

# Equality Analysis (EA)

## Section 1 – General Information (Aims and Objectives)

### Name of the proposal including aims, objectives and purpose:

*(Please note – for the purpose of this doc, ‘proposal’ refers to a policy, function, statement or project)*

### Homelessness Statement

The aim of the statement is to identify a partnership approach to homelessness, including: preventing homelessness and supporting homeless people to access appropriate services and move into settled accommodation. In order to achieve this aim, four themes/strategic objectives are articulated in the statement:

- Focus on homeless prevention and tackling the root causes of homelessness
- Ensure access to affordable housing options
- Children, Families and Young People; and
- Supporting Vulnerable Adults

The Statement is closely related to other partnership plans such as: the Hostel Commissioning Plan, the Children & Families Plan, the Employment and Enterprise Strategies the Financial Inclusion Strategy, the Health and Wellbeing Plan and the Substance Misuse Strategy.

The main drivers for developing the statement are the local impacts of welfare reform, persistent economic uncertainties and budget cuts to services.

The Government’s welfare reform agenda has had a major influence on the refresh of the Homelessness Statement. As part of the emergency budget and comprehensive spending review in 2010 the Government announced changes to the welfare system that will result in an £18b reduction in welfare spending by 2014. Changes to welfare, particularly the welfare cap, will have significant implications for housing and homelessness. Some impacts will include:

- More families experiencing financial hardship and getting into debt;
- More households presenting as homeless;
- An increase in the number of overcrowded households;
- An increase demand for entry level private sector properties;
- More families in temporary accommodation being placed outside the borough and outside London where properties are more affordable. This could have implications for family cohesion and educational attainment of children; and
- Increased anxiety, depression and other mental health issues.

The statement will form part of the Council’s strategic response to responding to national welfare changes and ties in with more operational initiatives such as notifying all local residents affected by the changes, negotiating with landlords to retain tenants with a small shortfall in their rents and supporting tenants to find alternative accommodation.

### Who is expected to benefit from the proposal?

- **Local residents, particularly vulnerable groups, who are homeless or are at risk of becoming so including:**
  - Families
  - Young people
  - Rough sleepers
  - Domestic violence victims
  - Sex workers
  - Ex-offenders
  - Substance misusers; and
  - Those with mental health problems
- **Local organisations providing services for homeless people** will benefit from a more joined up and strategic approach to providing support to homeless households.

**Service area:**

Strategy & Equality, Chief Executive's Directorate

**Team name:**

Strategy & Performance

**Service manager:**

Kevin Kewin

**Name and role of the officer completing the EA:**

Vicky Allen, Strategy, Policy & Performance Officer

**Section 2 – Evidence (Consideration of Data and Information)****What initial evidence do we have which may help us think about the impacts or likely impacts on service users or staff?**

The statement has been informed by a detailed evidence base comprising of a number of sources including:

- An analysis of statutory homelessness data, local data and interviews with practitioners, including the profile of homeless households
- Housing Waiting List data
- Population projection information
- Hostels Review
- Housing Benefit data outlining the potential local impacts of welfare reform
- Private Rented Stock Conditions Survey
- National studies and evaluations of homelessness and its impacts

**Section 3 – Assessing the Impacts on the 9 Groups****How will what you're proposal impact upon the nine Protected Characteristics?**

For the nine protected characteristics detailed in the table below please consider:-

- **What is the equality profile of service users or beneficiaries that will or are likely to be affected?**

-Use the Council's approved diversity monitoring categories and provide data by target group of users or beneficiaries to determine whether the service user profile reflects the local population or relevant target group or if there is over or under representation of these groups

- **What qualitative or quantitative data do we have?**

-List all examples of quantitative and qualitative data available

*(include information where appropriate from other directorates, Census 2001 etc)*

-Data trends – how does current practice ensure equality

- **Equalities profile of staff?**

-Indicate profile by target groups and assess relevance to policy aims and objectives e.g. Workforce to Reflect the Community. Identify staff responsible for delivering the service including where they are not directly employed by the council.

- **Barriers?**

-What are the potential or known barriers to participation for the different equality target groups? E.g., communication, access, locality etc

- **Recent consultation exercises carried out?**

-Detail consultation with relevant interest groups, other public bodies, voluntary organisations, community groups, trade unions, focus groups and other groups, surveys and questionnaires

undertaken etc. Focus in particular on the findings of views expressed by the equality target groups. Such consultation exercises should be appropriate and proportionate and may range from assembling focus groups to a one to one meeting.

