

# EQUALITY IMPACT ASSESSMENT AND ANALYSIS (EqIAA)

## HOMELESSNESS REVIEW & STRATEGY 2019 - 2024

### SECTION 1 - INTRODUCTION

#### **Homelessness - Local Authority Duties**

A local authority has a duty to provide advice and information about homelessness and the prevention of homelessness. This includes information on the rights of people, who are homeless, or threatened with homelessness, as well as the help that is available from the housing authority, or other organisations and how to access that help.

The Homelessness Reduction Act 2017, which came into force on 3<sup>rd</sup> April 2018, significantly reformed England's homelessness legislation by placing duties on local authorities to provide homelessness services to all those affected and to intervene at an earlier stage to prevent homelessness in their area. It also introduced a statutory 'duty to refer' on certain public organisations to refer clients, who are homeless, or threatened with homelessness to the local authority. Further information can be found in the [Homelessness Code of Guidance for Local Authorities](#) published by the Ministry of Housing, Communities & Local Government.

#### **Aim of the Strategy**

Under the Homelessness Act 2002, all housing authorities must have a Homelessness Strategy in place based on a review of all forms of homelessness in their district. The Strategy must be renewed at least every five years. The Strategy must set out the authority's plans for the prevention of homelessness and for securing that sufficient accommodation and support are, or will be available for people who become homeless, or who are at risk of becoming homeless.

## SECTION 2 - RESEARCH AND CONSULTATION

### RESEARCH

#### National Information

Annual homelessness acceptances have steadily increased since 2009/10. In 2016/17, 59,000 homelessness duties were accepted across England, which is 48% higher than 2009/10.

The vast bulk of the recently recorded increase in statutory homelessness is attributable to the sharply rising numbers made homeless from the private rented sector.

Since 2010/11, homeless placements in temporary accommodation have also risen sharply by 71% up to June 2018.

The lower overall benefit cap imposed in November 2016 has also had a far greater impact than the initial cap, tripling (to c. 61,000) the numbers of households impacted in England.

People from ethnic minorities are at higher risk of homelessness in England. Between 2006/07 and 2016/17, people from ethnic minorities accounted for 28.4% of all homeless households in England (Cabinet Office, 2017) compared with 14% of the population of England and Wales from an ethnic minority background (ONS, 2012). Of homeless households in 2016/17, 16% were Black, 9% were Asian, 3% were from a Mixed ethnic background, and 5% were from an Other ethnic minority group (Cabinet Office, 2017).

Shelter estimates that around 128,000 children in Britain were homeless in 2017, the highest figure in a decade.

The Equality and Human Rights Commission produced their latest report entitled "Is Britain Fairer? The state of equality and human rights 2018" in December 2018. The report provides the following information:

*Britain-wide literature reviews found that being at risk of homelessness is associated with being at risk and with other disadvantages. Although the causes vary, people at particular risk of homelessness include lone parents, young care leavers, young offenders, ethnic minorities (Watts et al., 2015), LGBT young people (Watts et al., 2015; Albert Kennedy Trust, 2015; Homeless Link, 2018), those with mental health conditions, women at risk of domestic abuse and ex-service personnel (Just Fair, 2015).*

*Living in material deprivation or in a deprived neighbourhood also increases risk of homelessness (Watts et al., 2015) and experiencing poverty in childhood increases an individual's likelihood of being homeless as an adult (Fitzpatrick and Bramley, 2017).*

*Official counts of people sleeping rough in England on a single night 'snapshot' show that numbers have risen each year since 2010, from 1,768 to 4,751 in 2017 (MHCLG, 2011; 2018a).*

*The number of households recorded as homeless by local authorities in England has fluctuated: 56,500 in 2015, 59,260 in 2016 and 57,890 in 2017, an overall increase of 2.5% (MHCLG, 2018b). The number of households in temporary accommodation increased 14% between 2015 and 2017, to 78,930 (MHCLG, 2018c). Most households (66%) accepted as statutorily homeless in England in 2017 had dependent children (MHCLG, 2017b).*

*Prior to the Homelessness Reduction Act 2017, certain homeless people in England and Wales were considered to be in 'priority need' and so had a statutory entitlement to be rehoused by their local authority. This included pregnant women and single parents (most of whom are women)... In England, 47% of all households accepted as statutorily homeless in 2014/15 were lone parent households*

headed by women, and a further 10% were single women (Watts et al., 2015). These proportions (47% and 10%) remained the same in 2017 (MHCLG, 2018d).

