

## 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>	<b>Enfield's Modern Slavery Strategy 2023-28</b>
<b>Team/ Department</b>	<b>People/ Strategic Safeguarding</b>
<b>Executive Director</b>	<b>Tony Theodoulou</b>
<b>Cabinet Member</b>	<b>Cllr Alev Cazimoglu</b>
<b>Author(s) name(s) and contact details</b>	<b>Fiana Centala 0208 132 2154</b>
<b>Committee name and date of decision</b>	

<b>Date the EqIA was reviewed by the Corporate Strategy Service</b>	<b>18.11.22</b>
<b>Name of Head of Service responsible for implementing the EqIA actions (if any)</b>	<b>Sharon Burgess</b>
<b>Name of Director who has approved the EqIA</b>	<b>Bindi Nagra</b>

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?

What is the proposed decision or change?

This equality impact assessments assess the potential impacts of Cabinet decision to approve the updated Modern Slavery Strategy.

What are the reasons for the decision or change?

The Modern Slavery Team have been established since January 2020 and the New Modern Slavery Strategy aims to reflect the learnings of the team and how they wish to move forward.

What outcomes are you hoping to achieve from this change?

There is no 'typical' victim of modern slavery, however those who are most vulnerable face increased risks of becoming victims of modern slavery. We will work with our partners to effectively communicate the risks and utilise our borough wide partnerships to provide a multi-disciplinary response to modern slavery to ensure that those who are most vulnerable are protected and supported. We will further consider the impact on individuals who have protected characteristics, where relevant, through the implementation of the Action Plan.

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

LBE staff will continue to be supported by the Modern Slavery Team and will be required to undertake refresher training every three years to ensure they are up to date with their knowledge of how to detect modern slavery and how to respond safely and appropriately.

Service users will also be impacted by the strategy. Our aim is to work more closely with Non-Government Agencies to provide appropriate support to victims. At times we have found delays in procuring support from the National Referral Mechanism (NRM) and this has not been in the best interests of the victim. We also want to improve support services for victims who decline to enter the NRM.

## 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)**

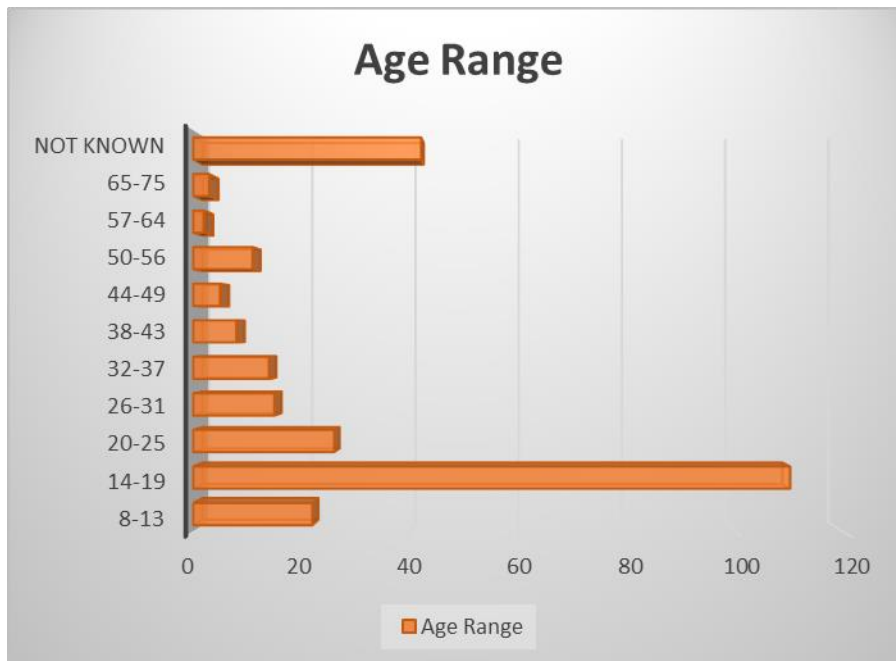
**Age**

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.

