising Social Worker will work closely with the family to support the individual needs of the looked after children and young people in their care.

Mitigating actions to be taken

No further action required.

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.

The Additional Bedroom Grant will support a limited number of foster carers each year, who would like to provide another fostering placement, but require an additional bedroom to be built at their property, to enable them to do so. Applying for the Additional Bedroom Grant is free, regardless of a foster carer's employment status and income, however Foster carers are required to be the Owner-Occupier of their home. This is a necessary policy decision, as the foster carer is required to be the Owner agree to a Legal Charge being placed on their property.

Foster carers must already be approved by Enfield to foster via a Fostering Panel and ADM process, and are required to work with their Supervising Social Worker to consider their family circumstances and suitability to take on an additional fostering placement before applying for the grant.

If a foster carer's application for an Additional Bedroom Grant is successful, the approved works (including costs for professional/service fees and decoration) will be funded in whole by Enfield Council as a non-repayable grant, subject to the conditions set out in the policy. To ensure foster carers understand the conditions of the grant, they are required by Enfield Council to seek independent legal advice before entering into the relevant legal

agreements. Enfield Council will agree to cover the cost of this advice up to £300+VAT. Exemption from the repayment condition due to exceptional circumstances, will be considered by the Council on a case by case basis.

The grant will not negatively impact on a foster family's universal eligibility to receive their Fostering Allowances that support the cost of caring for a child or young person.

Mitigating actions to be taken.

- In exceptional circumstances and at Enfield Council's absolute discretion the requirement to repay may be waived.

SECTION 4 – Monitoring and Review

How do you intend to monitor and review the effects of this proposal?

Who will be responsible for assessing the effects of this proposal?

The policy will be periodically reviewed by Enfield Council and, when necessary, updated to respond to local and national change. Due to the length of the scheme, it is recommended that the Fostering Service complete a retrospective EqIA following the completion of the second year of implementation, to evaluate the delivery phase of the scheme and the subsequent impact of the policy.

SECTION 5 – Action Plan for Mitigating Actions.

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