

# 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.

**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 1 – Equality Analysis Details

<b>Title of service activity / policy/ strategy/ budget change/ decision that you are assessing</b>	Tenancy Policy 2023-26
<b>Lead officer(s) name(s) and contact details</b>	Karen Lucas, Head of Housing Management <a href="mailto:Karen.lucas@enfield.gov.uk">Karen.lucas@enfield.gov.uk</a>
<b>Team/ Department</b>	Corporate Strategy Service
<b>Executive Director</b>	Joanne Drew, Director of Housing and Regeneration
<b>Cabinet Member</b>	Cllr George Savva, Cabinet Member for Social Housing
<b>Date of EqIA completion</b>	27/02/2023

## 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?

Enfield's Tenancy policy for 2023-2026 sets out how the council will apply the Enfield Tenancy Strategy to its own stock;

- The kinds of tenancies the council grants.
- The circumstances in which we grant a tenancy of a certain kind.
- The lengths of the tenancy; and
- The circumstances in which another tenancy is granted when an existing one expires

The new policy stipulates that lifetime tenancies are the Council's preference, except in certain circumstances when fixed-term tenancies apply.

There may be certain circumstances where the council could offer a fixed-term tenancy. Enfield Council will offer Flexible tenancies for homes of four or more bedrooms, specially adapted properties and on exceptional ground for leaseholders.

Fixed term tenancies may only be offered in certain circumstances and must be for at least 10 years with discretion for 5 years in other circumstances. A longer fixed term tenancy will be encouraged for families with children aged 5 years and under; or 10 years and under if the child is affected by special educational needs or disabilities.

In addition to those circumstances set above in exceptional circumstances, in order for the council to manage its strategic objectives, the Director of Housing and Regeneration may grant a fixed term tenancy of less than 10 years.

The new policy outlines the Council commitment to good homes in well-connected neighbourhoods through the setting of high standards for tenancies in the Borough.

## SECTION 3 – Equality Analysis

This section asks you to consider the potential differential impact of the proposed decision or change on different protected characteristics, and what mitigating actions should be taken to avoid or counteract any negative impact.

According to the Equality Act 2010, protected characteristics are aspects of a person's identity that make them who they are. The law defines 9 protected characteristics:

1. Age
2. Disability
3. Gender reassignment.
4. Marriage and civil partnership.
5. Pregnancy and maternity.

6. Race
7. Religion or belief.
8. Sex
9. Sexual orientation.

At Enfield Council, we also consider socio-economic status as an additional characteristic.

“Differential impact” means that people of a particular protected characteristic (eg people of a particular age, people with a disability, people of a particular gender, or people from a particular race and religion) will be significantly more affected by the change than other groups. Please consider both potential positive and negative impacts, and, where possible, provide evidence to explain why this group might be particularly affected. If there is no differential impact for that group, briefly explain why this is not applicable.

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

## Age

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

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

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

The preference for lifetime tenancies will benefit tenants and potential tenants of all ages, offering security and stability.

In certain situations, fixed-term tenancies of 10 years (5 years in exceptional circumstances) may apply to larger homes (4 bedrooms or more) or specially adapted properties or when allocating a home to a leaseholder. Properties qualifying as 'specially adapted' would have significant and permanent adaptations, made in addition to the building regulations 'accessible and adaptable' standard for new properties.

### Older People

Older people are more likely to have health conditions and mobility issues, (53.1% of over 65s reported having a disability that affects daily functioning in 2011 Census) and will benefit particularly from the security of longer tenancies. They will also benefit from the increased availability of specially adapted properties, partially afforded by 10 year fixed-term tenancies, enabling housing needs to be assessed and better met.

There are currently approximately 42,000 people aged 65 and over living in Enfield, making up around 13% of the total population. These figures are set to increase by 23% to 52,500 people aged 65 and older by 2025.<sup>1</sup>

In comparison, over 65s make up only 6.5% of applicants on the Housing Register. There are around 1,554 sheltered homes for older people in the borough.

The Tenancy Policy will positively support older people, as it continues to ensure that residents can stay in their home for as long as it remains suitable for them to do so. For those who need changes, such as downsizing, they will be supported to make informed choices.

