


Appendix C Section 1: Introduction

Name of proposal
For the purpose of this document, 'proposal' refers to a policy, function, strategy, or project
Approval of the councils revised Homelessness Accommodation Placement Policy and new Homelessness Accommodation Procurement Strategy 2024.
Service area and Directorate responsible
Housing Management & Procurement, Housing and Regeneration
Name of completing officer
Una Bedford, Senior Strategy and Policy Officer, Governance and Resources
Approved by (Corporate Director / Divisional Director/ Head of Service)
Karen Swift, Director of Housing
Date of approval
Click or tap to enter a date.

Where a proposal is being taken to a committee, please append the completed EIA(s) to the cover report.

Conclusion – To be completed at the end of the Equality Impact Analysis process.

Conclusion	Current decision rating (see Appendix A)
<p>This revised policy and the new strategy will ensure that the Housing Options Service in making placements fairly and consistently and to mitigate the risk of inequality for residents who are provided with accommodation, both temporary and in the private rented sector, in accordance with the relevant legislation. Resident's circumstances will be considered on an individual basis; however, categories where special consideration will be given are outlined in the policy.</p> <p>The Housing Options Service is accessible for all, however residents who are affected by this policy and strategy are limited to those that have been assessed as requiring temporary or emergency accommodation, as outlined in the legislation.</p> <p>This policy will inform residents of what is likely to happen should they require accommodation, and this will ensure they are better informed to look at their options, i.e., are they able to privately rent, stay with family etc.</p>	<p>Green</p>  <p>Proceed</p>

While officers have had due regard to the council's Equality duty in the development of this policy, the council has a range of other responsibilities including a duty to set a balanced budget.

The council is required to consider the value for money implications of its decisions and to secure best value in the provision of all its services. It is important that resources are allocated in accordance with priorities and that best value is achieved. The continued use of expensive temporary accommodation, the pro-longed use of nightly or bed and breakfast or commercial hotel accommodation in the borough is not sustainable to the public purse or to the benefit of residents who are placed in this accommodation due to a lack of affordable temporary and private rented sector accommodation in the borough.

It is evident that any risk of a disproportionately negative impact existing to one or more of the groups of people who share a protected characteristic under the Equality Act 2010 will be removed or reduced by implementing the actions detailed within the policy and by officers conducting of the suitability of accommodation test for all placements.

The necessary checks will be made to ensure that where placements are made outside of the borough and outside of Greater London, officers will ensure that there are established communities whereby a diverse community can be catered for.

In assessing the suitability of an offer of accommodation, each case will be considered on its own merits, considering both the nature of the property and the community that surrounds the property, to ensure that residents are not isolated in their new communities.

Where local accommodation is not possible, we will ensure that similar services are available to the residents in a new location and that support with the transition is available. Regular checks will also be made to ensure that there are adequate school placements and GP's available and support networks as required.

The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act.
- Advance equality of opportunity between those with 'protected characteristics' and those without them
- Foster good relations between those with 'protected characteristics' and those without them

This Equality Impact Analysis provides evidence for meeting the Council's commitment to equality and the responsibilities outlined above. For more information about the Council's commitment to equality, please visit the Council's [website](#).

Section 2: General information about the proposal

Describe the proposal including the relevance of proposal to the general equality duties and protected characteristics under the Equality Act 2010

The Homelessness Accommodation Procurement policy is a revision of the council's existing Placement Policy.

The council has a statutory duty to assist households presenting as homeless where they are eligible for assistance and in priority need. This policy relates to the temporary or emergency accommodation that is provided to homelessness households who meet this criterion. The policy is used as a guide to decide what accommodation is allocated to particular customer including the use of out of borough accommodation. The policy includes rehousing homeless households into private rented sector accommodation, to discharge the council's homelessness duties.

It relates to the placement of homeless households into temporary accommodation pursuant to Section 188 of the Housing Act 1996 and longer-term temporary accommodation placements for households accepted as homeless under Section 193 of the Housing Act 1996.

The revised policy considers other relevant statutory legislation, and requirements on Local Authorities in respect of the suitability of accommodation, including The Homelessness (Suitability of Accommodation) (England) Order 2012, and the Homelessness Code of Guidance 2017. It also has reference to Section 208 of the Housing Act 1996.

