

Enfield Equality Impact Assessment (EqIA)

Introduction

The purpose of an Equality Impact Assessment (EqIA) is to help Enfield Council make sure it does not discriminate against service users, residents and staff, and that we promote equality where possible. Completing the assessment is a way to make sure everyone involved in a decision or activity thinks carefully about the likely impact of their work and that we take appropriate action in response to this analysis.

The EqIA provides a way to systematically assess and record the likely equality impact of an activity, policy, strategy, budget change or any other decision.

The assessment helps us to focus on the impact on people who share one of the different nine protected characteristics as defined by the Equality Act 2010 as well as on people who are disadvantaged due to socio-economic factors. The assessment involves anticipating the consequences of the activity or decision on different groups of people and making sure that:

- unlawful discrimination is eliminated
- opportunities for advancing equal opportunities are maximised
- opportunities for fostering good relations are maximised.

The EqIA is carried out by completing this form. To complete it you will need to:

- use local or national research which relates to how the activity/ policy/ strategy/ budget change or decision being made may impact on different people in different ways based on their protected characteristic or socio-economic status;
- where possible, analyse any equality data we have on the people in Enfield who will be affected eg equality data on service users and/or equality data on the Enfield population;
- refer to the engagement and/ or consultation you have carried out with stakeholders, including the community and/or voluntary and community sector groups you consulted and their views. Consider what this engagement showed us about the likely impact of the activity/ policy/ strategy/ budget change or decision on different groups.

The results of the EqIA should be used to inform the proposal/ recommended decision and changes should be made to the proposal/ recommended decision as a result of the assessment where required. Any ongoing/ future mitigating actions required should be set out in the action plan at the end of the assessment.

Section 1 – Equality analysis details

Title of service activity / policy/ strategy/ budget change/ decision that you are assessing	Approval to enter into a Sale Agreement for 119 homes with Vistry Partnerships
Team/ Department	Housing and Regeneration
Executive Director	Sarah Cary
Cabinet Member	Cllr Nesil Caliskan
Author(s) name(s) and contact details	Cem Erkmn
Committee name and date of decision	n/a

Date the EqIA was reviewed by the Corporate Strategy Service	6 July 2022
Name of Head of Service responsible for implementing the EqIA actions (if any)	Karen Lucas
Name of Director who has approved the EqIA	Joanne Drew

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

Section 2 – Summary of proposal

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

Please summarise briefly:

What is the proposed decision or change?

What are the reasons for the decision or change?

What outcomes are you hoping to achieve from this change?

Who will be impacted by the project or change - staff, service users, or the wider community?

The Council is looking to acquire 27 shared ownership units in Block E2 of Meridian Phase 1a from Vistry Partnership and subject to grant, an additional 92 new Shared Ownership homes on (Phase 1b) will be acquired and entered into the Sale Agreement with Vistry Partnerships on the same contractual basis.

The decision seeks authority for expenditure to be committed in 2022/2023 for the acquisition of 119 newbuild homes on Meridian Water Phase 1, of which 27 will be acquired for London Affordable Rented (social housing) and 92 are proposed for Shared Ownership (subject to contract and GLA grant being allocated).

The reason for this decision is that subsequent to the planning permission covering Phase 1a of Meridian Water a marketing process was carried out. These homes were expected to be acquired by Registered Providers (also known as Housing Association) but following the marketing process, only one block (A1) was acquired. This enabled the Council to make an offer on the shared ownership homes adjacent to the Council's homes already under contract. Block E2 is currently being built as shared ownership homes but as the majority are large family homes (3bed and 4beds) the Council has secured additional grant to convert these to social housing. With this change the Council will allow for the early delivery of much needed affordable accommodation to people on the housing needs register.

Enfield's Housing Register is a local register of housing need. All applicants seeking social housing in Enfield must apply through its Housing Register. The demand for housing exceeds supply and the Housing Register exists to enable the Housing Allocations Policy to prioritise those households that are in greatest need and to maximise their opportunities for rehousing.

There are two primary routes onto the Housing Register:

- Homeless applicants to whom the Council has accepted a main housing duty are automatically entered onto the register
- Other residents can apply to join the Housing Register via an online portal

The decision to let 27 shared ownership homes as London Affordable Rented homes will have a positive impact on those who are eligible for social housing, reduce the cost of temporary accommodation and provide a stable home for an Enfield resident.

The council will retain 100% nomination rights to the London Affordable Rented units and ensure that properties are allocated fairly and transparently in line with the current allocations policy.

This EQIA has not identified negative impacts on any equalities group.

