


Section 1: Introduction

Name of proposal
For the purpose of this document, 'proposal' refers to a policy, function, strategy or project New Homelessness and Rough Sleeping Strategy 2024- 2029
Service area and Directorate responsible
Housing Options, Housing and Regeneration
Name of completing officer
Una Bedford, Senior Strategy and Policy Officer
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>As a result of completing the EIA, having consulted with residents and stakeholders, it is evident that the priorities being taken forward within the strategy will not have a negative or detrimental impact on residents, irrespective of any protected characteristics under the Equality Act 2010 which they may identify with - both directly and indirectly.</p> <p>There are no indications that the priorities within the council's new Homelessness and Rough Sleeping strategy or the activities that have been developed in the accompanying delivery plan, will have any negative or disproportionate impacts for any protected groups.</p> <p>The consultation exercise on the strategy's new priorities has demonstrated that there is a strong consensus of agreement with all of the council's proposed priorities to tackle homelessness and rough sleeping in Tower Hamlets - across all residents and stakeholders who identify with a particular or multiple protected characteristics with the majority of respondents to the consultation expressing that they definitely or tend to agree with all of the priorities.</p> <p>Both the strategy and the supporting delivery plan will ensure that the council's statutory homelessness provision will become more</p>	<p>Amber</p>  <p>Proceed</p>

accessible to all persons irrespective of any protected characteristics that they identify with. The activities which the Housing Options Service will take to support these priorities intend to ensure the delivery of targeted and appropriate support services as required. There are multiple actions within the delivery plan which intend to have a positive impact across all protected characteristics.

The strategy's focus on working earlier to prevent homelessness will therefore benefit all residents. While the strategy acknowledges that any household can become at risk of homelessness, those most vulnerable include a high proportion of households without social / family networks that can support them and are likely to have low or welfare based incomes. The strategy will seek to tackle exclusions, improve accessibility and assessment and enable individuals to achieve sustained outcomes that include improved health, wellbeing and choices.

The proposed priorities and actions identified within the strategy are designed to address the needs of those who are disadvantaged, and the equality groups within the EIA are all positively targeted with actions in the strategy's delivery plan which are designed to support and help them to maintain a home. The emphasis is on providing an accessible service and effective pathways to ensure sufficient advice and support is in place to support those who find themselves or at risk of homelessness or rough sleeping

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 council has a statutory duty under the Homelessness Act (2002) to conduct a review of the nature and extent of homelessness in its District (borough) every 5 years and to develop a strategy setting out:

- how services will be delivered in the future to tackle homelessness; and
- the available resources to prevent and relieve homelessness,

Our most recent Homelessness and Rough Sleeping strategy ended in December 2023 and our new strategy fulfils not only a statutory and mandatory imperative as required of the council as a Local Housing Authority but will fundamentally support the council's priority to tackle

Appendix 3 – Equality Impact Assessment

homelessness as set out within its Strategic Plan 2022 – 2026. The council has consulted with residents and stakeholders on the emerging priorities arising from review of homelessness and rough sleeping in the borough, which was completed in March 2023. These priorities are:

- 1. Working with people earlier to prevent them from becoming homeless and to reduce the use of Temporary Accommodation.**
- 2. Provide good quality accommodation for people who are at risk of, or where they become, homeless.**
- 3. Improve customer service and the individual's experience.**
- 4. Making sure that people have access to the right support services.**
- 5. To prevent rough sleeping but where it does occur, it's rare, brief and doesn't happen again.**
- 6. Boost staff resilience and well-being.**

These priorities will enable the council's Housing Options Service and its partners to tackle homelessness and rough sleeping in the borough and have been translated from the strategy into the supporting Delivery Plan. The priorities provide the framework for the Delivery Plan, which outlines the aims and projects that the council will undertake as part of its homelessness prevention and reduction activities over the next 5 years.

Under the Equality Act 2010, the council must have due regard to the need to:

- a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act.
- b) Advance equality of opportunity between those with a protected characteristic and those without.
- c) Promote good relations between those with a protected characteristic and those without.

The 'protected characteristics' referred to under the Equality Act are age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation. It also covers marriage and civil partnership with regard to eliminating discrimination. In addition, the council also considers the socio-economic impact on the community.

This EIA has been completed to ensure that all residents will benefit from the priorities which the council will be adopting in its new Homelessness and Rough Sleeping Strategy. As part of the consultation exercise, we wanted to ensure, in particular, that those with lived experience of homelessness and rough sleeping have been able to express their views but recognised that there will be some people who identify with multiple protected characteristics who are more likely to be part of the 'hidden' homeless group and this has presented challenges in ensuring their engagement and participation in the consultation process.

Every effort was made to provide access to the consultation and we have utilised the data intelligence and networks of the council's peers in other local authorities, other services within the council who support those who are or at risk of homelessness and rough sleeping, as well as the community groups, services and third sector partners who have regular contact with these individuals and experience of providing support and care.

