

## EQUALITY ANALYSIS (EA)

<b>POLICY/PROPOSAL:</b>	<b>Retendering of services for Rough Sleepers</b>
<b>DEPARTMENT:</b>	<b>Partnerships and Housing</b>
<b>TEAM:</b>	<b>Housing Needs &amp; Support</b>
<b>LEAD OFFICER:</b>	<b>Saleema Nuraney</b>
<b>DATE:</b>	<b>12-12-2024</b>

*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.

This Equality Analysis is on the retendering of the following services which are due to expire on 30 April 2025:

- a) Outreach, Housing Advice and Resettlement Services (core contract);
- b) Housing First Service funded by the Ministry of Housing, Community and Local Government under the Rough Sleeper Initiative (RSI) Grant;
- c) Rapid Assessment Hub funded by the Ministry of Housing, Community and Local Government under the Rough Sleeper Initiative (RSI) Grant;

Current and proposed service provision in Brent includes an Outreach Service to identify and engage with rough sleepers in Brent and in need of assistance with getting into accommodation and off the streets. It also includes an Advice and Resettlement Service to assist people who are at risk of sleeping rough to secure and maintain appropriate and stable accommodation.

The Housing First service is designed to assist up to 12 entrenched rough sleepers with a chance to rebuild their lives. The service provider identifies individuals known to outreach teams. The Council then approves and assists with sourcing and allocating accommodation to each individual and the provider continues to provide support on an individual basis.

The Rapid Assessment Hub is designed to provide a rapid response service to reduce the number of rough sleepers on the streets. The service provider undertakes intensive support around reconnection and assessments ensuring all key elements and barriers to access accommodation are addressed. Self-contained or accommodation is expected for up to 14 individuals. The accommodation is sourced independently. The service provides 24 hours waking support with a target stay of 12 weeks.

The objectives of the service are to:

- Meet and engage with rough sleepers.
- Work proactively with rough sleepers to resettle them, through the provision of a structured Rough Sleepers' Advice and Resettlement Pathway, into suitable, stable accommodation, including, where appropriate, reconnection to their home country/area.
- Work with rough sleepers holistically, addressing issues that contributed to their homelessness and impair their ability to maintain stable accommodation once resettled.

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

The proposed approach is expected to directly benefit homeless service users through improved responsiveness. The service will contribute to community safety and minimise both rough sleeping related anti-social behaviour and its impact on the wider community.

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.

Yes. This is a statutory service to meet the needs of homeless people in Brent. They must have "due regard" to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under section 149 of the Equality Act 2010, to advance equality of opportunity and foster good relations between those who have a "protected characteristic" and those who do not share that protected characteristic. The protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation

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	Impact Neutral/None	Impact Negative
Age		<b>x</b>	
Sex		<b>x</b>	
Race		<b>x</b>	
Disability *	<b>x</b>		
Sexual orientation		<b>x</b>	
Gender reassignment		<b>x</b>	
Religion or belief		<b>x</b>	

Pregnancy or maternity		<b>x</b>	
Marriage		<b>x</b>	

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

### **Screening Checklist**

	<b>YES</b>	<b>NO</b>
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	<b>x</b>	
Does the policy or proposal relate to an area with known inequalities?	<b>x</b>	
Would the policy or proposal change or remove services used by vulnerable groups of people?		<b>x</b>
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	<b>x</b>	

**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.**

## 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 the analysis has been derived from the Combined Homelessness and Information Network (CHAIN), a multi-agency database recording information about rough sleepers and the wider street population in London. CHAIN represents the UK’s most detailed and comprehensive source of information about rough sleeping. This data includes information about people seen rough sleeping by outreach teams in Brent between April 2023 and March 2024.

455 people were seen rough sleeping in the borough in 2023/24. This represents a 22% increase when compared to 2022/23. 70% of people seen rough sleeping in the borough during the year were new rough sleeper (flow), while 17% fell into the stock category (seen for 2 consecutive years), and 13% were returners.

