

**Equality Impact Assessment / Equality Analysis**

<b>Title of service or policy</b>	Homelessness Strategy 2014-2018
<b>Name of directorate and service</b>	Adult Social Care, Health and Housing Housing Services
<b>Name and role of officers completing the EIA</b>	Mike Chedzoy: Housing Options and Homelessness Manager Sue Wordsworth: Planning and Partnership Manager Amanda Taylor: Homelessness Review and Policy Officer
<b>Date of assessment</b>	October 2013

Equality Impact Assessment (or 'Equality Analysis') is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The primary concern is to identify any discriminatory or negative consequences for a particular group or sector of the community. Equality impact Assessments (EIAs) can be carried out in relation to service delivery as well as employment policies and strategies.

1.	Identify the aims of the policy or service and how it is implemented.	
	Key questions	Answers / Notes
1.1	<p>Briefly describe purpose of the service/policy including</p> <ul style="list-style-type: none"> <li>● How the service/policy is delivered and by whom</li> <li>● If responsibility for its implementation is shared with other departments or organisations</li> <li>● Intended outcomes</li> </ul>	<p>The Homelessness Strategy prevents homelessness and protects vulnerable homeless people by</p> <ul style="list-style-type: none"> <li>● mainstreaming homelessness prevention across council and key partnership services</li> <li>● tackling local priorities</li> <li>● performance targets leading to the government's Gold Standard for Homelessness Prevention.</li> </ul> <p>Homelessness prevention services are delivered by the council's Housing Options and Homelessness Team and many other service providers and third sector organisations who are members of the Homelessness Partnership.</p>
1.2	<p>Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> <li>● Is it a new service/policy or review of an existing one?</li> <li>● Is it a national requirement?).</li> <li>● How much room for review is there?</li> </ul>	<p>Homelessness Prevention Services have been in place since the Homelessness Act 2002 made it a national requirement that all housing authorities to have a homelessness strategy based on a 5 yearly review of all forms of homelessness in their district.</p> <p>The 5 yearly review was carried out in 2013. Ten local homelessness prevention priorities were identified:</p> <p>Priority 1 Identify those most at risk of domestic violence and enable early interventions to prevent homelessness</p> <p>Priority 2 Improve housing advice, information and support for people living in rural areas</p> <p>Priority 3 Target mortgage rescue advice and assistance at low income households.</p> <p>Priority 4 Target welfare and money management advice at low income households living in social housing.</p>