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 a variety of sources including Tower Hamlets Housing Services, the Department of Levelling Up Housing and Communities (DLUHC), the Census 2021 and the responses of residents and stakeholders who completed the consultation survey to gauge opinion on the council’s new priorities, which are embedded in the new strategy to tackle homelessness and rough sleeping in the borough.

Age

Prior to finalising the council’s new priorities to tackle Homelessness and Rough Sleeping, the council consulted with residents to determine if they agreed with the proposed priorities.

177 respondents (49%) who completed the survey provided details of their age.

Table 1 below shows how much agreement there was within each age range for each of the council’s proposed priorities.

Table 1: Percentage of respondents who Definitely/Tend to agree with the priorities by age group

Percentage of respondents who Definitely/Tended to agree with priorities by age group						
	18-24	25-34	35-44	45-54	55-64	65-74
Working with people earlier to prevent them from becoming homeless and to reduce the use of Temporary Accommodation.	100%	72%	87%	80%	91%	100%
Provide good quality accommodation for people who are at risk of, or where they become, homeless.	100%	77%	96%	87%	88%	100%
Improve customer service and the individual’s experience.	100%	80%	95%	87%	86%	100%
Making sure that people have access to the right support services.	100%	79%	98%	87%	86%	100%
To prevent rough sleeping but where it does occur, it’s rare, brief and doesn’t happen again.	100%	70%	95%	87%	81%	100%
Boost staff resilience and well-being	100%	74%	87%	90%	77%	100%

- The highest and most consistent agreement is in the youngest (18-24) and oldest (65-74) age groups, both showing 100% across all categories.
- Those aged between 25-34 and 55-64 show more variability and lower agreement percentages compared to the youngest and oldest groups.

Appendix 3 – Equality Impact Assessment

- The 35-44 age group shows high agreement, particularly strong support for ensuring access to support services (98%).

Among those aged between 18-24 (7 respondents, 2% of those who provided their age), they agreed fully (100%) with all six proposed priorities. All also agreed (100%) that the council's proposed priorities are clear and easy to understand.

Similarly of those who identified as being between the ages of 65-74, (3 respondents, 1%), they agreed 100% with all six of the council's proposed priorities. However, only 33% of this age group agree that the proposes priorities would help to tackle homelessness and rough sleeping in the borough.

Within the other age ranges the headlines are:

- **25-34** - 65% agreed that the priorities were clear and easy to understand while just over half agree (51%) that these priorities will help the council to tackle homelessness and rough sleeping in Tower Hamlets.
- **35-44** - There was 84% agreement that the council's proposed priorities were clear and easy to understand, with 62% of respondents in this cohort who thought that these priorities would assist the council to tackle homelessness and rough sleeping in the borough.
- **45-54** -. A total of 73% agreed that the priorities were clear and easy to understand. While only 40% agreed that these priorities would aid the council to tackle homelessness and rough sleeping.
- **55-64** -. Among this cohort, 74% of respondents said that they agreed that the priorities were clear and easy to understand, however, only 45% of respondents agreed that the council would be able to tackle homelessness and rough sleeping with these priorities.

The table below illustrates the ages of those owed a homelessness duty by the council which DLUHC collects. The data is not separated by relief and prevention duties.

Table 2 – Ages of those owed a duty.

Age range	2018/19	2019/20	2020/21	2021/22 Q1 Q2 and Q4	2022/23
16-17	2	6	4	6	5
18-24	458	339	359	276	364
25-34	820	705	657	509	804
35-44	555	498	503	372	528
45-54	320	294	278	213	346
55-64	167	142	112	88	154
65-74	27	30	18	36	62
75+	10	21	9	9	15

Table 2 shows that the majority of those owed a duty are aged between 18 and 44. By far, the lowest age groups owed a homelessness duty are those over the age of 75 and those between the ages of 16–17-year-olds. Those aged over the age of 65 are under-represented in the

Appendix 3 – Equality Impact Assessment

data that the council holds on those who are owed a duty and this illustrates that they are less likely to be directly affected by homelessness and rough sleeping.

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 media age of the population is 40 years of age (Census 2021).

The most affected age range in terms of those owed a duty are among those aged between 18-44 years of age. Combined with the most common reason for leaving settled accommodation being that family or friends are no longer willing or able to accommodate or the end of private tenancy, this indicates that factors including relationship breakdowns between young people and their family, or their primary caregivers has consistently emerged as a leading cause of youth homelessness. Pressures including financial hardship, housing, and the job market can contribute to family tensions and can lead to conflict with the breakdown of family relationships.

The high incidence of the end of a private rent sector tenancy as a reason for approaching the council for homelessness advice and assistance correlates strongly with most single private renters under 35 only get the shared accommodation rate of Local Housing Allowance.

