



Southwark's Homelessness Strategy 2018-2022:

Equality and Health Analysis

Section 1: Equality analysis details

Proposed policy/decision/business plan to which this equality analysis relates	Homelessness Strategy 2018-22
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Equality analysis author		Alex Skerten, Project & Change Manager			
Strategic Director:		Gerri Scott, Strategic Director of Housing and Modernisation			
Department		Housing and Modernisation	Division	Customer Experience	
Period analysis undertaken		June-August 2017			
Date of review (if applicable)					
Sign-off	Richard Selley	Position	Director, Customer Experience	Date	

Section 2: Brief description of policy/decision/business plan

1.1 Brief description of policy/decision/business plan

This Equalities and Health Analysis (EHA) assesses the impacts (individual and cumulative) of Southwark's Homelessness Strategy 2018-2022 that will provide a framework and plan for tackling homelessness and rough sleeping.

The intention of the strategy is to have a positive impact on all protected characteristic groups by reducing and preventing homelessness.

The timing of the strategy is particularly relevant as the Homelessness Reduction Act is anticipated to commence in April 2018 and this strategy sets out the steps we have taken in preparation of that and how the service will continue to function under this new legislation.

Legal framework

Southwark's statutory duties are primarily set out in the Housing Act 1996 (as amended), including:

- Section 179: Duty to provide advisory services
- Section 184: Duty to make enquiries in respect of eligibility and duties owed
- Section 188: Interim duty to accommodate in cases of apparent priority need
- Section 189B: Help to Secure Accommodation Duty. A new duty to be introduced by the Homelessness Reduction Act.
- Section 192: Duties to people found not to be in priority need and not homeless intentionally.
- Section 193: Duties to people found to be in priority need and not homeless intentionally.
- Section 195: Duties to those threatened with homelessness
- Section 198: Referral of case to another local housing authority

The 2002 Homelessness Act also introduced a requirement on Local Authorities to take a strategic approach to dealing with homelessness. This is done by:

- Carrying out a review of homelessness in their area, and
- Based on the findings of the review, developing and publishing a strategy to tackle and prevent homelessness.

The Homelessness Reduction Act (due to commence April 2018) will see changes to the way homelessness advice and assistance is provided by local authorities in the future.

The aim of the Act is to reform the current homelessness duties to ensure that local authorities provide meaningful advice and assistance to those people who do not fall into a priority need category or who have been found to be intentionally homeless.

Southwark is one of three early adopter trailblazer local authorities, along with Newcastle and Manchester, which are trialling and developing new services reflecting the reforms to provide early feedback to the Department for Communities and Local Government.

The Act introduced the following:

- The definition of being threatened with homelessness be extended from 28 days to 56 days
- Local authorities must accept a valid S.21 notice as evidence that the tenant is threatened with homelessness
- The creation of a stronger advice and information duty
- The creation of a stronger prevention duty for anyone threatened with homelessness and eligible for assistance
- Introduce a new relief duty for all eligible applicants who have a local connection meaning local authorities must take reasonable steps to secure accommodation regardless of priority need status
- Incentivise people to engage in prevention and relief work by allowing local authorities to discharge their prevent and relief duties if an applicant unreasonably refuses to cooperate with the course of action proposed
- Introduce a right to judicial review at the prevention, relief and main duty stages to ensure local authorities are held to account
- Collect data in order to monitor the overall effectiveness of the new legislation
- Explore options for further enforcement such as through the creation of a regulator of housing and homelessness services

The Council already takes steps at an early stage to assist those threatened with homelessness however; the additional requirements necessitated a re-design of the homelessness service.

In addition, a number of other Acts in recent years have shaped the national framework for homelessness services.

Localism Act 2011: the Localism Act came into force in November 2012 and supports the improvement of local housing options. The Act contained a number of key provisions relevant to homelessness including the power to discharge the full homelessness duty with an offer of private rented accommodation.