Enfield’s data suggests that the age group most at risk of modern slavery and exploitation are between the ages of 14-19. There may be some inconsistencies with this data as it is a legal requirement to complete National Referral Mechanisms (NRM) for those under the age of 18, however consent is required for those aged 18 and above which can be difficult to obtain and as such is reflected in lower numbers for adults.



LBE data of

referrals received by the team.

There are 42 individuals where concerns have been raised where the age is not known. This is due to either the concern being raised on a locational issue or lack of information being shared with the team.

Our strategy is reflective of the fact that modern slavery and exploitation can happen at any age. Our priorities, such as increasing awareness and knowledge, should mitigate the risk of signs of modern slavery being missed at different ages. Through sharing information, as highlighted in our strategy, we will be able to deliver support throughout a child, young person or adults’ life if they are

experiencing modern slavery. By sharing this information, we will be able to continue care and support each potential victim.

Furthermore, to support young people who have experienced modern slavery/ exploitation to transition into adulthood, we will improve strategic and operational working between children and adult services, enabling a whole family approach, understanding each family's context, needs, history and support network.

**Mitigating actions to be taken**

The Modern Slavery Team focus their attention on adults (aged 18 and above) to try and support vulnerable adults who might not be able to engage with statutory services.

The team acknowledges that there is a disproportionality by age of those impacted by modern slavery. To mitigate these risks the team will be utilising its partnership working links.

The team will also be working closely with our colleagues in children services who have published the following strategies.

Strategies are in place to reflect the needs highlighted above for adolescents:  
Safeguarding Adolescents from Exploitation Strategy  
Violence against women and girl's strategy

A plan is also in place:  
Tackling gangs, serious youth violence and exploitation plan

**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.

Disability has been identified as a risk factor in reference to modern slavery occurring. Although there are no local or national data sets on disability and increased risk of modern slavery, national figures show that those with a disability are 3.8 times more likely to be targeted by perpetrators than an individual without a disability. In addition, due to the presence of disability, the impact of abuse can be minimised by families and professionals.

As a result of the Covid-19 crisis, children with a disability were more likely to have

been at risk from unsafe situations over the lockdown period, with many children social-distancing, self-isolating and quarantining for longer period of time than children who do not have disabilities. This has impacted professionals ability to identify potential modern slavery/ exploitation of vulnerable children.<sup>1</sup>

In England and Wales, disabled people aged 16 years and over (43.4%) were significantly more likely to have experienced any Anti-Social Behaviour (ASB) in the year ending March 2020 than non-disabled people (39%)<sup>2</sup>.

Safeguarding activity is provided for children and families until the children are 18. For adults, safeguarding applies where there are care or support needs.

This strategy should have a positive impact on all individuals and the team will work closely with local charities to ensure that all groups are supported.

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

It is vital when engaging with victims who have with disabilities, including those with speech and communication impairments that we are able to hear their voice. This may mean, learning new methods of communication, to ensure no one's voice is lost. This is could be implemented into training practices, as part of the action plan, to ensure that a child's voice is paramount no matter how it is given.

There are a host of specific services for people with learning difficulties and mental health needs across the age ranges and the Modern Slavery Team work outside of the Care Act 2014 eligibility criteria.

The Modern slavery Team also utilise Language Line where appropriate.

The Modern Slavery Team have also attended training in Trauma Informed Practice to help them in their role.

#### **Gender Reassignment**

<sup>1</sup> [Then There Was Silence: The Impact of the Pandemic on Disabled Children, Young People and their Families.](#)

<sup>2</sup> [Outcomes for disabled people in the UK - Office for National Statistics \(ons.gov.uk\)](#)

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.

