

Appendix 4 – Equality Impact Analysis

The Proposal

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1. What is the Proposal

This proposal seeks to define the City of London Corporation’s approach to tackling the negative effects of rough sleeping within the Square Mile. The City of London Corporation is committed to ensuring those who sleep rough on the Square Mile have a route off the streets tailored to their needs and circumstances. Many of those who sleep rough in the City are entrenched and have complex needs. Such individuals often refuse offers of support, accommodation, and other welfare intervention. Rough sleeping can also be associated with activities like begging, street drinking, substance misuse and other antisocial behaviour. Not all those who sleep rough engage in begging, anti-social or criminal activities. However, anti-social behaviour has been associated with the presence of tent encampments and rough sleeping “hotspots” in the Square Mile.

The proposal ensures there is a balanced and proportionate response that supports those who are vulnerable and protects the communities of the City. It balances the Corporation’s commitment to a welfare driven approach, whilst also ensuring that the City is safe, secure and accessible for all. Any intervention to address negative impacts will only be undertaken if there is clear evidence of both support offer provided and the negative impact of their behaviour.

2. What are the recommendations?

Outcome 1: The Corporation will continue to offer routes off the streets for all rough sleepers.

Outcome 2: The Corporation established a framework to address the negative effects of rough sleeping (antisocial behaviour)

Outcome 3: This proposal will work with the current Homelessness and Rough Sleeping Strategy 2023-2027.

3. Who is affected by the Proposal?

This proposal will affect rough sleepers in the Square Mile who sleep in encampments. Those sleeping rough in the Square Mile are predominately white British nationals between 26 and 45 years of age. Rough sleeping presents considerable risks to health and wellbeing. Research by the homeless charity Crisis reports that people sleeping on the street are almost seventeen times more likely to have been victims of violence in the past

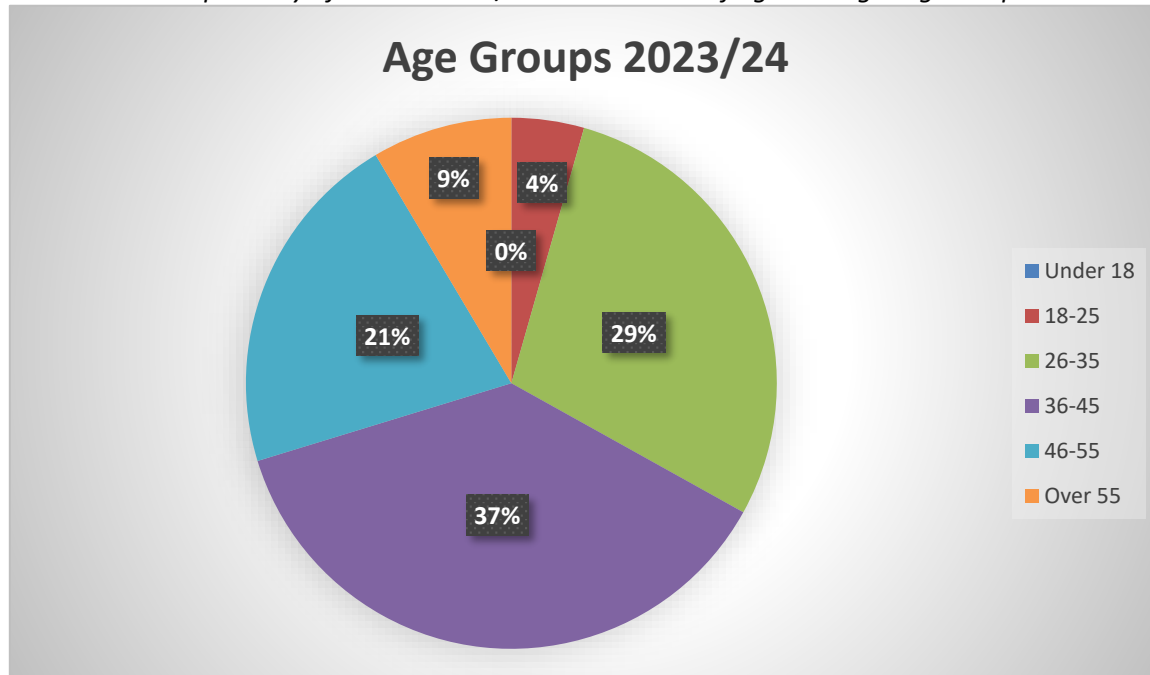
year compared to the general public. People experiencing homelessness and rough sleeping have a greatly reduced life expectancy. Homelessness support services also express concern that rough sleeping in tents can increase the risk of financial and sexual exploitation.

Age

Check this box if NOT applicable

Age - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*
The chart below shows the age profiles of those recorded as rough sleeping in the City of London from counts conducted in 2023/24. The largest cohort of rough sleepers remains the 36-45 year old (37.20%) ages 26-35 and 46-55 are the next highest (28.66% and 21.19% respectively). The City of London has a relatively low percentage of rough sleepers over the age of 55, and under 25 (8.54% and 4.42% respectively). The majority of the rough sleepers identified in the City of London are working age.