People from ethnic minorities are at higher risk of homelessness in England. Between 2006/07 and 2016/17, people from ethnic minorities accounted for 28.4% of all homeless households in England (Cabinet Office, 2017) compared with 14% of the population of England and Wales from an ethnic minority background (ONS, 2012). Of homeless households in 2016/17, 16% were Black, 9% were Asian, 3% were from a Mixed ethnic background, and 5% were from an Other ethnic minority group (Cabinet Office, 2017).

Shelter estimates that around 128,000 children in Britain were homeless in 2017, the highest figure in a decade. Of these, one in 11 lived in 'emergency accommodation' provided by their local authority, for example a bed and breakfast or hostel where they shared a kitchen and bathroom with other families (Shelter, 2017b). In England, the number of families with children who were in emergency accommodation for more than the legal six-week limit increased from 910 in 2015 to 1,260 in 2016, and then decreased to 880 in 2017 (MHCLG, 2018e).

In England, people from ethnic minorities are still much more likely to live in overcrowded accommodation compared with White people.

Across Britain, disabled people face a shortage of accessible and adaptable homes and long delays in making existing homes accessible. Our 2018 inquiry found that disabled people across Britain are demoralised and frustrated by the housing system, reporting a severe shortage of accessible houses across all tenures. Disabled people can experience serious deterioration in their mental wellbeing due to living in unsuitable accommodation. There is a chronic shortage of accessible homes, as local authorities are not building enough to meet increasing demand. Installing home adaptations involves unacceptable bureaucracy and delay and disabled people are often left waiting for long periods of time, even for minor adaptations. Disabled people are also not getting the support that they need to live independently as the provision of advice, support and advocacy is patchy and people report that they have nowhere to turn when their housing is unsuitable (EHRC, 2018).

A more hostile housing policy environment towards Gypsies and Travellers in England has been linked to an increase in unauthorised encampments.

The Home Affairs Committee reported that accommodation for asylum seekers is often of a poor standard and does not meet the specific needs of disabled people; pregnant women; families; victims of trafficking, rape or torture; or people with mental health conditions. There are also reports of bullying and threatening behaviour by staff. People can be moved to new accommodation with little notice, ending established relationships with support services (Home Affairs Committee, 2017). The UK Government disagreed with the findings but expressed a commitment to develop performance standards to improve the welfare of asylum seekers in accommodation (UK Government, 2017). Newly recognised refugees are at high risk of homelessness as accommodation is withdrawn after a 28 day 'move on' period following granting of their status. However, barriers to the private rental market (such as lack of income or savings for a deposit) and low likelihood of being considered for social housing can leave many people homeless for some time (All Party Parliamentary Group on Refugees, 2017).

## **South Gloucestershire Information**

From a peak in 2014/15, the number of statutory duties owed to households approaching the council as homeless has slowly reduced, as the council continues to take positive action to support households threatened with homelessness. This has seen an increase in the rate of preventions achieved, although the figure has plateaued in the year to date as the statutory requirements of the Homelessness Reduction Act are bedded in.

In 2013, when the last Strategy was adopted, the number of 16/17 years olds approaching the council as homeless and requiring accommodation under a statutory housing duty was on the increase. Over the last five years, we have seen a significant decrease in these numbers.

Loss of private sector accommodation continues to be the main cause of homelessness followed by parental eviction & non-violent relationship breakdown. This broadly mirrors the national picture.

The private rented market continues to be difficult to access for benefit claimants in South Gloucestershire. On average, there is a shortfall of £150 between average monthly rent and the Housing Benefit Local Housing Allowance for a typical two bedroom home.

The demand for social housing remains high with nearly 4,000 households on the council's housing register. Whilst South Gloucestershire Council has delivered a strong pipeline of affordable homes in partnership with Registered Providers in the district, this has not met the overall demand for housing. In 2017/18, 856 properties were let of which 613 were general needs homes of which 19% were let to homeless households.

