

LBBB

Equality Impact Assessment - Temporary Accommodation Placements Policy

Stage 1 – Scope of the equality Impact Assessment

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| 1 Directorate | Housing Advice Service, Housing Strategy |
| 2. Policy / Strategy / Service to be assessed: | Temporary Accommodation Placements Policy |
| 3. Lead Officer: | Anne Baldock |
| 4. Equality Impact Assessment Person / Team: | Lauren Stretch |
| 5. Date of Assessment: | 29 September 2014 |
| 6. The main purpose and outcomes of policy/strategy / service to be assessed | <p>The Council has a statutory duty to assist households presenting as homeless where they are eligible for assistance and in priority need.</p> <p>This policy relates to the temporary or emergency accommodation that is provided to customers who meet this criteria. The policy is used as a guide to decide what accommodation is allocated to particular customer including the use of out of borough accommodation.</p> |
| 7. Groups who the piece of work should benefit or apply to, for example: <ul style="list-style-type: none"> - Service users - Staff - Other internal or external stakeholder | <p>This policy will affect customers who are approaching the housing advice service as homeless and are to be provided with accommodation.</p> <p>The policy will also benefit the Accommodation Team who will be able to make placements in a more structured way. It will also benefit various stakeholders (who are listed later in this assessment) to understand the criteria in which placements are made and accommodation is allocated.</p> |
| 8. Any associated strategies or guidelines i.e. legal/national /statutory | <p>This Policy 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.</p> <p>This policy takes into account 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 2006. It also has reference to Section 208 of the Housing Act 1996.</p> |

Stage 2 - Gathering Information

| 1. Who should be served by the policy / strategy / piece of work? | | |
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| This policy will affect customers who are approaching the housing advice service as homeless and are to be provided with accommodation, and those customers who are currently already residing in temporary accommodation. | | |
| 2. What relevant information do you have about the people who this piece of work is aimed at? | | |
| All information is obtained from the Capita Housing System relating to the data held on customers currently residing in some form of temporary accommodation provided by the Council. We do not believe this data would widely change with future customers approaching for assistance however new figures would be collated with each review of the Policy and this EIA. | | |
| <i>All data shown below, relates to the lead applicant only, however households may consist of more than one adult.</i> | | |
| Equality Groups | Information (research / data) | Known or potential inequalities |
| Ethnicity | <p>African = 455 White British =342 Other White =138 Not Stated = 82 Caribbean = 59 Other = 47 Pakistani = 42 Bangladeshi =39 Other Black =29 Black British =24 Mixed White/Black Caribbean = 23 Other Asian = 21 Mixed White/Black African = 20 White Irish = 16 Indian = 14 Mixed White/Asian = 10 Other Mixed = 8 Chinese = 1</p> | <p>We recognise that a significant proportion of customers in temporary accommodation are from the BME community. Customers from some ethnic backgrounds have raised issues about the need to be close to their community/ the area where they currently live and potential inequality of them being moved to other areas further away.</p> <p>Whilst this has been taken into consideration, we are simply not able to provide enough accommodation to meet people's aspirations. However there is a case by case assessment of need and the policy has addressed this by allowing any customers access to the Rent Deposit Scheme and therefore if they do not wish to live long term in the area that they have been placed, they are able to continue to look for alternative accommodation through this scheme.</p> |
| Gender | <p>Male = 335 Female = 1035</p> | <p>There are a significantly higher number of female applicants than males and it is known that a large number of these cases are single mothers. Potentially applicants moving out of</p> |