GIRES (Gender Research and Identity Society) estimates that in the UK, around 650,000 people (1% of the population), are estimated to experience some degree of gender non-conformity.<sup>3</sup>

These statistics are for adults but can be reflected in children and young people as they become older. This strategy should have a positive impact on all individuals, including those who are trans, by ensuring all victims voices are reflected in decision making and by increasing knowledge and awareness to support the care of children and young people who are experiencing abuse.

Safeguarding activity is provided for children and families until the children are 18. For adults, safeguarding applies where there are care or support needs.

Where there are concerns about hate crime or discriminatory abuse for a resident with care and support needed, these are managed under the safeguarding processes.

We do not currently hold data in this area locally or nationally.

This strategy should have a positive impact on all individuals and the team will work closely with local charities to ensure that all groups are supported.

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

No mitigating action to be taken.

#### **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

<sup>3</sup> [Gender Identify and Research Society, Individual help](#)



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.

In 2018, there were 12.8 million families containing married, or civil partnership couples and half of these couples had children living with them. <sup>4</sup>

This strategy should have a positive impact on all children, young people and families regardless of whether parents or carers, are in a marriage or civil partnership. This positive impact should be ensured by working with individual families to understand each family's context, needs, history and the support networks they have.

Marriage and Civil Partnership would not affect the safeguarding response a resident would receive.

We do not currently hold data in this area locally or nationally.

**Mitigating actions to be taken**

No mitigating action 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.

<sup>4</sup> [Families and households in the UK: 2018, ONS](#)

Pregnancy and maternity would not affect the safeguarding response a resident would receive. However, there is an awareness of national trends around increased domestic abuse risk around the time of pregnancy and maternity.

We do not currently hold data in this area locally or nationally.

**Mitigating actions to be taken**

No mitigating action 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.

This strategy should have a positive impact on all potential victims, regardless of their race or ethnicity. Cultural factors should be considered including access to resources for some communities. Practitioners must be able to give enough understanding and weight to cultural needs and their impact on the person's lived experience. However, maintaining a focus on the person's needs are a paramount consideration.

Safeguarding activity is provided for children and families until the children are 18. For adults, safeguarding applies where there are care or support needs.

We monitor ethnicity data as part of our analysis of trends and areas of concerns.

The most common nationalities referred to the NRM during the financial year 2020/21 were UK, Albanian and Vietnamese.<sup>5</sup> The Team will be working closely with local charities to ensure that appropriate support can be provided.

This strategy should have a positive impact on all individuals and the team will

<sup>5</sup> [Modern Slavery: National Referral Mechanism and Duty to Notify statistics UK, end of year summary, 2021 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/92121/modern-slavery-statistics-2020-21.pdf)

work closely with local charities to ensure that all groups are supported.

**Mitigating actions to be taken**

To continue to improve our data collection both internally and externally to ensure an accurate data set can be recorded to help provide appropriate support.

**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.

Data from the last census in 2011, shows that Christianity was the most common religion in the borough (53.6%). 16.7% of residents were of the Muslim faith, and 15.5% hold no religion or belief at all. Sikhs were the smallest religious group in the borough, composing 0.3% of the population, and people of 'other religion' made up 0.6%.

This strategy should have a positive impact on all potential victims, no matter their religion or belief and will encourage communities, including religious organisations, to take a positive role in identifying and respond to signs of modern slavery within Enfield. As part of the strategy, modern slavery training and awareness has been offered at religious community events supported by Enfield Council.

Religious factors should be considered including access to resources for some communities which may contribute to patterns of modern slavery. Practitioners must be able to give enough weight to religious needs and their impact on the potential victim's lived experience.

Safeguarding activity is provided for children and families until the children are 18. For adults, safeguarding applies where there are care or support needs.

Religion and belief will not affect the response a person receives.

We do not currently hold data in this area locally or nationally.

This strategy should have a positive impact on all individuals and the team will work closely with local charities to ensure that all groups are supported.

**Mitigating actions to be taken**

No mitigating action identified.

