

Enfield Equality Impact Assessment (EqIA)

Introduction

The purpose of an Equality Impact Assessment (EqIA) is to help Enfield Council make sure it does not discriminate against service users, residents and staff, and that we promote equality where possible. Completing the assessment is a way to make sure everyone involved in a decision or activity thinks carefully about the likely impact of their work and that we take appropriate action in response to this analysis.

The EqIA provides a way to systematically assess and record the likely equality impact of an activity, policy, strategy, budget change or any other decision.

The assessment helps us to focus on the impact on people who share one of the different nine protected characteristics as defined by the Equality Act 2010 as well as on people who are disadvantaged due to socio-economic factors. The assessment involves anticipating the consequences of the activity or decision on different groups of people and making sure that:

- unlawful discrimination is eliminated
- opportunities for advancing equal opportunities are maximised
- opportunities for fostering good relations are maximised.

The EqIA is carried out by completing this form. To complete it you will need to:

- use local or national research which relates to how the activity/ policy/ strategy/ budget change or decision being made may impact on different people in different ways based on their protected characteristic or socio-economic status;
- where possible, analyse any equality data we have on the people in Enfield who will be affected eg equality data on service users and/or equality data on the Enfield population;
- refer to the engagement and/ or consultation you have carried out with stakeholders, including the community and/or voluntary and community sector groups you consulted and their views. Consider what this engagement showed us about the likely impact of the activity/ policy/ strategy/ budget change or decision on different groups.

The results of the EqIA should be used to inform the proposal/ recommended decision and changes should be made to the proposal/ recommended decision as a result of the assessment where required. Any ongoing/ future mitigating actions required should be set out in the action plan at the end of the assessment.

Section 1 – Equality analysis details

Title of service activity / policy/ strategy/ budget change/ decision that you are assessing	Leasehold property insurance – authority to agree to place buildings insurance policy with Protector Insurance.
Team/ Department	Audit & Risk Management Service Chief Executive’s Department
Executive Director	Terry Osborne Director of Law & Governance
Cabinet Member	Cllr Tim Leaver Cabinet Member for Finance & Procurement
Author(s) name(s) and contact details	Gemma Young Head of Internal Audit & Risk Management Gemma.Young@enfield.gov.uk
Committee name and date of decision	Key Decision 5584 27 March 2023

Date the EqIA was reviewed by the Corporate Strategy Service	
Name of Head of Service responsible for implementing the EqIA actions (if any)	Gemma Young Head of Internal Audit & Risk Management
Name of Director who has approved the EqIA	

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?

Our current leasehold property insurer, Avid Insurance Services Ltd (Avid), has pulled out of the market at short notice. We are proposing to award a one year contract to Protector Insurance (Protector) instead.

Leasehold property insurance is recharged to leaseholders in full as part of their service charge. Using Protector, the premium will increase from approx. £1m to £2m in 2023-24 meaning that average recharges per leaseholder will increase from approx. £200 pa to £400 pa.

Part of the increase is due to general market conditions, but part is also due to the fact that we are awarding a one year contract only.

We are only able to award a one year contract as the notice period given by Avid did not give us sufficient time to conduct a full procurement process and to consult with leaseholders as required by statute.

Given the current cost of living crisis, the premium increase may disadvantage socio-economically deprived leaseholders.

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)?

No

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

The increase in charges, as a result of changes in provider, will have a negative impact on leaseholders regardless of their age. This is because of unforeseen circumstances, due to our current leasehold property insurer, Avid Insurance Services Ltd (Avid), having pulled out of the market at short notice

Mitigating actions to be taken

To mitigate this impact, the Insurance team will work with Finance and other departments to develop strategies to lessen the financial burden for leaseholders e.g., payment by instalments or alternative allocation methodologies.

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?

No

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

The increase in charges, as a result of changes in provider, will have a negative impact on leaseholders regardless of their disability. This is because of unforeseen circumstances, due to our current leasehold property insurer, Avid Insurance Services Ltd (Avid), having pulled out of the market at short notice

Mitigating actions to be taken

To mitigate this impact, the Insurance team will work with Finance and other departments to develop strategies to lessen the financial burden for leaseholders

e.g., payment by instalments or alternative allocation methodologies.

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?

No

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

The increase in charges, as a result of changes in provider, will have a negative impact on leaseholders regardless of their gender. This is because of unforeseen circumstances, due to our current leasehold property insurer, Avid Insurance Services Ltd (Avid), having pulled out of the market at short notice

Mitigating actions to be taken

To mitigate this impact, the Insurance team will work with Finance and other departments to develop strategies to lessen the financial burden for leaseholders e.g., payment by instalments or alternative allocation methodologies.