### Children and Young People

Enfield has relatively high proportions of children and young people under the age of twenty – higher than both London and England averages.<sup>2</sup> According to official

<sup>1</sup> [Joint Strategic Needs Assessment](#), Enfield Council

<sup>2</sup> [Borough Profile 2021](#), Enfield Council

Department for Work and Pensions statistics (2019/20) 18% of children under 16 in Enfield live in low-income families.<sup>3</sup> Children in particular will benefit from the change in the strategy from a minimum of 5 years for fixed-term tenancies, to ten years; and the clearer preference for lifetime tenancies, ensuring security in important early years and stability in schooling.

Of all people on the Housing Register, 80% are families with children:

<b>Couples with children</b>	<b>Single parent families</b>
26%	54%

The policy allows fixed-term tenancies in certain circumstances and specifies that this may be appropriate for homes of four or more bedrooms and specially adapted properties. This is due to a shortage of these particular properties in comparison to demand. Properties qualifying as 'specially adapted' would have significant and permanent adaptations, made in addition to the building regulations 'accessible and adaptable' standard for new properties..

Households requiring a home of 4 bedrooms or more are likely to include children and young people. This means that the impact of fixed-term tenancies is likely to have a greater impact on this age group:

- Larger households, which are more likely to include children, are less likely to be granted a lifetime tenancy than smaller households. This is a potential negative impact on those families who will not benefit from a lifetime tenancy. However, the minimum fixed-term being 10 years, unless exceptional circumstances, and the stipulation in the policy that at the end of the term, the household is supported into alternative accommodation if the tenancy is not renewed.
- Furthermore, any potential negative impact on households is justified due to the positive impact on other larger households in future, which are also more likely to include children: the fixed-term tenancy means that we can free up the larger property for another larger household in the future, on expiry of the tenancy where the previous household no longer requires a home of this size.

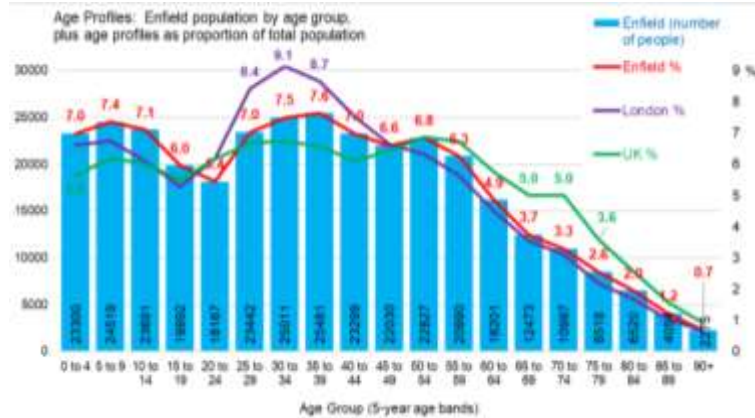
### **Aged 20-44**

Enfield has a higher proportion of adults aged 20-44 than in England in general, but below that of London as a whole.<sup>4</sup> This group makes up 58% of the Housing Register. This age group is the most likely to be raising young families and will benefit from the security of lifetime tenancies. This group can be negatively impacted by this change if growing families are not able to access suitably sized homes. Families requiring homes of 4 or more bedrooms are also likely to be subject to fixed-term tenancies.

<sup>3</sup> [Children in low income families: local area statistics 2014 to 2020](#), Department for Work and Pensions

<sup>4</sup> [Borough Profile 2021](#), Enfield Council

Figure 1: Age Profiles: Enfield Population by age group, plus age profiles as proportion of total population



### Under Occupation Project

The aim of this 3-year project started in 2020-21 is to make best use of Council stock by moving tenants that are under-occupying Council Homes into suitably sized accommodation thereby freeing up larger accommodation. With an increase in the incentive and flexible bespoke packages including support that meet the needs of tenants, and a supply of good quality homes in the right locations we will aim to do 60 Under-occupation moves per year. This will positively impact tenants of all ages, by ensuring that they have good quality homes which meet their needs.

### Mitigating actions to be taken

To mitigate potential differential impact on younger children, the policy sets out a fixed-term tenancy length of 10 years with a longer term encouraged for families with children aged 5 years and under or 10 years and under if the child is affected by special educational needs or disabilities. Tenants will be offered a further tenancy at the end of the fixed-term, if their circumstances have not significantly changed. If circumstances have changed, the Council will work with tenants to identify, in advance, appropriate alternative accommodation and fulfil their responsibility under the Homeless Reduction Act 2017 to prevent homelessness.

