

## 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

<b>Title of service activity / policy/ strategy/ budget change/ decision that you are assessing</b>	Homelessness in Enfield (4)
<b>Team/ Department</b>	Housing Advisory Service
<b>Executive Director</b>	Sarah Cary
<b>Cabinet Member</b>	Cllr Savva
<b>Author(s) name(s) and contact details</b>	Richard Sorensen
<b>Committee name and date of decision</b>	Cabinet 14 September 2022

<b>Date the EqIA was reviewed by the Corporate Strategy Service</b>	
<b>Name of Head of Service responsible for implementing the EqIA actions (if any)</b>	Richard Sorensen
<b>Name of Director who has approved the EqIA</b>	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?

1. To set rents for temporary accommodation at Local Housing Allowance levels for the size of property and location effective from 1<sup>st</sup> November 2022 with the exception of shared accommodation, which will remain at its current rate.

Enfield Council currently provides temporary accommodation to around 3100 households. Approximately 2600 households are in temporary accommodation within Enfield and 500 are housed in temporary accommodation outside Enfield.

Temporary accommodation rents are currently significantly below the Local Housing Allowance (LHA) in Enfield. This creates a barrier to households seeking to move out of temporary accommodation as it is perceived as being more expensive. Increasing the rent to LHA will remove this barrier whilst also reducing the net loss to the Council by approximately £900,000 pa.

2. To increase the number of homes available for residents to rent, approve vacant properties on Council Housing estates awaiting regeneration to be leased to Housing Gateway Ltd on short term tenancies.

This will increase the supply of privately rent homes available to households in temporary accommodation. It will therefore have a positive impact across all households currently living in temporary accommodation.

3. To increase the number of homes available for residents to rent, approve the increased management fee paid to Housing Gateway for Enfield Let properties under the Offer to Agents.

This will increase the supply of privately rent homes available to households in temporary accommodation by enabling Enfield Let to take on portfolios of properties from managing agents. It will therefore have a positive impact across all households currently living in temporary accommodation

## 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 is no differential impact on any particular age group of increasing the supply of privately rented accommodation.

The breakdown of ages of the lead applicant for whom we hold data is set out below:

Age	No
18-25	179
26-35	733
36-45	936
46-55	691
56-65	252
66-75	51
75+	19

There is a differential impact based on age. The Benefit Cap only applies to people of working age. People over 67 years old are therefore exempt from the Benefit Cap and will have their housing costs met in full through housing benefit. The negative impact is on those of working age. Larger households are more likely to be subject to the benefit cap, particularly those with children.

There are 234 households who would be subject to the Benefit Cap if temporary accommodation rents rise to LHA levels. Of these households:

6% are under 30 years old  
 51% are aged 30-39 years old  
 22% are aged 40-49 years old  
 16% are aged 50-59 years old  
 5% are aged over 60 years old

There is therefore a disproportionate impact of households aged between 30 and 50.

**Mitigating actions to be taken**

Households affected by the Benefit Cap will need to be supported financially to prevent rent arrears from building up or supported to make a claim for Universal Credit due to a change in circumstances. Households transitioning from legacy benefits to Universal Credit will not be subject to the Benefit Cap. Households will also be targeted for support to gain employment. The Benefit Cap does not apply to households in work and earning more than £658 per month (before tax, national insurance and pensions deductions).

**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.

There is a positive differential impact on people a physical or mental impairment as their benefits will increase to cover the rent increase. This group of people is exempt from the Benefit Cap meaning that the rent increase will not have any financial impact on them.

The proposals to increase the number of properties let through Enfield Let and Housing Gateway will also increase the supply of properties that can be adapted to meet their specific needs.

**Mitigating actions to be taken**

None

**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 differential impact on people who are or have reassigned their sex. This is an area where there is very little historic data and people have traditionally been reluctant to provide information.

**Mitigating actions to be taken**

We are in the process of implementing a new case management system. A core aspect of this is to improve the collection and use of equalities data including for Gender reassignment. We will monitor the extent to which this improves our data.

**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 differential impact on households based on their relationships.

There are 629 couples living in temporary accommodation with the remainder being single people with or without children. Single adults with or without children will therefore disproportionately benefit from an increase supply of privately rented accommodation.

Only households not on Universal Credit will be affected by the rent increase. The primary impact is that the Benefit Cap may be triggered by the increased rent. There are 466 households currently on legacy benefits. Of these 365 are single and 101 are couples.