- **Additional factors which may influence disproportionate or adverse impact?**

-Management Arrangements - How is the Service managed, are there any management arrangements which may have a disproportionate impact on the equality target groups

- **The Process of Service Delivery?**

-In particular look at the arrangements for the service being provided including opening times, custom and practice, awareness of the service to local people, communication

Please also consider how the proposal will impact upon the 3 One Tower Hamlets objectives:-

- Reduce inequalities
- Ensure strong community cohesion
- Strengthen community leadership.

**Please Note -**

Reports/stats/data can be added as Appendix

Target Groups	Impact – Positive or Adverse	Reason(s)
Race	Positive	<p><b><u>Homelessness and overcrowding</u></b></p> <p>Some ethnic minority groups are disproportionately affected by homelessness, particularly Bangladeshi and other BME households. These ethnic groups are also more likely to experience other forms of housing need such as overcrowding as they tend to have larger than average households, both by the number of children, and the adults within the extended family.</p> <p>In addition to existing levels of needs, welfare reform, including changes to the Local Housing Allowance – Housing Benefit paid to households in the private sector, and the household benefit cap – restricting the total amount of benefits that out-of-work households receive, and deductions made to a claimants Housing and Council Tax Benefits in light of non-dependent adults they have living with them who are not their partners, will also have a disproportionate impact on larger families, many of whom tend to be BME families.</p> <p>The Homelessness Statement will seek to reduce homelessness among all households, particularly those most at risk of homelessness. Some of the actions in the statement that will help do so include:</p> <ul style="list-style-type: none"> <li>• Improving the engagement of community and faith organisations in homeless prevention, particularly those from BME groups disproportionately impacted by homelessness.</li> <li>• Providing employment support and pathways to employment for households at risk of homelessness and exclusion</li> <li>• Provide financial inclusion and income maximisation advice and support for residents, particularly those at risk of losing their homes</li> <li>• Improving the use of mediation and respite to address family breakdown as a cause of homelessness</li> <li>• Developing new pathways to social housing to tackle overcrowding (for example exploring the potential of assured short hold tenancy in housing associations for particular groups, such as adult children living with parents in overcrowded accommodation)</li> </ul>

<b>Target Groups</b>	<b>Impact – Positive or Adverse</b>  What impact will the proposal have on specific groups of service users or staff?	<b>Reason(s)</b> <ul style="list-style-type: none"> <li>• Please add a narrative to justify your claims around impacts and,</li> <li>• Please describe the analysis and interpretation of evidence to support your conclusion as this will inform decision making</li> </ul> <p>Please also how the proposal will promote the three One Tower Hamlets objectives?</p> <ul style="list-style-type: none"> <li>-Reducing inequalities</li> <li>-Ensuring strong community cohesion</li> <li>-Strengthening community leadership</li> </ul>
		<p><b><u>Rough Sleepers</u></b></p> <p>The CHAIN report for Tower Hamlets shows that white British people are disproportionately more likely to be rough sleepers (60%) and Hostel residents (43%). In addition a further 18% are from Central and Eastern Europe (CEE). The number of CEE nationals sleeping rough in the borough has more than trebled since 2008/09.</p> <p>The Hostel Commissioning Plan, informed by the Hostel Review, will identify the detailed provision for rough sleepers, linked to the objectives in Homelessness Statement.</p> <p>The Homelessness Statement will seek to reduce homelessness among all vulnerable households. Some of the actions in the statement that will help do so include:</p> <ul style="list-style-type: none"> <li>• Improving the assessment of vulnerable adults, particularly those with multiple needs</li> <li>• Ensuring that structures and processes are in place to support a multi-agency approach to assessing vulnerable adults</li> <li>• Developing a joint commissioning approach to homeless adults with complex needs, including substance misuse and mental health</li> <li>• Improving move-on options for people in hostel accommodation</li> <li>• Improving the quality and accessibility of housing and homelessness advice services</li> </ul> <p><b><u>Domestic Violence</u></b></p> <p>Domestic violence is the third highest cause of homelessness in the borough, higher than the regional average. Local referral data from the Domestic Violence Team shows that the majority of referrals in 2010/11 were from the BME community, with 46% being Bangladeshi.</p> <p>The Homelessness Statement will seek to reduce homelessness among, and support households homeless due to DV all households. Some of the actions in the statement that will help do so include:</p> <ul style="list-style-type: none"> <li>• Where practical, improving the use of mediation and respite to address family breakdown as a cause of</li> </ul>