The notable change between the October 2021 Placement Policy and the new Homelessness Accommodation Placement Policy is the removal of the 90 minutes journey time back to the borough from where a placement has been made.

The council will now use 'zones' when procuring and allocating temporary and private rented sector accommodation.

The zones will enable the council to have a robust and clear policy and procedure on how properties are allocated. This policy will also serve to reduce the number of judicial reviews brought against the council when being challenged on suitability. Having zones, will give the council greater control on allocating accommodation, while being able to audit placements made for transparency. Areas in zone C are subject to change depending on the readiness and availability of supply in a specific area or county. The zones are as follows:

- Zone A – located in the borough of Tower Hamlets
- Zone B – located in Greater London
- Zone C – located outside Zones A and B but in the neighbouring counties and districts of Essex, Hertfordshire, Kent, Surrey, Berkshire, and Buckinghamshire
- Zone D – located outside of Zones A, B and C

This change in policy will affect customers who are approaching the council's Housing Options Service as homeless and are to be provided with accommodation. The policy will also benefit the Emergency Bookings & Allocations Team and the Accommodation Procurement Team, who will be able to make placements in a more structured way. It will also benefit various stakeholders to understand the criteria in which placements are made and accommodation is allocated.

The policy will enable the council to move away from placing families into unsuitable bed and breakfast accommodation, in particular, commercial hotels where costs are significantly higher, currently averaging £982.10 per week (January 2024). Where families need to be accommodated in hotels, the policy will allow the council to move families into self-contained

or settled accommodation within the statutory 6-week period. At present, our ability to move people on sooner is impeded by the lack of suitable affordable accommodation in the borough leading to residents remaining in hotels and bed and breakfast accommodation for longer than is legally permitted, which can be to the detriment of the health and well-being on our residents.

The revised policy will also empower the council to be more proactive when being legally challenged concerning a placement made for a homeless household where a homelessness duty is owed.

The council will also be able to move more households on from bed and breakfast temporary accommodation into settled accommodation in the private rented sector therefore enabling a faster move-on option into self-contained accommodation for those families in unsuitable bed and breakfast accommodation within 6 weeks, as there would be a better churn of available properties arising from the wider scope of supply beyond the borough and its neighbours.

The revised policy will enable the Housing Options Service, at the prevention stage of a homelessness application, to prevent more households from being placed into temporary accommodation, both bed and breakfast and self-contained, by rehousing households into more settled accommodation sooner as the scope of the areas for resettlement would be broadened.

The revision of this policy has been driven by more recent changes in case law, [Katie-Leigh Webb-Harnden v London Borough of Waltham Forest](#) (2023) EWCA Civ 992) but also in the consideration of the current and ongoing scarcity and demand for affordable housing in the borough and this includes within the provision of Temporary Accommodation.

There is not enough supply of social and affordable housing to meet demand in the borough. The Housing Options Service currently has over 2,805 households in temporary accommodation. At present, 48.6% of households are placed in the borough, with 49.8% of households placed in other London boroughs and only 1.5% of households placed in the neighbouring counties and districts.

There are circumstances beyond the council's control which make it increasingly difficult to acquire properties for use as temporary accommodation or indeed for the council to discharge its housing duty through an offer of private rented sector accommodation (PRSO) in the borough and London Boroughs.

Homelessness is increasing nationally due to market conditions and the cost of living. This can be costly and means that it is unlikely that officers will be able to place every household in accommodation within the borough. It also depends on the units which are available on a given day - which can vary. In addition, there are difficulties in procuring accommodation which meets the standards required. Consequently, the council may therefore need to acquire properties in a range of other locations where housing costs are affordable without depriving residents of food, clothing, heating, transport, and other essentials.

The policy sets out to ensure that people are placed in the most suitable form of accommodation as quickly as possible - taking into consideration the applicant's housing needs, and range of circumstances, including health, welfare, social, and financial situation as well - as the costs that the household will incur. In the assessment of the suitability of accommodation offered to residents, officers will also consider the distance from the borough, potential disruption to employment, education, caring responsibilities, access to essential medical services and local amenities.