There are **no** circumstances where a fixed-term tenancy can be granted to a tenant if they or a member of their household has been a victim of domestic abuse and the new tenancy is granted in connection with that abuse. This is in accordance with the Secure Tenancies (Victims of Domestic Abuse) Act 2018.

### 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.

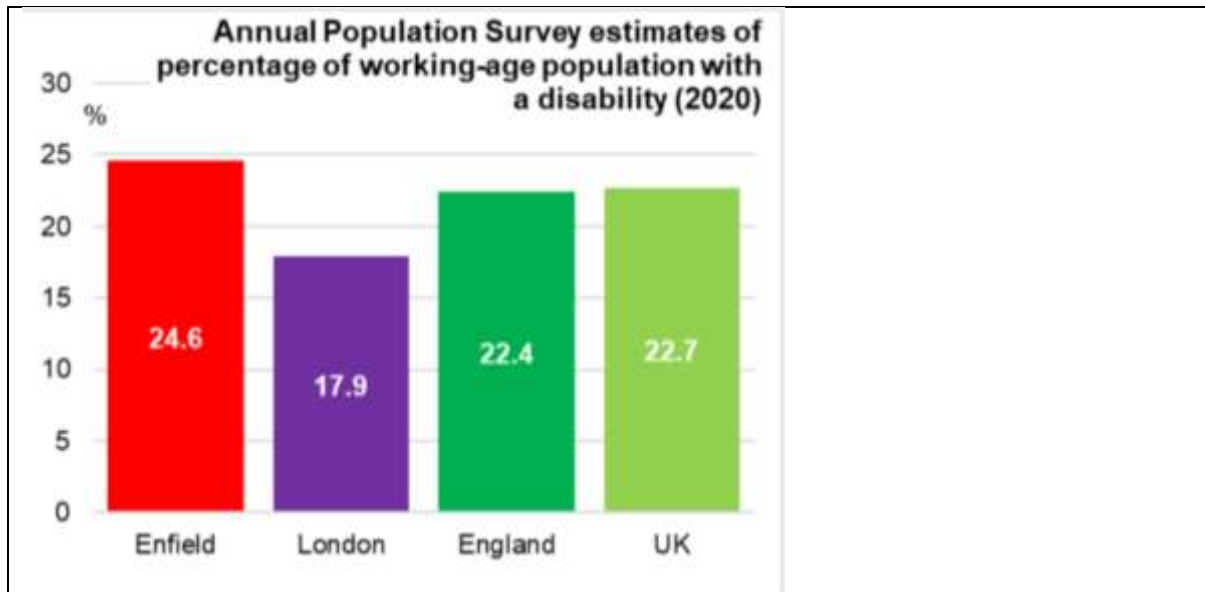
The preference for lifetime tenancies will benefit tenants and potential tenants with disabilities by providing stability and security of tenure. The change will also benefit those with mental impairments, ensuring their mental health is not adversely affected by the stress and anxiety of moving and that they can access support services they require without interruption.

In certain situations, fixed-term tenancies of 10 years may apply to larger properties (4 bedrooms or more) or specially adapted properties. In these situations, the council will make a case for requiring a fixed-term tenancy based upon the assessment of the local housing need and stock availability. Properties qualifying as 'specially adapted' would have significant and permanent adaptations, made in addition to the to the building regulations 'accessible and adaptable' standard for new properties. Adaptations provided by the Council through social care such as handrails, ramps and improved lighting would not qualify the property, when it became available to let, as 'specially adapted'.

Estimates suggest that nearly 25% of the working age population have a disability.<sup>5</sup> However, less than 2% of people on the Housing Register have a declared disability. The strategy sets out that existing tenants who have an assessed high health and wellbeing need that makes their current dwelling unsuitable will be given priority under Enfield's Allocation Scheme to be moved to more suitable accommodation.

Figure 2: Annual Population Survey estimates of working-age population with a disability (2020)

<sup>5</sup> Annual Population Survey, Office of National Statistics



The policy allows fixed-term tenancies in certain circumstances and specifies that this may be appropriate for specially adapted properties. This is due to a shortage of these particular properties in comparison to demand. Properties qualifying as ‘specially adapted’ would have significant and permanent adaptations, made in addition to the building regulations ‘accessible and adaptable’ standard for new properties. Enfield has assessed its stock profile against the housing register requirements, and we will introduce 10-year fixed tenancies for both homes of four or more bedrooms and specially adapted properties.