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

<b>Details of impacts identified</b>	<p>Neutral impact. Rough sleepers will not be discriminated against because of their age. Services can be accessed by adult rough sleepers who are aged 18 and over. Analysis indicates that the greatest number of people accessing the rough sleepers' service are aged 36-45.</p> <p>36-45 (143 individuals, 31.4%)  26-35 (127 individuals, 27.9%)  46-55 (92 individuals, 20.2%),  over 55 (54 individuals, 11.9%)  18-25 (39 individuals, 8.6%).</p>
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## DISABILITY

<b>Details of impacts identified</b>	<p>Positive impact. The Council recognises that rough sleepers often have mental or physical health conditions. It can be difficult for rough sleepers to secure and sustain suitable accommodation, and there is a need to provide advice and support. To this end, the services will ensure information and advice about housing options is available for persons who are rough sleeping within the borough. The Services will also identify persons who are rough sleeping within the borough and encouraging them to engage with and access advice and support services. Services will also identify trends amongst rough sleepers within the borough, contributing factors and possible preventative measures.</p> <p>Support needs data in CHAIN is derived from assessments made by support workers in the homelessness sector. It is important to note that 29% of people seen rough sleeping in the borough in 2023/24 did not have a support needs assessment recorded.</p> <p>322 people seen rough sleeping during the period who were assessed for at least one of the three support needs as follows:</p> <p>Mental Health (174 individuals, 54%)  Drugs (90 individuals, 28%)  Alcohol (84 individuals, 26.1%)  More than one of alcohol, drugs and mental health (94 individuals, 29.2%)  No alcohol, drugs or mental health support needs (95 individuals, 29.5%)</p> <p>Analysis indicates that 227 rough sleepers whose support needs were assessed have have mental health issues, mental health and alcohol dependency, mental health and drug addiction or all three support needs.</p>
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	<p>Various drug and alcohol referral pathways are available in Brent such as Adaction, which is the main referral route for advice, information and assessment. Assistance for clients with mental health issues includes referrals to Brent Mental Health Team.</p> <p>The tender process will include a requirement that bidders demonstrate their competence and experience to deliver the service to a wide range of service users with chaotic lifestyles, including those who may have had or still have ongoing drug and alcohol issues and/or mental health issues and may present with significant vulnerability as a consequence of these needs.</p> <p>Bidders will be required to provide examples of how they have successfully delivered equivalent outreach and support services, including examples of linking and partnering with community or specialist services to better enable the generic outreach service they deliver to meet the specific needs of disadvantaged and potentially discriminated against groups.</p>
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## **RACE**

<b>Details of impacts identified</b>	<p>Neutral impact. Rough Sleepers will not be discriminated against because of their race. Brent is one of the most diverse boroughs in London. A sensitive and flexible approach to meeting clients' needs is taken to ensure adequate and suitable provision is made.</p> <p>The majority of people sleeping rough in Brent in 2023/24 were from the BAME households (43.3%). This includes 19.3% from the Black community (African, Caribbean, Somali) and 12.1% from the Asian community (Asian other, Indian, Pakistani), 2.9% who were mixed and 9% from the Arab community</p> <p>38.7% were from White households (incl. Gypsy/Irish Traveller/Romany and Other).</p> <p>Information was not collected for 18% of rough sleepers.</p> <p>White-Other consists of CEE (Central or Eastern European citizen) rough sleepers in the borough and is reflective of the fact that many of these CEE rough sleepers have restrictions on their entitlement to benefits that significantly limit their options for escaping rough sleeping, often their only option being to accept the assistance offered to return/reconnect them to their country of origin. Many CEE rough sleepers however choose to continue to sleep rough rather than accept offers of reconnection.</p> <p>Providers will still be expected to develop links with charities and to enhance their capacity to refer/signpost rough sleepers with no recourse to public funds.</p>
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## **SEX**

<b>Details of impacts identified</b>	<p>Neutral impact. Rough sleepers will not be discriminated against because of their gender. According to data downloaded on CHAIN, 91.3% of rough sleepers were male (410 individuals) and 8.7% were female (39 individuals). 6 were unknown. These figures are comparable to the demographic of rough sleepers in other boroughs, with the overwhelming majority of rough sleepers being men.</p> <p>It is understood that some groups are disproportionately affected by facets of homelessness; for example men are more likely to be sleeping rough. This is due to wider societal factors, rather than inequity in the delivery of our services.</p>
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## **SEXUAL ORIENTATION**

<b>Details of impacts identified</b>	<p>Neutral impact. Rough sleepers will not be discriminated against on the basis of their sexual orientation. We have no data on this protected characteristic with respect to rough sleepers as this information isn't recorded on CHAIN. The Provider of the retendered services will be required to provide the council with monitoring data on the sexual orientation. The Council will review such monitoring data for any evidence of barriers to access the services. Providers will also be expected to develop links with local LGBT services to enhance their capacity to meet the particular needs of LGBT service users.</p>
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## **PREGANCY AND MATERNITY**