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		<p>homelessness</p> <ul style="list-style-type: none"> <li>• Ensuring victims of Domestic Violence are supported and their housing needs are met by:               <ul style="list-style-type: none"> <li>• Raising awareness with and providing training for Homelessness &amp; Housing Advice Services &amp; Partner agencies for identifying &amp; referring &amp; signposting households affected by DV</li> <li>• Reviewing referral and procedures for DV related cases</li> <li>• Maximising the use of floating support for DV households</li> <li>• Looking at mitigating the impact of the single room rate on single DV households</li> <li>• Addressing the needs of street prostitutes as DV victims</li> <li>• Strong housing representation on the multi-agency risk assessment conference</li> </ul> </li> </ul>
Disability	Positive	<p>The Council has a duty to house people who have been assessed as having a mental health or physical disability need. Around 13% of those accepted as homeless are vulnerable due to having a disability, making this group the fourth largest priority group after families with children, pregnant women and domestic violence victims.</p> <p><b><u>Mental health and homelessness</u></b></p> <p>There is a plethora of research showing a relationship between homelessness and mental health. It is likely that increased anxiety, depression and other mental health issues will be experienced by those who are affected by changes to the benefit support system.</p> <p>Low level mental health issues are unlikely to be a trigger for an applicant to be accepted within the statutory priority category for homeless acceptance. However, the Homelessness Statement aims to take a holistic approach to providing information and advice for all who approach as in need. This includes close working with health partners to identify and address the needs of households affected by welfare reform.</p> <p>The Homelessness Statement will seek to support all vulnerable groups who are at risk of homelessness or</p>

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		<p>are homeless, even those that do not qualify for statutory assistance. Some of the actions in the statement that will help do so include:</p> <ul style="list-style-type: none"> <li>• Improving the assessment of vulnerable adults, particularly those with multiple needs</li> <li>• Ensuring that structures and processes are in place to support a multi-agency approach to assessing vulnerable adults</li> <li>• Developing a joint commissioning approach for homeless adults with complex needs, including substance misuse and mental health</li> <li>• Working proactively with social and private landlords to identify and support people at risk of losing their homes and assist tenants to maintain their tenancies</li> <li>• Improve move-on options for people in hostel accommodation</li> <li>• Have no new people spending a second night on the streets and reduce the number of people who are living on the streets</li> <li>• Supporting ex-offenders to keep their homes or find suitable accommodation on return from prison</li> </ul> <p>No further issues were identified as a result of the consultation exercise. .</p>
Gender	Positive	<p>Women are more likely to be accepted as statutorily homeless due to having dependent children, being pregnant or victims of Domestic Violence. Women who fall into these categories accounted for over 80% of those accepted as statutorily homeless in 2011/12.</p> <p>Men are more likely to present as single homeless, with no dependent children and low level needs to make them vulnerable. Men account for 68% of single homeless households and 2011/12 CHAIN data for the borough show that 89% of rough sleepers are male.</p> <p>The extension of the single room rate from those under 25 to under 35 years (Housing Benefit paid to single claimants at the rate of the cost of renting a single room) will particularly affect single men. This could lead to an increase in homelessness, hidden homelessness and rough sleeping among single people, particularly men who will be disproportionately impacted by this change. It will also lead to a greater demand for shared</p>

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		<p>accommodation, specifically Homes in Multiple Accommodation.</p> <p>The Homelessness Statement will seek to prevent homelessness for all who are at risk of homelessness and support all homeless people, both those that are statutorily homeless and single homeless people not in priority need. Some of the actions in the statement that will help do so include:</p> <ul style="list-style-type: none"> <li>• Improving the quality and accessibility of housing and homelessness advice services</li> <li>• Working proactively with social and private landlords to identify and support people at risk of losing their homes and assist tenants to maintain their tenancies. Providing financial inclusion and income maximisation advice and support for residents, particularly those at risk of losing their homes</li> <li>• Providing employment support and pathways to employment for households at risk of homelessness and exclusion</li> <li>• Continuing to have a service catering specifically for single homeless households</li> <li>• Improving joint working across agencies to focus on homelessness prevention and early intervention for families and young people</li> </ul>
Gender Reassignment	Positive	<p>The Homelessness Statement will provide universal advice and support services for all homeless people and those at risk of being made homeless. This includes:</p> <ul style="list-style-type: none"> <li>• Improving the quality and accessibility of housing and homelessness advice services</li> <li>• Providing employment support and pathways to employment for households at risk of homelessness and exclusion</li> <li>• Continuing to have a service catering specifically for single homeless households</li> <li>• Improving joint working across agencies to focus on homelessness prevention and early intervention for families and young people</li> </ul> <p>The extension of the single room rate may force single gender reassigned people under 35 to live in shared accommodation with others who are prejudiced or antagonistic towards them.</p>