Households requiring a ‘specially adapted’ home will include one or more residents with a disability. This means that the impact of fixed-term tenancies is likely to have a greater impact on this group:

- Residents requiring a “specially adapted” home are less likely to be granted a lifetime tenancy than those without a disability. This is a potential negative impact on those families who will not benefit from a lifetime tenancy. However, a fixed term of 10 years and the stipulation in the strategy that at the end of the term, the household is supported into alternative accommodation if the tenancy is not renewed.
- In addition, any potential negative impact on households is justified due to the positive impact on others in future: the fixed-term tenancy means that we can free up specially adapted properties for another household in the future, on expiry of the tenancy where the previous household no longer requires a home of this size.

By introducing a fixed-term tenancy on the re-let of certain properties, the tenant’s needs will be assessed at set intervals, ensuring the property is still fit for purpose. This review is likely to be particularly beneficial for those with changing access needs. The strategy will support children affected by SEND to have security and stability in early years, as registered providers will be expected to grant a minimum fixed-term of ten years should the property be subject to a fixed-term tenancy.

**Mitigating actions to be taken**

To mitigate potential differential impact on residents with a disability a fixed-term tenancy length of 10 years will be offered with a longer term expected for families with children aged 5 years and under or 10 years and under if the child is affected by special educational needs or disabilities. Tenants will be offered a further tenancy at the end of the fixed-term, if their circumstances have not significantly changed. If circumstances have changed, the Registered Provider and/or Council will work with tenants to identify, in advance, appropriate alternative accommodation and fulfil their responsibility under the Homeless Reduction Act 2017 to prevent homelessness.

There are **no** circumstances where a fixed-term tenancy can be granted to a tenant if they or a member of their household has been a victim of domestic abuse and the new tenancy is granted in connection with that abuse. This is in accordance with the Secure Tenancies (Victims of Domestic Abuse) Act 2018.

**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.

People in the process of gender reassignment can face discrimination in local communities. Research from the Albert Kennedy Trust suggest that young trans people are overrepresented in youth homelessness statistics.<sup>6</sup>

In the 2018 Stonewall Report, 28% of trans respondents had experienced domestic abuse in the last 12 months. This strategy will positively impact trans

<sup>6</sup> [LGBT Youth Homelessness: A UK national scoping of cause, prevalence, response and outcome](#), The Albert Kennedy Trust

people who are experiencing or have experienced domestic abuse, as they will be able to access secure lifetime tenancies. We commit to educate all landlords on the requirements of the Secure Tenancies (Victims of Domestic Abuse) Act 2018.

**Mitigating actions to be taken**

This policy will positively impact people undergoing gender reassignment.

The policy sets out that new housing applicants and existing tenants considered to have high support needs, such as fleeing harassment or domestic abuse, will be awarded priority for housing under Enfield's Allocation Scheme.

**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 Housing Register does not record the relationship of cohabiting couples.

The Localism Act 2012 changed the rules of succession for social housing tenants. This positively impacts tenants who are married or in a civil partnership. For tenancies created on or after 1 April 2012 only a spouse, civil partner or a cohabitee as if they were a spouse or civil partner will have a statutory right to succession, and such a succession can only happens once. However, where there is no statutory right to succeed and if moving a successor may cause exceptional hardship, the Council Housing Team will submit a request for a new tenancy to be granted by way of discretion, to the appropriate Housing Panel. This will help to support tenants regardless of their marital or civil partnership status.

**Mitigating actions to be taken**

We have not identified any differential impact on groups who are married or in civil partnerships.

**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

Pregnant females and those with young children will benefit from lifetime tenancies giving them security and stability.

Over 50% of the Housing Register is made up of single female parent families. The proposed change to move to lifetime tenancies 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.

In exceptional circumstances, the council may offer a fixed-term of 10 years, with a longer term encouraged for families with children aged 5 years and under. Infants in particular will benefit from this change in length of tenancies, ensuring security in important early years and stability in schooling.

