

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	Grant funding award and contract
Team/ Department	Regeneration
Executive Director	Sarah Cary
Cabinet Member	Cllr George Savva
Author(s) name(s) and contact details	Amena Matin Amena.matin@enfield.gov.uk
Committee name and date of decision	Key decision

Date the EqIA was reviewed by the Corporate Strategy Service	Yes
Name of Head of Service responsible for implementing the EqIA actions (if any)	Amena Matin
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 seeking to support the delivery of 19 rented homes through part-funding using Right to Buy (grant) receipts. The grant will be paid to North London Muslim Housing Association who have acquired the newbuild homes from Lovell. The homes will be owned by the Housing Association with 100% nominations to the Council. The grant is to enable the homes to be converted from shared ownership to London Affordable Rent which will make available 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 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.

In discussion with NLMHA, they have confirmed they have due regard to the Public-Sector Equality Duty to eliminate unlawful discrimination; advance equality of opportunity between people who share a protected characteristic and those who don't; and to encourage or foster good relations between people who share a protected characteristic and those who don't. The HA has provided policies to support the allocation (managed and monitored directly by LBE Housing Advisory Services) and ongoing housing management.

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

Housing Register

There is a disproportionate number of people from BAME backgrounds on the housing register. There are approximately 1026 Black applicants (African, Caribbean and Other) on the housing register, in comparison to just 484 White UK applicants. There are 2612 housing register applicants with ethnicities data recorded. Applicants with a black background make up 39.3% of applicants, whereas White UK group make up 18.5%. 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 2918 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

This means that the allocation scheme has a disproportionately positive impact on people from BAME backgrounds.

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.

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.

The revised housing allocations scheme is intended to have a positive differential impact on families with children over the age of 15. In the previous allocations scheme, families with children under the age of 15 were the only group eligible for houses containing gardens. As houses with gardens tend to be larger properties and are in short supply, removing this limitation means that eligible families with children of all ages will have equal opportunities to obtain larger houses.

The allocation scheme limits the ability of 16 and 17 year old to bid for properties, although they are still able to join the housing register. This is because they would normally be housed under the provisions in the Children Act. The Exceptions Panel has the ability to award points in exceptional circumstances.

Mitigating actions to be taken

The service will work closely with Childrens Services to ensure that there is a joined up approach to the provision of accommodation to young people through co-location of services and case conferences.

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.

The revised housing allocations scheme will have a positive impact on households with disabilities.

Government figures suggest that the number of people with disabilities and medical conditions on the housing waiting list in England has risen by almost 11,000 in two years. They show 119,621 disabled people or people with a medical condition were left waiting for an accessible home by their local authority in 2018/19, a rise of more than 10% since 2016/17. The public consultation produced a strong response with 577 responses, and 37% of responses indicating that they had some form of illness or disability.

Mitigating actions to be taken

We will monitor the implementation of the revised scheme to ensure that the scheme 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.

There is a lack of available data in this area. However, we do not believe that the revised housing allocations scheme 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

We will monitor the implementation of the revised scheme to ensure that the scheme 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.

No

Mitigating actions to be taken

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.

No

Mitigating actions to be taken

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 revised housing allocations scheme will have a positive impact on people from minority ethnic backgrounds

The revised housing allocations scheme will have a positive impact on people from minority ethnic backgrounds.

The Housing Register

The new scheme is based on the assessment of a household's needs over an extended period. This will increase the level of transparency in the allocation of properties. Overall, we expect the proposals to have a positive impact on households from BAME backgrounds. This is primarily because of their over representation on the Housing Register, driven by wider socio-economic factors.

Homeless Applicants

For homeless applicants, the new points system gives greater priority to households moving out of temporary accommodation. This is part of a wider offer that includes pre tenancy training and on-going support to assist households in the private rented sector. All homeless households will benefit from firstly moving into a stable home rather than temporary housing, and then from getting greater priority through the points system for social housing which will increase over time.

Overcrowding and Covid

The Allocations Scheme gives priority to social rented tenants living in overcrowded households, with the level of priority rising according to the level of overcrowding. The Allocations Scheme and the Placement Policy have been amended to prevent overcrowding when assessing the needs of a household and in the allocation of properties regardless of tenure. This will have a disproportionately positive impact on BAME households.

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

The proportion of households on the housing register for whom we hold monitoring data is relatively low, with around 2600 applicants with ethnicities data recorded out of nearly 4500. As part of the implementation of the new scheme we will seek to increase the proportion of households for whom we hold monitoring data.

A number of measures will be taken to ensure that applicants are not disadvantaged including:

- Providing appropriate advice and assistance
- Translating documents on request
- Providing information in other formats on request
- Partnership working with support agencies
- Undertaking monitoring and regular reviews of the allocations policy

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.

No

Mitigating actions to be taken

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.

No

Mitigating actions to be taken

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.

No

Mitigating actions to be taken

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 revised housing allocations strategy will have a positive impact on people who are socio-economically disadvantaged.

The allocation scheme uses income thresholds so that social housing is available for those who are unable to afford rent or buy privately. Household income is assessed and those earning under £37,000 are eligible to be on the housing register, unless eligible for reasonable preference. Those who are eligible for reasonable preference can bid for some properties but not for those with rents at Social Rent or London Affordable Rent levels.

The calculation is based on the entry level to shared ownership and will apply if their gross household income is more than 10.5% of the average house price in Enfield (as published by the Office for National Statistics). This calculation is based on the minimum entry level for shared ownership in the borough. The income threshold will be set annually based on the figures for March.

The revised scheme has the effect of reserving the properties with the lowest rent levels for those with the lowest incomes.

Mitigating actions to be taken.

There is very little data held in this area. As part of the implementation of the new scheme the Council committed to seek to increase the proportion of households for whom we hold monitoring data.

We will monitor the implementation of the revised scheme to ensure that the scheme 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 the Housing Advisory Service will have overall responsibility for the implementation of the mitigating actions. A full review of the impact of the revised allocations scheme is carried out on an annual basis, following adoption in 2020.

Section 5 – Action plan for mitigating actions

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