The number of rough sleepers identified in the annual rough sleeping estimate in November 2018 was 4. Whilst this figure remains low, especially in comparison with neighbouring Authorities in the West of England, the number of referrals received through Streetlink, the government funded body set up, so that members of the public can report rough sleepers, has been slowly rising.

South Gloucestershire Council recognises that those of its citizens who are roofless are likely to gravitate to the city centre of its larger neighbour, Bristol, in order to access services. Bristol has provided data that, of 951 individual rough sleepers counted in its area during 2018, 9 came from a South Gloucestershire postcode. While the number is low, the impact is high and South Gloucestershire Council is working with its neighbour to ensure that each case is addressed.

## Housing Advice

The tables below show the number of households approaching the council for housing advice by ethnic origin, gender, age and disability.

**NB.** Classifications used are based on Central Government reporting descriptions

<i>Table 1</i>								
No of Housing Advice Approaches (2017-18)	Number by Ethnic Origin						Gender	
	White	Black	Asian	Mixed	Chinese or Other	Not Stated	Male	Female
1918 (100%)	1314 (68%)	55 (3%)	29 (2%)	41 (2%)	26 (1%)	453 (24%)	760 (40%)	1158 (60%)

<i>Table 1A</i>										
No of Housing Advice Approaches (2017-18)	Age							Disability		
	16-24	25-44	45-59	60-64	65-74	75+	Not Stated	Yes	No	Not stated
1918 (100%)	405 (21%)	1042 (54%)	320 (17%)	48 (3%)	50 (3%)	28 (1%)	25 (1%)	274 (14%)	1057 (55%)	587 (31%)

## Homeless Decisions

The tables below show the number of homeless application decisions by ethnic origin, gender, age and disability.

<i>Table 2</i>									
Decision (2017-18)	Number	Number by Ethnic Origin						Gender	
		White	Black	Asian	Mixed	Chinese or Other	Not Stated	Male	Female
Accept	147 (100%)	116 (79%)	2 (1%)	6 (4%)	6 (4%)	2 (1%)	15 (11%)	28 (19%)	119 (81%)
Intentionally Homeless	45 (100%)	33 (73%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	12 (27%)	14 (31%)	31 (69%)
Non Priority	14 (100%)	7 (50%)	3 (21%)	0 (0%)	0 (0%)	0 (0%)	4 (29%)	10 (71%)	4 (29%)
Not Homeless	54 (100%)	35 (65%)	4 (7%)	2 (4%)	1 (2%)	0 (0%)	12 (22%)	24 (44%)	30 (56%)
Not Eligible	2 (100%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	1 (50%)	1 (50%)	1 (50%)	1 (50%)
TOTAL	262 (100%)	191 (73%)	9 (3%)	8 (3%)	7 (3%)	3 (1%)	44 (17%)	77 (29%)	185 (71%)

<i>Table 2A</i>										
Decision (2017-18)	Number	Age						Disability		
		16-24	25-44	45-59	60-64	65-74	75+	Yes	No	Not stated
Accept	147 (100%)	26 (18%)	110 (74%)	10 (7%)	1 (1%)	0 (0%)	0 (0%)	18 (12%)	103 (70%)	26 (18%)
Intentionally Homeless	45 (100%)	8 (18%)	34 (76%)	2 (4%)	0 (0%)	1 (2%)	0 (0%)	4 (9%)	27 (60%)	14 (31%)
Non Priority	14 (100%)	1 (7%)	11 (79%)	2 (14%)	0 (0%)	0 (0%)	0 (0%)	2 (14%)	5 (36%)	7 (50%)
Not Homeless	54 (100%)	12 (22%)	28 (52%)	8 (14%)	2 (4%)	2 (4%)	2 (4%)	8 (15%)	33 (61%)	13 (24%)
Not Eligible	2 (100%)	0 (0%)	2 (100%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	2 (100%)	0 (0%)
TOTAL	262 (100%)	47 (18%)	185 (71%)	22 (8%)	3 (1%)	3 (1%)	2 (1%)	32 (12%)	170 (65%)	60 (23%)

## **CONSULTATION**

### **Pre Consultation**

As part of the review of the council's Homelessness Strategy, officers have consulted with a number of organisations and public bodies about the main issues and challenges facing their services as it relates to housing and homelessness. In addition, feedback has also been obtained from service users, who have approached HomeChoice for housing assistance.

