

Equalities Impact Assessment

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Rough Sleepers Accommodation
DEPARTMENT:	Community Wellbeing
TEAM:	Housing Needs Service
LEAD OFFICER:	Paul Phillips
DATE:	31 December 2020

NB: Please ensure you have read the accompanying EA guidance and instructions in full.

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Brent Council wishes to commission 20 units of high support complex needs accommodation across two different services under two lots as part of their services for people who are bedded down, or clearly about to bed down, in public or private open spaces (other than designated sites); spaces like stairwells, porches, unconverted garages and in vehicles.

The aim is to deliver an integrated service and each service will be expected to provide the following:

- Assessment, advice and work with people in the following areas
 - access to welfare benefits,
 - referrals to drug and alcohol services,
 - referrals to health services, including how to access mental health professionals;
 - referrals to Adult social care
 - referrals for immigration advice
 - access to reconnection services for moves within and outside of the UK
- Create a pathway for people which supports their move into more settled accommodation within a 6 month period, if possible.
- Provide an integrated staff team where support workers are assessment focussed, support people to develop their ability to do things for themselves rather than rely on the

service.

- Provide flexible levels of support to minimise the risk of crisis, and increase the potential for long term recovery.
- To be able to clearly demonstrate the outcomes which have been achieved

The services will take both a person-centred approach and an outcomes-based approach to all aspects of daily living in relation to the environment, care, support services, in line with each individual's care plan.

2. Who may be affected by this policy or proposal?

These services are for new, intermittent, entrenched and vulnerable rough sleepers who are bedded down, or clearly about to bed down, in public or private open spaces who have high support complex needs.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

The aim of the Rough Sleepers Initiative (RSI) is to provide an integral service to the vulnerable people rough sleeping in the borough regardless of age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

It is particularly important that the council ensures that the people accessing these services are treated fairly.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age	X		
Sex	X		
Race	X		
Disability	X		
Sexual orientation	X		

Gender reassignment	X		
Religion or belief		X	
Pregnancy or maternity	X		
Marriage		X	

5. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?	X	
Would the policy or proposal change or remove services used by vulnerable groups of people?		X
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	
<p>If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.</p>		

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

The information used for this analysis is data for 2019/20 from a GLA funded database that records information on rough sleepers in London - CHAIN (the Combined Homeless and Information Network database), MHCLG Rough Sleeping Strategy (August 2018), Brent's Homelessness & Rough Sleeping Strategy (2020 – 2025), Information from Shelter's records and St Mungo's database records.

2. For each "protected characteristic" provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state "not applicable".

AGE	
Details of impacts identified	A large proportion of people sleeping rough are between 25 and 55 years old. 73% of those contacted were between these ages. 18% were aged 50 or over and 10% were aged under 25.
DISABILITY	
Details of impacts identified	A study showed that 60% of people sleeping rough may have had mental health problems. Another survey found that 30% of rough sleepers had a current diagnosed psychotic illness and people who had slept rough for a year or more were likely to have had a psychiatric admission.
RACE	
Details of impacts identified	About 90% of people sleeping on the streets are white, including significant minorities of white Irish and Scottish people. However, there is evidence of that the profile of rough sleepers is becoming increasingly diverse. Recent reports from day centres that provide services to a large

	number of refugees from other countries show that migrants from the EU states are also present in the rough sleeping population. There was a total of 30 different nationalities represented among those sleeping rough.
SEX	
Details of impacts identified	Around 90% of those sleeping rough are men. During a recent survey conducted of 3,112 people. 89% were men (2,756) and 11% were women (356). While women and men have been found to be equally likely to experience hidden homelessness, these figures show that men are more likely to experience rough sleeping.
SEXUAL ORIENTATION	
Details of impacts identified	<p>LGBTIQ+ people are disproportionately more likely to be homeless or insecurely housed than their non-LGBTIQ+ peers, and are at higher risk of substance use and mental health issues due to discrimination, lack of acceptance and abuse. LGBTIQ+ people may face multiple discrimination and they may present specific needs if they are at risk of being homeless.</p> <p>Service providers are sometimes unaware of the sexuality or gender identity of service users and do not always understand their needs. This means that LGBTIQ+ individuals can struggle to get the right support, delaying their recovery and increasing the likelihood of their needs becoming more complex.</p>
PREGANCY AND MATERNITY	
Details of impacts identified	<p>At the current time we have no robust data on the incidence of pregnancy in homeless women (both hostel based and rough sleeping women) or outcomes for babies or mothers.</p> <p>Many homeless women have experienced a history of adversity which can impact on the woman's lifestyle, motivation, ability to engage with services, make changes and parenting capacity. Vulnerable and socially excluded women including women who are homeless are at increased risk of maternal death.</p> <p>Pregnancy is a time of increased vulnerability for homeless women as there is an increased risk of physical harm, financial and sexual exploitation.</p>
RELIGION OR BELIEF	

Details of impacts identified	Data on this protected characteristic is not currently gathered in regards to rough sleepers as this information is not recorded on CHAIN. However, the National Christian Charity Housing Justice suggests around 500 synagogues, mosques and churches served as temporary night shelters over the winter accommodating over 2,000 people.
GENDER REASSIGNMENT	
Details of impacts identified	Homelessness amongst trans people is disproportionately high. Stonewall Housing who conducted a survey, has seen an increase in trans people accessing their services from 8% in 2014-15 to 23% in 2017-18. Homeless Link's members are increasingly asking how they can best to meet the needs of trans people accessing their services. There are many possible gender identities, e.g. trans man, trans woman, non-binary or gender fluid. Good practice is to let people self-identify and avoid asking unnecessary personal questions.
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	Data on this protected characteristic is not currently gathered in regards to rough sleepers as this information is not recorded on CHAIN.

3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No

4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

N/A

5. Please detail any areas identified as requiring further data or detailed analysis.

None

6. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

There should be no negative impacts with regard to this proposal. We have identified those protected characteristics where data is minimal, and will look to improve understanding in these areas as part of the action plan process.

7. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

Through the contract monitoring process

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

There should be no negative impacts on equalities due to this proposal. By making our services to rough sleepers in our borough more personalised we can ensure that specialised and complex needs are met and that the housing solutions we provide are suitable and sustainable.

SECTION D – RESULT

Please select one of the following options. Mark with an "X".

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	X
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	

C	CHANGE / ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
To fully understand the challenge of homelessness in Brent and how it is experienced by individuals so we can develop informed, targeted solutions, and continually improve the quality of the services we deliver.	Review our approach to data collection and ensure data quality is maintained so we can monitor any changing trends and more effectively target resources.		On-going
To ensure that services are prevention focused and the right advice and support is available to those who need it.	Ensure online advice and signposting information for vulnerable people is accurate and up to date by developing a regular programme for reviewing web pages and develop staff awareness of homelessness.		On-going
Work to increase the supply of and access to stable and affordable homes across the borough.	Deliver our own new build programme, providing new affordable homes across the borough that effectively meet local need in accordance with the annual lettings plan.		On-going
Seek to personalise our services to individuals' needs, and work	Provide additional staff training so officers feel		On-going

collaboratively with our partners to ensure those needs are met.	equipped to provide tailored advice (e.g. family mediation, supporting LGBTQ individuals, sex workers, BAME households, Eastern European Rough Sleepers) and ensure tools are in place to tackle language barriers when they arise.		
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SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Paul Phillips
REVIEWING OFFICER:	Richard Harrington 5/1/21
HEAD OF SERVICE:	Laurence Coaker