

# 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>Acquisitions Programme for affordable housing</b>
<b>Team/ Department</b>	<b>Place/ Regeneration</b>
<b>Executive Director</b>	<b>Joanne Drew</b>
<b>Cabinet Member</b>	<b>Cllr George Savva</b>
<b>Author(s) name(s) and contact details</b>	<b>Walter Menteth</b> <a href="mailto:Walter.menteth@enfield.gov.uk">Walter.menteth@enfield.gov.uk</a>
<b>Committee name and date of decision</b>	

<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>	<b>Karen Lucas</b>
<b>Name of Director who has approved the EqIA</b>	<b>Joanne Drew</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?

The proposal relates to entry by the council into a Framework Agreement with three lots to provide for procuring development works, development services and estate management for its affordable housing programme.

Enfield's Housing Register is a local register of housing need, there are currently 6613 applicants seeking social housing in Enfield. The demand for housing exceeds supply and the Housing Register exists to enable the Housing Allocations Policy to prioritise those households that are in greatest need and to maximise their opportunities for rehousing.

Enfield wishes to build 12,460 new homes over the Local Plan period.

The Authority is specifically seeking to work with Suppliers to deliver up to 2,000 new homes on council-owned land in the borough, over the period of the Framework, in line with The Authority's Good Growth Strategy.

The London Affordable Housing Programme (2021 – 2026) will provide in excess of £4bn made available by the Greater London Authority ("GLA") to invest in new housing delivery.

The Authority want to ensure they are able to attract a large proportion of this investment which taken together with land released by the Authority will allow this framework to make a significant contribution to economic growth in the borough. Enfield has been awarded the 5th largest allocation in London and the 2nd highest Local Authority allocation which indicates the Boroughs scale of delivery and needs.

The framework agreements will work towards attracting investment, improving services, raising standards and building development capacity in Enfield aligned to the councils' vision.

All providers on this framework are required to comply with the Council's Equality commitments as set out in the Council's Equality and Diversity Policy and Equal Opportunities Code of practice, and with any additional measures and Key performance indicators (KPIs) which may be appropriate and specific to the call off. Equalities diversity and inclusivity was considered and built into tender selection questionnaire and evaluation criteria, with bidders evaluated on their described EDI objectives, policies and targets, including:

- Their commitment to improvement.
- How they innovate.
- Their willingness to support, sustain and work, in partnership with smaller, specialist and / or bespoke affordable housing providers.
- Direct and indirect employment training, recruitment and retention initiatives including with estate residents.
- Use of local supply chains; and
- Their defined EDI methods of measurement and evaluation of their performance targets.

Equalities diversity and inclusivity was considered and built into tender selection questionnaire and evaluation criteria:

- Bidders were required to describe how they would provide skills training, apprenticeships and commit to social value activities in their delivery.
- All bidders were asked, how their organisation would add Social Value to affordable housing projects under the framework relative to SV measures such as the National Themes, Outcomes and Measures (TOMS) framework, their corporate social value policy, the successful creation of

new communities, and the long-term outcomes achieved.

- Bidders for Lots 1 & 3 were further asked how their organisation would work to successfully deliver tenancy sustainment and support across all stages of the 'residents' journey' and the outcomes to be achieved from the dedicated services provided.
- Bidders for Lot 2 were further asked, as part of the Selection Questionnaire, to example key relationships with Black and Ethnic minority (BAME) and specialist registered providers, their partnership deliveries and the added value provided through these relationships.

On issuing call off contracts further Social Value and Equalities Impacts may be sought and required from bidders, that are appropriate and specific for each individual contract call.

## Section 3 – Equality analysis

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

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

1. Age
2. Disability
3. Gender reassignment.
4. Marriage and civil partnership.
5. Pregnancy and maternity.
6. Race
7. Religion or belief.
8. Sex
9. Sexual orientation.

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

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

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

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

**Age**

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

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

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

The framework is not expected to have a differential impact (positive or negative) on a specific age group, although it is anticipated to have a generally positive impact by providing more affordable housing, thereby reducing the number of people in temporary accommodation.

Bidders were required to describe how they would provide skills training, apprenticeships and commit to social value activities in their delivery. All bidders were asked, how their organisation would add Social Value to affordable housing projects under the framework relative to SV measures such as the National Themes, Outcomes and Measures (TOMS) framework, their corporate social value policy, the successful creation of new communities, and the long-term outcomes achieved.

The framework opens opportunity for additionally delivering more and better housing accommodation for people with specialist needs, including elderly people.

**Mitigating actions to be taken**

**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.

Disabled people are more likely to live in the social rented sector. According to the English Housing Survey 2020/21, over half (55%) of households in the social

rented sector had one or more household members with a long-term illness or disability.<sup>1</sup>

Currently 570 applicants on the Council’s Housing Needs Register indicated that they have a disability but not all will require accessible home.