There are **no** circumstances where a fixed-term tenancy can be granted to a tenant if they or a member of their household has been a victim of domestic abuse and the new tenancy is granted in connection with that abuse. This is in accordance with the Secure Tenancies (Victims of Domestic Abuse) Act 2018.

**Mitigating actions to be taken**

No negative impact anticipated.

**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

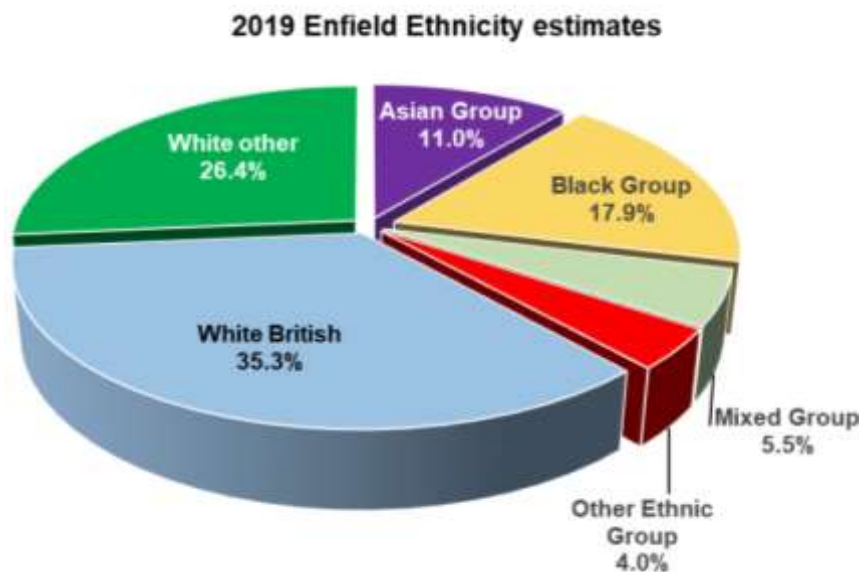
It is estimated that residents from White British backgrounds make up 35.3% of Enfield's inhabitants with other White groups (including White Irish) combined at 26.4%. Mixed Ethnic Groups account for 5.5%, Asian Groups for 11% and Black groups for 17.9% of Enfield's population.<sup>7</sup> 39% of the borough's population were born overseas.<sup>8</sup> National and borough wide data has been used as a proxy indicator given current gaps in the data we have for tenants and those on our housing waiting list.

<sup>7</sup> [Borough Profile 2021](#), Enfield Council

<sup>8</sup> <https://new.enfield.gov.uk/services/your-council/equality-and-diversity-report-2020-your-council.pdf>

Whilst ethnic diversity is one of our biggest assets, ethnic minorities experience inequality in housing, education, employment, health and criminal justice in Enfield, as is the case across the UK. This needs to be addressed.

