

## ANNEX 4:

# Equality Impact Assessment

## 1. Introduction

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| <b>1.1 Service:</b>                                       | Housing  |
| <b>1.2 Name of proposal, policy, strategy or project:</b> | Homelessness & Rough Sleeping Strategy 2022-27 |
| <b>1.3 This is:</b>                                       | A change to an existing policy or strategy     |
| <b>1.4 Completing officer's name:</b>                     | Alison Robinson                                |
| <b>1.5 Date initially completed:</b>                      | 10/09/2021                                     |

## 2. About the proposal

*\*\* Note that the term 'proposal' is used here to include any new services proposed for introduction, changes to an existing service, withdrawal of an existing service, any new policy or strategy or change to an existing policy or strategy, and any project \*\**

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| <b>2.1 What is the main purpose of the proposal?</b><br><i>Please explain in one or two short paragraphs</i>   |
| There is a legal requirement to publish a Homelessness Strategy every five years setting out the local authority's approach to tackling it. The Strategy sets out the priorities for homelessness prevention and related housing activities. |

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| <b>2.2 Why is it being introduced / reviewed / changed now?</b><br><i>This could be, for example, because of new government legislation or guidance, because of changing service user needs, or for financial reasons.</i> |
| The term of the previous five year Strategy is ending, a replacement Strategy is required for the next five years.   |

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| <b>2.3 Who is the intended audience or target group(s) for the proposal?</b>  |
| Internal audience or group: Staff and councillors   |
| External audience or group: Multiple (please specify below)   |
| Partner organisations delivering statutory and non-statutory services, social housing providers, supported housing providers, support providers, the voluntary sector and charities working with households with housing issues or facing homelessness who are usually borough residents. |

### 3. Assessment of potential impact

Information about the protected characteristic groups as defined by the Equality Act is available [here](#). You should also use this assessment to consider impacts on other vulnerable groups such as those on low incomes.

**In undertaking your assessment, please think about every stage of your process, including the design phase, any consultation, the delivery phase and once the proposal is up and running.**

#### Who could be affected by your proposal?

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| <b>3.1 Will the proposal affect people - service users, employees or the wider community?</b>                            | Yes | <i>If yes, please identify which group(s):</i><br>Service users, employees in other organisations   |
| <b>3.2 Will the proposal introduce a change which will significantly affect how services or functions are delivered?</b> | No  | The Homelessness Strategy underpins the services and activities being delivered to tackle homelessness based on existing legislative requirements, many of the activities are already being delivered. New actions are proposed which enhance existing services or accommodation provision. |

#### Data and evidence

In undertaking this assessment, you will need to consider relevant data and evidence, depending on the people the proposal will affect, for example:

- Relevant information about service users held by your service
- Relevant information about staff (eg, the workforce equality information published on the [website](#), staff surveys etc)
- Relevant information about borough residents (eg the borough equality information published on the [website](#), service user surveys etc)
- Relevant information published by third party organisations (eg data, research studies etc)
- Feedback or information from organisations representing target equality groups

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| <b>3.3 Please list the evidence / data sources you have considered in assessing the likely impact of your proposal</b>                 | <ul style="list-style-type: none"> <li>• Homelessness Data: high level and detailed data is collected about the homelessness activities recorded on every client in which casework is undertaken and is broken down by household composition e.g. single female, single male, couple no children, female lone parent, male lone parent, couple with dependents, ethnicity, support needs broken down by type for example mental health problems, age, substance dependency, physical ill health, learning disability etc</li> <li>• Housing Needs: Numbers on the register over time, by size of property, broad waiting times, number of social housing lettings</li> <li>• Borough wide data: earnings data, house price data, private rent costs data, unemployment data, new affordable housing delivery</li> </ul> |  |
| <b>3.4 Are there any significant gaps in the evidence base that mean it is difficult to assess the likely impact of your proposal?</b> | No  |  |

### Potential impact

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| <b>3.5 Does your proposal relate to a service or function which information indicates is important to those with protected characteristics?</b> | Yes | <i>If yes, please outline the issues – these could include (for example) access to information or ability to use or access a service.</i><br>Households facing homeless frequently have a protected characteristic and ease of access to information, advice, assistance and the right accommodation is important to deliver an effective homelessness service. |
| <b>3.6 Will the proposal intentionally target any particular protected characteristic group?</b>  | No  |   |
| <b>3.7 Will the proposal intentionally exclude any particular protected characteristic group?</b>   | No  |   |

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| <p><b>3.8 Will the proposal be able to be equally accessed by all at every stage of the process? Or are there barriers that might inhibit access for some people?</b></p> | <p>May be barriers that could inhibit access</p> | <p><i>Please identify any barriers. These could be physical, digital, social or cultural:</i></p> <p>The activities and services offered under the umbrella of the Homelessness Strategy depend on the ability to access information, to access the internet, the ability to a communicate or have a representative who can assist. These are potential barriers to some people.</p>  |
| <p><b>3.9 Does the proposal have the potential to reduce inequalities or improve outcomes for protected characteristic groups?</b></p>                                    | <p>Yes, Improve outcomes</p>                     | <p>Activities to prevent homelessness do improve outcomes for groups. For example, homeless women or families with a pregnancy, people with disabilities, long-term health problems are prioritised by legislation and, depending on their circumstances, are assisted to secure suitable accommodation and / or support. The Strategy sets out a broad and flexible range of activities to prevent homelessness and to assist those facing it.</p> |