Chain Annual Report City of London 2023/24 – Breakdown of age among rough sleepers:



What is the proposal's impact on the equalities aim? *Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact*

Young People

The City of London has low figures for those aged 25 and under sleeping rough. However, this figure will not include or identify the 'hidden homeless' who are more likely to be young people.

Action for Children have estimated that over 136,000 children and young people are homeless in the UK. ([What is the extent of youth homelessness in the UK? | Action For Children](#) – accessed October 2024. Research from Centrepoin also shows that there are strong links between rough sleeping as a young person and long-term rough sleeping and social exclusion in later life.

The drivers and impacts of youth homelessness and rough sleeping are often very different from those of older adults, and as such consideration of these issues should be included in any work, and distinct and tailored services and support in both the statutory and voluntary sector are in place.

The research from Centrepoin (Centrepoin (2019) No place to stay: Experiences of Youth Homelessness. London: Centrepoin.) also suggests that challenges related to the cost of living have intensified the key drivers for youth homelessness and rough sleeping for example family breakdown and domestic abuse.

Older People

*Research also supports that homelessness amongst older people is also increasing, with the Centre for Policy and Aging rapid review (2017) ([CPA-Rapid-Review-Diversity-in-Older-Age-Older-Homeless-People.pdf](#)) showing that between 2010 and 2015 the number of street homeless older people has more than doubled. The increased health issues experienced by those who are homeless and rough sleeping is likely to have a higher significant impact on those over 50 years of age - considered older people (Crane M and Warnes A M (2010) Homelessness among older people and service responses, *Reviews in Clinical Gerontology*, 20; 354-363).*

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

The vast majority of individuals sleeping rough in the Square Mile are of working age. However, before a specific encampment is considered for action, the age profiles of rough sleepers within are crucial to ensure they are not going to be disproportionately affected by any action.

The Corporation will also continue to provide routes off the streets for rough sleepers in line with the Homelessness and Rough Sleeping Strategy 2023-27.

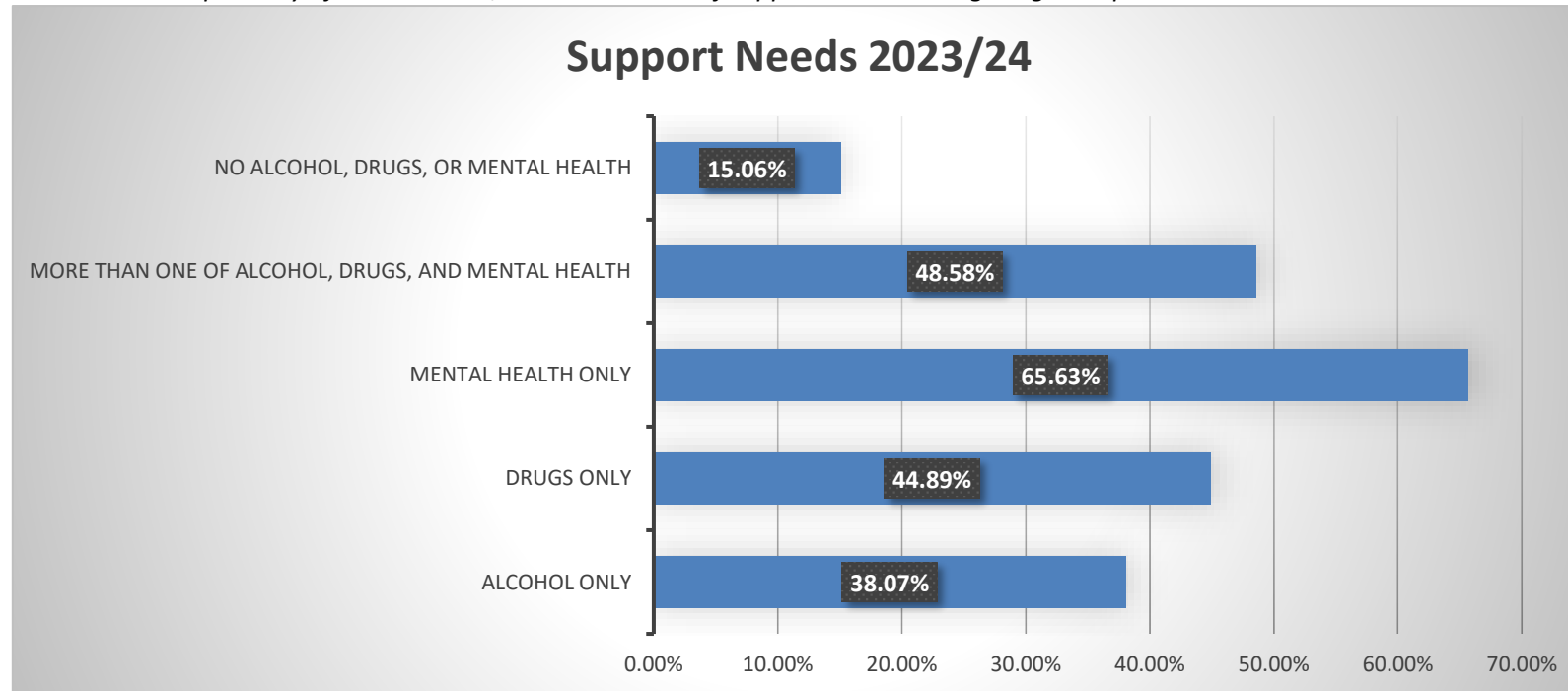
<p><i>Again, as with young people the drivers for homelessness in older people, is often different from other age demographics. Older women are more likely to cite relationship breakdown as a reason for becoming homeless, while older men associate becoming homeless with job loss and drug and alcohol problems (Crane & Warnes, 2010).</i></p> <p><i>Homeless older people are more likely than other groups to experience social isolation and its associated problems, as well as issues surrounding personal safety and health (Warnes A, Crane M, Whitehead N and Fu R (2003) Homelessness Factfile Sheffield Institute for Studies on Ageing, University of Sheffield; Crisis).</i></p>	
<p>Key borough statistics:</p> <p>The City has proportionately more people aged between 25 and 69 living in the Square Mile than Greater London. Conversely there are fewer young people. Approximately 955 children and young people under the age of 18 years live in the City. This is 11.8% of the total population in the area. Summaries of the City of London age profiles from the 2011 Census can be found on our website.</p>	<p>A number of demographics and projections for Demographics can be found on the Greater London Authority website in the London DataStore. The site details statistics for the City of London and other London authorities at a ward level:</p> <ul style="list-style-type: none"> • Population projections <p>NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.</p>

