

Equality impact assessment form

Directorate- Communities and Place

Service area – Strategic Housing

Name of policy, strategy, review or function being assessed- Homelessness and Rough Sleeping Strategy 2020-25

Date of assessment- 22nd November 2019

Name of Head of Service signing it off- Ian Fullagar

Decision of Cabinet, Personnel Committee or Chief Officer Group

January 2019



Derby City Council



Equality impact assessment – please read this section first before you do the assessment

This is our equality impact assessment form to help you equality check what you are doing when you are about to produce a new policy, review an older one, write a strategy or plan or review your services and functions. In fact you need to do an equality impact assessment whenever a decision is needed that affects people and **before** that decision is made.

So why do we need to do equality impact assessments? Although the law does not require us to do them now, the courts still place significant weight on the existence of some form of documentary evidence of compliance with the **Public Sector Equality Duty** when determining judicial review cases. This method helps us to make our decisions fairly, taking into account any equality implications, so yes we still need to do them.

The Public Sector Equality Duty is part of the Equality Act 2010 and this Duty requires us as a public body to have '**due regard**' to eliminating discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act. It requires us to advance equality of opportunity and foster good relations between people who share a '**relevant protected characteristic**' and people who don't.

Having 'due regard' means:

- removing or minimising disadvantages suffered by people due to their protected characteristics
- taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people
- encouraging people with certain protected characteristics to participate in public life or in other activities where the participation is disproportionately low.

The protected characteristics are:

- age
- disability
- gender identity
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

This completed form should be attached to any Chief Officer Group, Cabinet or Personnel Committee report to help elected members make their decisions by taking the equality implications into account. Equality impact assessments **must be done before** decisions are made. Include the Cabinet or Personnel Committee's decision on the front sheet when you know it.

You'll find that doing these assessments will help you to:

- understand your customers' and communities needs
- develop service improvements
- improve service satisfaction
- demonstrate that you have been fair and open and considered equality when working on re-structuring
- make sure you pay due regard to the requirements of the Public Sector Equality Duty.

Don't do the form by yourself, get a small team together and make sure you include key people in the team such as representatives from our Diversity Forums and employee networks and you could invite trade union representatives too – the more knowledge around the table the better. You also need to decide how and who you will consult with to help inform the equality impact assessment. Our Lead on Equality and Diversity can help with useful contacts – we have a team of people who are used to doing these assessments and can help with information on barriers facing particular groups and remedies to overcome these barriers.

You'll need to pull together all the information you can about how what you are assessing affects different groups of people and then examine this information to check whether some people will be negatively or positively affected. Then you'll need to look at ways of lessening any negative effects or making the service more accessible – this is where your assessment team is very useful and you can also use the wider community. Against every negative impact you will need to complete the mitigation section to explain how you will lessen the impact.

Agree an equality action plan with your assessment team, setting targets for dealing with any negative effects or gaps in information you may have found. Set up a way of monitoring these actions to make sure they are done and include them in your service business plans.

When you have completed the assessment, get it signed by your Head of Service or Service Director and **send it to our Lead on Equality and Diversity for checking and to publish on our website.** It is a public document so must not contain any jargon and be easy to understand.

Remember, we need to do these assessments as part of our everyday business, so we get our equality responsibilities right and stay within the law – Equality Act 2010.

Equality groups and protected characteristics

These are the equality groups of people we need to think about when we are doing equality impact assessments and these people can be our customers or our employees and job applicants...

- Age equality – the effects on younger and older people
- Disability equality – the effects on the whole range of disabled people, including Deaf people, hearing impaired people, visually impaired people, people with mental health issues, people with learning difficulties, people living with autism and people with physical impairments
- Gender identity – the effects on trans people
- Marriage and civil partnership equality
- Pregnancy and maternity equality - women who are pregnant or who have recently had a baby, including breast feeding mothers
- Race equality – the effects on minority ethnic communities, including newer communities, Gypsies and Travellers and the Roma community
- Religion and belief or non-belief equality – the effects on religious and cultural communities, customers and employees
- Sex equality – the effects on both men and women and boys and girls
- Sexual Orientation equality – the effects on lesbians, gay men and bisexual people

Contact for help

Ann Webster – Lead on Equality and Diversity

ann.webster@derby.gov.uk

Tel 01332 643722 Minicom 01332 640666 Mobile 07812301144

The form

We use the term 'policy' as shorthand on this form for the full range of policies, practices, plans, reviews, activities and procedures.