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| | | borough could be further away from their support networks, however with the Policy we would look to ensure that this distance is manageable. However by the same token, many of these cases are the ones who struggle the most financially and moving to accommodation in cheaper areas will help these cases reduce the financial burden on the family. |
| Disability | <p>There are 21 cases in temporary accommodation that are currently registered as needing an adapted property.</p> <p>There were also 315 single applicants in temporary accommodation all of whom have a priority need and therefore likely to have some level of disability relating to either their mobility or mental health.</p> | Due to individual needs for customers in this area, the potential inequality in this area is us being unable to provide suitable accommodation that meets their needs. The policy recognises this and has been developed in conjunction with our Occupational Therapist. Customers in need of physical adaptations will be registered for a Direct offer of Council Accommodation, which is addressed in the Council's Allocations Policy. |
| Age | <p><18 = 6 18 – 29 = 469 30 – 47 = 726 48 – 65 = 153 >65 = 38</p> | <p>There are a small number of cases under 18 and these have been identified as unsuitable for B&B accommodation. These cases would normally be kept in our hostels and not moved out of borough due to the on-going input from Children's Services. Similarly with elderly applicants, cases would be looked at on an individual basis for example many cases would be referred for sheltered accommodation within the borough.</p> <p>Almost all cases in accommodation fall within the working age bracket and therefore we do not feel that this category would have any potential other inequalities.</p> |
| Religion and Belief | Not enough data captured on applicants to analyse | No potential inequalities identified in this area |
| Sexual Orientation | Not enough data captured on applicants to analyse | No potential inequalities identified in this area |
| Maternity and Nursing Mothers | As of 01/10/2014 there were 72 cases showing as pregnant, with a further 108 who did not provide an answer to this question. | Same issues identified as with Gender. |
| <p>3. Do you have enough information about the different groups to inform an equality impact assessment? Yes as described above the data relates to all customers in our accommodation and we do not foresee any major changes that would affect these levels in the near future.</p> | | |
| <p>4. Do you have monitoring data or consultation findings specific to your area of work? Yes – Evidence source is data held about our customers in accommodation from the Capita Housing System.</p> | | |
| <p>5. What consultation activity has taken place / will be taking place on this piece of work and the Equality Impact Assessment? Consultation has taken place across the housing advice service, including the Housing Options Service, Choice Homes and</p> | | |

with our Review and Policy Manager and Occupational Therapist. We have also consulted with our current managing agents on their ability to provide the necessary properties. We have also trialled the placements with a limited number of customers to ensure that placements are suitable and to deal with any issues that have arisen. Now that the placements criteria has been finalised it is our intentions to consult with the stakeholders and representatives of the affected groups, this includes:

- Children's Services
- Education Section including the Access and Attendance Officer
- Adult Services including Mental Health and Complex Needs
- KRI and KCA (Drug and Alcohol Support Services)
- Faith Groups
- Tenant and Resident Associations

Stage 3 – Assessing the Impact

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| 1. | What does your monitoring data on your service users tell you? Are any groups under or over represented compared to what you would expect to see. | |
| | Ethnicity | The breakdown in this area has changed to large extent in recent years; however this does correlate to the wider statistics for the borough as a whole. There is a mix of people which we would expect to see. |
| | Gender | The split of males to females is quite significant, however this is not unsurprising. A large proportion of customers we deal with have children and therefore the females are usually represented as the main applicant. |
| | Age | The majority of our clients fall within the working age category which is what we would expect to see, however we are seeing an increase in older people coming through the service whose existing accommodation is no longer suitable. |
| | Disability | Numbers of disabled customers approaching the service requiring accommodation is still relatively low in comparison to overall numbers; however we are seeing an increase recently in the severity of issues that customers are presenting with. |
| | Sexual Orientation | Data is not collected in this area, so impact cannot be fully quantified; however no issues have been identified in this area in relation to the implementation of the policy. |
| | Religion and belief | Data is not collected in this area, so impact cannot be fully quantified; however no issues have been identified in this area in relation to the implementation of the policy. |