Disability

Check this box if NOT applicable

Disability - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*
The Combined Homelessness and Information Network (CHAIN) analysis from 2023/24 showed that 47.60% of all recorded rough sleepers, had mental health support needs. This figure went up to 65.63% of all rough sleepers within the City of London, although it should be noted that CHAIN does not record any data on the other disability status of rough sleepers.

Chain Annual Report City of London 2023/24 – Breakdown of support needs among rough sleepers:



What is the proposal's impact on the equalities aim? *Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact*

Issues surrounding disability and homelessness also need to consider the increase in disabilities and long-term health conditions that are associated with older ages.

Research by Action for Children suggests that compared to the general population, individuals who are rough sleeping are far more likely to report mental health issues. A report for the City of London on healthcare for rough sleepers (Revolving Doors Agency, Health care provision for people sleeping rough in the City of London, June 2018) identified the following challenges:

- Health needs and preferences of people experiencing rough sleeping are not known or shared between services working with them.

- People experiencing rough sleeping in the City of London are likely to be accessing health services elsewhere in Greater London. Although little is known about the circumstances, experiences and effectiveness of treatment received, evidence suggests that experiences and outcomes are unlikely to be positive. It is also unclear if care and support services on offer to housed residents in City of London are accessible to people sleeping rough e.g. those accessed through a Care Act assessment.

- Mental ill-health is a significant issue for people experiencing rough sleeping. There is no clear pathway to services, and gaps in services, across the spectrum of need, for people in this situation, and those who have moved off the streets e.g., living in the Lodge, who may need continued support to sustain their homes.

- There are many services working across sectors that engage with people experiencing rough sleeping in the City of London, albeit to achieve different and potentially conflicting outcomes. Provision is weighted towards reactive and crisis management rather than planned and preventative. There is more than one meeting of partners to discuss individual cases and it is unclear how they relate, who is accountable for what, or how learning is applied.

The Housing Act (1996) prioritises housing for disabled people and those with health conditions.

The United Nations Convention on the rights of Persons with Disabilities (UNCPRD) has introduced a new benchmark for the provision of adequate housing to disabled

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Before a specific encampment is considered for action, the support needs of rough sleepers within must be assessed through a Care Act assessment to ensure they are not going to be disproportionately affected by any action.

Care and support needs should be assessed through a Care Act assessment as it must be assumed that:

- Physical and/or mental ill-health are associated with rough sleeping, and there are likely needs arising from this ill-health;*
- These needs are likely to prevent an individual sustaining a home and related outcomes e.g., accessing work;*
- The needs and inability to achieve the specified outcomes cause or risk causing a significant impact on their wellbeing.*

The Corporation will also continue to provide routes off the streets for rough sleepers in line with the Homelessness and Rough Sleeping Strategy 2023-27.