Policies will usually fall into three main categories...

- Organisational policies and functions, such as recruitment, complaints procedures, re-structures
- Key decisions such as allocating funding to voluntary organisations, budget setting
- Policies that set criteria or guidelines for others to use, such as criteria about school admissions, procurement methods, disabled facilities grants, on street parking bays

If in doubt – it's better and safer to do an Equality Impact Assessment than not to bother! You never know when we may get a legal challenge and someone applies for Judicial Review.

What's the name of the policy you are assessing?

Homelessness and Rough Sleeping Strategy 2020-25

The assessment team

Team leader's name and job title – Angelina Novakovic, Housing Strategy Development Officer

Other team members

Name	Job title	Organisation	Area of expertise
Angelina Novakovic	Housing Strategy Development Officer	DCC	Strategic Housing
Phil Taylor	Consultant	Derby Homes	Homelessness
Bob MacDonald	Vice Chair of Derby Homes	Derby Homes	Housing and Homelessness
Lesley Buxton Kay	Member of Customer Voice	Derby Homes	Housing and Homelessness

Name	Job title	Organisation	Area of expertise
Glynnis Hawkes	Senior Housing Advisor	Derby Homes and Padley	Homelessness
Bob Owusu	Member of Race Equality Hub and Business Owner	Race Equality Hub	General Housing and Race equality
Nezrine Hudson	Member of Citizens Plus Forum and Volunteer at Nightshelter	Citizens Plus Forum	Homelessness

Step 1 – setting the scene

Make sure you have clear aims and objectives on what you are impact assessing – this way you keep to the purpose of the assessment and are less likely to get side tracked.

- 1 What are the main aims, objectives and purpose of the policy? How does it fit in with the wider aims of the Council and wider Derby Plan? Include here any links to the Council Plan, Derby Plan or your Directorate Service Plan.**

The new draft Homelessness and Rough Sleeping Strategy 2020-25, sets out our vision for tackling homelessness and rough sleeping in Derby over the next 5 years. This is the first time we are producing a homelessness strategy that is joint with a rough sleeping strategy. We believe this will enable us to meet the needs of the most disadvantaged and complex members of our community.

In order to write the new strategy, we have carried out a full review of homelessness in our area. In 2018, the Homelessness Reduction Act was introduced, placing additional duties on local authorities in respect of the provision of services and the assessment and relief of homelessness. The duties now placed on local authorities are considerable and it is only through effective partnership working and shared vision, that we can meet the ambitions of the Homelessness Reduction Act.

In brief, the biggest changes within the new strategy, which reflect the new Act, include:

- The prevention of homelessness
- The duty to relieve homelessness
- A duty to make an assessment of housing and support needs, producing a personal housing plan.

The outcome of the Homelessness Review has helped us to target our action plan to meet the needs within our city. More recently, homeless applications have doubled, with the main reasons for homelessness staying broadly similar. We have therefore focused our strategy on the delivery of two action plans:

- Homelessness Strategy Action Plan
- Rough Sleeping Action Plan.

By focussing on these two action plans, we are able to separate out the complex needs of rough sleepers with a targeted set of initiatives.

The priorities within the Homelessness Action Plan and Rough Sleeping Action Plan are based around three main priorities, namely:

- Prevention: this is about our work to prevent homelessness and people at risk of becoming homeless. This includes how we identify households at risk of homelessness, the help and information we make available to them and how we work together in effective partnerships
- Supply: The actions under this theme will seek to ensure there is sufficient and appropriate accommodation to meet need and we must work across a range of tenures and make the best use of resources
- Support: We must ensure there are sufficient and appropriate support services to meet the needs of homeless people in accessing and maintaining accommodation.

The new Strategy links with the Council's broader Housing Strategy and its wider plan to provide safer homes and communities.

2 Who delivers/will deliver the policy, including any consultation on it and any outside organisations who deliver under procurement arrangements?

The Homelessness and Rough Sleeping Strategy will be a corporately adopted strategy, which will be delivered by Derby Homes who run and manage the Housing Options Service on behalf of DCC. It contains a number of objectives which will be delivered by a range of services within Derby Homes and the council, primarily within Housing Options, Strategic Housing, Commissioning, and supported by the actions of external partner agencies including charitable and voluntary groups and organisations.

