



## Equality Impact Assessment (EIA) Form

### 1. Service Area/Directorate

Name of Head of Service for activity being assessed: Hilary Hall

Directorate: Community Wellbeing

Name of lead person for this activity: Hannah McSherry

Individual(s) completing this assessment: Bob Barnett

Date assessment completed: 26/01/26

### 2. What is being assessed

Activity being assessed (eg. policy, procedure, budget, service redesign, strategy etc.)

Homelessness Prevention and Rough Sleeping Strategy 2026-2031

What is the aim, purpose, or intended outcome of this activity?

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.

This Strategy replaces the 2020-25 homeless Prevention and Rough Sleeping Strategy. The strategic Priorities will be:-

1. **Improving our Systems**– identify those that are at risk of becoming homeless as early as possible and through the Duty to Refer to prevent homelessness or rough sleeping and identifying the most vulnerable and ensuring individuals are safe from harm, and have access to the support and services to maintain their health and wellbeing
2. **Strengthening our Partnerships** – strengthen and maintain relationships to bring together resources and knowledge to prevent and relieve homelessness across the whole multi-agency and cross sector workforce.
3. **Improving our Accommodation Offer**– ensure the volume of temporary accommodation is increased and quality of temporary accommodation maintained and improved. Ensure that accommodation is both available and suitable for those that need it and explore opportunities to increase the supply of all types of accommodation for move on accommodation within the BRAVE pathway as well as increase the volume of affordable housing in the county.
4. **Being Data Led** – Develop our systems and processes to ensure we capture the relevant data, have agreements in place to share where necessary and use the data to take a proactive and joined up approach to tackling rough sleeping and homelessness. Use the evidence to explore funding opportunities to ensure we meet the needs of all client groups.
5. **Make best use of funding** Ensure all partners meet their primary legal obligations and deliver services that ensure we collectively are able to mitigate and reduce complex multiple experiences for the communities and people of Herefordshire. Where appropriate use shared funding models to develop and build resilience in staffing models, and services. Identify and secure new funding sources.

Who will be affected by the development and implementation of this activity?

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> Service users | <input checked="" type="checkbox"/> Visitors to the county |
| <input checked="" type="checkbox"/> Communities   | <input checked="" type="checkbox"/> Carers                 |
| <input checked="" type="checkbox"/> Children      | <input checked="" type="checkbox"/> Patients               |
| <input checked="" type="checkbox"/> All staff     | <input checked="" type="checkbox"/> All part-time staff    |

- Staff at a particular location  Other:

Is this:

- Review of an existing activity/policy  
 New activity/policy  
 Planning to withdraw or reduce a service, activity or presence?

### 3. Background information and findings

What information and evidence have you reviewed to help inform this assessment? (name your sources, eg. demographic information, usage data, Census data, feedback, complaints, audits, research)

Each council is required to collect statistical monitoring data on all homelessness presentations and linked outcomes. This information is submitted to the Ministry of Housing Communities and Local Government (MHCLG) through the completion of monthly data returns. This statutory requirement for data requires the submission of equality data in relation to: age, ethnicity, gender, disability, presence of a pregnant woman in the household, as well as if the individual has additional support needs, such as addiction, mental ill-health, physical health / disability and also if they are an ex or current offender, released from an institution or former military personnel.

In addition. The following steps were also taken: -

1. review of the 2020-25 Homeless Prevention and Rough Sleeping Strategy and progress to meet the strategic priorities within it. This included a public, service users, staff, delivery partner and accommodation provider survey.
2. Public consultation with the public, service users, staff, delivery partner and accommodation provider on the development of the 2026-31 Homeless Prevention and Rough Sleeping Strategy.



Appendix F -  
2020-25 priorities co

3. Detailed review of the last seven years data submitted to MHCLG to identify trends and patterns



Appendix E -  
Graphs and tables fi

that would shape this service.

4. A comprehensive review of national and international literature pertaining to homelessness and



Appendix D - A  
Review of Homeless

rough sleeping.

5. A Half day work shop with the membership of Herefordshire Homeless Forum looking back at the



Appendix C -  
Rough Sleeper Strat

2020-25 strategy and looking at what was required for the 2026-31 strategy.

Summary of engagement or consultation undertaken (eg. who you've engaged with, and how, or why do you believe this is not required)

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.

1. Public consultation

2. Service provider consultation, including statutory, voluntary and faith-based interest groups.
3. Accommodation provider consultation.
4. Delivery Partner consultation.
5. Service user consultation.

See appendices C and F above.