**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.

In the borough men are disproportionately affected by modern slavery accounting for around 70% of all the NRM referrals made by the team. Enfield's data set has similarities with the figures produced nationally. For adult potential victims, 75% (4,812) were male and 25% (1,594) were female were referred to the NRM.<sup>6</sup> Due to the data highlighting this disproportionality we are able to work closely with our partners such as health to try and offer interventions at every available opportunity. The Team has been on hand to provide training to our partners to help identify the signs of modern slavery early on, be it at work on a building site or during a health visit.

Safeguarding activity is provided for children and families until the children are 18. For adults, safeguarding applies where there are care or support needs.

This strategy should have a positive impact on all individuals and the team will work closely with local charities to ensure that all groups are supported.

<sup>6</sup> <https://www.gov.uk/government/statistics/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-end-of-year-summary-2021/modern-slavery-national-referral-mechanism-and-duty-to-notify-statistics-uk-end-of-year-summary-2021>

**Mitigating actions to be taken**

By exploring this data, we can ensure that we have appropriate support services and structures in place. By having this information, the team can also target its resources in the most effective way.

**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.

Safeguarding activity is provided for children and families until the children are 18. For adults, safeguarding applies where there are care or support needs.

In 2014, nationally, people identifying as Gay or Lesbian increased from 1.1% to 1.6%, Bisexual respondents rose from 0.5% to 1.1%, and people in the 'Other' category from 0.3% to 0.7%. This strategy should have a positive impact on all potential victims experiencing modern slavery, no matter their sexual orientation.

We do not currently hold data in this area locally or nationally.

This strategy should have a positive impact on all individuals and the team will work closely with local charities to ensure that all groups are supported.

**Mitigating actions to be taken**

No mitigating action 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.

Safeguarding activity is provided for children and families until the children are 18. For adults, safeguarding applies where there are care or support needs.

In our analysis, we are considering geography as part of our assessment of risks and have noticed a divide in the west and east of the borough.



This has helped our team work jointly with Enfield and Haringey BCU to target our resources.

This strategy will link potential victims with borough wide support and early help services that can assist them if they are facing socio-economic deprivation to ensure poverty is not a factor in modern slavery occurring.

**Mitigating actions to be taken.**

To continue to obtain data linked to the location of the potential modern slavery activity to help target resources jointly with our police and health colleagues.

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## 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?

Monitoring and Reviewing:

The Modern Slavery Team complete annual reports and publishes key safeguarding information adults for adults and children. This includes demographic information relating to gender, age. The data also includes types of abuse and location of abuses for adults. The Modern Slavery Board is the platform where data are reviewed and trends, or issues, are highlighted. If this analysis, or the learning from reviews and audits highlights area of concerns around equalities, then these are actioned through these groups. The board will help monitor if the team is meeting their objectives in the following areas:

- An increased awareness of MS across the partnership, through opportunities such as training.
- An increased identification of MS across the partnership, including by communities and voluntary sector organisations.
- Share anonymous data to increase understanding and awareness of modern slavery across London
- Meaningful engagement with survivors to improve practice
- Develop cross-border sharing housing protocol
- Address gap in support for child victims of modern slavery as they turn 18

Responsibility for assessing the effects of this proposal:

The Modern Slavery Board would be responsible for assessing the effects of this proposal. Enfield Council is the lead agency for modern slavery and has a joint team with Enfield and Haringey Basic Command Unit.



## **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
Age: Enfield's data suggests that the age group most at risk of modern slavery and exploitation are between the ages of 14-19.	The Modern Slavery Team focus their attention on adults (aged 18 and above) to try and support vulnerable adults who might not be able to engage with statutory services.	Children's Services	December 2023		
Disability: Trauma informed practice	The Modern Slavery Team have also attended training in Trauma Informed Practice to help them in their role.	Modern Slavery Team	April 2023		
Race, gender	To continue to improve our data collection both internally and externally to ensure an accurate data set can be recorded to help provide appropriate support.	Modern Slavery Team	March 2023		<b>To be published in Annual report</b>