The Homelessness Liaison Forum will be the main operational delivery group that will oversee the delivery of this strategy and work to ensure the action plans are completed. The partnership forum is open to representatives of organisations working with homeless people in Derby.

The Strategic Homeless and Safe Housing Board provides governance through senior members of statutory agencies. Members include registered social housing providers, Derbyshire Police and Crime Commissioning, DWP, Adult Social Care, Children's Social Care, Youth Offending Service, Public Health and Probation and Community Rehabilitation. Consultation, oversight, monitoring, and responsibility for any future revisions of the strategy will be lead by Strategic Housing and Derby Homes.

3 Who are the main customers, users, partners, employees or groups affected by this proposal?

The main customers of this strategy will be all people who are homeless or at risk of becoming homeless, and will include single people and families. For people who are either physically or mentally disabled or elderly, this may also include their carers.

Step 2 – collecting information and assessing impact

- 4 Who have you consulted and engaged with so far about this policy, and what did they tell you? Who else do you plan to consult with? – tell us here how you did this consultation and how you made it accessible for the equality groups, such as accessible locations, interpreters and translations, accessible documents.**

A consultation plan has been developed with Consultation Officers in the Communications team. Widespread promotion has taken place via a press release, e-media such as the council's website (Your City, Your Say) In Touch, Twitter and iDerby – this was to ensure that as large a group of people as possible knew that the consultation was taking place.

A survey is currently taking place with all residents and organisations in the City, which has been made available on the Council's website, In Touch, Your City Your Say and at the library and other locations like Housing Offices throughout the city. The survey is seeking views on the strategy from all residents and relevant organisations and services.

The draft Strategy was also promoted at the Strategic Liaison Group to other registered providers of housing and other local service providers

The Council's standard alternative language translation box was put onto the questionnaires circulated and on the website.

Other people/organisations consulted include:

- Elected members
- All members of the Homeless Liaison Forum (see above)
- The Police and Public Health
- Voices for Action
- HLF
- Housing associations and charitable organisations
- All members of the over 60's Forum (previously over 50's Forum), including Age UK
- Disability Hub
- LGBT groups and households
- Local Community Groups representing diversity in the City
- Health and Social Care providers
- Council departments including Adult Social Care and Commissioning
- Members of the public

5 Using the skills and knowledge in your assessment team, and from any consultation you have done, what do you already know about the equality impact of the policy on particular groups? Also, use any other information you know about such as any customer feedback, surveys, national research or data. Indicate by a tick for each protected

characteristic group whether this is a negative or a positive impact. If it's negative, fill in the mitigation section as well to explain how you are going to lessen the impact.

Age

What do you already know?	Positive impact	Negative impact	Mitigation
<p>We know that there is generally insufficient suitable housing options for elderly people, which will meet their needs as they become more immobile and need housing with support and care.</p>	<p>x</p>	<p>X</p>	<p>Actions contained within the draft new Older Persons Housing Strategy prioritise the continuing development of more Extra Care and other suitable housing options designed specifically for older people, with housing initiatives to support older people to stay at home for longer.</p>
<p>Older and younger people do not always have internet access or are able to use it and therefore information and advice online is not always accessible.</p> <p>Sometimes younger people and people who may be homeless are put off by a perceived unwelcoming atmosphere in the main reception area.</p>	<p>X</p>		<p>Actions within the new draft Homelessness and RS Strategy prioritise improving advice and information for older and younger people, to include making information available at relevant organisations and in different ways. Actions include making more information available at Age UK, advice and information at GP surgeries and a focus on children who are carers – strategy action plan to consider what can be done (work with Children for Voices). Also work needs to be done with the Council to improve the 'friendliness' of front line and security staff in the main reception area.</p>

Disability

What do you already know?	Positive impact	Negative Impact	Mitigation
Disabled people who become homeless find it more difficult to access appropriate and affordable housing, as there is a lack of attractive and suitable options for their needs.	x		
Disabled people with learning difficulties can struggle to access advice and information in a way that is appropriate for them and is able to meet their needs.		X	The Action Plan needs to consider what level of information is available and where, and also needs to consider how information is presented.