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		<p>Support mechanisms will need to be put in place to support any single person living in shared accommodation that may experience prejudice. Local partners will have to work closely with community groups to ensure adequate support is in place.</p> <p>There is limited data available to fully assess the specific impact of homelessness on this group, however no further information was provided as a result of the consultation process.</p>
Sexual Orientation	Positive	<p>The Homelessness Statement will provide universal advice and support services for all homeless people and those at risk of being made homeless. This includes:</p> <ul style="list-style-type: none"> <li>• Improving the quality and accessibility of housing and homelessness advice services</li> <li>• Providing employment support and pathways to employment for households at risk of homelessness and exclusion</li> <li>• Continuing to have a service catering specifically for single homeless households</li> <li>• Improving joint working across agencies to focus on homelessness prevention and early intervention for families and young people</li> </ul> <p>The extension of the single room rate may force single LGBT people under 35 to live in shared accommodation with others who are prejudiced or antagonistic towards them. Support mechanisms will need to be put in place to support any single person living in shared accommodation that may experience prejudice. Local partners will have to work closely with community groups to ensure adequate support is in place.</p> <p>There is limited data available to fully assess the specific impact of homelessness on this group, however no further information was provided as a result of the consultation process.</p>
Religion or Belief	Positive	<p>The borough's demographics show a significant overlap between ethnicity and religion, particularly in relation to Bangladeshi and Muslim households. Therefore, some of the issues highlighted under ethnicity and how these will be addressed in the statement will also be applicable to Muslim households, such as for example the action in the statement to improve the engagement of community and faith organisations in homeless prevention, particularly those from BME groups disproportionately impacted by homelessness.</p>

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Age	Positive	<p>The pressure of finding affordable accommodation may force single under 35's to live with others, in shared accommodation, who are prejudiced or antagonistic towards people who have a different religion or belief. There may also be conflict of religious practices within shared spaces such as kitchens. Partners will need to work together to address and mitigate these issues where possible.</p> <p>People aged 25-44 and aged 18-24 account for the majority of those accepted as statutorily homeless, with 58% and 29% respectively. Similarly, CHAIN data for the borough relating to 2011/12 show that 62% of rough sleepers are aged 26-45. As mentioned above, those under the age of 35 will also be affected by the extension of the single room rate which could lead to increased housing need for this age</p> <p>In addition, 'parents no longer willing to accommodate' remains the main reason for loss of accommodation.</p> <p>Whilst older people account for a small number of homeless households, the housing needs of this group, including homelessness, are addressed as part of the Older People's Housing Statement.</p> <p>The statement will aim to prevent homelessness and support homeless households, particularly those age groups more at risk of homelessness. Some of the actions in the statement targeting specific age groups include:</p> <ul style="list-style-type: none"> <li>• Improving the use of mediation and respite to address family breakdown as a cause of homelessness such as 'crash pads'</li> <li>• Improving joint working across agencies to focus on homelessness prevention and early intervention for young people</li> <li>• Improve the use of the Common Assessment Framework as a tool for supporting families and young people</li> <li>• Support young people to achieve their full potential</li> <li>• Providing employment support and pathways to employment or households at risk of homelessness and exclusion</li> </ul>