Disability

As part of the consultation on the priorities underpinning the new Homelessness and Rough Sleeping Strategy, feedback was sought from residents who identified as having a disability. From those who chose to disclose this information, 69 respondents (19%) indicated that they had physical or mental health conditions or illnesses lasting or expected to last 12 months or more.

74% felt that the proposed priorities were clear and easy to understand, however only 49% of this group thought that these priorities would assist the council to tackle homelessness and rough sleeping in Tower Hamlets.

- 85% of this protected group definitely or tended to agree with **Priority 1: Working with people earlier to prevent them from becoming homeless and to reduce the use of Temporary Accommodation**
- 85% definitely or tended to agree with **Priority 2: Provide good quality Accommodation for people who are at risk of, or where they become, homeless.**
- 81% definitely or tended to agree to **Priority 3: Improve customer service and the individual's experience.**
- While 87% definitely or tended to agree with **Priority 4: Making sure that people have access to the right support services.**
- 85% definitely or tended to agree with **Priority 5: To prevent rough sleeping but where it does occur, it's rare, brief and doesn't happen again** and 83% agreed with **Priority 6. Boost staff resilience and well-being.**

Data from DLUHC, shows the percentage of applicants owed a duty by the council who suffer from physically ill health and disability and also those who suffer from a learning disability. The consultation provided an indicative sample of those who identified with this protected characteristic who were owed a duty in 2022/23 (Table 3).

Appendix 3 – Equality Impact Assessment

Table 3 – Disability and health amongst those owed a duty.

Support Needs:	2018/19	2019/20	2020/21	2021/22 Q1 Q2 and Q4	2022/23
Physical ill health and disability	15.1%	19.0%	20.4%	13.66%	17.2%
Learning disability	2.5%	4.2%	4.6%	3.75%	4%
History of mental health problems	21.2%	23.1%	25.4%	19.27%	21.1%

Table 3 indicates that there is a sizable proportion of applicants owed a duty who have indicated some form of disability. Mental health problems are the most prevalent of support needs among those who seek housing advice and assistance from the council.

Sex

Information taken from the consultation on the council's new priorities to tackle homelessness and rough sleeping (Table 4) showed that female respondents accounted for 171 responses received (48% of all responses). Male respondents represented 88 of all responses (25%).

Table 4: Percentage of respondents who Definitely/Tended to agree with priorities by sex

Percentage of respondents who Definitely/Tended to agree with priorities by sex		
	Female	Male
Working with people earlier to prevent them from becoming homeless and to reduce the use of Temporary Accommodation.	88%	79%
Provide good quality accommodation for people who are at risk of, or where they become, homeless.	94%	89%
Improve customer service and the individual's experience.	89%	86%
Making sure that people have access to the right support services.	91%	89%
To prevent rough sleeping but where it does occur, it's rare, brief and doesn't happen again.	88%	81%
Boost staff resilience and well-being	89%	85%

- Females consistently show a slightly higher level of agreement across all the priorities compared to males.
- The highest agreement for both genders is seen in the priority of providing good quality accommodation (94% for females, 89% for males).
- The lowest agreement is seen in the priority of working with people earlier to prevent homelessness (88% for females, 79% for males).
- The data suggests that while both genders largely agree on the priorities, females tend to show stronger support for each of the priorities listed.
- 71% of all female respondents compared to 80% of male respondents indicated that our priorities are clear and easy to understand.

Both sexes had the same approval percentage on whether or not they thought that the council's proposed priorities might help the council to tackle homelessness and rough sleeping – 53% said Yes for both sexes.

The feedback received from the consultation is representative of the household types owed a prevention duty. Data from DLUHC shows that, in 2022/23 there were far more female led single parent families with dependent children than male led (12.9% female, compared to 0.9% male). However, there are marginally more single females without dependent children than single male households presenting at the prevention stage (31.3% female, compared to

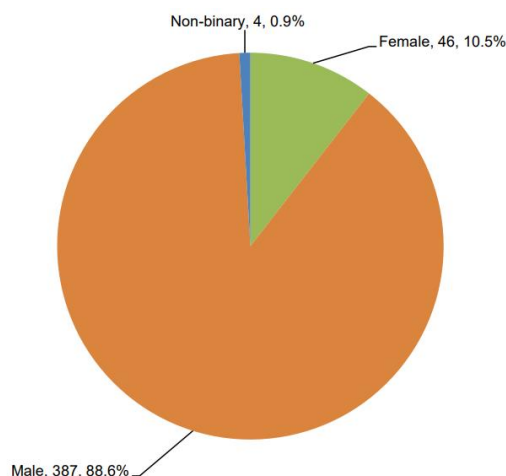
Appendix 3 – Equality Impact Assessment

30.6% male). Certainly at the prevention stage, data shows that there are more women than men presenting as homeless who are owed a prevention duty.