Gender identity- trans

What do you already know?	Positive impact	Negative Impact	Mitigation
People may experience victimisation or ASB if homeless or living in areas where there is discrimination. Whilst it was reported by the group that people are generally well supported in hostels in the City, it was reported that little information is known about this group and the demand for services.	x	X	The key issue for this group is the lack of information about their needs and demand for services. It has been proposed that the Domestic Abuse Working Group is re-established which can look at gathering information on protected characteristic groups.

Race

What do you already know?	Positive impact	Negative impact	Mitigation
There may be discrimination in particular sectors such as private housing and as such more people may become homeless. Some people may find language barriers in terms of accessing tenancies and understanding terms and conditions of tenancies. Some people may experience discrimination in certain parts of the city or feel socially isolated.	x		
Concern was also expressed by the group that for some people, they have no recourse to public funds.		x	It was felt that work needs to be done (and specified within the action plan) to understand what can be done to support people in this situation.
Travellers who become homeless often have children who are not in education.		x	The action plan needs to consider how we are supporting the educational needs of travelling children who become homeless.

Religion or belief or none

What do you already know?	Positive impact	Negative impact	Mitigation
Some people who are homeless may need to live nearer places of worship and its likely that there is limited social housing available in certain areas. There may be a need for some sensitive allocations.	x		

The group felt that there has been increased sensitivity and prejudice against some faith groups since the Brexit issue.	x	x	The action plan should recognise this issue and promote greater sensitivity when supporting homeless people.
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Sex

What do you already know?	Positive impact	Negative impact	Mitigation
There are higher levels of women experiencing domestic violence than men. There is therefore a higher demand for refuge accommodation and appropriate housing with support for women and their children.	x		
However the group also expressed concern that men experiencing DV are treated less sensitively.		x	There needs to be an action within the strategy around better training for staff working with DV and also a general improved encouragement for men to talk more about their issues.
It was reported by the group that suicide rates around Christmas time increases dramatically for men.		x	The strategy needs to consider facilitating a place for men to be able to talk to people about their feelings – consider venues around the city. Also the strategy should look at how perpetrators of DV can be supported as they often can become isolated from children family and friends.

Sexual orientation

What do you already know?	Positive impact	Negative impact	Mitigation
People may experience victimisation or ASB if living in areas where there is discrimination. Sensitive allocations are required for social housing. The group also felt that there were some issues in hostels, but that support was available now from LGBT groups.	X		

Important - For any of the equality groups you don't have any information about, then make it an equality action at the end of this assessment to find out. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. You can get lots of information on reports done from organisations' websites such as the Equality and Human Rights Commission, Stonewall, Press for Change, Joseph Rowntree Trust and so on. Please don't put down that the impact affects 'everyone the same' – it never does!

6 From the information you have collected, how are you going to lessen any negative impact on any of the equality groups? How are you going to fill any gaps in information you have discovered?

The actions proposed (as listed) to mitigate any negative impact will be considered and incorporated within the Action Plan of the new strategy. A further action is proposed, to be included within the Action Plan – to research and gather more information that the group feel is missing, on particular groups, to enable a better understanding of their needs.

Step 3 – deciding on the outcome

7 What outcome does this assessment suggest you take? – You might find more than one applies. Please also tell us why you have come to this decision?

Outcome 1	No major change needed – the EIA hasn't identified any potential for discrimination or negative impact and all opportunities to advance equality have been taken
Outcome 2	Adjust the policy to remove barriers identified by the EIA or better advance equality. Are you satisfied that the proposed adjustments will remove the barriers you identified?
Outcome 3	Continue the policy despite potential for negative impact or missed opportunities to advance equality identified. You will need to make sure the EIA clearly sets out the justifications for continuing with it. You need to consider whether there are: <ul style="list-style-type: none"> • sufficient plans to stop or minimise the negative impact • mitigating actions for any remaining negative impacts • plans to monitor the actual impact.
Outcome 4	Stop and rethink the policy when the EIA shows actual or potential unlawful discrimination

Our Assessment team has agreed Outcome number(s)

Outcome 3 has been agreed by the group – subject to the proposals cited to lessen or remove any negative impact being progressed within the Action Plan of the new strategy.

Why did you come to this decision?

The group felt that this outcome fairly reflected the discussions that took place. On the whole, the new draft strategy will have a very positive impact on homeless people and on the individual protected groups discussed.