#### **⇒ HomeChoice Customer Feedback**

Feedback was obtained from customers who have contacted HomeChoice for advice and assistance. They were asked to comment on what they had expected before contacting the council, their experience of using the service and the final outcome for them. A summary of the main points from the survey are as follows:

- 83% of households stated that they tried to find their own accommodation, but were unable to do so before visiting the council.
- 40% of service users expected to be offered social housing and 34% thought they would be offered temporary accommodation.
- Of the households who responded, 34% remained in their existing home, or were helped into alternative accommodation with the council's assistance and a further 26% were able to remain at home temporarily giving them a further opportunity to secure alternative housing.
- Over 60% of respondents felt that staff were helpful and friendly and listened to them.
- 85% of households using the service found the advice they were given easy to understand.

#### **⇒ Survey of Partners & Stakeholders**

The survey asked for information on the main issues facing their clients around housing and homelessness issues, the support that partners already offer, the gaps in service provision and how they could be met. The main issues raised included:

- The difficulty that service users found in securing affordable accommodation.
- The importance of access to timely debt & money advice.
- Difficulty in housing clients with complex needs, e.g. drug & alcohol, or offending history.
- Lack of awareness of the total range of support services available in the region.
- Concerns that people may not be digitally included, e.g. no access to bank account, or e-mail address.

### **Outcome of Consultation on Strategic Priorities**

Following the completion of the homelessness review, a set of strategic priorities were proposed to prevent and tackle homelessness in South Gloucestershire. In order to obtain feedback on the proposed priorities, a consultation exercise ran from 22 February 2019 to 21 March 2019. Full details of the consultation can be found by clicking on the following link: [Consultation Page](#)

The consultation included questions in relation to respondent's gender, age, ethnic origin and disability in order that results could be disaggregated and analysed in respect of these protected characteristic groups. A brief summary of these results is set out below.

In total, the council received 24 responses to the survey. The consultation feedback obtained shows the following,

- 79% of respondents agreed with the vision statement with a further 13% neither agreeing nor disagreeing.
- The three main priorities set out in the Strategy were supported by 78% of respondents with a further 17% neither agreeing nor disagreeing.

In addition, the following comments relating to equalities issues were received,

- Identification of those with complex needs is welcomed as is an understanding from the council of how personal, social and cultural barriers for people trapped in homelessness affects their ability to gain and maintain housing and tenancy.
- Young people are especially vulnerable. I hope the action plan will provide special focus on 16-24 year olds.
- Include people with mental health issues.
- The fact that the council wants to treat individuals holistically and to put in place the ability to recognise people that need help.
- Far too many people are facing homelessness with the implementation of UC.
- Homelessness is a very complex issue caused by a variety of reasons. You need to prioritise an individual approach that helps address the individuals issues and provides and helps them keep a new home.
- Helping people bridge the gap between claiming universal credit and receiving it so they don't fall into arrears or are threatened with eviction.
- There is a need for clear signposting to enable people at risk to be able to access help. As South Gloucs is a spread-out area this would need multiple access points.
- It is interesting that most of the enquiries come from women - and yet it is often men that you will find sleeping rough. This stigma for asking for help needs to be addressed.

The tables below set out the equalities profile of respondents,

<b>Gender Profile of Respondents</b>			
	Male	Female	Prefer Not to Say/ Not answered
South Gloucestershire	49.6%	50.4%	---
Consultation	32%	59%	9%

The gender profile of respondents shows that a greater proportion of women responded to the survey when compared to the South Gloucestershire population.

<b>Age Profile of Respondents</b>				
	0-15	16-64	65+	Prefer Not to Say/ Not answered
South Gloucestershire	18.6%	62.7%	18.6%	---
Consultation	0%	60%	37%	5%

The age profile of respondents was broadly in line with the 16-64yrs age group although a greater proportion of respondents aged 65+ completed the survey.

<b>Disability profile of respondents</b>			
	Yes	No	Prefer Not to Say/ Not answered
South Gloucestershire	15.6%	84.4%	---
Consultation	10%	86%	5%

A slightly lower proportion of respondents with a disability responded to the consultation when compared to the South Gloucestershire population.