The policy documents what officers need to take in account when considering whether accommodation is suitable and how households are prioritised for an in-borough placement of temporary accommodation (TA) or the Private Rented Sector (PRS).

The new Homelessness Accommodation Procurement Strategy sets out the council's approach as to how accommodation will be procured to discharge the council's statutory homelessness duties and responsibilities. It will ensure that officers follow current legislation and provides a reference point for Housing Options staff to make their decisions.

The strategy details the end to end processes for officers when they are procuring accommodation for homelessness households, including how we assist with ensuring that a household settles into a new area, where applicable, and that they are able to access the local amenities.

Section 3: Evidence (consideration of data and information)

What evidence do we have which may help us think about the impacts or likely impacts on residents, service users and wider community?

The following data has been compiled from data obtained from Tower Hamlets Housing Options Service (through information obtained from most recently collated H-Clic returns to DLUHC (Department for Levelling Up, Housing and Communities) (Department for Levelling Up, Housing and Communities) from Q2. 2023/24, this is limited to only providing data on age, gender, and race of the main applicants. The EIA also uses data from the most recently available Census (2021) to describe some of the key features of the borough's population, and the Housing Options Services' IT system, Northgate.

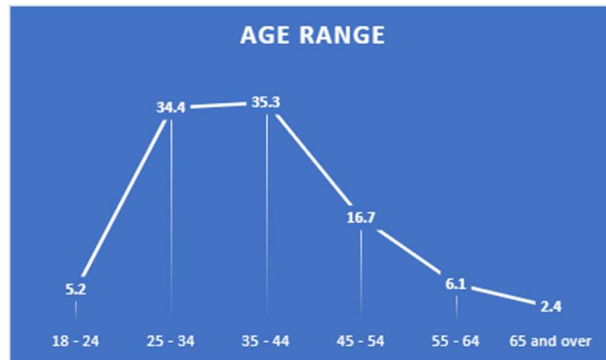
Age

Tower Hamlets is the youngest Local Authority district in England by median age. The median age within Tower Hamlets is 30 while in comparison to the rest of England, the median age of the population is 40 years of age (Census 2021).

The Census 2021 data revealed that the numbers of children, working age adults and older people in Tower Hamlets have all increased since 2011, with the largest proportionate rise in the working age population (25% increase). Tower Hamlets age structure shows the working-age population to be 240,393 which is 77.0% of the population. People under the age of 16 represent 17.4% of the population, and over 65s represent 5.6% of the population. Despite the proportion of older people in Tower Hamlets being the smallest in the country, it is characterised by elevated levels of need, with many older people requiring help with certain tasks or experiencing difficulty getting around.

Children and young people represent a slightly smaller proportion of all residents than in 2011, despite a numerical increase of 10,500. There are around 9,300 fewer children aged 0-14 when compared to the 2020 mid-year estimate.

When looking at the most recent available data on who the Housing Options Service supports, it is evident that working age residents may be disproportionately impacted by the new policy. Residents aged over 65+ are the least represented among residents who are placed in accommodation by the Housing Options Service.



The most prominent age groups among the main applicants are those within the 35-44 years age group (35.3%) and those aged 25-34 years (34.4%). Followed thirdly by those applicants aged 45-54 years (16.7%). The lowest represented age group are those aged 18-24 years (5.2%) which conversely suggest that the interventions involving mediation to prevent 'family and friends no longer willing or able to accommodate' younger residents may be working.

Disability

Data from the Housing Options Service on residents placed in Temporary Accommodation who identify as having a disability is not collated, however where a need for suitable accommodation is identified for the applicant or a member of their household, officers work to place the household in accommodation that meets their needs.

Census 2021 data sets out that 12.9% (40,125) of residents across the borough reported having a disability/. This is slightly lower than in 2011 when 13.5% had a disability.