- The framework provides that bidders uphold Enfield policy, regulations and standards with regards to disabilities, when contracted under the framework.
- Bidders were required to describe how they would provide skills training, apprenticeships and commit to social value activities in their delivery.
- All bidders were asked, how their organisation would add Social Value to affordable housing projects under the framework relative to SV measures such as the National Themes, Outcomes and Measures (TOMS) framework, their corporate social value policy, the successful creation of new communities, and the long-term outcomes achieved.

The framework opens opportunity for additionally delivering more and better housing accommodation for people with specialist needs, including disabled people. The frameworks social value measures deliver opportunities for improving services, facilities, skills training and employment for those with disabilities.

**Mitigating actions to be taken**

**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.

For the first time in 2021, the Census asked a voluntary question on gender identity to respondents aged 16 years or over. People were asked “Is the gender

<sup>1</sup> Department for Levelling Up, Housing and Communities, [English Housing Survey](#), 2020/21

you identify with the same as your sex registered at birth?” and had of the option of selecting “Yes”, or selecting “No” and writing in their gender identity.<sup>2</sup>

In Enfield 91.42% of residents aged 16 years and over responded to the question.

Gender identity	Enfield population aged 16 years and over	Percentage of residents aged 16 years and over
<b>Gender identity the same as their sex registered at birth</b>	232,329	90.34%
<b>Gender identity different from their sex registered at birth but no specific identity given</b>	1,652	0.64%
<b>Trans woman</b>	518	0.2%
<b>Trans man</b>	486	0.19%
<b>Non-binary</b>	74	0.03%
<b>Another gender identity</b>	58	0.02%
<b>Did not answer</b>	22,065	8.58%

The Affordable Housing Framework will assist the Council to build more affordable housing in the borough. This is expected to positively impact on all residents on the Housing Needs Register, regardless of their gender identity, by increasing the amount of affordable housing available.

#### Mitigating actions 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 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 Framework is not expected to have a differential impact (positive or

<sup>2</sup> ONS, [Gender identity, England and Wales: Census 2021](#)



negative) because of marital status.

**Mitigating actions to be taken**

No mitigation actions required.

Upon contracts within the borough being awarded under this framework the implementation of the decision will be monitored by the mechanisms to be put in place for each award to ensure that it is not having a differential impact on people or households with protected characteristics

**Pregnancy and maternity**

Pregnancy refers to the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Lone female parents of which there are 2559 households on the housing register, who have made successful homeless applications, and their children, should find much needed stability after likely spending years in insecure or temporary accommodation.

The Affordable Housing Framework will assist the Council to build more affordable housing in the borough. This is expected to positively impact on all residents on the Housing Needs Register, including those who are pregnant or in the maternity period, by increasing the amount of affordable housing available.

**Mitigating actions to be taken**

No mitigation actions required.

Upon contracts within the borough being awarded under this framework the implementation of the decision will be monitored by the mechanisms to be put in place for each award to ensure that it is not having a differential impact on people or households with protected characteristics.

**Race**

This refers to a group of people defined by their race, colour, and nationality (including citizenship), ethnic or national origins.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people of a certain race?

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

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

*Homeless Applicants*

People from BAME backgrounds are more likely to approach our homelessness service for help. In 2020/21, 35% of households in Enfield owed a homelessness prevention or relief duty were from a Black or Black British ethnic background. It is expected that the provision of additional social and affordable housing within the Borough projected in the outcomes from this framework will have a proportionately positive impact on the housing register and for the homeless.

Equalities diversity and inclusivity was considered and built into tender selection questionnaire and evaluation criteria:

- Bidders were required to describe how they would provide skills training, apprenticeships and commit to social value activities in their delivery.
- All bidders were asked, how their organisation would add Social Value to affordable housing projects under the framework relative to SV measures such as the National Themes, Outcomes and Measures (TOMS) framework, their corporate social value policy, the successful creation of new communities, and the long-term outcomes achieved.
- Bidders for Lots 1 & 3 were further asked how their organisation would work to successfully deliver tenancy sustainment and support across all stages of the ‘residents’ journey’ and the outcomes to be achieved from the dedicated services provided.
- Bidders for Lot 2 were further asked, as part of the Selection Questionnaire, to example key relationships with Black and Ethnic minority (BAME) and specialist registered providers, their partnership deliveries and the added value provided through these relationships.

**Mitigating actions to be taken**

No mitigation action identified

Upon contracts within the borough being awarded under this framework the implementation of the decision will be monitored by the mechanisms to be put in place for each award to ensure that it is not having a differential impact on people or households with protected characteristics

**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.

**Religious profile of Enfield (2021 Census)**<sup>3</sup>

Religion	Proportion of Enfield population
Christian	46.4%
Buddhist	0.5%
Hindu	3.1%
Jewish	1.1%
Muslim	18.6%
Sikh	0.4%
Other religion	3.1%
No religion	19.8%
Religion not stated	7.0%

We do not believe that the increase in social housing will have a differential impact (positive or negative), because of religion or belief as properties will be allocated based on housing need and not other characteristics.