Figure 3: 2019 Enfield Ethnicity estimates

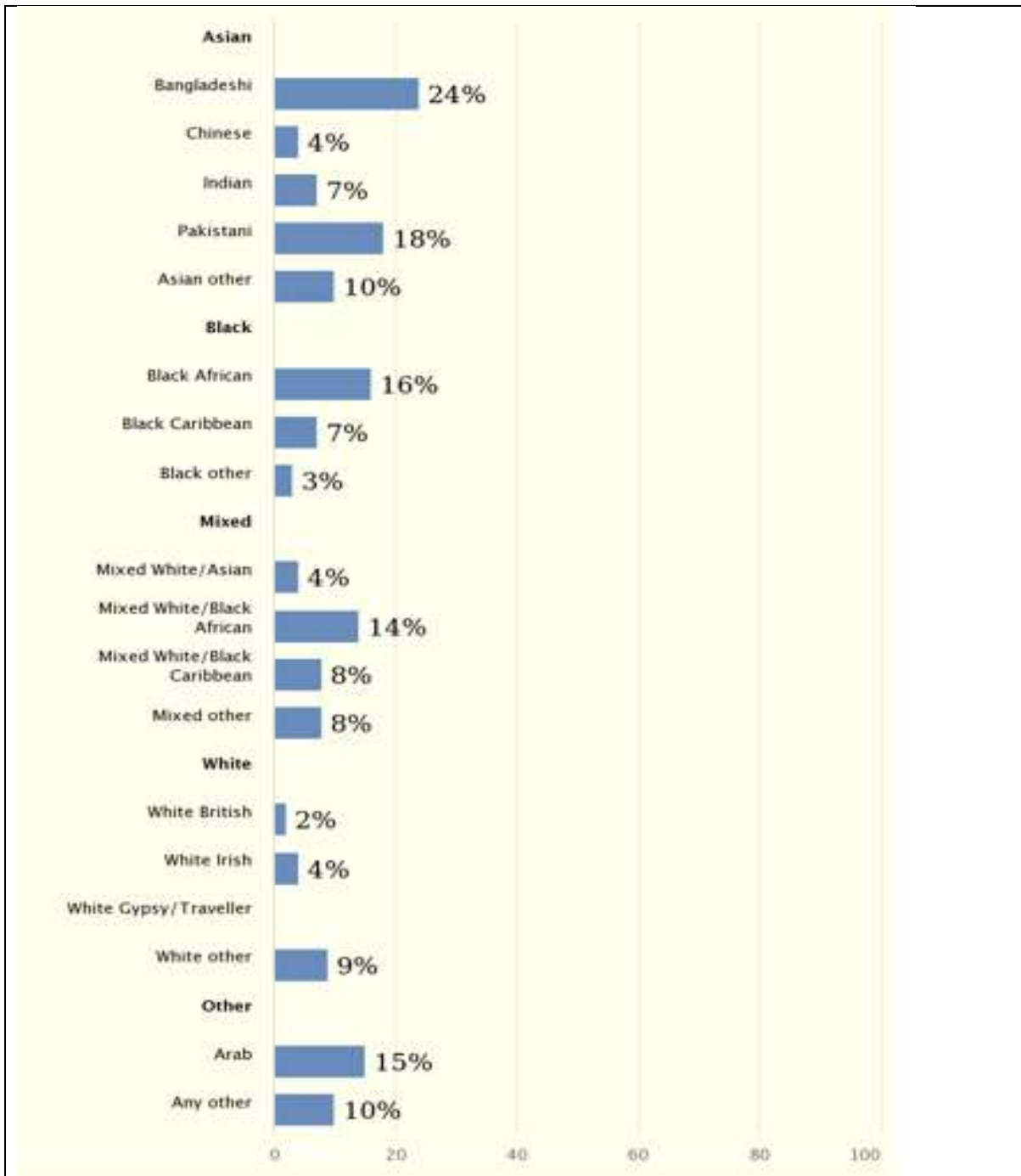


In 2016-2019, an average of around 787,000 (3%) of the estimated 23 million households in England were overcrowded (that is, they had fewer bedrooms than they need to avoid undesirable sharing).<sup>9</sup> White British households were less likely to be overcrowded than households from all other ethnic groups combined.

The households with the highest rates of overcrowding were in the Bangladeshi (24%), Pakistani (18%), Black African (16%), Arab (15%) and Mixed White and Black African (14%) ethnic groups.

Figure 4: Percentage of households that were overcrowded, by ethnicity. April 2016 to March 2019

<sup>9</sup> [Overcrowded households](#) (2020), UK Government



**Under Occupation Project**

The aim of this 3-year project starting in 2020-21 is to make best use of Council stock by moving tenants that are under-occupying Council Homes into suitably sized accommodation thereby freeing up larger accommodation. With an increase in the incentive and flexible bespoke packages including support that meet the needs of tenants, and a supply of good quality homes in the right locations we will aim to do 60 Under-occupation moves per year. This will help to address overcrowding by ensuring that suitable larger accommodation is made available.

The strategy allows fixed-term tenancies in certain circumstances and specifies that this may be appropriate for homes of four or more bedrooms and specially adapted properties. This is due to a shortage of these particular properties in comparison to demand. Enfield has assessed its stock profile against the housing register requirements, and we will introduce 10-year fixed tenancies for both homes of four or more bedrooms and specially adapted properties.