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		<ul style="list-style-type: none"> <li>• Improving the accessibility of the private rented sector such as information and advice for those wanting to move outside the borough</li> <li>• Improving the quality and safety of the private sector in the borough, including HMOs</li> </ul>
Marriage and Civil Partnerships.	Positive	The statement aims to provide support for all households at risk of being homeless and those who are homeless. There are no specific issues relating to this group in isolation. Any issues will be based on the other characteristics of people in this group which have been addressed.
Pregnancy and Maternity	Positive	See comments relating to Gender.
Other Socio-economic Carers	Positive	<p><b><u>Large families on low incomes</u></b></p> <p>Over 40% of households in the borough are living in income poverty, the highest in the country. Approximately 16% of the working age population are in receipt of out of work benefits and about a third is economically inactive, above the regional averages. In light of the changes to the benefit support system, out-of-work households dependent on benefits, particularly large family households, will find it increasingly difficult to access or remain living in their homes.</p> <p>The household cap of £500 per week will disproportionately affect larger families. Larger families with three or more children will find it particularly difficult to access accommodation, many of whom will receive no Housing Benefit once the cap is introduced. This will have significant implications for child poverty and income poverty in the borough, already the highest nationally.</p> <p>Large families will also find it difficult to afford social housing even at an affordable rent model of 65% of the market rate. More families in temporary accommodation are likely to be placed outside the borough and outside London where properties are more affordable. This could have implications for family cohesion and educational attainment of children.</p>

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		<p>The statement will help by:</p> <ul style="list-style-type: none"> <li>• Improving the use of mediation and respite to address family breakdown as a cause of homelessness</li> <li>• Improving joint working across agencies to focus on homelessness prevention and early intervention for families and young people</li> <li>• Providing better support services for homeless families</li> <li>• Providing financial inclusion and income maximisation advice and support for residents</li> <li>• Providing advice and support for homeowners at risk of losing their homes</li> <li>• Providing financial inclusion and income maximisation advice and support for residents, particularly those at risk of losing their homes</li> <li>• Provide employment support and pathways to employment for households at risk of homelessness and exclusion</li> </ul>

## Section 4 – Mitigating Impacts and Alternative Options

From the analysis and interpretation of evidence in section 2 and 3 - Is there any evidence of or view that suggests that different equality or other protected groups (inc' staff) could have a disproportionately high/low take up of the new proposal?

Yes? No? **No**

If yes, please detail below how evidence influenced and formed the proposal? For example, why parts of the proposal were added/removed?

*(Please note – a key part of the EA process is to show that we have made reasonable and informed attempts to mitigate any negative impacts. AN EA is a service improvement tool and as such you may wish to consider a number of alternative options or mitigation in terms of the proposal.)*

## Section 5 – Quality Assurance and Monitoring

Have monitoring systems been put in place to check the implementation of the proposal and recommendations?

Yes? **YES** No?

How will the monitoring systems further assess the impact on the equality target groups?

A detailed action plan is being developed as part of the Homelessness Statement, including progress measures, which will be monitored by the Homelessness Partnership Board.

Does the policy/function comply with equalities legislation?  
(Please consider the [OTH objectives](#) and [Public Sector Equality Duty](#) criteria)

Yes? **Yes** No?

If there are gaps in information or areas for further improvement, please list them below:

**Sexual Orientation & Gender Reassignment** – there is a lack of equalities data around sexual orientation and gender reassignment and homeless presentations and acceptances. We will engage with representatives from these communities through the consultation exercise and no further information was provided.

**Older People** – analysis of homelessness and housing issues affecting older people will be addressed through the Older People's Housing Statement.

How will the results of this Equality Analysis feed into the performance planning process?

Findings from the Equality Analysis, and feedback from the consultation which will include the Equality Analysis, have been used to inform the final version of the statement.

## Section 6 - Action Plan

As a result of these conclusions and recommendations what actions (if any) **will** be included in your business planning and wider review processes (team plan)? Please consider any gaps or areas needing further attention in the table below the example.

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
<b>Example</b>				
1. Better collection of feedback, consultation and data sources	1. Create and use feedback forms. Consult other providers and experts	1. Forms ready for January 2010 Start consultations Jan 2010	1.NR & PB	
2. Non-discriminatory behaviour	2. Regular awareness at staff meetings. Train staff in specialist courses	2. Raise awareness at one staff meeting a month. At least 2 specialist courses to be run per year for staff.	2. NR	
Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
Improving equalities monitoring of service users	Further improve the databases used by the HOS to ensure they enable data monitoring across the protected characteristics.	To be incorporated into the action plan for the statement.	David Gingell	
	Ensure databases and paperwork used by agencies providing homeless service data to the Council have the appropriate monitoring fields to capture comprehensive equalities data.	To be incorporated into the action plan for the statement.	David Gingell	
	Provide awareness training for staff	To be incorporated into the action plan of the statement.	David Gingell	
Update Homelessness Statement following consultation process		To be incorporated into the action plan for the statement.	Daisy Beserve and Vicky Allen	Completed