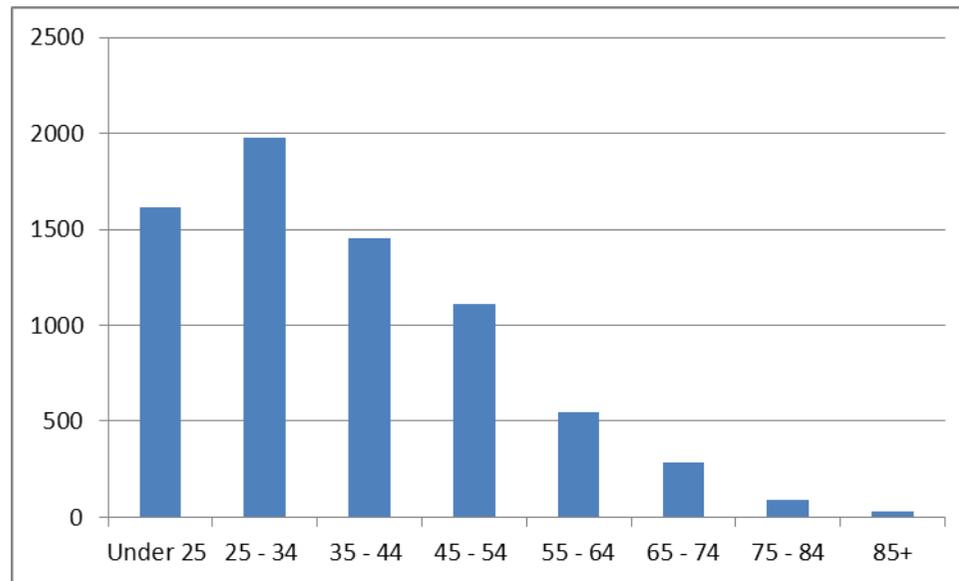
		<p>Priority 5 Prevent evictions of social housing tenants by reviewing pre-eviction protocols and ensuring adequate support in the first year of new tenancies.</p> <p>Priority 6 Review the housing aspirations of older social housing residents to enable safe and independent living and potential for freeing up family sized social housing.</p> <p>Priority 7 Protect housing standards and conditions in low cost private rented housing.</p> <p>Priority 8 Develop private sector access schemes to facilitate shared rented housing for single people aged under 35.</p> <p>Priority 9 Provide suitable temporary accommodation and stop using Bed &amp; Breakfast except in emergencies and then for less than 6 weeks.</p> <p>Priority 10 Review the housing needs of women and older rough sleepers, rough sleepers with no local connection and people with complex needs and improve their accommodation pathways and options.</p>
1.3	Do the aims of this policy link to or conflict with any other policies of the Council?	<p>The Homelessness Strategy links to:</p> <p>Sustainable Community Strategy 2009-26</p> <p>Joint Health and Wellbeing Strategy 2013</p> <p>Housing and Wellbeing Strategy 2010-15</p> <p>Tenancy Strategy 2012</p> <p>Allocations Scheme 2013</p> <p>This Homelessness Strategy will directly contribute to the Health and Wellbeing Board's priority themes:</p> <ul style="list-style-type: none"> <li>• Helping people to stay healthy</li> <li>• Improving the quality of people's lives</li> <li>• Creating fairer life chances</li> </ul>

## 2. Consideration of available data, research and information

Monitoring data and other information should be used to help you analyse whether you are delivering a fair and equal service. Please consider the availability of the following as potential sources:

- **Demographic** data and other statistics, including census findings
- Recent **research** findings (local and national)
- Results from **consultation or engagement** you have undertaken
- Service user **monitoring data** (including ethnicity, gender, disability, religion/belief, sexual orientation and age)
- Information from **relevant groups** or agencies, for example trade unions and voluntary/community organisations
- Analysis of records of enquiries about your service, or **complaints** or **compliments** about them
- Recommendations of **external inspections** or audit reports

	Key questions	Data, research and information that you can refer to
2.1	What is the equalities profile of the team delivering the service/policy?	Homelessness prevention services are delivered by several provider organisations whose equalities profile is not known.  The equalities profile of B&NES housing services is broadly similar to the equalities profile of B&NES population. (With the exception of gender likely to be caused by higher rates of part time women housing officers).
2.2	What equalities training have staff received?	Housing officers must attend corporate Equalities Training or be trained in Equalities at appropriate level. Equalities training must be updated every 3 years.
2.3	What is the equalities profile of service users?	Equalities profile main applicant seeking homelessness prevention advice (Council Services) October 2007-October 2013  Sex: 55% Female 45% Male Disability: 18% Disability Age:



Ethnicity:

Prefer not to say/unavailable	175
Asian - Pakistani	3
Asian - Bangladeshi	35
Asian - Indian	20
Asian - Other	46
Black - African	61
Black - Caribbean	65
Black - Other	51
Chinese	10
Dual Heritage - Asian	16

