



‘You will not get far if you perceive the duty to be over burdensome or take a mechanistic approach....there will be progress if the duty is seen as a way of fundamentally changing the core values and culture of the organisation.....we need and outcome-oriented approach’ – CRE Chair 2001

Equality Impact Assessment: Stage 1: Initial Screening Form for Policies or Functions (including new & revised)

A: Summary Details

Directorate: Community and Children's Services

Section: People

Person responsible for the assessment: Simon Cribbens

Contact details: simon.cribbens@cityoflondon.gov.uk

Names of other people participating in review: Jonathan Qureshi

Name of Policy to be assessed: Homelessness Strategy

Is this a new or revised policy: Revised

Date policy scheduled for Committee (if relevant): 13 June 2014

B: Preparation

*It is important to consider all available information that could help determine whether the policy could have any actual or **potential** adverse impact. Please attach examples of available monitoring information, research and consultation reports.*

1. Do you have monitoring data available on the number of people (with protected characteristics*) who are using or are potentially impacted upon by your policy? *Please specify what monitoring information you have available (your monitoring information should be compared to the current available census data or more recent population data if available to see whether a proportionate number of people are taking up your service).*

Statutory homelessness statistics for the UK are published by the government¹. These statistics are drawn from quarterly submissions by each local authority (statutory homelessness returns) which are collated by the Department of Communities and Local Government (DCLG). These returns identify the ethnicity of all those who have made an application to a local authority for help with homelessness or the threat of homelessness. For those applicants who are found to be homeless and for whom an authority accepts a duty to house, the following is reported:

- Age
- Reason for priority
- Reason for loss of home
- Nationality

¹ <https://www.gov.uk/government/collections/homelessness-statistics>

The last available full-year statutory homelessness figures published for the City of London are for 2012-13. These report detailed data for 18 households accepted as homeless by the City during that period, identifying the characteristics below:

Ethnicity	count	%
White	13	72%
Black	3	17%
Asian	2	11%
Mixed	0	0%
other	0	0%
Total	18	100%

Ages of those accepted	count	%
18-24	2	11%
25-44	13	72%
45-59	2	11%
60-64	1	6%
65-74	0	0%
75 & over	0	0%
total	18	100%

Reason for Priority	count	%
Dependent children	3	17%
Physical disability	2	11%
Mental illness or disability	4	22%
Drug dependency	2	11%
other	4	22%
Been in custody	2	11%
fleeing DV	1	6%
total	18	100%

A legal duty to house exists for homeless households who have priority need – as shown above. It should be noted that the reason for priority may not reflect an individual’s circumstances in full. For example, if someone presents with dependent children, but also has underlying mental health issues, the reason for priority will be recorded as “dependent children” as this is the primary priority need. As such the statistics may mask the prevalence of some characteristics.

Rough sleeping statistics are published by the Combined Homeless and Information Network (CHAIN) on the St Mungo’s Broadway website². CHAIN data is based on records of all street contacts with rough sleepers in London. It provides detailed demographic detail for this group including:

- Age

² <http://www.broadwaylondon.org/CHAIN/Reports.html>

- Ethnicity
- Nationality
- Support needs (drugs, mental health, alcohol)
- Gender

CHAIN has published data on rough sleeping in the City of London in 2012-2013. This data shows that 284 people were recorded sleeping rough in the City over the course of that year.

Gender	count	%
Female	18	6%
Male	266	94%

Age	count	%
18-25	14	5%
26-35	75	26%
36-45	92	32%
46-55	72	25%
over 55	31	11%
total	284	100%

Ethnicity	%
White - other	36%
White - Irish	3%
White - British	48%
Refused	0%
Other	1%
Mixed	3%
Black	7%
Asian	2%

Nationality	count	%
UK	158	56%
Central and East Europe	78	27%
Other Europe	29	10%
Africa	6	2%
America	1	0%
Asia	5	2%
Not known	7	2%
Total	284	100%

2. If monitoring has NOT been undertaken, will it be done in the future or do you have access to relevant monitoring data for this area? If not, specify the arrangement you intend to make; if not please give a reason for your decision.