<p><i>people.</i></p>	
<p>Key borough statistics: Day-to-day activities can be limited by disability or long-term illness – In the City of London as a whole, 89% of the residents feel they have no limitations in their activities – this is higher than both in England and Wales (82%) and Greater London (86%). In the areas outside the main housing estates, around 95% of the residents responded that their activities were not limited. Additional information on Disability and Mobility data, London, can be found on the London Datastore.</p>	<p>The 2011 Census identified that for the City of London’s population:</p> <ul style="list-style-type: none"> • 4.4% (328) had a disability that limited their day-to-day activities a lot • 7.1% (520) had a disability that limited their day-to-day activities a little <p>Source: 2011 Census: Long-term health problem or disability, local authorities in England and Wales</p> <p>NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.</p>

Gender Reassignment

Check this box if NOT applicable

Gender Reassignment - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*

No data is collected on the gender reassignment status of rough sleepers as part of the regular CHAIN reporting, so this impact is neutral.

What is the proposal's impact on the equalities aim? *Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact*

Gender identity is not identified in English homelessness statistics, even though AKT's research suggests that within the LGBTQ+ community, it is trans young people who are currently suffering the most. DLUHC confirms to Inside Housing that local authorities are instructed to collect data on gender identity. The official question asks people to identify as "male", "female" or "transgender". But most trans people would be unlikely to tick that last option.

Key borough statistics:

- [Gender Identity update 2009 - ONS](#)

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Before a specific encampment is considered for action, the support needs of rough sleepers within are crucial to ensure they are not going to be disproportionately affected by any action.

The Corporation will also continue to provide routes off the streets for rough sleepers in line with the Homelessness and Rough Sleeping Strategy 2023-27.

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.

Pregnancy and Maternity

Check this box if NOT applicable

Pregnancy and Maternity - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*

CHAIN data for rough sleepers in the City of London only identifies a small population of female rough sleeps (7%) and no data recorded for pregnancy or women rough sleeping with children.

What is the proposal's impact on the equalities aim? Look for *direct impact* but also evidence of *disproportionate impact* i.e. where a decision affects a protected group more than the general population, including *indirect impact*

Families with children are generally prioritised as they are identified as needing statutory support. The highest reason for households to be accepted as in priority need is due to have dependants (across England there were 38,370 cases accepted due to this reason in 2017). Due to individuals faced with homelessness often fail to be recognised as vulnerable, despite being in danger, particularly single males who are identified as being at the lowest priority need.

Reports from St. Mungo's show that socially excluded and vulnerable women are less likely to engage with services and have an increased risk of maternal death. Pregnancy is also a period where an individual is more vulnerable from a variety of factors, including an increased risk of abuse and exploitation. Pregnancy has also been shown to either start or escalate domestic abuse. (Saving Mothers Lives – Reviewing maternal deaths to make motherhood safer: 2006-2008 (2011) British Journal of Obstetrics and Gynaecology, vol 118, S.1.).

Access to health care is frequently cited as a barrier to those homeless and rough sleeping, and therefore during periods of pregnancy and maternity, when access to access to health care is important, and this should also be in consideration.

Key borough statistics:

Under the theme of population, the [ONS website](#) has a large number of data collections grouped under:

- [Contraception and Fertility Rates](#)
- [Live Births](#)

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Despite the City of London having low numbers of women with dependants or pregnant women, services must still be capable of responding to their needs in suitable ways. This demographic is generally prioritised as in priority need; therefore this proposal and on-going actions must look at how these individuals are supported.

Before a specific encampment is considered for action, the support needs of rough sleepers within are crucial to ensure they are not going to be disproportionately affected by any action.

The Corporation will also continue to provide routes off the streets for rough sleepers in line with the Homelessness and Rough Sleeping Strategy 2023-27.

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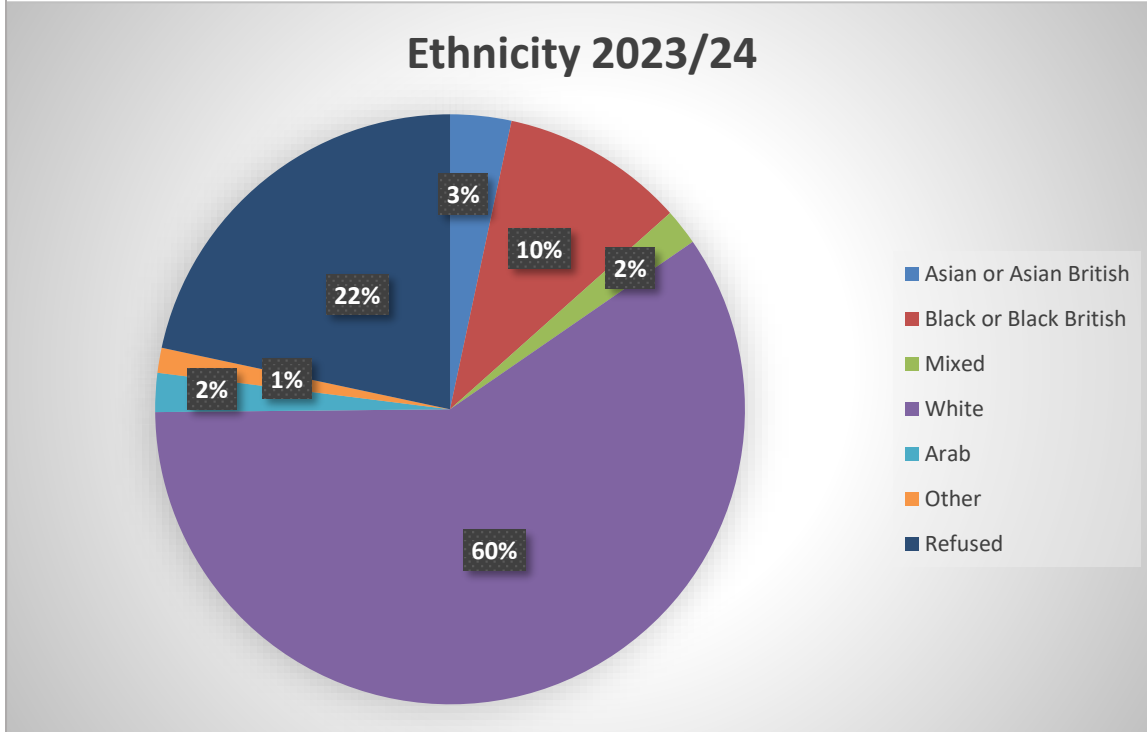
Race

