

Equality Impact Assessment (EIA) Form

Please read EIA guidelines when completing this form

1. Name of Service Area/Directorate

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| Name of Head of Service for area being assessed | Richard Gabb |
| Directorate | Economy and Place |

| Individual(s) completing this assessment | Name | Job Title |
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| | Sandie Rogers | Housing Strategy Officer |
| Date assessment completed | 15 th October 2019 | |

2. What is being assessed

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| Activity being assessed (eg. policy, procedure, document, service redesign, strategy etc.) | Homelessness Prevention and Rough Sleeping Strategy 2020-2025 | | |
| What is the aim, purpose and/or intended outcomes of this activity? | <p>The Homelessness Act 2002 requires every local authority to carry out a review of homelessness in their district every 5 years and to publish a Homelessness Strategy based on the findings of the review. The legislation emphasises the importance of working strategically with social services and other statutory, voluntary and private sector partners in order to tackle homelessness more effectively.</p> <p>The Ministry of Housing, Communities and Local Government (MHCLG) Rough Sleeping Strategy, August 2018 requires all local authorities to update and publish their strategies by 31st December 2019 and rebadge them as Homelessness and Rough Sleeping Strategies.</p> <p>Our key strategic priority outcomes for the strategy are that:</p> <ul style="list-style-type: none"> ▪ Rough sleeping is minimised and tenancy sustainment opportunities for rough sleepers and those with complex needs are increased. ▪ Homelessness prevention activity for all households is maximised. ▪ The health and wellbeing of homeless people and those at risk is improved. ▪ Homeless people and those at risk are able to access appropriate housing and support services are targeted effectively. | | |
| Name of lead for activity | Hayley Crane, Strategic Housing Manager | | |
| Who will be affected by the development and implementation of this activity? | <input checked="" type="checkbox"/> Service Users <input type="checkbox"/> Patients <input type="checkbox"/> Carers <input type="checkbox"/> Visitors | <input type="checkbox"/> Staff <input type="checkbox"/> Communities <input type="checkbox"/> Other _____ | |

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| Is this: | <input checked="" type="checkbox"/> x Review of an existing activity <input type="checkbox"/> New activity <input type="checkbox"/> Planning to withdraw or reduce a service, activity or presence? |
| What information and evidence have you reviewed to help inform this assessment? (name sources, eg demographic information for services/staff groups affected, complaints etc.) | <p>The council is required to collect statistical monitoring data on homelessness presentations and outcomes and to send this to the Ministry of Housing, Local Government and Communities (MHCLG) through the completion of the quarterly H-Click Statutory Return. The Statutory Return requires the submission of equality data in relation to; age, ethnicity, gender, disability and presence of a pregnant women in the households.</p> <p>In addition, we have undertaken a review of homelessness in Herefordshire, which includes some data relating to protected characteristics.</p> |
| Summary of engagement or consultation undertaken (eg. who and how have you engaged with, or why do you believe this is not required) | <p>The strategy development has been informed by our close working relationship with the multi-agency Herefordshire Homeless Forum and through the following consultations held during August/September 2019.</p> <ol style="list-style-type: none"> 1. Public consultation 2. Service provider consultation, including statutory, voluntary and faith based interest groups. 3. Accommodation provider consultation. 4. Service user consultation. |
| Summary of relevant findings | <p>The findings have been analysed in two separate consultation reports, as follows:</p> <ol style="list-style-type: none"> 1. Public and service user consultation. 2. Service and accommodation provider. <p>There was a significant consistency in identified issues across the consultations with the main 'themes' relating to:</p> <ul style="list-style-type: none"> ▪ The need for improved physical and mental health support and service access. There is an action in the improvement plan relating to this. ▪ The need for improved provision and service access for people with substance addictions. There is an action in the improvement plan relating to this. In addition, there is an intention to recommission the council's current treatment system and a public drug and alcohol consultation has recently taken place to inform this process. ▪ The need for more affordable housing provision and more support / supported provision for vulnerable people. Actions in the improvement plan to strengthen the Outreach and Resettlement Team will improve support provision for rough sleepers and those at risk. In addition, the council will be developing its new Housing Strategy over the course of the next year. This will include analysis of housing need. ▪ The need for more effective partnership working, particularly in relation to interventions to prevent rough sleeping and support for |