**Mitigating actions to be taken**

Upon contracts within the borough being awarded under this framework the implementation of the decision will be monitored by the mechanisms to be put in place for each award to ensure that it is not having a differential impact on people or households with protected characteristics

**Sexual Orientation**

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.

For the first time in 2021, the Census included a voluntary question on sexual orientation for all respondents aged 16 and over.<sup>4</sup> The different sexual orientations that people could choose from included:

- Straight or heterosexual

<sup>3</sup> ONS, [Religion, England and Wales: Census 2021](#)

<sup>4</sup> ONS, [Sexual orientation, England and Wales: Census 2021](#)

- Gay or lesbian
- Bisexual
- Other sexual orientation (respondents were then asked to write in the sexual orientation with which they identified)

In Enfield, 90.3% of residents aged 16 and over responded to this question.

Sexual orientation	Enfield population aged 16 years and over	Percentage of Enfield residents aged 16 years and over
<b>Straight or heterosexual</b>	226,705	88.15%
<b>Gay or lesbian</b>	2,342	0.91%
<b>Bisexual</b>	2,073	0.81%
<b>Pansexual</b>	944	0.37%
<b>Asexual</b>	74	0.03%
<b>Queer</b>	35	0.01%
<b>All other sexual orientations</b>	151	0.06%
<b>Not answered</b>	24,858	9.67%

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

An increase in social housing will not have a differential impact (positive or negative) because of sexual orientation as properties will be allocated based on housing need and not other characteristics.

**Mitigating actions to be taken**

Upon contracts within the borough being awarded under this framework the implementation of the decision will be monitored by the mechanisms to be put in place for each award to ensure that it is not having a differential impact on people or households with protected characteristics

**Sex**

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 a disproportionate number of female applicants on the housing register representing 74.6% of 6,216 applicants that have indicated their sex. Male applicants make up 25.3% of the applicants.

Women are more likely to be single parents – 94% of single parents on Enfield’s Housing Register are mothers. Therefore, the increased provision of more family homes, which are available to residents on the housing register, will help lone female parents who have made successful homeless applications, and their children, find much needed stability after likely spending years in temporary accommodation.

The Affordable Housing Framework will assist the Council to build more affordable housing in the borough. This is expected to positively impact on all residents on the Housing Needs Register, in particular women who are more likely to be on the housing register, by increasing the amount of affordable housing available.

**Mitigating actions to be taken**

Upon contracts within the borough being awarded under this framework the implementation of the decision will be monitored by the mechanisms to be put in place for each award to ensure that it is not having a differential impact on people or households with protected characteristics

**Socio-economic deprivation**

This refers to people who are disadvantaged due to socio-economic factors e.g. unemployment, low income, low academic qualifications or living in a deprived area, social housing or unstable housing.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who are socio-economically disadvantaged? Yes

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. Enfield’s median household income is £35,300, which is the 9th lowest of the 33 London boroughs and lower than the London average. Within the borough, there are clear differences in household income between the western and eastern parts. Median incomes in the most affluent neighbourhoods are twice those of the least affluent.

The median rent charge in the year ending March 2021 was £1,300. This is 44% of the median household income per month. As at March 2020, 3,497 households were in temporary accommodation – the second highest number of all English authorities. Enfield has a higher total number of households in temporary accommodation per thousand, (26.29), than the England, (4.03), and London, (16.05), average.

The projected increase in homes will have a positive impact by providing more housing in the borough and more affordable rental homes and family sized homes to residents on the housing register.

**Mitigating actions to be taken.**

Upon contracts within the borough being awarded under this framework the implementation of the decision will be monitored by the mechanisms to be put in place for each award to ensure that it is not having a differential impact on people or households with protected characteristics

## Section 4 – Monitoring and review

How do you intend to monitor and review the effects of this proposal?

Who will be responsible for assessing the effects of this proposal?

Equalities data on ethnicity and disability is currently captured for some applicants but is not comprehensive.

Equalities data is not currently collated on religion, sexual orientation or gender reassignment.

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

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

## Section 5 – Action plan for mitigating actions

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
EQI matters relating to religion, sexuality and gender reassignment, as well as the standard Council equalities questions on age, gender, ethnicity and whether the applicant or household has a disability, relevant to LBE, where call offs are for contracts let by LBE	Bid applicants will be asked the Council's standard monitoring questions in relation to religion, sexuality and gender reassignment, as well as the standard Council equalities questions on age, gender, ethnicity and whether the applicant or household has a disability	TBC	On issue of any contract call off	Variable, according to the scale, nature & type of contract being called off	