Check this box if NOT applicable

Race - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*

The majority of the rough sleepers recorded in the Square mile in the 2023/24 CHAIN report where white (59.45% in total with the largest proportion being White British – 43%).

Chain Annual Report City of London 2023/24 – Breakdown of ethnicity among rough sleepers:



What is the proposal’s impact on the equalities aim? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

A report from Crisis shows that there is clear evidence that ethnic minority and global majority groups are disproportionately affected by homelessness. Compounded with this is the increased likelihood for working adults from these communities to be in less affordable housing.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

This policy must have an understanding of race issues and the problems facing individuals with NRPF.

This could be done through:

10% of applications for prevent and relief duty in 2020-21 were from Black led applicants, which when considered that in England lack people make up 3.5% of the population indicates the disproportionality of the risks to homelessness. According to research conducted by Shelter Bangladeshi households are also twice as likely to claim housing benefits than white households. ([The fight for home is a fight against racism - Shelter England](#)).

Anecdotal studies have found that abuse, threats, and assaults as hate crimes in hostels also lead to many global majority individuals preferring to rough sleep or sofa-surf than go into hostels, and very little research has been carried out in this arena.

Immigration policies and controls also have an influence in this area, and for those with No Recourse to Public Funds (NRPF) it is even more challenging to access support. Those with NRPF are more likely to skip meals, rely on food banks and face increased debt ([Why are people of colour disproportionately impacted by the housing crisis? | Shelter](#)). And even [research](#) from the Joint Council for the Welfare of Immigrants (JCWI) in 2017 found that over half of landlords (51%) were less likely to consider renting to foreign nationals from outside of the EU because of the Right to Rent scheme

Despite the population of City of London rough sleepers and statutory homeless being predominately UK nationals and white, awareness and training of the challenges facing the BAME, and non-UK population are essential.

Research has also shown that a multi-agency multi-disciplinary approach is key to responding to issues raised in these communities.

- Training for all front-line staff on the challenges faced by different population groups, including prejudice from the private rent market.
- Training for staff on how to support non-UK nationals, including ensuring they access the full range of support they are entitled to.
- Commissioning work into how services can tailor their support to meet the different needs of the population based on nationalities and cultural responses.

Through the national homelessness strategy, a cross-government working group has been set up around supporting non-UK nationals off the streets. There has also been a commitment of £5 million new funding to support non-UK nationals who sleep rough, with an increased focus on rough sleeping in the Controlling Migration Fund.

Before a specific encampment is considered for action, services available to support NRPF rough sleepers are crucial to ensure they are not going to be disproportionately affected by any action.

The Corporation will also continue to provide routes off the streets for rough sleepers in line with the Homelessness and Rough Sleeping Strategy 2023-27.

Key borough statistics:

Our resident population is predominantly white. The largest minority ethnic groups of children and young people in the area are Asian/Bangladeshi and Mixed – Asian and White. The City has a relatively small Black population, less than London and England and Wales. Children and young people from minority ethnic groups account for 41.71% of all children living in the area, compared with 21.11% nationally. White British residents comprise 57.5% of the total population, followed by White-Other at 19%.

The second largest ethnic group in the resident population is Asian, which totals 12.7% - this group is fairly evenly divided between Asian/Indian at 2.9%; Asian/Bangladeshi at 3.1%; Asian/Chinese at 3.6% and Asian/Other at 2.9%. The City of London has the highest percentage of Chinese people of any local authority in London and the second highest in England and Wales. The City of London has a relatively small Black population comprising 2.6% of residents. This is considerably lower than the Greater London wide percentage of 13.3% and also smaller than the percentage for England and Wales of 3.3%.

See [ONS Census information](#) or [Greater London Authority projections](#).

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.