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| | Pregnant and Nursing Mothers | As this period is time limited and ever changing it is hard to capture accurate data in this area and numbers reported are lower than expected. |
| 2. | Based on the evidence gathered have you identified any potential differential impact for any of the equality groups? What are the potential access issues or barriers for people in each of the equality groups? | |
| | Ethnicity | There are no potential barriers to any of these groups, as accommodation is provided in line with Homelessness Legislation. However as described above, customer have raised issues with being moved away from their community networks, although an alternative solution is offered to people within the policy in relation to the Rent Deposit Scheme. |
| | Gender | Homelessness legislation can indirectly discriminate against males, as single males with no priority need would not be placed and this can be a barrier, however whilst our accommodation may not be offered, there are other options available for cases such as this and information is provided by the Housing Options Service to assist with this. |
| | Disability | As described above there can be issues with sourcing appropriate and suitable accommodation for customers needs and this can be a barrier to this group, however numbers in this area are relatively low and cases are dealt with on an individual basis with the assistance of other stakeholders to resolve issues to the best of our ability. |
| | Age | The only potential barrier in this group is those cases under the age of 17, who will not be placed by this Policy. As per legislation these are the responsibility of Children's Services and are therefore placed under a different policy. |
| | Religion and Belief | As accommodation is provided in line with Homelessness legislation it is not felt that there are any potential access barriers in this group, however as with Ethnicity certain groups may feel a differential impact in being moved away from their community. |
| | Sexual Orientation | As accommodation is provided in line with Homelessness legislation it is not felt that there are any potential access barriers in this group. |
| | Pregnant and nursing mothers | Homeless legislation may positively discriminate against this group, as are more likely to meet the necessary criteria of being in priority need. There are therefore no access issues in this group. |
| | Socio economic | Some of the customers that we deal with are likely to be some of the poorest in our society, and whilst there is no barriers to them accessing the scheme, accommodation |

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| | <p>provided can still be expensive and sometimes unaffordable. This Policy has looked to address this by widening the options available to customers who fall in this bracket and procure and place people in accommodation outside of London where rents are cheaper and more affordable.</p> |
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Stage 4 - Promoting Equality

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| 1. | <p>What has been done to promote equality in this piece of work? This includes any measures you've put in place to:</p> <ul style="list-style-type: none"> <input type="checkbox"/> <input type="checkbox"/> Improve the accessibility of your service <input type="checkbox"/> <input type="checkbox"/> Improve the quality of outcomes for people from different groups <input type="checkbox"/> <input type="checkbox"/> Make your service/policy/strategy more inclusive <input type="checkbox"/> <input type="checkbox"/> Ensure staff are trained appropriately <input type="checkbox"/> <input type="checkbox"/> Promote community cohesion or good relationships between different groups of people. <p>(Think about physical access, communications needs, staff awareness, partnership working)</p> <p>This policy has been created to assist the Accommodation Team in making placements fairly and consistently and to reduce the likelihood of inequality for customers who are provided with accommodation. Customer's circumstances will be considered on an individual basis; however categories where special consideration has been given have been outlined in the report. The Housing Advice Service is accessible for all, however customers who are affected by this policy is limited to those that have been assessed as requiring temporary or emergency accommodation, which is outlined in the legislation.</p> <p>It is our view that this Policy will inform customers 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> |
| 2. | <p>How have you consulted on this Equality Impact Assessment?</p> <p>As described above we have consulted extensively across our service area, looking at relevant legislation to ensure that the Policy complies. This consultation has included our managing agents, Housing Options Services, Reviews and Policy Manager and Occupational Therapist. We have also had informal discussions with other stakeholders, who represent the customers who would be affected, in order to inform the scope of the Policy and it is now our intention to consult these groups formally to advise of the proposal.</p> |
| 3. | <p>How will the outcomes from this EIA be managed and monitored - all of the proposed equality outcome should be managed through the service plans</p> <p>Any outcomes from the EIA will be managed and monitored through the Temporary Accommodation Service Plan and the Accommodation Manager will be the lead on ensuring that these actions are completed.</p> |