Marriage and Civil Partnership

Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, whereas 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?

No

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

The increase in charges, as a result of changes in provider, will have a negative

impact on leaseholders regardless of their marriage or civil partnership status. This is a because of unforeseen circumstances, due to our current leasehold property insurer, Avid Insurance Services Ltd (Avid), having pulled out of the market at short notice

Mitigating actions to be taken

To mitigate this impact, the Insurance team will work with Finance and other departments to develop strategies to lessen the financial burden for leaseholders e.g., payment by instalments or alternative allocation methodologies.

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?

No

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

The increase in charges, as a result of changes in provider, will have a negative impact on leaseholders regardless of their pregnancy and maternity status. This is a because of unforeseen circumstances, due to our current leasehold property insurer, Avid Insurance Services Ltd (Avid), having pulled out of the market at short notice

Mitigating actions to be taken

To mitigate this impact, the Insurance team will work with Finance and other departments to develop strategies to lessen the financial burden for leaseholders e.g. payment by instalments or alternative allocation methodologies.

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?

No

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

The increase in charges, as a result of changes in provider, will have a negative impact on leaseholders regardless of their race. This is because of unforeseen circumstances, due to our current leasehold property insurer, Avid Insurance Services Ltd (Avid), having pulled out of the market at short notice

Mitigating actions to be taken

To mitigate this impact, the Insurance team will work with Finance and other departments to develop strategies to lessen the financial burden for leaseholders e.g. payment by instalments or alternative allocation methodologies.

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?

No

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

The increase in charges, as a result of changes in provider, will have a negative impact on leaseholders regardless of their religion and belief. This is because of unforeseen circumstances, due to our current leasehold property insurer, Avid Insurance Services Ltd (Avid), having pulled out of the market at short notice

Mitigating actions to be taken

To mitigate this impact, the Insurance team will work with Finance and other departments to develop strategies to lessen the financial burden for leaseholders e.g. payment by instalments or alternative allocation methodologies.

Sex

Sex refers to whether you are a female or male.

<p>Will this change to service/policy/budget have a differential impact [positive or negative] on females or males?</p> <p>No</p> <p>Please provide evidence to explain why this group may be particularly affected.</p>
<p>The increase in charges, as a result of changes in provider, will have a negative impact on leaseholders regardless of their sex. This is a because of unforeseen circumstances, due to our current leasehold property insurer, Avid Insurance Services Ltd (Avid), having pulled out of the market at short notice</p> <p>N/A</p>
<p>Mitigating actions to be taken</p> <p>To mitigate this impact, the Insurance team will work with Finance and other departments to develop strategies to lessen the financial burden for leaseholders e.g. payment by instalments or alternative allocation methodologies.</p>

<p>Sexual Orientation</p> <p>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.</p>
<p>Will this change to service/policy/budget have a differential impact [positive or negative] on people with a particular sexual orientation?</p> <p>No</p> <p>Please provide evidence to explain why this group may be particularly affected.</p>
<p>The increase in charges, as a result of changes in provider, will have a negative impact on leaseholders regardless of their sexual orientation. This is a because of unforeseen circumstances, due to our current leasehold property insurer, Avid Insurance Services Ltd (Avid), having pulled out of the market at short notice</p>
<p>Mitigating actions to be taken</p> <p>To mitigate this impact, the Insurance team will work with Finance and other</p>

departments to develop strategies to lessen the financial burden for leaseholders e.g. payment by instalments or alternative allocation methodologies.

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.

The insurance premium quoted by Protector Insurance means a 100% increase on the average premium per leaseholder. Given the current cost of living crisis, this level of increase may affect this group.

We do not consider that the Council can offer to pay on behalf of leaseholders as there will be a conflict with other services/funding offered to residents.

Mitigating actions to be taken.

We will work with Finance and other teams to develop strategies to lessen the burden for leaseholders e.g. payment by instalments or alternative allocation methodologies.

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?

The normal Council processes in terms of collection of service charges will monitor the payment of service charges and leasehold insurance premiums.

This proposal is for one year only and during the coming financial year (2023-24) we will:

- Consider another option for the Council to provide the insurance and set aside an insurance reserve to fund future claims (it is not possible to do this in necessary detail at present due to timescales)
- A full insurance contract tender will take place in 2023-24 when we **may** be able to obtain better rates as we will be contracting for 5 years.

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
Ability of leaseholders to pay increased premiums	Research with Finance and other teams options to ease the burden on leaseholders	Kay Osborne, Insurance Manager	July 2023	Potential loss of income to the Council	