Religion or Belief

Check this box if NOT applicable

Religion or Belief - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*

Data is not collected on the religion or belief of rough sleepers, those at risk of homelessness or those applying to the City of London for prevention or relief duties. Despite this there are faith groups that provide support for rough sleepers in the City of London

What is the proposal's impact on the equalities aim? *Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact*

There is little to no research available in the United Kingdom for the direct or indirect impacts of spirituality and belief on incidents or individuals. The Department of Health (2011) identifies belief and spirituality as a broader way in which individuals understand and live their lives, through their core beliefs and values (Department of Health. 2011. Spiritual Care at the End of Life: a systematic review of the literature.).

There are anecdotal reports that religion and belief may lead to incidents of homelessness and rough sleeping, for example where differences in family beliefs may lead to family breakdown and tensions leading to homelessness and exclusions.

Also linked to this is the Hate Crime that may be experienced by an individual through perception of faith based on race.

Key borough statistics – sources include:

The ONS website has a number of data collections on [religion and belief](#), grouped under the theme of religion and identity.

[Religion in England and Wales provides a summary of the Census 2011 by ward level](#)

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

This policy must ensure the awareness and understanding of faith issues are factored into full wrap around support – from prevention to ensuring that no one needs to return to homelessness.

This could be done through:

- *Consideration to training for all front-line staff on the challenges faced by different faith groups, including prejudice that may exist within the faith*
- *Training for staff on how to support non-UK nationals, including ensuring they access the full range of support they are entitled to.*
- *Commissioning work that ensures that no individual is excluded on the basis of faith.*

Before a specific encampment is considered for action, the support needs of rough sleepers within are crucial to ensure they are not going to be disproportionately affected by any action.

The Corporation will also continue to provide routes off the streets for rough sleepers in line with the Homelessness and Rough Sleeping Strategy 2023-27.

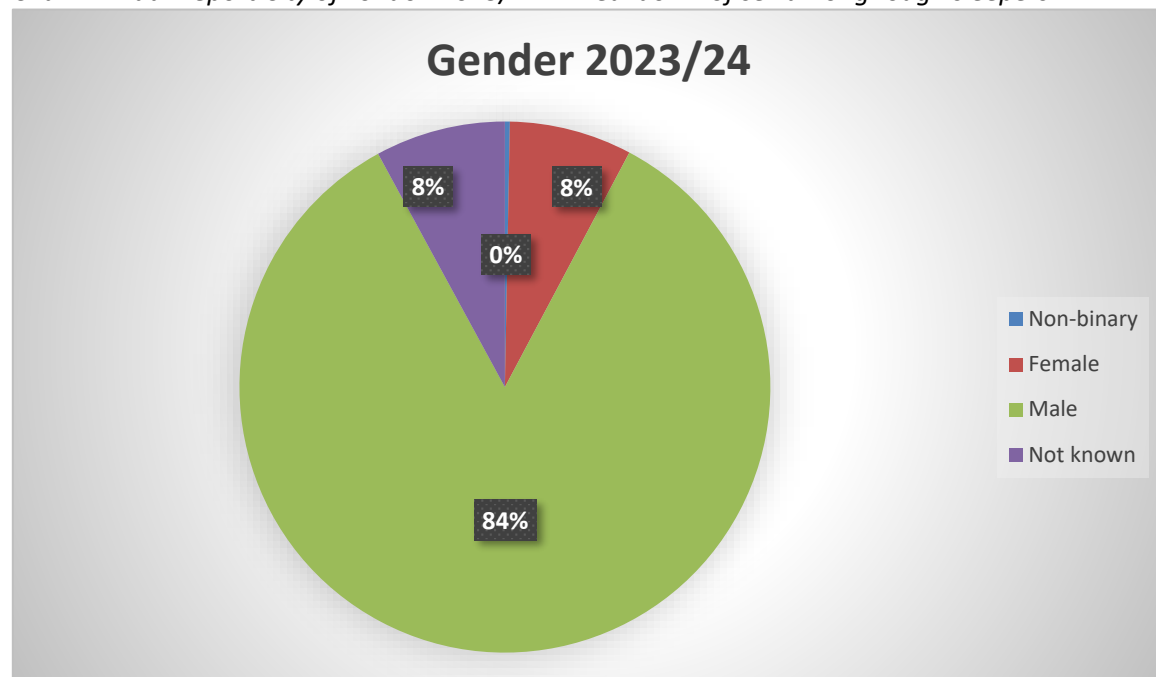
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Sex

Check this box if NOT applicable

Sex - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*
The 2023/24 Annual CHAIN report showed that the overwhelming majority of Rough Sleepers in the City were male- 84.30%. Only 7.47% of all recorded rough sleepers that year had been female.

Chain Annual Report City of London 2023/24 – Breakdown of sex among rough sleepers:



What is the proposal’s impact on the equalities aim? *Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact*

2021 saw a shift in focus for many organisations to identify and create work specifically to support women who experience homelessness and rough sleeping. Especially as it is well known that women are likely to be much harder to identify. There is growing evidence that men and women experience homelessness differently, and the results of gender-neutral services can often lead to women avoiding seeking support.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Even if few, actions to support women sleeping rough in the City of London will be important for this policy.