In comparison, data from 2022/23 on household types owed a relief duty indicates that 12.9% of single parent households are female, whereas 1% are male led. There is however a vast difference between single persons owed the relief duty according to gender, with 48.3% of single men owed a relief duty compared to 28.3% of women.

While the official CHAIN report shows that the vast majority of rough sleepers are men, the true extent of female rough sleeping may be misrepresented as women are more likely to be part of the 'hidden' homeless group. Official data from the CHAIN Annual Report – Tower Hamlets April 2022 - March 2023 found only 10.5% of rough sleepers were female. While this gives the impression that women were by far in the minority of rough sleepers, there is increasing evidence that women are far more likely to be hidden homeless. This is due in part to women facing higher levels of violence when rough sleeping leading them to try and stay hidden finding different ways to seek shelter rather than bedding down on the street. Female rough sleeping is often transient, intermittent and hidden which means that they are often missed from official statistics and that can have a knock-on effect of excluding them from accessing housing and support.

Graph 1: Gender of Rough Sleepers in Tower Hamlets (2022/23).



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. Family rejection and abuse is a common cause of young trans people's homelessness.

The council will work with community groups and charities to ensure that this group feel safe and able to access the council's homelessness services and support provisions.

The consultation exercise on the council's proposed new priorities failed to provide sufficient data on respondents who identified with this protected characteristic. The decision to provide this data is an elective process on the part of the respondent and they can choose to provide this information to the council.

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. The marital or civil

Appendix 3 – Equality Impact Assessment

partnership status of those who responded to the council’s consultation on the strategy’s new priorities is thought to not have had a material impact or detrimental effect on whether a respondent agreed or disagreed with the council’s new priorities.

Religion or philosophical belief

In response to the consultation on the council’s proposed priorities within the new Homelessness and Rough Sleeping Strategy, the most represented religion or belief system which respondents identified with was Muslim (126 responses or 35% of all responses received). Those who identified as Christian represented 58 respondents or 16% of all responses received. A total of 49 (14%) of respondents said that they held no religion or belief, while all other faiths (Any other religion, Buddhist, Hindu or Jewish) represented 2% of all respondents (8 responses combined).

Table 5 sets out the percentage of consultation respondents who affirmed that **they Definitely or Tended to agree** with the council’s new priorities.

Table 5: Percentages of consultation respondents who Definitely/Tended to Agree with the council’s proposed priorities by Religion/Belief.

	Muslim	Christian	No religion or belief	All other
Working with people earlier to prevent them from becoming homeless and to reduce the use of Temporary Accommodation.	86%	86%	90%	100%
Provide good quality accommodation for people who are at risk of, or where they become, homeless.	87%	90%	94%	100%
Improve customer service and the individual’s experience.	87%	86%	92%	100%
Making sure that people have access to the right support services.	86%	93%	94%	100%
To prevent rough sleeping but where it does occur, it’s rare, brief and doesn’t happen again.	86%	84%	85%	100%
Boost staff resilience and well-being	88%	86%	82%	100%

Residents who identified as belonging to ‘Another religion, Buddhist, Hindu or Jewish’ showed unanimous agreement (100%) across all the priorities.

Those who held ‘No religion or belief’ consistently shows higher agreement percentages compared to Muslim and Christian groups, except for **Priority 6: Boost staff resilience and well-being** where it is lower (82%).

The percentages for Muslims and Christians are relatively close across all categories, with slight variations.

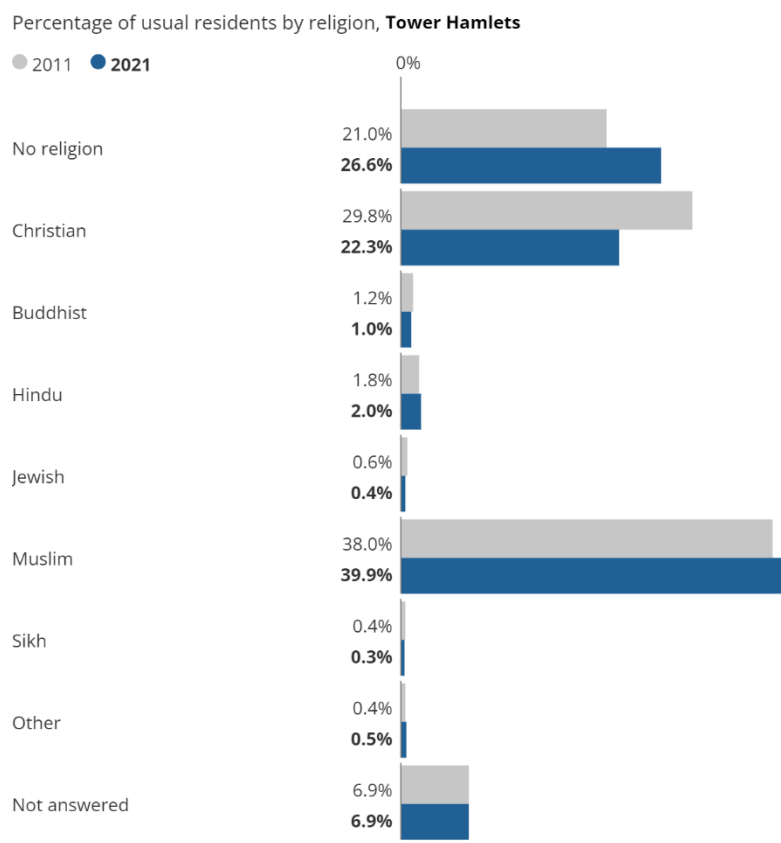
The highest agreement from all groups for **Priority 2: Provide good quality accommodation for people who are at risk of, or where they become, homeless** and **Priority 4: Making sure that people have access to the right support services.**