The council will meet its equality duties through the allocation of tenancies.

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 provide evidence to explain why this group might be particularly affected. If there is no differential impact for that group, briefly explain why this is not applicable.

Please consider how the proposed change will affect staff, service users or members of the wider community who share one of the following protected characteristics.

Detailed information and guidance on how to carry out an Equality Impact Assessment is available here. (link to guidance document once approved)

Age

This can refer to people of a specific age e.g. 18-year olds, or age range e.g. 0-18 year olds.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people of a specific age or age group (e.g. older or younger people)?

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

There are currently 6,234 applicants on the Housing Need Register waiting to be housed. Three of the applicants are at 0-18 age group, 372 are over 65 and 5,859 people are aged 18-65. The decision is bringing in the acquisition of new build social housing homes which will help 27 applicants and their household who are most in need in the Borough to be housed by the Council. As the proportion of homes include three and four bedrooms the acquisition is likely to have a positive impact on families with children or dependents on the housing register.

However, the acquisition of these homes will not have a differential impact (positive or negative) on a specific age group. The acquired homes will be allocated on the basis of need rather than household characteristics.

Mitigating actions to be taken

No mitigating action identified. We will monitor the implementation of the decision to ensure that it is not having a differential impact on people or households with protected characteristics.

Disability

A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on the person's ability to carry out normal day-day activities.

This could include: physical impairment, hearing impairment, visual impairment, learning difficulties, long-standing illness or health condition, mental illness, substance abuse or other impairments.

Will the proposed change to service/policy/budget have a **differential impact**

[positive or negative] on people with disabilities?

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

This will have a positive impact as residents with high vulnerabilities will be assessed for social housing within the 27 acquired homes.

Currently 570 applicants on the Council's Housing Needs Register indicated that they have a disability but not all will require accessible home. Although the acquisition of these homes may help house people with disabilities that are currently on the Housing Need Register, the acquisition will not have a differential impact (positive or negative) on people with disabilities as the acquired homes will be allocated on the basis of need rather than household characteristics

Mitigating actions to be taken

No mitigating action identified. We will continue to monitor the implementation of the decision to ensure that it is not having a differential impact on people or households with protected characteristics.

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.

We do not have robust local data with regard to gender reassignment, however GIRES estimates that around 650,000 people in the UK, 1% of the population, are estimated to experience some degree of gender non-conformity. If GIRES' estimates are correct and the distribution among Enfield's population were typical of their national research, this would equate to around 3,350 individuals with some

degree of gender non-conformity.

Although there is lack of available local data in this area, we do not believe that the acquisition of these homes for the purpose of letting them as London Affordable Rented homes will have a differential impact (positive or negative) on transgender people. Properties will be allocated on the basis of need rather than household characteristics.

Mitigating actions to be taken

No mitigation action identified. However, we will monitor the implementation of the decision to ensure that it is not having a differential impact on people or households with protected characteristics.

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.

The acquisition of these homes will not have a differential impact (positive or negative), because of marital status. Properties will be allocated on the basis of need rather than household characteristics.

Mitigating actions to be taken

No mitigation action identified. We will continue to monitor the implementation of the decision to ensure that it is not having a differential impact on people or households with protected characteristics.

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.

A significant proportion of the Housing Register is made up of single female parent families. The proposed increase in affordable rental family sized homes will help lone female parents who have made successful homeless applications, and their children, find much needed stability after likely spending years in temporary accommodation. It is therefore possible that the decision will have a positive impact on people who fall within the pregnancy and maternity category.

The homes however will be allocated on the outcome of need assessment rather than household characteristics which may or may not include people who have these characteristics.

Mitigating actions to be taken

No mitigation action identified. We will continue to monitor the implementation of the decision to ensure that it is not having a differential impact on people or households with protected characteristics.

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.

Enfield Housing Register

There is a disproportionate number of people from BAME backgrounds on the

housing register. There are approximately 1,494 Black applicants (African, Caribbean and Other) on the housing register waiting to be housed, in comparison to just 779 White UK applicants. There are 3,724 housing register applicants with ethnicities data recorded. Applicants with a Black background make up 40.1% of the applicants that provided their ethnicity whereas White UK group make up 20.9%. When comparing the demographics with the borough of Enfield, White UK group make up 40.5% of the total population.

Homeless Applicants

People from BAME backgrounds are more likely to approach our homelessness service for help. During 2018-19, we assessed 2,918 households under the Homelessness legislation.