Summary of relevant findings (it is possible that you will have gaps in your evidence. You must decide whether you need to fill in the gaps now, and if it is feasible to do so. It might be that collecting robust information forms part of your action plan below)

The findings were analysed and encapsulated into the needs assessment document. See appendix D



Appendix D - A  
Review of Homeless

Key amongst them were the challenges to the housing service listed below: -

- Too many families in Temporary Accommodation, including some very large families.
- The length of time families are in Temporary Accommodation.
- The challenge of single people moving on from Temporary Accommodation.
- The low number of one-bedroom units of accommodation on the Private Rental Market.
- Not enough social and affordable housing in Herefordshire.
- Individuals being released from HMP estate with little or no notice to housing services.
- Individuals with NRPF or No Permanent Status to remain in the UK needing support.
- Individuals with outstanding rental debts and / or composite debts and / or a history of failed tenancies and anti-social behaviour.
- There is no single data management system for all agencies to access and record notes.
- No single shared data set to drive continuous improvement.
- Access to better early information and resources to help mitigate the risk of crisis or complex difficulties developing into homelessness.
- Recruitment and Retention of staff.
- Training of staff across our multi-agency / sector partnerships.
- Need to reinforce and expand the Duty to Refer scheme.
- No single integrated model that targets resources early in a household's descent into homelessness across health, education, employment and the criminal justice system.
- Lack of integrated funding models across our multi-agency / sector partnership.
- Number of households who lose contact with Housing Solutions Service.
- Individuals with high levels of and / or complex support needs that require access to bespoke supported accommodation and Adult Social Care support, linked to the high thresholds for support from health and social care services.

#### 4. The Public Sector Equality Duty

Will this activity have a positive, neutral or negative impact on our duty to:

Equality Duty	Positive	Neutral	Negative
Eliminate unlawful discrimination, harassment, victimisation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Advance equality of opportunity between different groups?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Foster good relations between different groups?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explain your rationale here, and include any ways in which you could strengthen the capacity of this activity to promote equality (remember to add anything relevant into your action planning below)

## 5. The impact of this activity

Consider the potential impact of this activity on each of the equality groups outlined below and explain your rationale. Please note it is possible for the potential impact to be both positive and negative within the same equality group. Remember to consider the impact on staff and service users (current and potential) and partner organisations. It may be useful to include data within these sections if you know the diversity make-up of the people likely to be affected.

Equality Group	Potenti al <u>positiv</u> <u>e</u> impact	Potenti al <u>neutral</u> impact	Potenti al <u>negativ</u> <u>e</u> impact	Rationale
<b>Age</b> (include safeguarding, consent and child welfare)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<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>Since 2018 the breakdown of households by age seeking accommodation support is as follows: -</p> <ul style="list-style-type: none"> <li>• 16-17 years old - 3 households</li> <li>• 18-24 year old – 235 Households (23%)</li> <li>• 25-34 year old – 300 households (29%)</li> <li>• 35-44 year old – 224 households (22%)</li> <li>• 45-54 year old – 136 households (13%)</li> <li>• 55-64 year old – 80 households (8%)</li> <li>• 65-74 year old – 35 households (3%)</li> <li>• Over 75 years old – 14 households (1%)</li> </ul> <p>It can clearly be seen that the majority of households seeking help were between the ages of 18-44 years.</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</p>

Equality Group	Potenti al positiv e impact	Potenti al neutral impact	Potenti al negativ e impact	Rationale
				<p>2018-2019 financial year, which indicates that the 'pathway' is working effectiely.</p> <p>In addition, Strategic Housing continues to work 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 inititiative are likely to have a postive impact on homelessness prevention.</p> <p>Over the past four years Herefordshire has also developed its offer of a free at the point of use emergency night shelter (18 bed) and 4 emergency accommodation pods as well as developed a rough sleeper pathway (BRAVE) that has seen over 50 units of specific accommodation for those most vulnerable.</p>
<p><b>Disability</b> (consider attitudinal, physical, financial and social barriers, neuro-diversity, learning disability, physical and sensory impairment)</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<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. Since 2018 an average of 20 households a year were owed a full homeless duty due to a physical disability. 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 Strategy will impact negatively on disabled people or that it will present any barriers to service access.</p>
<p><b>Gender Reassignment</b> (include gender identity, and consider privacy of data and harassment)</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<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>