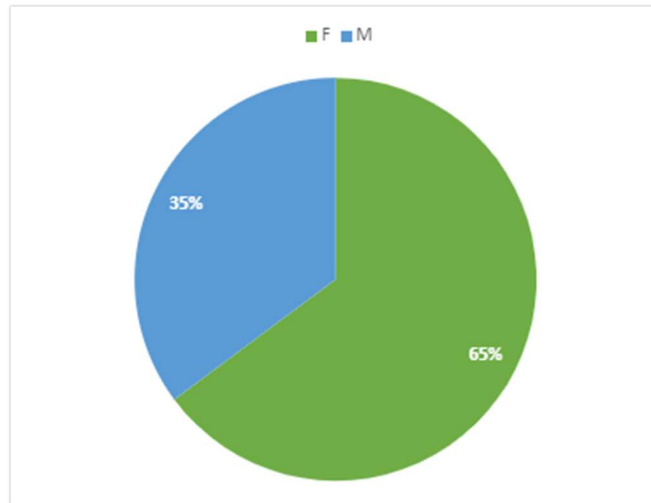
Of these, 5.7% (17,599) reported that their activities were limited a lot and 7.3% (22,526) reported that their activities were limited a little.

A further 4.5% had a long term physical or mental health condition that did not limit their day-to-day activities. However, 25.7% of all households had at least one person with a disability.

Sex

Tower Hamlets is unusual in having slightly more males than females within the population (50.2% of residents are male) and this is related, at least in part, to the age structure and the specific economic opportunities that attract residents to come and live in the borough.

However, among the cohort whom the Housing Options Service support and place in accommodation to relieve their homelessness, women main applicants vastly outnumber men (a ratio of 13:7). This implies that females are more likely to be impacted by the changes in the policy.



Gender reassignment

Official data suggests that transgender people make up a small proportion of people experiencing rough sleeping and homelessness. However, due to multiple factors trans people experiencing homelessness are more likely to be part of the 'hidden' homeless group. Official data from the Census 2021 found that about one per cent of residents have a different gender identity to their sex registered at birth in Tower Hamlets.

However, among the residents who seek assistance from the Housing Options Service in the provision of emergency or temporary accommodation, there is a reluctance to disclose this information.

Marriage and civil partnership

Data on marriage and civil partnerships of homelessness applicants is lacking as it is not collected by DLUHC or internally by the Housing Options Service.

This policy will not adversely affect this group unless they are members of one or more other protected groups. For example, a joint income household could be more likely be able to have more disposable income. Lone parents however maybe more disproportionately affected by homelessness compared to their share of the population so are more likely to be affected.

Religion or philosophical belief

The religion or belief of residents seeking assistance and requiring emergency or temporary accommodation is not recorded. However, the Census 2021 provides extensive data on the religion of the general population of Tower Hamlets. 39.9% of residents in Tower Hamlets identify as Muslim making it the most prevalent religion within the borough. Religious groups in Tower Hamlets identified from Census 2021 data shows:

- **Christian** - 69,223 people or 22.3%
- **Buddhist** - 2,961 people or 1.0%
- **Hindu** - 6,298 people or 2.0%
- **Jewish** - 1,341 people or 0.4%
- **Muslim** - 123,912 people or 39.9%
- **Sikh** - 966 people or 0.3%