The lowest percentage of agreement is for **Priority 6: Boost staff resilience and well-being** among those with "No religion or belief" (82%).

Appendix 3 – Equality Impact Assessment

The religion of homelessness applicants and rough sleepers is not recorded. However, the Census data from 2021 provides extensive data on the religion of the general population of Tower Hamlets. 40% of residents in Tower Hamlets identify as Muslim making it the most recognised and identified religion within the borough. Graph 2 goes through religion of Tower Hamlets in more detail and shows how it has changed since the previous 2011 Census.

Graph 2 – Religion in Tower Hamlets



Source: Office for National Statistics – 2011 Census and Census 2021

The consultation feedback reflects the demographics of the borough in terms of religion, providing a clear indicative sample showing that irrespective of religion, residents definitely or tend to agree with the council's priorities to tackle homelessness and rough sleeping.

Race

From data provided by the consultation respondents, the most represented race/ethnic groups identified as Bangladeshi (26%), followed by those who identified as White English, White Scottish, White Welsh, White North Irish, and White British (23%), Black British, Caribbean, African (8%), White other (5%) and Asian/Asian British (4%).

All other indicated races/ethnicities that respondents identified with have been collated together - (*Any other/Asian background/Black/ Black British or Caribbean background/any other ethnic group/Any mix or multiple background/Arab/Black, British Black/Caribbean/Indian/Other African/Other ethnic group/Pakistani/White Asian/White and Black Asian/White and Black African/White and Black Caribbean/White Irish* – 74 respondents, 21% of all responses).

The percentage rates of those who Definitely/Tended to agree for the largest represented groups and the combined total of all other ethnic groups which residents identified with, has

Appendix 3 – Equality Impact Assessment

been set into Table 6 below and highlights that there are variations in priority agreement across different ethnic groups, with some groups showing consistently higher or lower levels of agreement with the stated priorities.

Table 6: Percentage of respondents who Definitely/Tended to agree with the priorities by race/ethnicity

Percentage of respondents who Definitely/Tended to agree with priorities by race/ethnicity.						
	Bangladeshi	White: English, Scottish, Welsh, Northern Irish, British	Black British, Carib- bean or African	White Other	Asian/ Asian British	All other
Working with people earlier to prevent them from becoming homeless and to reduce the use of Temporary Accommodation.	72%	85%	89%	100%	93%	90%
Provide good quality accommodation for people who are at risk of, or where they become, homeless.	82%	94%	86%	94%	93%	90%
Improve customer service and the individual's experience.	85%	88%	86%	89%	100%	90%
Making sure that people have access to the right support services.	86%	95%	86%	100%	87%	90%
To prevent rough sleeping but where it does occur, it's rare, brief and doesn't happen again.	83%	80%	89%	89%	93%	88%
Boost staff resilience and well-being	86%	80%	96%	88%	93%	88%

Respondents who identified as White Other consistently showed very high agreement across all priorities, particularly for **Priority 1: Working with people earlier to prevent them from becoming homeless and to reduce the use of Temporary Accommodation (100%)** and **Priority 4: Making sure that people have access to the right support services (100%)**.

Those who identify as Bangladeshi tend to show lower agreement percentages compared to other groups, particularly for **Priority 1: Working with people earlier to prevent them from becoming homeless and to reduce the use of Temporary Accommodation (72%)** and **Priority 2: Providing good quality accommodation for people who are at risk of or where they become homeless (82%)**.

Appendix 3 – Equality Impact Assessment

Respondents who identified as Asian/Asian British show the highest agreement for **Priority 3: improve customer service and the individual's experience** (100%).

The Black British, Caribbean or African group shows the highest agreement for **Priority 6: Boosting staff resilience and well-being** (96%).