<b>Ethnic profile of respondents</b>		
<b>Ethnic Group</b>	<b>South Gloucestershire</b>	<b>Consultation</b>
Asian/Asian British - Bangladeshi	0.1%	0%
Asian/Asian British - Indian	1%	0%
Asian/Asian British - Pakistani	0.3%	0%
Asian/Asian British - Chinese	0.5%	0%
Asian/Asian British - Other	0.6%	0%
Black/African/Caribbean/Black British - African	0.4%	0%
Black/African/Caribbean/Black British - Caribbean	0.4%	0%
Black/African/Caribbean/Black British - Other	0.1%	0%
Mixed/Multiple Ethnic Groups - White & Asian	0.4%	0%
Mixed/Multiple Ethnic Groups - White & Black African	0.2%	0%
Mixed/Multiple Ethnic Groups - White & Black Caribbean	0.6%	0%
Mixed/Multiple Ethnic Groups - Other	0.3%	0%
White - English/Welsh/Scottish/Northern Irish/British	91.9%	77%
White - Irish	0.5%	5%
White - Gypsy or Irish Traveller	0.1%	0%
White - Other	2.5%	5%
Other Ethnic Group - Arab	0.1%	0%
Any Other ethnic group	0.2%	0%
Prefer not to say/Not answered	---	14%

The ethnic profile of respondents to the survey showed a lower proportion of white British and BAME respondents when compared to the South Gloucestershire population, although it should be noted that 14% of respondents did not answer this question.

## SECTION 3 - IDENTIFICATION & ANALYSIS OF EQUALITIES ISSUES AND IMPACTS

### The Issues

A comparison of the number of households from different ethnic groups approaching for housing advice compared to the South Gloucestershire average is difficult, as a quarter of people approaching did not state their ethnic origin. Nevertheless, it is clear that most figures are in line with Census data with the majority of approaches from households from a 'White' background. It is noted that the data shows that 3% of housing advice approaches were from households identifying as 'Black'; this compares to just 0.9% identifying as 'Black' in the South Gloucestershire population. This is also comparable to the national data presented by the Equality and Human Rights Commission.

Similarly, a high proportion of households do not state whether or not they have a disability, so, again, direct comparisons with Census data is difficult. Of those who did answer the question, 14% stated that they did have a disability. Whilst this is in line with the South Gloucestershire population, it is reasonable to assume that some of the people, who did not answer the question would also have a disability, which would put the percentage of people approaching the service for housing advice with a disability above the South Gloucestershire average. The EHRC reported that nationally, "*disabled people face a shortage of accessible and adaptable homes and long delays in making existing homes accessible*"

60% of housing advice approaches were made by women compared to 40% of men. Of those cases where the council accepted a statutory duty to house an applicant under homeless legislation, 64% of lead applicants were women. In South Gloucestershire, 50.4% of the population are female and 49.6% are male.

63% of the South Gloucestershire population are aged 16-64yrs compared to 95% of the clients approaching for housing advice. In 100% of accepted cases, the lead applicant was aged 16-64yrs. In part, this reflects the fact that there is a lower demand for older person's social housing compared to general needs accommodation, which means that a proportion of older people were able to resolve their housing situation before becoming homeless.

The survey of customers, partners and stakeholders completed as part of the homelessness review alongside the formal consultation on the homelessness strategy provides useful evidence which raises information clearly impacting upon people with Protected Characteristics. Some of the points raised are listed below:

- 83% of households contacted as part of the Homelessness review stated that they tried to find their own accommodation, but were unable to do so before visiting the council, suggesting that a large proportion of households would have become homeless without targeted support and intervention.
- Local partners and stakeholders listed the following when asked what the main issues were for clients facing housing or homelessness issues,
  - The difficulty that service users found in securing affordable accommodation.
  - The importance of access to timely debt & money advice.
  - Difficulty in housing clients with complex needs, e.g. drug & alcohol, or offending history.
  - Lack of awareness of the total range of support services available in the region.
  - Concerns that people may not be digitally included, e.g. no access to bank account, or e-mail address.
- The issue of affordability was raised by a number of respondents to the formal consultation. Some also raised concerns about the impact of Universal Credit and concerns that it could lead to an increase in homelessness.