Of the couples, 3 are currently affected by the Benefit Cap. This will increase by 44 if the rent increase is approved, taking the total to 47.

Of the singles, 49 are currently affected by the benefit cap. This will rise by 138 if the rent increase is approved, taking the total to 177.

**Mitigating actions to be taken**

Households affected by the Benefit Cap will need to be supported financially to prevent rent arrears from building up or supported to make a claim for Universal Credit due to a change in circumstances. Households transitioning from legacy benefits to Universal Credit will not be subject to the Benefit Cap. Households will also be targeted for support to gain employment. The Benefit Cap does not apply to households in work and earning more than £658 per month (before tax, national insurance and pensions deductions).

**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.

There is no differential impact on people who are pregnant or expecting a baby.

**Mitigating actions to be taken**

None

**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.

There are 3100 households currently living in temporary accommodation. Of these households we hold ethnicity data on 1471 households. This reflects the fact that many households have been living in temporary accommodation before the implementation of the Homelessness Reduction Act.

There are a wide range of ethnicities within the households living in temporary accommodation. The largest groups are:

BLACK AFRICAN	24.61%
BLACK CARIBBEAN	11.83%
WHITE UK	11.01%
TURKISH	10.40%
WHITE OTHER	6.19%
OTHER ETHNIC	5.37%
SOMALIAN	4.42%
KURDISH	3.13%

Ethnic groups with higher representation will disproportionately benefit from any increase in the supply of privately rented accommodation.

Data on the impact of the rent increase on households claiming benefits is drawn from housing benefit and therefore uses a different categorisation of households. This data is also far more complete.

The impact of increasing temporary accommodation rents is determined by whether they are in receipt of Universal Credit. Households on Universal Credit will have their housing costs met in full regardless of the rent level and will not be subject to the benefit cap. For households on legacy benefits the position is slightly different but their benefits will rise to cover the increased rent provided that they are not subject to the Benefit Cap. Households not claiming benefits would need to pay the increased rent from earnings.

The Benefit Cap predominantly affects larger households with more than two children. Analysing Housing Benefit data on the impact of the proposed rent increase suggests that the number of households affected by the Benefit Cap will increase from 49 to 234 out of a total of 3100 households in temporary accommodation. Breaking this down by ethnicity suggests that households from BAME backgrounds will be disproportionately affected by the rent increase and its impact on their benefits. No White: British or White: Irish households are affected, and all the affected households are from BAME communities.

<b>Ethnicity</b>	<b>No of Households</b>
White other (not British or Irish)	11
Mixed: White and Black Caribbean	4
Mixed: White and Black African	4
Asian or Asian British: Bangladeshi	9
Black or Black British: Caribbean	54
Black or Black British: African	128
Black or Black British: Any other Black Background	24

As the Universal Credit roll out continues (due to complete in December 2024) the impact of the rent increase on the 234 households will disappear as they will then have their housing costs covered in full by Housing Benefit.

#### **Mitigating actions to be taken**

Households affected by the Benefit Cap will need to be supported financially to prevent rent arrears from building up or supported to make a claim for Universal Credit due to a change in circumstances. Households transitioning from legacy benefits to Universal Credit will not be subject to the Benefit Cap. Households will also be targeted for support to gain employment. The Benefit Cap does not apply to households in work and earning more than £658 per month (before tax, national insurance and pensions deductions).

We are in the process of implementing a new case management system. A core aspect of this is to improve the collection and use of equalities data including for ethnicity. We will monitor the extent to which this improves our data and take action to resolve any issues.

**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 differential impact on people based on their religion. This is an area where there is very little historic data and people have traditionally been reluctant to provide information

**Mitigating actions to be taken**

We are in the process of implementing a new case management system. A core aspect of this is to improve the collection and use of equalities data including for religion and belief. We will monitor the extent to which this improves our data.

**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 differential impact on women as 64% of households living in temporary accommodation are single women or single women with children.

The proposals around increasing the supply of privately rented accommodation will therefore have a disproportionately positive impact on women.

The proposal around increasing temporary accommodation rents will have a disproportionately negative impact on women.

The impact of increasing temporary accommodation rents is determined by whether they are in receipt of Universal Credit. Households on Universal Credit will have their housing costs met in full regardless of the rent level and will not be subject to the benefit cap. For households on legacy benefits the position is slightly different but their benefits will rise to cover the increased rent provided that they are not subject to the Benefit Cap. Households not claiming benefits would need to pay the increased rent from earnings.