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| | existing rough sleepers to access and maintain a home away from the streets. |
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3. The impact of this activity

Please consider the potential impact of this activity (during development and implementation) on each of the equality groups outlined below. **Please tick one or more impact box below for each Equality Group and explain your rationale.** Please note it is possible for the potential impact to be both positive and negative within the same equality group and this should be recorded. Remember to consider the impact on staff, public, patients, carers etc. in these equality groups.

| Equality Group | Potential <u>positive</u> impact | Potential <u>neutral</u> impact | Potential <u>negative</u> impact | Please explain your reasons for any potential positive, neutral or negative impact identified |
|----------------|----------------------------------|---------------------------------|----------------------------------|---|
| Age | x | | | <p>Homelessness legislation identifies 'vulnerability' due to age as a priority need category</p> <p>Nationally, older people are less likely to become homeless or be at risk of homelessness than young people and this situation is reflected locally. In addition, as the county has a good supply of social housing for older people, there are sufficient opportunities to prevent older people from becoming homeless through an offer of a property through the Home Point Choice Based Letting Scheme.</p> <p>Data from our Homelessness Review showed that for the financial year 2018-2019 the majority of households seeking help were between the ages of 35-64 years. Homelessness was prevented for seven people over the age of 75 years who were seeking help.</p> <p>In partnership with Children's Services we have developed and implemented an Accommodation Pathway for Care Leavers and vulnerable 16-17 year olds. No Care Leavers or 16-17 year olds became homeless during the 2018-2019 financial year, which indicates that the 'pathway' is working effectively.</p> <p>In addition, Strategic Housing is working with Children's Services to refurbish a number of properties, which will provide accommodation and support for vulnerable Care Leavers with challenging needs.</p> <p>The above initiatives are likely to have a positive impact on homelessness prevention.</p> |
| Disability | | x | | <p>Homelessness legislation identifies 'vulnerability' due to disability as a priority need category. This includes people who are disabled physically and those who experience mental ill-health. Only seven households were owed a full homeless duty due to disability during the 2018-2019 financial year. We will always take the specific needs of the household into account when delivering our services.</p> <p>There is no reason to believe that the implementation of the Homelessness Prevention</p> |

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|--|----------------------------------|---------------------------------|----------------------------------|---|
| | | | | Strategy will impact negatively on disabled people or that it will present any barriers to service access. |
| Gender Reassignment | | x | | <p>We do not currently collect customer profiling information on gender reassignment and, therefore, we have no evidence to show that the strategy will have a negative impact on this protected characteristic. However, we will always take the specific needs of the household into account when delivering our services.</p> <p>There is no evidence to suggest that the implementation of the Homelessness Prevention Strategy will have a negative impact on this protected characteristic or that it will present any barriers to service access.</p> |
| Marriage & Civil Partnerships | | x | | <p>We do not currently collect customer profiling information on marriage and civil partnerships. However, there is no evidence to suggest that the implementation of the Homelessness Prevention Strategy will have a negative impact on this protected characteristic or that it will present any barriers to service access.</p> |
| Pregnancy & Maternity | | x | | <p>Homelessness legislation identifies 'vulnerability' due to pregnancy as a priority need category. Data is collected on pregnancy as part of the MHCLG H-Click homelessness statistics. Analysis from our homelessness review shows that, during the 2018-2019 financial year, only two households who became homeless contained a pregnant women. We will always take the specific needs of the household in account when delivering our services.</p> <p>There is no evidence to suggest that the implementation of the Homelessness Prevention Strategy will have a negative impact on this protected characteristic or that it will present any barriers to service access.</p> |
| Race (including Travelling Communities and people of other nationalities) | | x | | <p>During the 2018-2019 financial year 37 customers self-identified as a race other than 'White English/Welsh/Scottish/Northern Irish/British.' We will always take any specific needs of the household into account we delivering our services.</p> <p>There is no evidence to suggest that the implementation of the Homelessness Prevention Strategy will have a negative impact on this protected characteristic or that it will present any barriers to service access.</p> |