Monitoring draws on the available published (and therefore verified) data. This data does not capture all target equality group characteristics: faith and sexuality is not reported in this data. Collection of additional data can be difficult at the first point of contact when working with people who are rough sleeping or facing homelessness.

The City is working with its homelessness services to explore how this recording can be improved.

A number of vulnerable and target equality groups are over-represented in the City's homeless population. However it is important to note that given the City's relatively low level of statutory homelessness applications and the changing rough sleeping population mean the level of representation of any group or characteristic can fluctuate considerably from year to year.

Statutory homelessness statistics for 2012-2013 show that 19% of those who made a homeless application to the City and 17% of those accepted to be homeless and owed a duty to house were from the black population. This is high compared to the 2.6% black resident population of the Square Mile, the 5% black City workers population³ and the 13.3% black resident population of Greater London⁴. Asian households accounted for 16% of applications made, and 11% of those accepted to be homeless and owed a duty, compared to 12.7% resident population and 12% City workers population.

Men are significantly over-represented in the rough sleeping population – consisting of 94% of those contacted on the City's streets. Mental ill health, physical ill health and substance abuse are more prevalent in the rough sleeping population.

Sexuality and faith are not routinely recorded by CHAIN or for the purpose of statutory homeless reporting. These characteristics can be identified through case work. No applicant approached the City as homeless in 2012-2013 as a result of fleeing abuse or threats of violence based on their sexuality or faith.

The City provides signposting to specialist services such as Stonewall Housing (which is also signposted on the website), the Albert Kennedy Trust and Broken Rainbow. It has also referred individuals to support groups and networks reflecting serving specific cultures and faiths.

3. Please list any consultations that you may have had and/or local/national consultations, research or practical guidance that will assist you in completing this EqIA.

We have reviewed the EqIAs of neighbouring boroughs, which although much larger, have similar characteristics to the City in terms of rough sleeping. In developing the strategy we have also consulted with key internal and external stakeholders, including those who have experienced homelessness. The strategy also draws on the successes, learning and changing environment that have been experienced within and beyond the City since the last strategy was produced.

C: Your Policy or Function

³ JSNA City Supplement-draft (2014)

⁴ <http://www.cityoflondon.gov.uk/services/environment-and-planning/planning/development-and-population-information/demography-and-housing/Documents/census-information-reports-ethnicity.pdf>

1. What is the main purpose of the policy or function?

The Homeless Act 2002 places a duty on local authorities to carry out a review of homelessness in their area and publish a strategy to prevent and respond to homelessness. This is the City of London's third Homelessness Strategy. It sets out the priorities of addressing homelessness, identifies what the City is seeking to achieve, and sets out how it will achieve this. The strategy identifies five key priorities:

1. Preventing homelessness
2. Ending rough sleeping
3. Increasing supply of and access to accommodation
4. Delivering outstanding integrated services
5. Improving the health and wellbeing of homeless people

2 Are there any other objectives of the policy or function, if so what are they?

The strategy sits within the wider objective of the government's commitment to tackling homelessness. The strategy sits alongside the City's broader Housing Strategy and housing allocations scheme.

3 Do any written procedures exist to enable delivery of this policy or function?

The Homelessness Act 2002 and Code of Guidance for Homelessness are the key written procedures governing the statutory homelessness function. The strategy is also supported through guidance from DCLG and Homeless Link in relation to work with rough sleepers. Other supporting documents and procedures include guidance on eligibility, benefits legislation, working with those deemed to have "no recourse to public funds" and housing allocations.

The City Outreach service is delivered in line with the service specification against which it was commissioned.

4 Are there elements of common practice in the service area or function that are **not** clearly defined within the written procedures?

No

5 Who are the main stakeholders of the policy?

There are number of stakeholders to this policy. The main stakeholders are the homeless population of the Square Mile. However, other key stakeholders also include partner agencies as discussed in the strategy. The strategy has been developed through consultation with key stakeholders, including those who have experienced homelessness and those who remain homeless in the City. Others consulted include the following.