- **Other** - 105,605 people or 34.0%

Race/Ethnicity

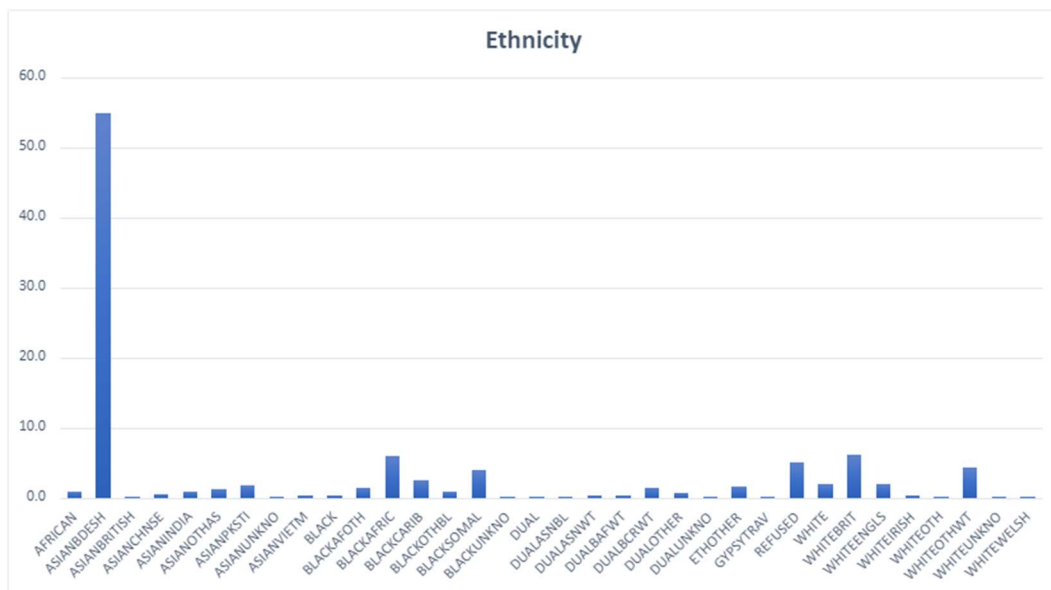
In common with much of London, most residents from Tower Hamlets are not from a White British ethnic background and the 2021 census reveals that almost half (47%) are born outside of the UK. Beyond this, Tower Hamlets has a very distinctive ethnic mix due to its longstanding Bangladeshi population (34.6% in 2021).

Tower Hamlets has by far the largest proportion of Bangladeshi residents in the UK with one in six people of Bangladeshi origin in England and Wales living in the borough. The Census 2021 has revealed that 43,561 Tower Hamlets residents were born in Bangladesh making it by far the largest country of birth of residents behind the UK.

The borough also has significant Black African populations, with a particularly notable Somali population, 5% of the population is now from a Black African background and these populations have grown rapidly in recent years. Among this population, the number of residents from Somali and Somalilander communities totals 6180 residents– 2% of the borough’s population.

White people were the largest minority group in Tower Hamlets accounting for 39.4% of the population.

Mirroring the general demographics of the population in the borough, data from the Housing Options Service reports that the largest group of applicants identified as Bangladeshi (54.9%). In terms of representation, White British/English applicants make a combined 8.1% of applicants, followed those who identify as Black African (5.9%) and Black Somalian (4.0%).



Sexual orientation

The Housing Options Service does not request this data from applicants. According to Census 2021 data, Tower Hamlets has a substantial proportion of residents who identify their sexual orientation as Lesbian Gay, Bisexual or other (7.2%) compared to England and Wales as a whole (3.1%). 83.1% of Tower Hamlets residents aged 16+ identified as straight or heterosexual.

9.8% of residents chose not to answer this voluntary census question. This was a relatively high proportion compared with England and Wales and was slightly higher than London.

Pregnancy and maternity

This data is not recorded for the purposes of reporting back to DLUHC on those residents who the council has assisted through the provision of accommodation.

Other

Socio economic status

Homelessness impacts on our most financially vulnerable residents - those with higher incomes are very unlikely to ever be threatened with homelessness.

This means that households in temporary accommodation are largely dependent on welfare benefits.

The freeze on Local Housing Allowance has meant that the local private rented sector is unaffordable for most households. The growing gap between benefits and rents is set out below.

	Room only	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms
LHA (Local Housing Allowance) Rate 2023/24 (per week)	£136.50	£295.49	£365.92	£441.86	£585.70
Average Weekly Rent* 1/10/22 – 30/09/23	£195.00	£380.76	£461.54	£553.85	£761.45
Weekly difference	£58.50	£85.27	£95.62	£111.99	£175.75

NB: Average Rent* taken from Private rental market summary statistics in England: October 2022 to September 2023 – ONS.

The growing gap between benefits and rents disproportionately affects those who are already disadvantaged with an even greater impact on those households who are benefit capped.

The difference between benefit levels and rents, makes it impossible for the council to fully mitigate the impact on low-income households without finding affordable accommodation in areas of the country where rents and benefits are more closely aligned.