| Equality Group | Potential <u>positive</u> impact | Potential <u>neutral</u> impact | Potential <u>negative</u> impact | Please explain your reasons for any potential positive, neutral or negative impact identified |
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| Religion & Belief | | x | | <p>We do not currently collect customer profiling information on religion or belief. However, we will always take the specific needs of the household into account when delivering our services.</p> <p>We have no evidence to suggest that the implementation of the Homelessness Prevention Strategy will have a negative impact on this protected characteristic or that it will present any barriers to service access.</p> |
| Sex | | x | | <p>During the 2018-2019 financial year 135 single males and 63 single females were provided with advice and support in relation to homelessness prevention.</p> <p>Domestic violence and abuse as a cause of homelessness is more likely to affect women who are abused by their male partners. However, we recognise that this can also happen in same sex relationships and that sometimes women abuse their male partners. We will also take the specific needs of the household into account when delivering our services.</p> <p>There is no reason to believe that the implementation of the Homelessness Prevention Strategy will impact negatively on people because of this protected characteristic or that it presents any barriers to service access.</p> |
| Sexual Orientation | | x | | <p>We do not currently collect customer profiling information on sexual orientation. However, we will always take the specific needs of the household into account when delivering our services.</p> <p>We have no evidence to suggest that the implementation of the Homelessness Prevention Strategy will have a negative impact on this protected characteristic or that it will present any barriers to service access.</p> |
| Other Vulnerable and Disadvantaged Groups (eg. carers, care leavers, homeless, social/ economic deprivation, etc) | x | | | <p>Research conducted by Bramley and Fitzpatrick¹ suggests that childhood poverty and social deprivation is a powerful indicator of future adult homelessness. This is an issue that is considered in the Homelessness Prevention and Rough Sleeping Strategy.</p> |

¹ Glen Bramley & Suzanne Fitzpatrick (2018) Homelessness in the UK: who is most at risk? Housing Studies, 33:1.

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| Health Inequalities (any preventable, unfair & unjust differences in health status between groups, populations or individuals that arise from the unequal distribution of social, environmental & economic conditions within societies) | x | | | We have undertaken Homeless Link's Health Needs Audit. The Audit ² showed that participants' physical and mental health, on all dimensions, is extremely poor compared to that of the population as a whole. The results of the audit were presented to Herefordshire's Health and Wellbeing Board and all the report recommendations agreed. |

| What actions will you take to mitigate any potential negative impacts? | Risk identified | Actions required to reduce/eliminate negative impact | Who will lead on the action? | Timeframe |
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| | Health needs of rough sleepers and those at risk of rough sleeping. | This is included as an Improvement Action for the first year of the strategy. | This will be identified in the Strategy Improvement Plan. | 2020-2021 financial year. |
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4. Monitoring and review

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| How will you monitor these actions? | The action will be monitored by the council's Housing Board as part of annual Improvement Plan reporting arrangements. |
| When will you review this EIA? (eg in a service redesign, this EIA should be revisited regularly throughout the design & implementation) | The EIA will be reviewed as part of the annual Improvement Plan process. |

5. Equality Statement

- All public bodies have a statutory duty under the Equality Act 2010 to set out arrangements to assess and consult on how their policies and functions impact on the 9 protected characteristics.
- Herefordshire Council will challenge discrimination, promote equality, respect human rights, and design and implement services, policies and measures that meet the diverse needs of our service, and population, ensuring that none are placed at a disadvantage over others.
- All staff are expected to deliver services and provide services and care in a manner which respects the individuality of service users, patients, carers etc, and as such treat them and members of the workforce respectfully, paying due regard to the 9 protected characteristics.

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| Signature of person completing EIA | <i>Sandie Rogers</i> |
| Date signed | 17 th October 2019 |

² 102 health Needs Audits were undertaken to capture the health needs of people sleeping rough, sofa surfing or living in specialist supported accommodation.