Equality Group	Potenti al positiv e impact	Potenti al neutral impact	Potenti al negativ e impact	Rationale
				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.
<b>Marriage &amp; Civil Partnerships</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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.
<b>Pregnancy &amp; Maternity</b> (consider working arrangements, part-time working, infant caring responsibilities)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Homelessness legislation identifies 'vulnerability' due to pregnancy as a priority need category.</p> <p>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>
<b>Race</b> (including Travelling Communities and people of other nationalities)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>During the seven years since 2018, 96% of all households self-identified as 'White English/Welsh/Scottish/Northern Irish/British.'</p> <p>Of the remaining 4% of households, 1% self-identified (6 per year) as Black / African / Caribbean / Black British; 1% self-identified (8 per year) as Asian / Asian British / Pakistani; 1% self-identified (6 per year) as being from mixed / , 1% self-identified (^ per year) as being from another ethnic group.</p> <p>We will always take any specific needs of the household into account we are delivering our services.</p>

Equality Group	Potenti al positiv e impact	Potenti al neutral impact	Potenti al negativ e impact	Rationale
				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.
<b>Religion &amp; Belief</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<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>
<b>Sex</b> (consider issues of safety, sexual violence, part-time work, and single-sex provision – especially in light of the legal definition of “sex”)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Since 2018 an average of 136 single males and 113 single females were provided with advice and support in relation to homelessness prevention.</p> <p>However, 13 single men with dependent children were also provided with advice and 149 single women with dependent children.</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. Since 2018 an average of 68 people (mainly female) presented for housing support when fleeing domestic violence. A further 17 on average were fleeing harassment or violence and 48 because of a non-violent relationship breakdown.</p> <p>There is no reason to believe that the implementation of the Homelessness Prevention Strategy will impact negatively on</p>

Equality Group	Potenti al positiv e impact	Potenti al neutral impact	Potenti al negativ e impact	Rationale
				people because of this protected characteristic or that it presents any barriers to service access.
<b>Sexual Orientation</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Since 2019 data has been collected on sexual orientation. An average of 617 (58%) household lead applicants stated they were heterosexual or straight, an average of 9 (1%) stated they were homosexual or gay, five stated they were bi-sexual and 118 (11%) lead applicants recorded 'other'. An average 315 lead applicants (30%) preferred not to disclose their sexual orientation.</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>
<b>Others: carers, care leavers, homeless, social/ economic deprivation</b> (consider shift-patterns, caring responsibilities)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Research conducted by Bramley and Fitzpatrick <sup>1</sup> 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.
<b>Health Inequalities</b> (any preventable, unfair & unjust differences in health status between groups, populations or individuals that arise from unequal distribution of social, environmental & economic conditions)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	In 2018/19 We undertook Homeless Link's Health Needs Audit. The Audit <sup>2</sup> 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. The health need audit was completed again over the winter of 2024/25 with all users of the winter night shelter. The outcomes corresponded with our 2018/19 audit and the 2025 National Homeless Link Health Needs Audit.

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

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

Equality Group	Potential positive impact	Potential neutral impact	Potential negative impact	Rationale

Where a negative impact on any of the equality groups is realised after the implementation of the activity, the activity lead will seek to minimise the impact and carry out a full review of this EIA.

**6. Action planning**

What actions will you take as a result of this impact assessment? (you will need to include actions to mitigate any potential negative impacts)

Potential negative impact	What action will be taken	Who will lead	Timeframe

**7. Monitoring and review**

How will you monitor these actions?

A comprehensive Strategy has been drafted, and this contains five key themes / priorities. To deliver these are 42 comprehensive action points that will be overseen and managed by the BRAVE Operations delivery board and the Herefordshire Homeless Forum acting as an impartial monitoring body.

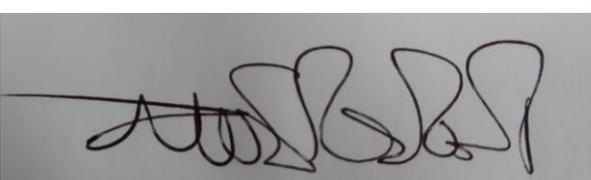
When will you review this EIA?

The EIA will be reviewed as part of the annual Improvement Plan process.

**8. Equality Statement**

- All public bodies have a statutory duty under the Equality Act 2010 to give due regard to how they can improve society and promote equality in every aspect of their day-to-day business. This means that they must consider, and keep reviewing, how they are promoting equality in decision-making, policies, services, procurement, staff recruitment and management.
- 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 population, ensuring that none are placed at a disadvantage over others.

Signature of person completing EIA



Date signed 26/1/26

**9. Make this EIA available (and delete this section)**

- Attach your EIA as an appendix to any decision reports so that decision-makers have all the equality data they need in order to make robust and fair decisions.
- Upload your EIA to the shared Teams site: [Equality Impact Assessment | General | Microsoft Teams](#)
- Staff, trade unions, service users or members of the public may want to see this EIA, so it must be published on our website along with the decision report.