Households requiring a home of 4 bedrooms or more are likely to include households with the highest rates of overcrowding. Households with the highest rates of overcrowding were in the Bangladeshi (24%), Pakistani (18%), Black African (16%), Arab (15%) and Mixed White and Black African (14%) ethnic groups. This means that the impact of fixed-term tenancies is likely to have a greater impact on these ethnic groups:

- Larger households, which are more likely to include the above-mentioned ethnic groups, are less likely to be granted a lifetime tenancy than smaller households. This is a potential negative impact on those families who will not benefit from a lifetime tenancy. However, this is mitigated by the minimum fixed-term of 10 years and the stipulation in the strategy that at the end of the term, the household is supported into alternative accommodation if the tenancy is not renewed. The strategy also states that this approach can only be taken based on an assessment of the housing market and local demand for homes, so can only be justified where the need for this size homes outstrips supply.
- Furthermore, any potential negative impact on households is justified due to the positive impact on other larger households in future, which are also more likely to include ethnic minority groups: the fixed-term tenancy means that we can free up the larger property for another larger household in the future, on expiry of the tenancy where the previous household no longer requires a home of this size.

By introducing a fixed-term tenancy on the re-let of certain properties, the tenant's needs will be assessed at set intervals, ensuring the property is still fit for purpose. This review is likely to be particularly beneficial for growing families. The Tenancy Strategy will enable longer tenancies which provide stability and security and reduce the stress and anxiety raised by frequently moving property.

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

To mitigate potential differential impact on residents requiring larger homes, the council will offer a fixed term tenancy of 10 years with a longer term expected for families with children aged 5 years and under or 10 years and under if the child is affected by special educational needs or disabilities. Tenants will be offered a further tenancy at the end of the fixed-term, if their circumstances have not significantly changed. If circumstances have changed, the Registered Provider and/or Council will work with tenants to identify, in advance, appropriate alternative



accommodation and fulfil their responsibility under the Homeless Reduction Act 2017 to prevent homelessness.

There are **no** circumstances where a fixed-term tenancy can be granted to a tenant if they or a member of their household has been a victim of domestic abuse and the new tenancy is granted in connection with that abuse. This is in accordance with the Secure Tenancies (Victims of Domestic Abuse) Act 2018.

### 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 have robust data on the religion of existing tenants of Council homes or on those on our housing register which can be used to consider potential differential impact of the strategy on people of different religions.

### Mitigating actions to be taken

We have not identified any differential impact based on religion and belief, however, the strategy sets out that new housing applicants and existing tenants considered to have high support needs, such as fleeing harassment, will be awarded priority for housing under Enfield's Housing Allocation Scheme.

### 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.

Females are more likely to be single parents – 94% of single parents on Enfield’s Housing Register are mothers<sup>10</sup>. The proposed change to move to lifetime tenancies 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.

Females are more likely to be on lower incomes and lower paid work than men. Statistics show that in 2019 females earned on average 17.3% less than their male counterparts.<sup>11</sup> This put females at greater risk of becoming homeless. We commit to support and provide advice for private landlords and tenants in order to help resolve situations where the tenant has got into financial difficulty and is struggling to make rent payments.

The strategy allows fixed-term tenancies in certain circumstances and specifies that this may be appropriate for homes of four or more bedrooms and specially adapted properties. This is due to a shortage of these particular properties in comparison to demand. Properties qualifying as ‘specially adapted’ would have significant and permanent adaptations, made in addition to the building regulations ‘accessible and adaptable’ standard for new properties. Enfield has assessed its stock profile against the housing register requirements, and we will introduce 10-year fixed tenancies for both homes of four or more bedrooms and specially adapted properties.

Households requiring a home of 4 bedrooms are more likely to be headed up by a females (mothers) rather than males. This means that the impact of fixed-term tenancies is likely to have a greater impact on this group:

- Larger households, which are more likely to include children, are less likely to be granted a lifetime tenancy than smaller households. This is a potential negative impact on those families who will not benefit from a lifetime tenancy. However, this is mitigated by a fixed-term being of 10 years and the stipulation in the strategy that at the end of the term, the household is supported into alternative accommodation if the tenancy is not renewed. The strategy also states that this approach can only be taken based on an assessment of the housing market and local demand for homes, so can only be justified where the need for this size homes outstrips supply.
- Furthermore, any potential negative impact on households is justified due to the positive impact on other larger households in future, which are also more likely to include females: the fixed-term tenancy means that we can free up the larger property for another larger household in the future, on expiry of the tenancy where the previous household no longer requires a home of this size.