If you have decided on **Outcome 3**, then please tell us here the justification for continuing with the policy. You also need to make sure that there are actions in

the Equality Action Plan to lessen the effect of the negative impact. This is really important and may face a legal challenge in the future.

If you have decided on **Outcome 4** then if the proposal continues, without any mitigating actions, it may be likely that we will face a legal challenge and possibly a Judicial Review on the process - it is really important that the equality impact assessment is done thoroughly, as this is what the Judge will consider.

Step 4 – equality action plan – setting targets and monitoring

8 Fill in this table with the equality actions you have come up with during the assessment. Indicate how you plan to monitor the equality impact of the proposals, once they have been implemented.

Equality Action Plan –setting targets and monitoring

Age

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
Have better housing options Improve the type and range of advice and information available	Improve housing choice Improve access to information and advice	Lead by Homeless Team	Monitored by the Homeless Strategy Action Plan

Disability

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
<p>Improve the number and type of accommodation that is available</p> <p>Improve more appropriate information being made available</p>	<p>Improve housing options</p> <p>Improve accessibility to information and advice</p>	Homeless Team	Under the action plan of the new strategy

Gender identity - trans

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
Re establish the Domestic Abuse Working Group	Gather information/ commission research to promote a better understanding	Homeless Team	Action Plan of new Strategy

Race

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
<p>Gather more information to understand the issues</p> <p>Consider how travelling children can access education</p>	<p>Promote a better understanding</p> <p>Improve life chances</p>	Homeless Team	Action Plan of the new Strategy

Religion or belief or none

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
Promote better sensitivity around prejudice towards certain faith groups	Communities can live in harmony	Homeless Team	Action Plan in new Strategy

Sex

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
<p>Promote a better understanding about men experiencing DV</p> <p>Explore finding suitable venues in the city for men to talk about their feelings</p>	<p>Improve DV services and outcomes for men</p> <p>Reduce suicide rates amongst men in the City</p>	Homeless Team	Action Plan within the new Strategy

Sexual orientation

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
Promote that support is available from LGBT groups	People will feel supported about their experiences	Homeless Team	Action Plan within the new draft Strategy.

We can give you this information in any other way, style or language that will help you access it. Please contact us on: 01332 643722
Minicom: 01332 640666

Polish

Aby ułatwić Państwu dostęp do tych informacji, możemy je Państwu przekazać w innym formacie, stylu lub języku.

Prosimy o kontakt: **01332 643722** Tel. tekstowy: 01332 640666

Punjabi

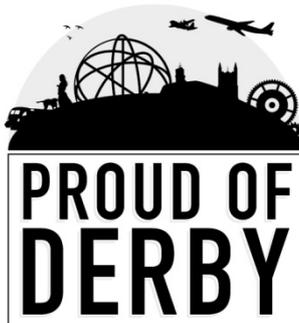
ਇਹ ਜਾਣਕਾਰੀ ਅਸੀਂ ਤੁਹਾਨੂੰ ਕਿਸੇ ਵੀ ਹੋਰ ਤਰੀਕੇ ਨਾਲ, ਕਿਸੇ ਵੀ ਹੋਰ ਰੂਪ ਜਾਂ ਬੋਲੀ ਵਿੱਚ ਦੇ ਸਕਦੇ ਹਾਂ, ਜਿਹੜੀ ਇਸ ਤੱਕ ਪਹੁੰਚ ਕਰਨ ਵਿੱਚ ਤੁਹਾਡੀ ਸਹਾਇਤਾ ਕਰ ਸਕਦੀ ਹੋਵੇ। ਕਿਰਪਾ ਕਰਕੇ ਸਾਡੇ ਨਾਲ ਟੈਲੀਫੋਨ **01332 643722** ਮਿਨੀਕਮ 01332 640666 ਤੇ ਸੰਪਰਕ ਕਰੋ।

Slovakian

Túto informáciu vám môžeme poskytnúť iným spôsobom, štýlom alebo v inom jazyku, ktorý vám pomôže k jej sprístupneniu. Skontaktujte nás prosím na tel.č: **01332 643722** Minicom 01332 640666

Urdu

یہ معلومات ہم آپ کو کسی دیگر ایسے طریقے، انداز اور زبان میں مہیا کر سکتے ہیں جو اس تک رسائی میں آپ کی مدد کرے۔ براہ کرم **01332 643722** منی کام 01332 640666 سے رابطہ کریں۔



Derby City Council