White: English, Scottish, Welsh, Northern Irish, British tend to show lower agreement with **Priority 5: To prevent rough sleeping but where it does occur, it's rare, brief and doesn't happen again**, and **Priority 6: Boost staff resilience and well-being (80%)**

Of those who identified as Bangladeshi, 68% of these respondents thought that the council's proposed priorities are clear and easy to understand with 15% disagreeing and 16% uncertain. When asked if they thought that the draft priorities would help the council to tackle homelessness and rough sleeping in Tower Hamlets, 48% agreed while 37% did not know and 15% disagreed.

Respondents who identified as White – English, Scottish, Welsh, Northern Irish, British agreed (73%) that the council's proposed priorities were clear and easy to understand. Some 41% of this group agreed that these priorities would help the council to tackle homelessness and rough sleeping, while 41% said that they did not know and 15% did not think that the priorities would help.

Among respondents who identified as Black - British, Caribbean or African, 62% agreed that the council's priorities are clear and easy to understand, while 28% disagreed and 10% did not know. Across this cohort, 66% thought that the priorities would help the council to tackle homelessness and rough sleeping.

The consultation has delivered a response rate across each ethnic group which mirrors the make up of the communities within the borough and how these are represented in DLUHC audited data on those owed a prevention or relief duty in Tower Hamlets.

Data confirms that the largest ethnic group in Tower Hamlets is Asian British at 45%, more specifically it is the Bengali population who are owed the highest percentage of duties. This is in line with the demographics of the borough (according to the Census 2021) and when compared to the general population of Tower Hamlets applicants from the Asian/Asian British community are neither significantly over nor under-represented.

The second most represented community owed either a prevention or relief duty are those who identify as White with the most common sub-group of this being White: English/Scottish/Welsh/Northern Irish/British. Again, the percentages are like that of their representation amongst the general population of Tower Hamlets (according to the 2021 census figures). The next represented ethnic group of homeless applicants is White at 22% of those owed a duty. There is also a significant number of Black/African/Caribbean/Black British owed a duty making up 14% of those owed a duty in 2022/23.

Table 7 – Ethnicity of those owed a prevention or relief duty in Tower Hamlets 2022/23

Ethnicity of main applicants owed a prevention or relief duty⁷:		
White	509	22.3%
Black / African / Caribbean / Black British	318	14.0%
Asian / Asian British	1,020	44.8%
Mixed / Multiple ethnic groups	160	7.0%
Other ethnic groups	114	5.0%
Not known	157	6.9%

Sexual orientation

Many young people will have been thrown out of their family home, or otherwise excluded from housing because of their sexuality.

Taking the limited data provided from respondents to the consultation who identified as LGBTQI+, Table 8 below shows the agreement percentages among those who chose to provide this information (17 respondents/5% of all respondents).

Table 8: Percentage of respondents who identified as LGBTQI+ who Definitely and Tended to agree with the priorities

Percentage of respondents who identified as LGBTQI+ who Definitely and Tended to agree with the priorities	
	%
Working with people earlier to prevent them from becoming homeless and to reduce the use of Temporary Accommodation.	88%
Provide good quality accommodation for people who are at risk of, or where they become, homeless.	100%
Improve customer service and the individual’s experience.	88%
Making sure that people have access to the right support services.	100%
To prevent rough sleeping but where it does occur, it’s rare, brief and doesn’t happen again.	88%
Boost staff resilience and well-being	87%

76% of respondents who identified with this protected characteristic agreed that the proposed priorities are clear and easy to understand, 18% disagreed while 6% said that they didn’t know. 65% agreed that the council’s priorities will help to tackle homelessness and rough sleeping over the next five years (25% said that they didn’t know) and 6% said they didn’t think that the priorities would help.

DLUHC records the sexual identity of homeless applicants at local authority district level. The majority of homeless applicants identified as heterosexual (88%) of those owed a duty in 2022/23. The percentage identifying as homosexual was only 2% however a significant proportion preferred not to say, or their sexuality was not known so this may be an underestimation of the true figure (9%). LGBTQI+ people may be more likely to be part of the hidden homeless group, it follows that therefore estimations of the proportion of rough sleepers and homeless people who are part of this cohort are likely to be inaccurate.

Appendix 3 – Equality Impact Assessment

Pregnancy and maternity

Data is collected on those owed a duty who have dependent children or are pregnant however data is not collected separately meaning it is hard to infer how many people owed a duty are pregnant.

There was limited data from consultation respondents to conclude how those who identify with this specific characteristic felt about the proposed priorities underpinning this new strategy.

Other

Socio economic status

Homelessness impacts the poorest in society, those with higher incomes are very unlikely to ever be threatened with homelessness. 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. Table 4 shows this in more detail.

Table 9 – Employment status of main applicants owed a duty 2022/23.