<sup>10</sup> EqIA for preventing homelessness and rough sleeping strategy

<sup>11</sup> [Employment and Labour Market](#), Office of National Statistics

The policy will protect the security of tenancy for certain groups forced to move, including victims of domestic violence, of which females are overrepresented. We commit to educating Registered Providers of the requirement of the Secure tenancies (Victims of Domestic Abuse) Act 2018 to offer existing tenancy holder/s, or new tenancy holders that meet the criteria, a new lifetime tenancy.

By introducing a fixed-term tenancy on the re-let of certain properties, the tenant's needs will be assessed at set intervals, ensuring the property is still fit for purpose. Policy will enable longer tenancies which provide stability and security and reduce the stress and anxiety raised by frequently moving property.

### Mitigating actions to be taken

To mitigate potential differential impact on residents requiring larger homes , the Policy specified a fixed-term tenancy length of 10 years with a longer term encouraged for families with children aged 5 years and under or 10 years and under if the child is affected by special educational needs or disabilities. Tenants will be offered a further tenancy at the end of the fixed-term, if their circumstances have not significantly changed. If circumstances have changed, the Registered Provider and/or Council will work with tenants to identify, in advance, appropriate alternative accommodation and fulfil their responsibility under the Homeless Reduction Act 2017 to prevent homelessness.

There are **no** circumstances where a fixed-term tenancy can be granted to a tenant if they or a member of their household has been a victim of domestic abuse and the new tenancy is granted in connection with that abuse. This is in accordance with the Secure Tenancies (Victims of Domestic Abuse) Act 2018.

### 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 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.

Research by the Albert Kennedy Trust suggests LGB people are overrepresented in youth homelessness statistics.<sup>12</sup> The strategy have a positive impact on homeless LGB people, as it will support them to access sustainable, long-term tenancies.

In England, it is estimated that more than 1 in 4 gay men and lesbian females and more than 1 in 3 bi people experience at least one form of domestic abuse since the age of 16.<sup>13</sup> The Tenancy Strategy will have a positive impact on LGB people who are experiencing or have experienced domestic abuse by supporting them to access life-time tenancies, through educating landlords on the requirements of the Secure Tenancies (Victims of Domestic Abuse) Act 2018.

### Mitigating actions to be taken

We have not identified a differential impact based on sexual orientation.

The Policy sets out that new housing applicants and existing tenants considered to have high support needs, such as fleeing harassment and domestic, will be awarded priority for housing under Enfield's Housing Allocation Scheme.

### 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.<sup>14</sup> 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

<sup>12</sup> [LGBT Youth Homelessness: A UK national scoping of cause, prevalence, response and outcome](#), The Albert Kennedy Trust

<sup>13</sup> Galop

<sup>14</sup> <https://new.enfield.gov.uk/services/your-council/equality-and-diversity-report-2020-your-council.pdf>

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. The strategy will be beneficial to tenants experiencing financial difficulty, as the Council commits to support and provide advice for private landlords and tenants in order to resolve situations where the tenant is struggling to make rent payments. Eviction should always be a last resort action once all other avenues to resolve concerns have been exhausted.

The policy allows fixed-term tenancies in certain circumstances and specifies that this may be appropriate for homes of four or more bedrooms and specially adapted properties. This is due to a shortage of these particular properties in comparison to demand. Properties qualifying as 'specially adapted' would have significant and permanent adaptations, made in addition to the building regulations 'accessible and adaptable' standard for new properties. Enfield has assessed its stock profile against the housing register requirements, and we will introduce 10-year fixed tenancies for both homes of four or more bedrooms and specially adapted properties.

Though providing lifetime tenancies and partially addressing the shortage of the particular properties in comparison to demand through 10 year fixed-term tenancies, households on the housing register are afforded a better opportunity for securing a long-term tenancy.

**Mitigating actions to be taken.**

The Policy will be beneficial to people suffering from socio-economic deprivation, since priority will be given to those suffering from homelessness.

**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?

Metrics concerning social housing delivered by Enfield Council are monitored on a quarterly basis using internal databases. Monitoring information contains demographic data to ensure that the services are not precluding any protected characteristic. This information will be used to monitor and respond to any emerging trends so that our provision is fit for purpose.

**SECTION 5 – Action Plan for Mitigating Actions.**

Identified Issue	Action Required	Lead officer	Timescale/By When	Costs	Review Date/Comments
None to date					