Internal:

- Members of the Court of Common Council of the City of London Corporation
- Adult Social Care
- Built Environment
- Children's Social Care
- City of London Police
- Community Safety Partnership
- Early Years and Education
- Housing
- Public Health
- Substance Misuse Partnership

External:

- Broadway
- East London NHS Foundation Trust
- London Borough of Tower Hamlets
- London Probation Trust
- Pathway Homeless Team, Royal London Hospital
- Providence Row
- Providence Row Housing Association
- Toynbee Hall
- Westminster City Council

6 Is the policy associated with any other Corporation policy (s)?

The strategy sits alongside the Housing Strategy and Housing Allocations Policy

It also integrates with, and supports the delivery of, a number of the City's strategies and policies, including:

- **City Together Strategy: The heart of a world class city 2008–2014**, which identifies the challenge of supporting our communities, including those experiencing homelessness and rough sleeping
- **Corporate Plan 2013-17**, in which responding to the implications of welfare reform, the Localism Act, and NHS and public health reforms is a key priority
- **Department of Community and Children's Services Business Plan**, in which protecting and safeguarding vulnerable people through better prevention and early intervention is a priority
- **Joint Health and Wellbeing Strategy**, in which improving the health and wellbeing of those who are homeless and sleeping rough is identified as a priority, and which sets out plans to reduce health inequalities between local communities, and
- **Safer City Partnership Plan 2013-16**, which sets out the City's response to domestic abuse, a significant cause of homelessness, and anti-social behaviour.

- 7 Are there any areas of the service/policy that are governed by discretionary powers? If so, is there clear guidance as to how to exercise these?

There is some discretion within the Homelessness Act to provide interim accommodation or assistance to secure housing for those who are homeless but not in priority need. Changes to legislation also give the City the discretion to discharge its duty to house a homeless household into the private rented sector. Guidelines on the City's approach and the use of such discretion will be developed through the implementation of the homelessness strategy.

- 8 Is the responsibility for the proposed policy or function shared with another department or authority or organisation? If so, what responsibility, and which bodies?

Under each priority, the strategy states 'we will'. The 'we' does not refer to the City alone. It is instead a reference to the broad range of partners – City services, outreach services, health services, the City of London Police, businesses and others – who have a role in delivering better outcomes for those who are homeless or at risk of homelessness. Where the City is responsible, it will lead on the delivery of actions, and where partners are responsible, the City will work to co-ordinate and support delivery where necessary. The City will lead on monitoring the implementation of this strategy and reporting its progress.

The City will develop the action plan that supports this strategy and that delivers the commitments made under each priority. The action plan will be refreshed annually. Its delivery will be monitored by the leadership team of the City's Department of Community and Children's Services, and reported to its Grand Committee

D: The Impact

Assess the potential impact that the policy could have on people who share the protected characteristics. The potential impact could be negative, positive or neutral. If you have assessed negative potential impact for any people who share one or more of the protected characteristics, you will need to also assess whether that negative potential impact is high, medium or low.

(N.B. Impact will not be equally negative or positive or neutral for all groups. There will be differing degrees of impact, the purpose of this section is to highlight whether it is disproportionately different)

a) Identify the potential impact of the policy/service/proposal on men and women:

Gender	Positive	Negative (please specify if High, Medium or Low)	Neutral	Reason
Women	✓			Although under-represented, the needs of this group will be addressed through improved prevention and the development of specific approaches to factors such as Domestic Abuse.
Men	✓			This group is over-represented in the rough sleeping demographic. The strategy makes tackling rough sleeping a priority and therefore is expected to have a beneficial impact for rough sleeping men.
Transgender/ transexual			✓	Services are sensitive to this need and will signpost or refer to specialist agencies as appropriate.

b) identify the potential impact of the policy/service/proposal on the basis of the following:

	Positive	Negative (please	Neutral	Reason
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		specify if High, Medium or Low)		
Pregnancy & Maternity	✓			Homelessness legislation provides specific protections for this group.
Marriage & Civil Partnership			✓	

c) Identify the potential impact of the policy/service/proposal on different race groups:

Race	Positive	Negative (please specify if High, Medium or Low)	Neutral	Reason
Asian (including Bangladeshi, Pakistani, Indian, Chinese, Vietnamese, Other Asian Background – please specify_____)			✓	This group is highly represented and should benefit from the actions and priorities of the strategy.
Black (including Caribbean, Somali, Other African, Other black background – please specify_____)	✓			This group is over-represented. The improvements driven by the strategy should deliver a positive impact.
White (including English, Scottish, Welsh, Irish, Other white background – please specify_____)			✓	
Mixed/ Dual heritage (White and Black Caribbean, White and Black African, White and Asian, Other mixed background - please specify_____)			✓	
Gypsies/Travellers			✓	Annual monitoring statistics suggest there are no clients in this group in the City.