60% of the borough falls within 30% of the most deprived areas of England and 29,000 residents earn less than the London Living Wage. DLUHC collects data on the employment status of those owed a duty by the council, the vast majority are registered unemployed with sizable minorities in full time work or unable to work due to long term health issues.

In the borough, unemployment is higher than the national average for residents (4.6% compared to a national average 3.7%) and many lack the skills to succeed. Women in particular are much less likely to be employed (59.7% compared with 72% in Great Britain). While half of adult residents are highly qualified, 16% have no qualifications at all.

Children and older people in particular are far more likely to be living in poverty in Tower Hamlets than those living elsewhere in the country. The Covid-19 pandemic and the cost-of-living crisis have impacted disproportionately on our most vulnerable residents.

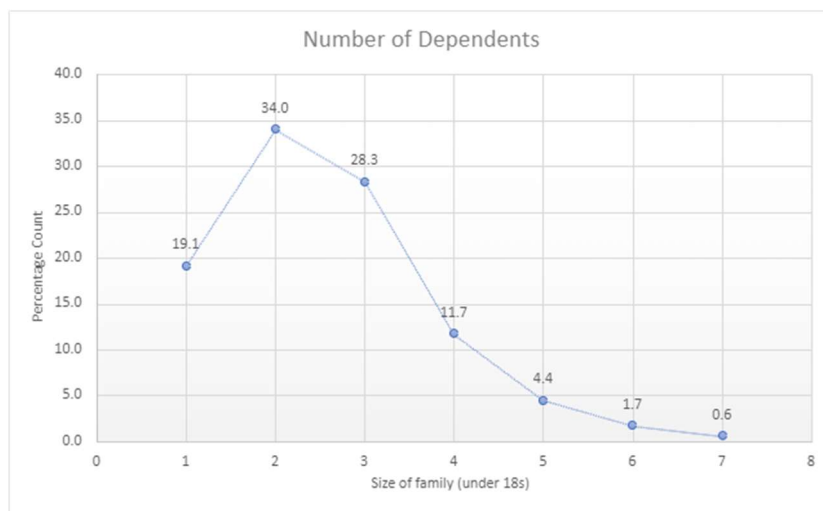
Parents/carers

Census data 2021 provides the following information: 32,666 households had dependent children. This was 27.1% of all households. This was a lower proportion than both England and Wales (28.3%) and London (31.3%)

As 6.6%, Tower Hamlets had a lower proportion of lone parent households than England and Wales (6.9%) or London (7.8%).

This represented a total of 7,961 lone parent households in Tower Hamlets.

In terms of data, information from the Housing Options Services' IT system Northgate reports that currently (January 2024) out of the 2805 households currently placed in TA, 2,239 are households that include children, however despite there being 566 households placed in temporary accommodation without children, this should not discount that these may include a household member who is currently pregnant. The graph below shows the percentages of children (dependents) within those households.



People with different Gender Identities e.g., Gender fluid, Non-Binary etc

The Housing Options Service does not collect this data. Best estimates can be derived from the Census 2021 which found:

90.7% residents identified their gender identity as being the same as their sex registered at birth. 0.6% of residents aged 16+ had a gender identity different from their sex registered at birth with no specific identity given.

0.1% identified as a Trans woman, 0.1% identified as a Trans man, 0.1% identified as Non-binary and 0.06% identified as having another gender identity.

Collectively, 1% (2,643) of Tower Hamlets residents had a gender identity that was different to their sex registered at birth. This was the same proportion as London but twice the proportion in England and Wales (0.5%)

8.3% chose not to answer this voluntary question, which was higher than the proportion in England and Wales and in London

People who have Care Experience

Data is unavailable on residents who identify with this protected characteristic.