In addition, the following comments relating to equalities issues were received,

- Identification of those with complex needs is welcomed as is an understanding from the council of how personal, social and cultural barriers for people trapped in homelessness affects their ability to gain and maintain housing and tenancy.
- Young people are especially vulnerable. I hope the action plan will provide special focus on 16-24 year olds.
- Include people with mental health issues.
- The fact that the council wants to treat individuals holistically and to put in place the ability to recognise people that need help.
- Far too many people are facing homelessness with the implementation of UC.
- Homelessness is a very complex issue caused by a variety of reasons. You need to prioritise an individual approach that helps address the individuals issues and provides and helps them keep a new home.
- Helping people bridge the gap between claiming universal credit and receiving it so they don't fall into arrears or are threatened with eviction.
- There is a need for clear signposting to enable people at risk to be able to access help. As South Gloucs is a spread-out area this would need multiple access points.
- It is interesting that most of the enquiries come from women - and yet it is often men that you will find sleeping rough. This stigma for asking for help needs to be addressed.

A range of equalities related issues have been raised by this EqIAA. In responding to these issues, the strategies sets out three priorities which ensure that equalities is integral to the Strategy itself. These are clearly laid out in the Strategy, for example, one of the aims under the Prevention and Response priority will be to, *'Ensure that personal circumstances and complex needs are not a barrier to accessing services and receiving an appropriate response. Have clear customer journey pathways that ease inclusion'*.

The key will be to monitor the successful implementation of these priorities for all diverse groups in society

Further information on how these issues will be addressed are included in Section 5 of this EqIAA.

## SECTION 4 - EqIAA OUTCOME

Outcome	Response	Reason(s) and Justification
Outcome 1: No major change required.	<input type="checkbox"/>	
Outcome 2: Adjustments to remove barriers or to better promote equality have been identified.	<input checked="" type="checkbox"/>	<p>The research and consultation conducted has identified a wide range of equalities issues in relation to the subject of homelessness. In response to this, the Strategy has aimed to integrate sound equalities principles into its priorities and objectives.</p> <p>The actions set out in section 5 of this EqIAA ensure that the Homelessness Forum (which will be created once the Strategy has been adopted) will have a robust role in scrutinising and assessing the successful delivery of the stated priorities in respect of all protected characteristic groups.</p> <p>As a result, this Strategy sets out to integrate equalities at its core and monitor progress on an on-going basis. This approach has clear potential to deliver positive impacts for all groups.</p>
Outcome 3: Continue despite having identified potential for adverse impact or missed opportunities to promote equality.	<input type="checkbox"/>	
Outcome 4: Stop and rethink.	<input type="checkbox"/>	

## **SECTION 5 - ACTIONS TO BE TAKEN AS A RESULT OF THIS EqIAA**

South Gloucestershire Council wants to see positive change and development in services to those at risk of, or affected by homelessness. We will work together with customers and partners to ensure that the service is designed to optimise best use of resources and to ensure that we have the skills, knowledge and processes in place for the delivery of the vision and priorities of this Strategy.

The Council will create a Homelessness Forum of key partners and with customer representation, with an appointed Chair. This will be responsible for leading on the development and the successful delivery of the Homelessness Strategy Implementation Plan, and for developing and publishing annual progress reports.

The council will ensure that the Forum receives full information regarding equalities issues relating to homelessness and ensure that actions are built in to address these issues in any implementation plan. This will include any on-going monitoring of the success in addressing these equalities issues.

One of the first tasks set out for the Forum will be the identification of 'at risk' groups (as identified by the EHRC) and to ensure that monitoring encompasses these groups so that on an ongoing basis the data analysed, reported and considered by the group is fully robust, leading to clearly defined actions to support those groups most affected.

## **SECTION 6 - EVIDENCE INFORMING THIS EqIAA**

- The Housing Act 1996 Part VII, Localism Act 2011, Homelessness Reduction Act 2017.
- Ministry of Housing, Communities and Local Government guidance: Homelessness Code of Guidance for Local Authorities
- The Housing Strategy 2013 - 2018
- Homelessness Review & Strategy 2013-2018
- “Is Britain Fairer? The state of equality and human rights 2018”, Equality and Human Rights Commission (EHRC)
- Consultation results and feedback