Employment status of main applicants owed a duty 2022/23:		
Registered unemployed	966	42.4%
Not working due to long-term illness / disability	210	9.2%
Full-time work	338	14.8%
Part-time work	313	13.7%
Not seeking work / at home	108	4.7%
Not registered unemployed but seeking work	110	4.8%
Retired	37	1.6%
Student / training	42	1.8%
Other	118	5.2%
Not known ⁸	36	1.6%

Parents/carers

Data is collected on the household composition of those owed a duty. This allows us to identify the number with dependent children and hence are parents/carers.

Table 10– Homelessness approaches by household composition

Household Type	2018 /19	2019/20	2020/21	2021/22	2022/23
Single Person households (prevention)	1000	640	477	577	643
Single Person households (relief)	821	695	982	715	949
Single persons with dependent children or pregnant (prevention)	140	194	117	169	143
Single persons with dependent children or pregnant (relief)	83	141	101	117	164
Couples with dependent children (prevention)	139	180	101	144	183
Couples with dependent children (relief)	55	51	63	75	91

Appendix 3 – Equality Impact Assessment

Couples/households with non-dependent adult children/other (prevention)	70	75	53	77	70
Couples/households with non-dependent adult children/other (relief)	26	26	32	33	35

Table 10 shows that single person households without children make the most approaches to the council both at the prevention and relief stage (in 2022/23, this represented 69.8% of all approaches). Single persons with dependent children both at the prevention and relief stage however represented 13.4% of approaches made to the council during 2022/23. Couples with dependent children at both the prevention and relief stage accounted for 12% of all approaches, while couples/households with non-dependent adult children represented 4.6% of approaches.

If combining both single people and couples with children who present at the prevention and relief duties, this represents 25.4% of all approached to the council's housing options service during 2022/23.

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

There is insufficient data to determine if there is a link between homelessness and those who identify with this protected characteristic, although it is widely understood that family rejection is a common cause of young trans people's homelessness. Trans young people may find themselves experiencing homelessness for a multitude of reasons, however their homelessness often intersects with their gender identity. The most visible form of this is where young people are rejected and/or harmed by their families and communities due to their gender identity.

The CHAIN report on rough sleeping in Tower Hamlets provides some indication of the number of non-binary people sleeping rough (see Graph 1) this was 0.9% of rough sleepers in Tower Hamlets. Those who may have different gender identities may be more likely to be a part of the hidden homeless group. Again this highlights the need to work with community groups in order to engage with these marginalised groups.

Section 4: Assessing the impacts on different groups and service delivery

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>The delivery plan which sits underneath the council's new strategy includes activities which support all age groups, and with specific actions to support young people who may have particular needs or who may be vulnerable. This includes implementing a joint protocol with Adults and Children's Social Care Services to support young people aged 16-17 years who are homeless or at risk of becoming homeless. The delivery plan intends to continue building on the council's existing mediation work with families given the high incidence of young people approaching the council for housing advice and support as a result of family relationship breakdown (the biggest reason for presenting to the council/last settled accommodation). This will ensure that support is provided and that better outcomes are available for this group. The piloting of two new grant schemes – Cost of Living and Find Your Own PRS accommodation are also measures which will increase access to private rented accommodation which should contribute to the council's efforts to reduce and negate the need for temporary accommodation to relieve homelessness among this group.</p> <p>We recognise that around 25% of approaches who are owed a duty are made by households</p>

Appendix 3 – Equality Impact Assessment

				<p>with dependent children. Actions within the Delivery Plan to meet the priorities of the new strategy intend to provide more upstream prevention service in children’s centres, with a specialist housing adviser embedded within Children’s Social Care services. The Housing Options Service will work in partnership with Children’s Social Care services in the council to increase early intervention on cases where homelessness risks exist.</p>
<p>Disability (Physical, learning difficulties, mental health and medical conditions)</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Housing and homeless prevention advice and support to relieve homelessness and rough sleeping is available to all.</p> <p>The delivery plan includes specific work to explore early homelessness prevention and support options for those with poor health outcomes by reviewing the hospital discharge policy and identifying trends, particularly in relation to cases of repeat homelessness, to understanding who may require more support than others to sustain a tenancy in the future.</p> <p>In addition, the council will be seeking to improve access to health and social care services and the associated outcomes for people rough sleeping through the Homelessness and Rough Sleeping Health Strategic Group and putting into place activities from within the action plan arising from the council’s Rough Sleeping Health Needs Assessment (2024).</p> <p>We will work in collaboration with Mental Health, Substance Misuse and Social Care services within the council to put in place coordinated referral pathways, ensuring that service users receive holistic support.</p> <p>To aid partnership working, we will implement co-location of</p>