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| <p><b>3.10 Considering the above information, please summarise the likely impact on <u>protected characteristic groups</u> (within the organisation, outside the organisation or both) <i>This may be direct, indirect or differential impact. Use the above link for definitions, and consider issues such as physical access to services, different cultural or social practices and how people are able to access information.</i></b></p> |                                |  |
|   | <p><b>Nature of impact</b></p> | <p><b>Please briefly explain your answer</b></p>   |
| <p><b>Age</b> <i>including children, young people or older people</i></p>   | <p>Positive</p>                | <p>Children: depending on legislation, households with children facing homelessness have a priority and the strategy sets out a range of activities to help households prevent their homelessness, options to secure alternative accommodation and a range of support services for families with additional needs.</p> <p>Young people: The strategy identifies young people as a specific group with support needs, recognises the vulnerability of care leavers, identified joint working with partners to help young people who face financial and other barriers to secure settled housing and access support.</p> <p>Older people: whilst the strategy does not specifically mention older people, this group are prioritised under homelessness legislation.</p> |
| <p><b>Disability</b> <i>including physical, sensory or</i></p>  | <p>Positive</p>                | <p>Homelessness legislation and the Strategy identify a number of specific grounds with support needs for example, long-term health impairments, mental ill-health, substance</p>  |

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| <i>learning disability or long-term health impairment</i> |                 | misuse, prison leavers, complex need clients and sets out activities to support these groups to move to settle accommodation.  |
| <b>Gender reassignment</b>                                | Neutral         | All households approaching the Council with a housing issue are given advice and information and according to their situation and the legislative framework may be assisted into accommodation.  |
| <b>Marriage and civil partnership</b>                     | Neutral         |  |
| <b>Pregnancy and maternity</b>                            | Positive        | Homelessness legislation, which underpins the Strategy, identifies this group as a priority. This means if a homelessness duty is accepted because homelessness couldn't be prevented, accommodation will be provided.   |
| <b>Race or ethnicity</b>                                  | Neutral         |  |
| <b>Religion or belief</b>                                 | Neutral         |  |
| <b>Sex</b>  | Neutral         |  |
| <b>Sexual orientation</b>                                 | Neutral         |  |
| <b>Deprivation</b>  | Positive        | Homelessness households frequently have low incomes and this impacts on their housing options and can make them more vulnerable to risk of homelessness. The Strategy supports activities to help manage debt, to budget, to assess affordability, to assess benefits and to work in partnership with other organisations to assist those experiencing financial hardship and deprivation. |
| <b>Other vulnerable group</b>                             | Choose an item. |  |

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| <b>3.11 Has there been any consultation with relevant interested parties or is any consultation planned?</b>   |
| <i>This could include consultation, further evidence gathering or changing or amended the proposed approach. Give consideration to both consultation within the Council (eg staff) and outside the Council (eg residents).</i> |
| Yes, already undertaken  |

*If yes, please explain the nature of the consultation that has been undertaken or is planned. If no, please explain why consultation is not considered necessary. How were protected characteristic groups consulted or how will they be consulted?*

A consultation exercise took place during Sept – Oct 2021. This included an on-line survey available on the Council's website, seeking views in the Housing Services. It was designed with specific 'routing' to questions based on these respondent types: clients / members of the public, professionals, others. Specific questions were asked around support needs, services and accommodation for groups such as those with mental ill-health, disabilities, substance misuse etc. It was promoted on social media and on the Council's website. Housing staff also include a link to the survey within their email signatures which goes to clients and professionals. Housing staff also encouraged service users to complete the survey and offered assistance. A further qualitative survey will be undertaken with homelessness service users many of whom have protected characteristics. A stakeholder workshop also took place to whom a variety of professionals were invited including mental health teams, support providers, the NHS, Surrey County Council services including children's services and mental health services, Probation, Police, domestic abuse services, local charities.

**3.12 What actions have been, or could be, taken to increase the positive impacts for people with protected characteristic(s) or other vulnerabilities?** *This could include changing or amending the proposed approach.*

The Housing Team supports the most vulnerable and offers a flexible service which is tailored to the individual within the limits of legislation. No further actions are identified.

**3.13 What actions have been, or could be, taken to reduce potential negative impacts on people with protected characteristic(s) or other vulnerabilities?** *This could include changing or amended the proposed approach, or allowing the proposal to be tailored to fit different individual circumstances*

None.

**3.15 Are there any remaining negative impacts for people with protected characteristic(s) or other vulnerabilities?** *For example, physical, cultural or information access issues that cannot be resolved.*

No

*If yes, please summarise which groups could be impacted and how.*

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**3.16 Is any remaining negative impact legal or intended?** *The Equality Act says discrimination can be justified if it can be demonstrated that this is a proportionate means of achieving a legitimate aim (for example, see [here](#)). However, this should always be a last resort.*

No

*If yes, please explain further.*

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## 4. Monitoring and review

**4.1 How do you proposed to monitor and review the impact of your proposal?** *Please outline how you will monitor the impact of your proposal, once implemented, on protected characteristic groups, and what the mechanisms for review are (for example if any negative impact is found to be occurring)*

Data on high level indicators is assessed monthly, this identifies potential issues with our services, this is supported by regular meetings about the services and any issues. Following implementation, the strategy action plan will be reviewed annually alongside the data on our homelessness duties that is also published quarterly.