		<table border="1"> <tr><td>Dual Heritage - Black African</td><td>22</td></tr> <tr><td>Dual Heritage - Black Caribbean</td><td>61</td></tr> <tr><td>Dual Heritage - Chinese</td><td>2</td></tr> <tr><td>Dual Heritage - Other</td><td>32</td></tr> <tr><td>Dual Heritage - White</td><td>15</td></tr> <tr><td>Eastern European</td><td>38</td></tr> <tr><td>Gypsy/Irish Traveller</td><td>8</td></tr> <tr><td>Other</td><td>48</td></tr> <tr><td>South East Asian</td><td>12</td></tr> <tr><td>White - British</td><td>6104</td></tr> <tr><td>White - Irish</td><td>39</td></tr> <tr><td>White - Other</td><td>273</td></tr> </table>	Dual Heritage - Black African	22	Dual Heritage - Black Caribbean	61	Dual Heritage - Chinese	2	Dual Heritage - Other	32	Dual Heritage - White	15	Eastern European	38	Gypsy/Irish Traveller	8	Other	48	South East Asian	12	White - British	6104	White - Irish	39	White - Other	273
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2.4	What other data do you have in terms of service users or staff? (e.g results of customer satisfaction surveys, consultation findings). Are there any gaps?	<p><b>Young People:</b> Leaving the home of parents, friends or relatives is the <b>main reason for homelessness</b> locally. The resident population has increased by 4% since 2001 and a significant proportion is young adults aged 15-24, many of them students (17% compared to 13% nationally).</p> <p><b>Older People:</b> The age profile of social housing tenants is significantly <b>older than nationally</b> (50% of social rented sector tenants are retirement age compared to 31% nationally). However the demand for social housing is greatest from working age population (90% of households on the Housing Register).</p> <p><b>Social housing tenants:</b> Within the area, however, are distinct geographical locations where there are high densities of social housing and greatest likelihood of <b>multiple deprivations</b>. Two in every three social housing tenants are in receipt of either full or part <b>Housing Benefit</b> for housing costs. The <b>age profile</b> of social housing tenants is significantly <b>older</b> than nationally (50% of social rented sector tenants are retirement age compared to 31% nationally).</p> <p><b>Women:</b> Only a small proportion of nightshelter service users are women however the number of women using the service trebled from 2011/12 (9) to 2012/13 (27). <b>Domestic violence ...is the third most common reason for becoming statutorily homeless</b> amongst people who have a</p>																								

		<p>priority need for housing.</p> <p><b>Rough Sleepers:</b> Demand for the nightshelter and associated services for rough sleepers are high. The total <b>number of service users is increasing every year</b> and doubled from 2011/12 (75) to 2012/13 (146). Rough sleepers characteristically have mental and/or physical ill health. Around 60 % of nightshelter service users are aged 36 or older.</p>
2.5	<p>What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?</p>	<p>A programme of extensive consultation has been implemented throughout the development of the Draft Homelessness Strategy. It commenced with initial planning meetings with a wide range of organisations that form the local Homelessness Partnership in early 2013. A Welfare Reform conference was subsequently facilitated by Housing Services and the Homelessness Partnership in March 2013. The conference enabled key stakeholders to consider local challenges and contribute to forming a draft Homelessness Strategy.</p> <p>The draft Homelessness Strategy was approved by the Homelessness Partnership and presented to the Health and Wellbeing Board in September 2013. A formal open public consultation on the draft Homelessness Strategy was endorsed by the Board and launched on 28 September running until 6 November 2013. The consultation together with the draft strategy and evidence base was posted on the council website.</p> <p>Everyone who attended the welfare reform event, homelessness service providers, key local authority service managers all councillors on the exchange and all parish councillors were invited to contribute to the consultation. Comments from the Board and other respondents led to amendments and improvements in the strategy, for example a greater emphasis on the health impacts of homelessness.</p> <p>A strategic core group of the Homelessness Partnership met on 7 November to review the amended strategy and their comments have been taken into account in the final version of the strategy that is presented to Cabinet.</p>
2.6	<p>If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?</p>	<p>None planned</p>
<p><b>3. Assessment of impact: 'Equality analysis'</b></p>		

Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:			
<ul style="list-style-type: none"> <li>● Meets any particular needs of equalities groups or helps promote equality in some way.</li> <li>● Could have a negative or adverse impact for any of the equalities groups</li> </ul>			
		What steps have been or could be taken to address the negative/adverse impacts	Examples of actual or potential negative or adverse impact
<b>3.1</b>	<b>Gender</b> – identify the impact/potential impact of the policy on women and men.	Priority 10 Review the housing needs of women ... rough sleepers, ...  Priority 1 Identify those most at risk of domestic violence and enable early interventions to prevent homelessness	Potential adverse impact if nightshelter services are not tailored to meet women’s specific needs.  Potential adverse impact if domestic violence preventative services are not in place.
<b>3.2</b>	<b>Pregnancy and maternity</b>		No adverse impact
<b>3.3</b>	<b>Transgender</b> – – identify the impact/potential impact of the policy on transgender people		No adverse impact
<b>3.4</b>	<b>Disability</b> - identify the impact/potential impact of the policy on disabled people (ensure consideration both physical and mental impairments)	Priority 10 Review the housing needs of ...rough sleepers with ...complex needs and improve their accommodation pathways and options.  Review pathways into employment for people with mental or physical disability	Potential adverse impact if rough sleepers fail to access health and employment services.
<b>3.5</b>	<b>Age</b> – identify the impact/potential impact of the policy on different age groups	Priority 8 Develop private sector access schemes to facilitate shared rented housing for single people aged under 35.  Prevent youth homelessness by producing an evidence-based document which sets out	Potential adverse impact on Housing Benefit claimants aged 34 and under (entitled to shared accommodation rates).  Potential adverse impact on older social housing tenants if housing needs are unmet.

		<p>effective local approaches</p> <p>Priority 6 Review the housing aspirations of older social housing residents to enable safe and independent living ...</p> <p>Priority 10 Review the housing needs of ... older rough sleepers...and improve their accommodation pathways and options.</p>	Potential adverse impact on older rough sleepers if housing and other needs are unmet.
3.6	<b>Race</b> – identify the impact/potential impact on different black and minority ethnic groups		No adverse impact
3.6	<b>Sexual orientation</b> - identify the impact/potential impact of the policy on lesbians, gay, bisexual & heterosexual people		No adverse impact
3.7	<b>Marriage and civil partnership</b> – does the policy/strategy treat married and civil partnered people equally?		No adverse impact
3.8	<b>Religion/belief</b> – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.		No adverse impact
3.9	<b>Socio-economically disadvantaged</b> – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances	<p>Priority 3 Target mortgage rescue advice and assistance at low income households.</p> <p>Priority 4 Target welfare and money management advice at low income households living in social housing.</p> <p>Priority 5 Prevent evictions of social housing tenants by reviewing pre-eviction protocols and ensuring adequate support in the first year of</p>	<p>Potential adverse impact on low income, unemployed households if</p> <p>a)homelessness prevention services are inaccessible.</p> <p>b)standards in low cost private rented housing are driven down</p> <p>Potential adverse impact on new social housing tenants if introductory tenancies fail.</p>

		new tenancies.  Priority 7 Protect housing standards and conditions in low cost private rented housing.	
<b>3.10</b>	<b>Rural communities</b> – identify the impact / potential impact on people living in rural communities	Priority 2 Improve housing advice, information and support for people living in rural areas	Potential adverse impact on rural communities because access to advice and homelessness prevention services is more difficult.

#### 4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

	Issues identified	Actions required	Progress milestones	Officer responsible	By when
1	All the issues identified in this Equalities Impact Assessment are included in the Homelessness Strategy Action Plan	The Homelessness Strategy Delivery Plan will be implemented in 2014 enabling agencies to work together to address the local priorities and issues.	Annual progress review	Housing Options and Homelessness Manager	December 2014

#### 5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team ([equality@bathnes.gov.uk](mailto:equality@bathnes.gov.uk)), who will publish it on the Council's and/or NHS B&NES' website. Keep a copy for your own records.

**Signed off by:** Jane Shayler  
**Date:** October 2013

(Divisional Director or nominated senior officer)