

INITIAL EQUALITY IMPACT ASSESSMENT AND ANALYSIS (EqIAA) FORM

HOMELESSNESS REVIEW & STRATEGY 2019 - 2024

Please Note:-

This document describes an **initial** assessment of equalities impacts in relation to the draft Homelessness Strategy.

The council has a statutory duty to consider the impact of its actions in relation to the following protected characteristic groups:-

Age
Disability
Gender Reassignment
Marriage and Civil Partnership
Pregnancy and Maternity
Race
Religion or Belief
Sex
Sexual Orientation

Therefore, the council wishes to hear and proactively consider any comments in relation to how any aspect of the issues presented may impact on any sections of the community as listed above. Any feedback in relation to equalities and any point raised in respect of this document will feed into and inform a full Equality Impact Assessment and Analysis.

You can find out more and tell us your views by completing our survey online at <https://wh.snapsurveys.com/s.asp?k=155083737832>

Or sending your comments to:

Email: consultation@southglos.gov.uk

Write to: South Gloucestershire Council, Corporate Research & Consultation Team,
Council offices, Badminton Road, Yate, Bristol, BS37 5AF

Phone: 01454 863297

Copies of the consultation are available from your local library or one stop shop.

The consultation on these proposals starts on **Friday 22nd February 2019 and will be open for four weeks until Thursday 21st March 2019**

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 3rd 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 by clicking on the following [link](#).

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 61% up to 31 March 2017.

The lower overall benefit caps 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.

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.

Whilst the number of rough sleepers identified in the council's annual rough sleeping estimate continues to be low, the number of referrals received through Streetlink, the government funded body set up so that members of the public can report rough sleepers, has shown an increase.

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

During the homelessness review, 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.

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.

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.

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.

The survey of partners and stakeholders provides useful evidence which raises information clearly impacting upon people with Protected Characteristics. These issues require consideration and planning, and this will be achieved as part of the consultation process, leading to an action plan which will be presented 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 type="checkbox"/>	
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

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)