Applicants identifying as Black make up the largest single group with 33% with 57% of applicants identifying as being from a non-white background. A full breakdown is set out below:

Ethnicity	%
White	30
Black / African / Caribbean / Black British	33
Asian / Asian British	4
Mixed / Multiple ethnic groups	3
Other ethnic groups	17
Not known	13

Overcrowding and Covid

The impact of the Covid pandemic on BAME communities has been profound. Research by UCL into mortality rates from Covid has demonstrated that there is an increased risk of death with BAME communities being nearly twice as likely to die than the white population. Many of the overcrowded households in the borough are from BAME communities. For BAME households this has meant an increased risk as it is far more difficult to maintain lockdown measures when the household do not have enough space to live in.

Although, the lettings will be in line with the housing allocations scheme which may have a positive impact on people from minority ethnic backgrounds, we do not believe that the increase in social housing will have a differential impact (positive or negative) on people of certain race. Properties will be allocated on the basis of need rather than household characteristics.

Mitigating actions to be taken

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We will monitor the implementation of the decision to ensure that it is not having a differential impact on people or households with protected characteristic.

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.

The most reliable estimates on percentages of Enfield residents of different religions are those from the 2011 Census; Christianity (all denominations) was the most common religion in the borough (53.6%) at that time. 16.7% of residents were of the Muslim faith, and 15.5% hold no religion or belief at all. Sikhs were the smallest group in the borough, composing 0.3% of the population, and people of 'other religion' made up 0.6%.

We do not believe that the increase in social housing will have a differential impact (positive or negative), because of religion or belief. Properties will be allocated on the basis of need rather than household characteristics.

Mitigating actions to be taken

We will monitor the implementation of the decision to ensure that it is not having a differential impact on people or households with protected characteristics.

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 a disproportionate number of female applicants on the housing register representing 74.6% of 6,216 applicants that have indicated their sex. Male applicants make up 25.3% of the applicants. Females are more likely to be single parents – 94% of single parents on Enfield’s Housing Register are mothers. Therefore, the increased provision of more family homes, which are available to residents on the housing register, will help lone female parents who have made successful homeless applications, and their children, find much needed stability after likely spending years in temporary accommodation.

Mitigating actions to be taken

We will monitor the implementation of the decision to ensure that it is not having a differential impact on people or households with protected characteristics.

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.

There is very little boroughwide reliable data on sexual orientation, however the ONS 2019 Annual Population Survey predicted that 92.1% of the UK population

identified as heterosexual while 2.9% identified as lesbian, gay or bisexual. 2,595 applicants in the housing register specified their sexual orientation whereby 97.1% identified themselves as heterosexual, less than 1% as gay/lesbian and 2% as other.

The increase in social housing however will not have a differential impact (positive or negative), because of sexual orientation. Properties will be allocated on the basis of need rather than household characteristics.

Mitigating actions to be taken

We will monitor the implementation of the decision to ensure that it is not having a differential impact on people or households with protected characteristics.

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.

Enfield is the 9th most deprived London borough and has the 11th highest rate of child poverty in the country.¹ Enfield's median household income is £35,300, which is the 9th lowest of the 33 London boroughs and lower than the London average. Within the borough, there are clear differences in household income between the western and eastern parts. Median incomes in the most affluent neighbourhoods are twice those of the least affluent.

The median rent charge in the year ending March 2021 was £1,300. This is 44% of the median household income per month. As at March 2020, 3,497 households were in temporary accommodation – the second highest number of all English authorities. Enfield has a higher total number of households in temporary

¹ <https://new.enfield.gov.uk/services/your-council/equality-and-diversity-report-2020-your-council.pdf>

accommodation per thousand, (26.29), than the England, (4.03), and London, (16.05), average.²

The increase in affordable homes will increase provision in the borough and provide more affordable rental family sized homes to residents on the housing register.

Mitigating actions to be taken.

We will monitor the implementation of the decision to ensure that it is not having a differential impact on people or households with protected characteristics.

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?

Equalities data on ethnicity and disability is currently captured for some applicants but is not comprehensive. Equalities data is not currently collated on religion, sexual orientation or gender reassignment.

In future, applicants will be asked the Council's standard monitoring questions in relation to religion, sexuality and gender reassignment, as well as the standard Council equalities questions on age, gender, ethnicity and whether the applicant or household has a disability.

The Head of Housing Management will have overall responsibility for the implementation of the mitigating actions.

Section 5 – Action plan for mitigating actions

² <https://new.enfield.gov.uk/services/your-council/equality-and-diversity-report-2020-your-council.pdf>

Any actions that are already completed should be captured in the equality analysis section above. Any actions that will be implemented once the decision has been made should be captured here.

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