Other (please specify)				
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d) Identify the potential impact of the policy/service/proposal on disabled people:

Disability	Positive	Negative (please specify if High, Medium or Low)	Neutral	Reason
Physical Disability	✓			Legislation provides a statutory responsibility to prioritise homeless people who are vulnerable with these support needs.
Sensory Impairment	✓			Legislation provides a statutory responsibility to prioritise homeless people who are vulnerable with these support needs.
Learning Difficulties	✓			Legislation provides a statutory responsibility to prioritise homeless people who are vulnerable with these support needs.
Mental Health Issues	✓			It is a commitment to this strategy and the City's Health and Wellbeing Board to improve the health of this group.

e) Identify the potential impact of the policy/service/proposal on different age groups:

Age Group (specify, for example younger, older etc)	Positive	Negative (please specify if High, Medium or Low)	Neutral	Reason
Older People	✓			Legislation provides a statutory responsibility to prioritise homeless people who are vulnerable with these support needs.
Young People/children	✓			Legislation provides a statutory responsibility to prioritise homeless people who are vulnerable with these support needs.

f) identify the potential impact of the policy/service/proposal on lesbians, gay men, bisexual or heterosexual people:

Sexual Orientation	Positive	Negative (please specify if High, Medium or Low)	Neutral	Reason
Lesbian			✓	Support and signposting to specialist services are available for this group.
Gay Men			✓	Support and signposting to specialist services are available for this group.
Bisexual			✓	Support and signposting to specialist services are available for this group.
Heterosexual			✓	Mainstream provision meets the needs of this group. Specialist provision exist for those in circumstances such as domestic abuse.

g) Identify the potential impact of the policy/service/proposal on different religious/faith groups?

Religious/Faith groups (specify)	Positive	Negative (please specify if High, Medium or Low)	Neutral	Reason
Buddhist			✓	This group is not monitored, but it is not anticipated that faith groups will be impacted negatively by the strategy.
Christian			✓	This group is not monitored, but it is not anticipated that faith groups will be impacted negatively by the strategy.
Hindu			✓	This group is not monitored, but it is not anticipated that faith groups will be impacted negatively by the strategy.
Jewish			✓	This group is not monitored, but it is not anticipated that faith groups will be impacted negatively by the strategy.
Muslim			✓	This group is not monitored, but it is not anticipated that faith groups will be impacted negatively by the strategy.
Sikh			✓	This group is not monitored, but it is not anticipated that faith groups will be impacted negatively by the strategy.
Other (please specify)				

h) As a result of completing Question 1 a-f above what is the potential impact of your policy?

High ⑤

Medium ⑤

Low ✓

The safety net provision of legislation more broadly supports those with vulnerabilities such as age, mental health etc and are therefore deemed as priority. In addition, the City of London is committed to monitoring the equalities impact of the strategy within the context of the wider monitoring process.

2. Could you minimise or remove any negative potential impact? Explain How.

We have not identified any potential negative impacts but through monitoring will continue to identify any risk and respond accordingly.

3. If there is no evidence that the policy promotes equality of opportunity or prevents unlawful discrimination– could it be adapted so that it does? How?

We believe that the policy promotes equality of opportunity / prevents unlawful discrimination by delivering a targeted response to improve outcomes for clients.

Please ensure that all actions identified are included in the attached action plan and reflected in your service plan.

Please sign and date this form, keep one copy and send one to Equality, Diversity & Human Rights Manager

Signed

Signed

Signed

Simon Cribbens

Service Head

Date

Date

Date

Action Plan

Recommendation	Key activity	Progress milestones	Officer Responsible	Progress