- Training for all front-line staff that may come into contact with females suffering from domestic abuse that need help.
- Training for all outreach workers on how to best support any females found sleeping rough in the City of London.

<p><i>Women who are homeless are especially vulnerable to violence and experience risk differently to men, subject to stigma, sexual abuse and harassment, robbery, and severe stress, in addition to violence, with the serious impact on physical and mental health that this has, as well as on self-esteem (Groundswell (2020) Women, homelessness and health: A peer research project. London: Grounswell).</i></p> <p><i>Homelessness is frequently viewed through the perspective of rough sleeping, yet studies have found that women will turn to sleeping on the streets as a last resort, as they would be at such risk, opting for other precarious and potentially unsafe arrangements, such as long-term sofasurfing, remaining with or returning to dangerous partners, or sexual exploitation in exchange for accommodation (Bretherton, J. and Maycock, P. (2021) Women’s Homelessness: European Evidence Review. Brussels: FEANTSA.).</i></p>	<p><i>Mitigation of disadvantage among the statutory homeless can be done by ensuring that the duties under the Homelessness Reduction Act (HRA) 2017 are fully undertaken by the City Corporation. The HRA provisions require local housing authorities to provide homelessness advice services to all residents in their area and expands the categories of people who they have to help to find accommodation. Individuals will be better supported through:</i></p> <ul style="list-style-type: none"> • <i>A strengthened duty to provide advisory services.</i> • <i>An extension to the period during which an applicant considered ‘threatened with homelessness’ from 28 to 56 days.</i> • <i>New duties to assess all applicants (now including those who are not in priority need) and to take reasonable steps to prevent and relieve homelessness.</i> • <i>These steps will be set out in a personalised housing plan that, wherever possible, must be agreed between the local authority and the applicant.</i> • <i>Strengthen understanding of VAWG and the direct and indirect impacts on women.</i> <p><i>Before a specific encampment is considered for action, the support needs of female rough sleepers are crucial to ensure they are not going to be disproportionately affected by any action.</i></p> <p><i>The Corporation will also continue to provide routes off the streets for rough sleepers in line with the Homelessness and Rough Sleeping Strategy 2023-27.</i></p>
<p>Key borough statistics:</p> <p>At the time of the 2011 Census the usual resident population of the City of London could be broken up into:</p> <ul style="list-style-type: none"> • 4,091 males (55.5%) • 3,284 females (44.5%) 	<p>A number of demographics and projections for demographics can be found on the Greater London Authority website in the London DataStore. The site details statistics for the City of London and other London authorities at a ward level:</p> <ul style="list-style-type: none"> • Population projections <p>NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.</p>

Sexual Orientation

Check this box if NOT applicable

Sexual Orientation - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*

Data is not collected on the sexual orientation of rough sleepers, those at risk of homelessness or those applying to the City of London for prevention or relief duties.

What is the proposal's impact on the equalities aim? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

Action for children estimate that 24% of all homeless young people are LGBTQ+.

Many people in the LGBTQ+ community, do not feel comfortable disclosing their sexual orientation or gender identity when rough sleeping.

While young LGBTQ+ people are generally able to move on and exit the cycle of homelessness permanently, a 2018/19 study by Shelter found that trans people are at risk of homelessness and housing precarity throughout their lifespan.⁵⁶ Common themes for young trans people are becoming trapped in unsafe relationships upon which their housing is dependent and with no family to turn to, sofa surfing, and experiences of hate crime, domestic abuse and sexual exploitation. The research also indicated that trans people had an overwhelmingly negative view of mainstream services and thus were unlikely to seek out services that could support them. This was due to a perception that they would not have anything to offer them that met their needs.

Key borough statistics:

- [Sexual Identity in the UK – ONS 2014](#)
- [Measuring Sexual Identity - ONS](#)

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Given that it is unclear how many LGBTQ+ people are among the City of London homeless population, it is critical that all front-line staff are aware of specific LGBTQ+ services and that signposting to these services makes up part of the standard package offered.

The Homelessness Strategy and on-going actions ensure that training and awareness is incorporated across all service front line staff on how to effectively support LGBTQ+ people.

Before a specific encampment is considered for action, the sexual orientation of rough sleepers within are crucial to ensure they are not going to be disproportionately affected by any action.

The Corporation will also continue to provide routes off the streets for rough sleepers in line with the Homelessness and Rough Sleeping Strategy 2023-27.

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.

Marriage and Civil Partnership

Check this box if NOT applicable

Marriage and Civil Partnership - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*

No data is collected on the marital or civil partnership status of rough sleepers as part of the regular CHAIN reporting. Some commissioned service partners have reported challenges when working with couples who are homeless and being able to provide them with appropriate support and accommodation.