The impact of this is that only those households who are not on Universal Credit are affected by the rent increase as all other households will have their housing costs met in full through Housing Benefit. There are currently 3100 households living in temporary

accommodation. Of these 466 households are claiming legacy benefits.

Of these 466 households, 52 are currently subject to the Benefit Cap. This is expected to rise to 234 households. The majority of households affected by the Benefit Cap have children and women are disproportionately affected with women being the applicant for 212 households compared with just 22 men.

As the Universal Credit roll out continues (due to complete in December 2024) the impact of the rent increase on the 234 households will disappear as they will then have their housing costs covered in full by Housing Benefit.

#### **Mitigating actions to be taken**

Households affected by the Benefit Cap will need to be supported financially to prevent rent arrears from building up or supported to make a claim for Universal Credit due to a change in circumstances. Households transitioning from legacy benefits to Universal Credit will not be subject to the Benefit Cap. Households will also be targeted for support to gain employment. The Benefit Cap does not apply to households in work and earning more than £658 per month (before tax, national insurance and pensions deductions).

**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 no differential impact on people based on their sexual orientation. This is an area where there is very little historic data and people have traditionally been reluctant to provide information

**Mitigating actions to be taken**

We are in the process of implementing a new case management system. A core aspect of this is to improve the collection and use of equalities data including for sexual orientation. We will monitor the extent to which this improves our data

**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.

Homeless households are largely at the bottom end of the income spectrum. This means that households in temporary accommodation are largely dependent on benefits. Welfare benefits play a key role in trapping people in temporary accommodation. Most people are aware of the benefit cap and this limits single people and households with more than two children who are not in employment. However, whilst a household is in temporary accommodation, they are entitled to full Housing Benefit provided they have a Universal Credit claim regardless of their income. Their Housing Benefit is not included in the Benefit Cap calculation.

The impact of this is that only those households who are not on Universal Credit are affected by the rent increase as all other households will have their housing costs met in full through Housing Benefit.

There are currently 101 households living in temporary accommodation who are not claiming any form of benefit but are paying their rent out of earnings. These households would need to either find the increased rent from their earnings, or make a benefits claim.

There are currently 466 households who are on legacy benefits. Of these, 52 households

are already subject to the Benefit Cap. This will rise to 234 households.

As the Universal Credit roll out continues (due to complete in December 2024) the impact of the rent increase on the 234 households will disappear as they will then have their housing costs covered in full by Housing Benefit.

**Mitigating actions to be taken.**

Households who are not on any form of benefit will be supported to secure accommodation in the private rented sector.

Households affected by the Benefit Cap will need to be supported financially to prevent rent arrears from building up or supported to make a claim for Universal Credit due to a change in circumstances. Households transitioning from legacy benefits to Universal Credit will not be subject to the Benefit Cap. Households will also be targeted for support to gain employment. The Benefit Cap does not apply to households in work and earning more than £658 per month (before tax, national insurance and pensions deductions).

## 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?

We will be working with affected households on an ongoing basis to reduce the impact on the 234 households negatively affected by the benefit cap.

Vince Rose (Sustainable Housing Service Manager) will have responsibility for ongoing monitoring of the effectiveness of the mitigation actions.

Vince Rose and Sharon Pinnock will have ongoing responsibility for ensuring that the quality of our data is improved.

Monitoring outcomes for households affected by the Benefit Cap will form part of the monthly performance challenge meetings for the Housing Advisory Service.

## 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
234 households affected by the benefit cap	Financial support through DHP or homelessness prevention for 8 weeks	Sally Sanders Vince Rose	07/11/2022	£200,000	01/11/2022
	Support to claim Universal Credit	Vince Rose	07/11/2022	BAU	01/11/2022
	Support into Employment	Sharon Pinnock/ Vince Rose	Ongoing	BAU	01/11/2022
101 households not on any form of benefit	Support to secure privately rented accommodation	Vince Rose	07/11/2022	BAU	01/11/2022
Key equalities data not held within Hope or Northgate for historic cases	Migration to Jigsaw. Equalities data to be refreshed as each case worked on.	Sharon Pinnock & Vince Rose	15/09/2022	BAU	15/09/2022
	Potential to link/import HB data				