Appendix 3 – Equality Impact Assessment

				<p>housing advice surgeries and host regular multi-disciplinary meetings with key stakeholders</p> <p>Disabled households will particularly benefit from the actions in the delivery plan which support the priority (2) which seeks to ensure that the council provides good quality accommodation for people who are at risk of, or where they become, homeless as the Service works to improve the health and wellbeing of all residents who need this support.</p>
Sex	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The Homelessness and Rough Sleeping Strategy identifies a series of priorities to respond to homelessness and rough sleeping in the borough. These priorities do not differentiate on the grounds of gender. The delivery of the strategy will have a positive impact on both homeless men and women alike and identifies that female-specific supported accommodation needs to be addressed. The Strategy will have a positive effect on women who are over-represented among homeless households through tackling and preventing homelessness and meeting housing need. Providing comprehensive advice services across all tenures will also benefit women at risk of domestic violence, and those at most risk through the impact of the cost of living crisis.</p> <p>Activities within the delivery plan intend to improve the customer journey of all applicants irrespective of their gender. Under Priority 5, the council intends to build on the existing provision for women rough sleepers to ensure more routes into services and off the streets for women, including learning</p>

Appendix 3 – Equality Impact Assessment

				from the Women's Rough Sleeping Census.
Gender reassignment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Transgender people may be less visible and are more likely to be a part of the hidden homeless cohort. Transgender people often experience abuse by family members, meaning the focus on customer wellbeing will benefit this group. Our delivery plan which supports the strategy will include actions to ensure that our Housing Options Service supports and responds to the needs of LGBTQI+ people, including those from marginalised groups, such as ethnic minorities, trans and disabled LGBTQI+ people through the activities we will deliver under Priority 3 – Improving customer service and the individual's experience.</p> <p>We will work with partner services in the council to provide effective support for young LGBTQI+ people who are or at risk of homelessness. We will ensure that LGBTQI+ young people are given assistance to access support from tailored services. We will review the data available to the council and work with partners to understand the scale and challenges of youth LGBTQI+ homelessness and take interventions to improve our provision wherever possible as part of our ongoing delivery plan.</p>
Marriage and civil partnership	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No adverse or disproportionate impacts are anticipated for this characteristic, unless they identify with one or more other protected characteristics which are affected.
Religion or philosophical belief	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The priorities contained within the Homelessness and Rough Sleeping Strategy are not anticipated to disproportionately impact on an individual's religion or beliefs.

Appendix 3 – Equality Impact Assessment

<p>Race</p>	<p><input checked="" type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p>The priorities of the new strategy and the Delivery Plan which supports it will be applied equally among all protected characteristics. Working in partnership with other organisations and particularly through more outreach work, could lead to more approaches and engagement from minority groups, that may currently be hidden homeless or staying in otherwise unsatisfactory living arrangements.</p> <p>Activities under Priority 3 intend to deliver a higher quality of advice across a variety of channels – including working to ensure that translation services are available and easy to use. Applicants whose first language is not English will benefit from this additional support which will enhance their understanding of what is often a lengthy and complicated journey.</p>
<p>Sexual orientation</p>	<p><input checked="" type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p>LGBTQI+ people may be more likely to be a part of the hidden homeless group. The council supports any person who approaches the service and will work with and support them to prevent or relieve their homelessness. The delivery plan includes a review of the challenges and the support available to households with protected characteristics.</p>
<p>Pregnancy and maternity</p>	<p><input checked="" type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p>Homelessness legislation provides protection to residents who are pregnant or have dependent children, recognising these applicants as having a priority need.</p> <p>The activities in the delivery plan which fall under Priority 1 that intend to provide an upstream prevention service located in children's centres to deliver early advice among other more generic improvements to the customer journey which apply to</p>

Appendix 3 – Equality Impact Assessment

				all residents seeking advice and assistance from the Housing Options Service.
Other				
Socio-economic	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The impact of social and economic deprivation is recognised as a factor in causing homelessness. Homeless people are amongst the most vulnerable in terms of socio-economic status with very few people being in employment. The delivery plan will identify actions to try to address worklessness and to assist homeless people into training, education or employment where possible. Locally focussed actions within the delivery plan have been identified to better tackle homelessness for households in this specific group. Losing your home or being threatened with homelessness causes stress, anxiety and poor health. This proposal will bring a positive impact to people who face homelessness/ rough sleeping as priority one focuses on prevention in the worst affected areas therefore reducing the number of people losing their home. Many people experiencing rough sleeping / homeless people suffer with poor physical and mental health.
Parents/Carers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Parents and carers may have limited time to approach the council for housing advice. The Housing Options Service intends to extend its opening hours which aims to ensure that housing advice and support is available at times which are more suitable for residents with these responsibilities.
People with different Gender Identities e.g., Gender fluid, Non-Binary etc	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	People with different gender identities are more likely to be a part of the hidden homeless cohort.

Appendix 3 – Equality Impact Assessment

Any other groups	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No other groups have been identified who might experience an adverse or disproportionate impact.

Section 5: Impact analysis and action plan

N/A



Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Update on progress

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 