What is the proposal's impact on the equalities aim? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

Rough sleeping couples have become a familiar sight on the streets of many English towns and cities. The BWC report shows that most of these relationships develop among those already homeless, fuelled by a belief among highly vulnerable women that they are safer on the street in a couple, even where a relationship might be controlling, abusive or harmful. (Brighton Women's Centre, Couples first? Understanding the needs of rough sleeping couples, October 2018).

Fewer than 10% of services in England will accept couples together, meaning that the couple may choose not to access support at all rather than be housed separately (St Mungo's (2020) Homeless Couples and Relationships Toolkit. London: St Mungo's).

Key borough statistics – sources include:

- [The 2011 Census contain data broken up by local authority on marital and civil partnership status](#)

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Though there may be few couples sleeping rough in the City of London this proposal must support these people through continued:

- *Training for all front-line staff that may come into contact with couples sleeping rough. Such training should include being able to support couples into accommodation should they wish to stay together and also being able to identify whether there is any abuse.*
- *Ensuring the rough sleeping services commissioned by the City of London are supportive of couples that wish to remain together in seeking accommodation.*

Before a specific encampment is considered for action, the support needs of rough sleepers within are crucial to ensure they are not going to be disproportionately affected by any action.

The Corporation will also continue to provide routes off the streets for rough sleepers in line with the Homelessness and Rough Sleeping Strategy 2023-27.

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.

Additional Impacts on Advancing Equality and Fostering Good Relations

Check this box if NOT applicable

Additional Equalities Data (Service Level or Corporate)

Click or tap here to enter text.

Are there any additional benefits or risks of the proposals on advancing equality and fostering good relations not considered above?

Click or tap here to enter text.

What actions can be taken to avoid or mitigate any negative impact on advancing equality or fostering good relations not considered above? Provide details of how effective the mitigation will be and how it will be monitored.

Click or tap here to enter text.

This section seeks to identify what additional steps can be taken to promote these aims or to mitigate any adverse impact. Analysis should be based on the data you have collected above for the protected characteristics covered by these aims.

In addition to the sources of the information highlighted above – you may also want to consider using:

- Equality monitoring data in relation to take-up and satisfaction of the service
- Equality related employment data where relevant
- Generic or targeted consultation results or research that is available locally, London-wide or nationally
- Complaints and feedback from different groups.

Additional Impacts on Social Mobility

Check this box if NOT applicable

Additional Social Mobility Data (Service level or Corporate)

Click or tap here to enter text.

Are there any additional benefits or risks of the proposals on advancing Social Mobility?

Click or tap here to enter text.

What actions can be taken to avoid or mitigate any negative impact on advancing Social Mobility not considered above?

Provide details of how effective the mitigation will be and how it will be monitored.

Click or tap here to enter text.

This section seeks to identify what additional steps can be taken to promote the aims or to mitigate any adverse impact on social mobility. This is a voluntary requirement (agreed as policy by the Corporation) and does not have the statutory obligation relating to protected characteristics contained in the Equalities Act 2010. Analysis should be based on the data you have available on social mobility and the access of all groups to employment and other opportunities. In addition to the sources of information highlighted above – you may also want to consider using:

- Social Mobility employment data
- Generic or targeted social mobility consultation results or research that is available locally, London-wide or nationally
- Information arising from the Social Mobility Strategy/Action Plan and the Corporation's annual submissions to the Social Mobility Ind

Conclusion and Reporting Guidance

Set out your conclusions below using the EA of the protected characteristics and submit to your Director for approval.

If you have identified any negative impacts, please attach your action plan to the EA which addresses any negative impacts identified when submitting for approval.

If you have identified any positive impacts for any equality groups, please explain how these are in line with the equality aims.

Review your EA and action plan as necessary through the development and at the end of your proposal/project and beyond.

Retain your EA as it may be requested by Members or as an FOI request. As a minimum, refer to any completed EA in background papers on reports, but also include any appropriate references to the EA in the body of the report or as an appendix.

This analysis has concluded that ...

This analysis has indicated that the proposal has little potential for discrimination against protected characteristics. The proposal will have no negative impact on protected characteristics of race, gender, disability support needs, and age of rough sleepers. This assessment will be updated if new data emerges

Outcome of analysis – check the one that applies

Outcome 1

No change required where the assessment has not identified any potential for discrimination or adverse impact and all opportunities to advance equality have been taken.

Outcome 2

Adjustments to remove barriers identified by the assessment or to better advance equality. Are you satisfied that the proposed adjustment will remove the barriers identified.

Outcome 3

Continue despite having identified some potential adverse impacts or missed opportunities to advance equality. In this case, the justification should be included in the assessment and should be in line with the duty to have 'due regard'. For the most important relevant policies, compelling reasons will be needed. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact.

Outcome 4

Stop and rethink when an assessment shows actual or potential unlawful discrimination.

Signed off by Director: *Simon Cribbens*

Name: *Simon Cribbens*

Date *22 November 2025*