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
Protected				
Age (All age groups)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Residents of working age may appear to be more disproportionately impacted. Consideration will be given in terms of employment for those residents who work.</p> <p>Many households include children of school age. Accommodation provided outside of the borough and neighbouring localities could impact on children having to change schools, potentially losing any educational support services and networks. However, children taking exams (at Key Stage in their education) will not to be placed where this would affect their ability to attend schools. This also includes those attending specialist schools.</p> <p>When considering placing a family outside of the borough, the council will take children's ages and their educational and support needs into consideration and will make every effort to establish the availability and location of schools and required services in the new area. Medical needs (in terms of regular appointments for specialist treatment) which necessitate that a household member needs to remain in or be placed in a neighbouring borough will also be considered.</p> <p>Households with children at risk, on the Child Protection Register or significantly disadvantaged, will be prioritised for an offer of accommodation in the borough or as close as we can get dependent on the availability and suitability of accommodation. In all cases, a suitability of accommodation assessment will be undertaken for all placements into temporary accommodation or PRS accommodation which will identify any overriding needs of all household members.</p> <p>All household members will benefit where they are placed in accommodation which they are able to financially sustain.</p>
Disability (Physical, learning difficulties, mental health,				<p>The council recognises that less-able residents could be negatively impacted by being placed out of the borough. These impacts could arise from accommodation that is secured further away</p>

and medical conditions)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>from hospitals, clinics, support centres etc, they may also find it harder to travel.</p> <p>Disabled residents who have regular medical appointments in the borough will be prioritised for an offer of accommodation within or as near as possible to Tower Hamlets. The policy recognises this, and the council aims to allocate suitable accommodation where we can, with the assistance of other stakeholders to resolve issues to the best of our ability.</p>
Sex	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Women represent a sizeable percentage of applicants who the Housing Options service place in Temporary Accommodation (65%). There is a significantly higher number of female applicants than males and it is anecdotally known that many these cases are single parents.</p> <p>Potentially applicants moving out of borough could be placed away from their support networks, however the policy assures that officers would look to ensure that this distance is manageable. Similarly, many of these cases are more likely to struggle the most financially and moving to accommodation in cheaper areas will help these applicants reduce the financial burden on the family.</p> <p>The council will continue to endeavour to place women applicants in safe and secure accommodation, in areas with good transport links, and with support and community facilities in place.</p>
Gender reassignment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Residents are reluctant to disclose this information - this disclosure is entirely at the discretion of residents - consequently there is a gap in the data available on residents who identify with this protected characteristic. However, the council recognises that transgender people who have or may be in the process of changing gender may be more dependent on local support networks or health services.</p> <p>Where it is not possible to offer or place a resident locally, we will ensure that similar services and support are available in the new location, and that they are placed in a safe locality.</p>
Marriage and civil partnership	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>There is unlikely to be an adverse or disproportionate impact on households based on the main applicant's relationship status unless they identify with one or more other protected characteristics which are affected. Increasing the</p>

				<p>reach and scope of where the council can accommodate, and place homeless households has the potential to reduce waiting time spent in interim temporary hostel or emergency accommodation for all households.</p> <p>Moving to a new location may be challenging for single applicants either with or without children who may be more reliant on local support networks. Although the revised Policy will prioritise the more vulnerable households with extenuating circumstances for local accommodation, the policy will ensure that where single parents are moved outside of the borough and further away from London, they have access to local support networks and provided with links to local community groups.</p>
Religion or philosophical belief	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The council recognises that religious households are supported by the communities that they live in, and it is important to ensure that in making out of area placements, the communities that we are placing into are supportive and sufficiently diverse. In assessing the suitability of an offer of accommodation, each case will need to be assessed on its own merits, considering both the nature of the property and the community that surrounds the property, to ensure that residents are not isolated in their new communities. As well as any extenuating circumstances that necessitate that it is critical that the applicant or a member of their household remain in the borough or are placed in an area nearby.</p> <p>Where local accommodation is not possible, we will ensure that similar services are available to the residents in a new location and that support with the transition is available.</p>
Race	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>A considerable proportion of residents placed in temporary accommodation are from the BME community – specifically Bengali. Culturally, residents from some ethnic backgrounds need to be close to their community/ the area where they currently live and there could be a potential inequality arising from them being placed into accommodation in other areas further away - if they were to be placed in areas which are less diverse, this could lead to isolation and potential discrimination.</p> <p>Officers will ensure that if local accommodation is not available, that residents and their households are placed in an area where there is an existing community and support networks available.</p>