<b>Details of impacts identified</b>	<p>Neutral impact. Pregnant women or parents with dependent children are a priority housing need group to whom there is a statutory duty which means they very rarely sleep rough or make contact with rough sleeping services.</p> <p>The expectation would be that where the Rough Sleepers Support Services did encounter a pregnant woman or parents with dependent children they would actively put them in touch with statutory services and, if appropriate, make a safeguarding referral.</p>
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## **RELIGION OR BELIEF**

<b>Details of impacts identified</b>	<p>Neutral impact. We have no data on this protected characteristic with respect to rough sleepers as this information isn't recorded on CHAIN. Rough sleepers will not be discriminated against on the basis of their religious belief. The Provider of the retendered services will be required to provide the council with monitoring data on the religious belief of service users contacted by the outreach team and supported by the</p>
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housing advice and resettlement team and the council will review such monitoring data for any evidence of barriers to access the services.

### **GENDER REASSIGNMENT**

#### **Details of impacts identified**

Neutral impact. We have no data on this protected characteristic with respect to rough sleepers as this information isn't recorded on CHAIN. Rough sleepers will not be discriminated against on the basis of gender reassignment. The Provider of the retendered services will be required to provide the council with monitoring data which will be reviewed for any evidence of barriers to access the services.

The current service provider does however collect data on the number of *non-binary* individuals and 0 have been reported for the last financial year.

### **MARRIAGE & CIVIL PARTNERSHIP**

#### **Details of impacts identified**

Neutral impact. We have no data on this protected characteristic with respect to rough sleepers as this information isn't recorded on CHAIN. The service can be accessed by singles and childless couples though the number of couples sleeping rough is relatively low. As this is a transient population, relationships are not often long-term. Service providers can try to accommodate couples however there are risks that need to be assessed e.g. potentially violent relationships that do not support positive outcomes for either or both individuals.

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.

N/A

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

N/A

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.

The service will meet the responsibilities of the Council in relation to equality and diversity.

No negative impacts have been identified and the service is intended to provide more certain and sustainable outcomes for rough sleepers.

A positive impact on customers with mental or physical health conditions has been identified through the provision of advice support and targeted accommodation pathways.

The services have the potential to save the Council money over the medium term by prevention of future and repeated rough-sleeping, by prevention of future homelessness acceptances, and by reduction in the future need for supported housing and adult social care.

Homelessness amongst rough sleepers if not tackled often leads to future problems such as offending, worsening mental and physical health, reduced employment prospects and substance abuse, all of which could lead to higher financial costs to the Council. These services will ensure that all assessed rough sleepers receive the best possible support in accordance with their individual needs and requirements.

The Council is committed to the principle of equal opportunities in the delivery of all of its services. The Council and its partners will be responsive, accessible and sensitive to the needs of all applicants. They will not tolerate prejudice and discrimination and will actively promote equality.

The contract terms will ensure rough sleepers receive the best possible service in accordance with their individual needs and requirements and there is a clear understanding of the relationship between the Council and the Provider. The tender process will also include method statements which allow the panel to assess how well the Provider is able to meet our clients' needs in a fair, consistent and non discriminatory manner.



The contract terms also include Brent's commitment to Equality and Diversity in Procurement and states clearly the commitment we expect from Provider to promote equality and diversity, taking into account the needs of the people protected under the Equality Act 2010 in respect of the Protected Characteristics.

## SECTION D – RESULT

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

<b>A</b>	<b>CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED</b>	<b>X</b>
<b>B</b>	<b>JUSTIFY AND CONTINUE THE POLICY/PROPOSAL</b>	
<b>C</b>	<b>CHANGE / ADJUST THE POLICY/PROPOSAL</b>	
<b>D</b>	<b>STOP OR ABANDON THE POLICY/PROPOSAL</b>	

## 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.

<b>Action</b>	<b>Expected outcome</b>	<b>Officer</b>	<b>Completion Date</b>

## SECTION F – SIGN OFF

Please ensure this section is signed and dated.

<b>OFFICER:</b>	Saleema Nuraney
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<b>REVIEWING OFFICER:</b> <i>* the manager with oversight of the project</i>	 Laurence Coaker Director, Housing Needs & Support <div>Date 13/12/2024</div>
<b>HEAD OF SERVICE / Operational Director:</b>	 Laurence Coaker Director, Housing Needs & Support <div>Date 13/12/2024</div>