Sexual orientation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Data on the sexual orientation of residents placed in temporary accommodation is insufficient.</p> <p>There may be impacts arising from the relative lack of support and other services designed specifically for LGBTQ+ people in some places outside London, but the needs for these specific services would be considered before an offer is made. Where specific needs are identified, the council will take these into consideration when allocating temporary accommodation.</p>
Pregnancy and maternity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The number of people living in interim or long-term temporary accommodation who are in the maternity or paternity leave phase is not data which is collated by the council and therefore the impact of the policy on this group cannot be analysed.</p> <p>However, a transition of services during pregnancy could have a potential negative impact, as could a potential loss of support networks. The council will actively seek to link residents into maternity and support services in their new area.</p>
People who have Care Experience	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Data is unavailable on those who have care experience. It is likely though that individuals who have care experience will not be disproportionately or negatively impacted by the revised policy and new strategy and will benefit from the council's approach in the same way as residents with other protected characteristics.</p> <p>When considering placing a person who has experience of care outside of the borough, the council will consider the individual's support needs and the availability and location of these services in the new area where the person will be placed. Where an individual has any medical needs that require them to remain in the borough or be placed in a neighbouring borough, due consideration will be made in the allocation and placement of any temporary accommodation placement or PRS offer made to the person.</p> <p>The suitability of accommodation test will ensure that residents who identify with this or multiple protected characteristics will not be disproportionately affected.</p>
Other				
				<p>Accommodation both in the borough and in neighbouring boroughs can still be expensive and sometimes unaffordable. This policy has</p>

Socio-economic	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	looked to address this by widening the options available to customers who are socio-economically disadvantaged. Unless there are extenuating circumstances as set out in the policy, households will benefit from the procurement and placement of people in accommodation outside of London where rents are cheaper and more affordable.
Parents/Carers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Parents and carers could be more negatively impacted by being placed outside of the borough.</p> <p>Welfare and support requirements are considered in the suitability assessment of the accommodation for the households needs. This includes consideration of the need for any children to be in close proximity to support services due to health, medical needs, for child protection purposes and care reasons. It will also consider the need for families to remain close to existing schools; however, considerations for in-borough placements will only apply for children at key stages of education.</p>
People with different Gender Identities e.g., Gender fluid, Non-Binary etc	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>People with different gender identities are more likely to choose not to disclose this information. Consequently, obtaining this data can be challenging. The policy ensures people of all backgrounds can access transparent guidance on the placements process that will be beneficial to all gender identities.</p> <p>The council has a statutory legal duty to provide accommodation for people of all protected characteristics including people who have different gender identities who are eligible, homeless and in priority housing need.</p> <p>This policy therefore ensures people across a range of equality backgrounds can access clear guidance on the whole placements process. People with different gender identities will not be discriminated against in the homeless placements process.</p> <p>As part of the duties under the Equality Act 2010, the council will have due regard to the gender identity of an applicant when determining the suitability of a property. For example, a victim of harassment or violence will not be placed in locations close to a perpetrator. Placements will made in a suitable area which is safe.</p>
Any other groups	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No other groups have been identified who might experience an adverse or disproportionate impact arising from this policy.



Section 6: Monitoring

What monitoring processes have been put in place to check the delivery of the above action plan and impact on equality groups?

N/A .

Appendix A

EIA decision rating

Decision	Action	Risk
As a result of performing the EIA, it is evident that a disproportionately negative impact (direct, indirect, unintentional, or otherwise) exists to one or more of the nine groups of people who share a Protected Characteristic under the Equality Act and appropriate mitigations cannot be put in place to mitigate against negative impact. It is recommended that this proposal be suspended until further work is undertaken.	Suspend – Further Work Required	Red 
As a result of performing the EIA, it is evident that there is a risk that a disproportionately negative impact (direct, indirect, unintentional, or otherwise) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, there is a genuine determining reason that could legitimise or justify the use of this policy.	Further (specialist) advice should be taken	Red Amber 
As a result of performing the EIA, it is evident that there is a risk that a disproportionately negatively impact (as described above) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, this risk may be removed or reduced by implementing the actions detailed within the <i>Impact analysis and action plan</i> section of this document.	Proceed pending agreement of mitigating action	Amber 