Welfare Reform Act 2012: the Welfare Reform Act 2012, aimed to simplify the benefits system and help more people into work. The Act introduced the following changes that have had an impact on the availability and affordability of housing:

- changes to the local housing allowance rates left fewer tenants being able to meet their rental costs through housing benefit
- the shared accommodation rate was extended to those aged 25-34 meaning fewer single people were able to afford to rent accommodation unless it was shared accommodation
- the introduction of the under-occupation charge (bedroom tax) for working age social rented tenants
- the introduction of the council tax support scheme in place of council tax benefit meant all households now had to pay something towards their council tax bill
- the introduction of a benefit cap, restricting the amount of benefits a household can

receive

- the introduction of Universal Credit

Deregulation Act 2015: the Deregulation Act 2015 introduced protection for private rented tenants against so called retaliatory evictions. Retaliatory eviction is where a tenant makes a legitimate complaint to their landlord about the condition of their property and instead of making the repair; the landlord serves them with an eviction notice. All new assured shorthold tenancies starting on or after 1 October 2015 will be covered by the provisions in the Act.

Welfare Reform and Work Act 2016: the Welfare Reform and Work Act 2016 reduced the benefit cap set by the Welfare Reform Act 2012 in London to £23,000 per year for couples and lone parents and £15,410 per year for single people. Under the Act, certain social security benefits and child tax credits have been frozen for four years from April 2016 and social housing rents have to be reduced by 1% per year for 4 years from April 2016.

Housing and Planning Act 2016: the Housing and Planning Act 2016 contains measures that could have an impact on social housing and homelessness including:

- the extension of the right to buy to housing association tenants
- local authorities will be required to sell their higher value homes as they become vacant, impacting on the supply of social housing
- local authority tenants with higher incomes will be required to pay a higher rent
- measures to tackle rogue landlords in the private sector including banning orders, a national database of rogue landlords and the extension of when a tenant can apply for a rent repayment order
- private landlords will be able to regain possession of a property they believe has been abandoned without a court order

Reasons for the strategy

Overall this strategy is intended to ensure that the council delivers the most effective service possible whilst ensuring value for money and a regard to providing a high quality service to those who need it. Homelessness services frequently encounter very vulnerable households and the strategy takes account of how the services should be provided so that they are well looked after within the framework of the current legislation and guidance.

The current costs of temporary accommodation to the council are over £3 million per year, at a time when, in common with other local authorities, it faces medium-term financial pressures. This means that it cannot sustain an uncontrolled increase in costs. The strategy sets out plans for how we aim to off-set the impact of continuing high numbers of homeless households presenting to the council and the historical loss of social rented supply.

The main objectives for the strategy are to offer a high quality and innovative service to homeless households, to encourage self-service where possible and assist households in

crisis to explore all the options available to them and to find long-term housing solutions for people threatened with homelessness.

What is being assessed

The following initial assessment of impacts compares the new strategic approach with the existing practices in place. In making it, the council acknowledges that homelessness is in itself a very difficult experience for any household. In summary the differences are:

- The impact of the Homelessness Reduction Act
- The impact of the Rough Sleeper Prevention trailblazer
- Improved advisory services for personal resilience and mental health
- Ending the use of nightly rate (bed and breakfast style) temporary accommodation with shared facilities for homeless families.
- The development of online services and advice.
- The development of suitable private rented sector offers for all client groups.
- Future plans for partnerships with support agencies and local services to offer solutions that ensure households are able to maintain tenancies and their homes sustainably.

Section 3: Overview of service users and key stakeholders consulted

Service users and stakeholders	
Key users of the department or service	<p>All customers who approach or are referred to the service for housing advice, assistance and support through the related homelessness legislation.</p> <p>Third sector partners who work with the council in delivering its duties.</p>
Key stakeholders were/are involved in this policy / decision / business plan	<p>The following stakeholders were involved in reviewing this strategy -</p> <ul style="list-style-type: none"> Advising London Citizens Advice Southwark Depaul Uk DWP Guys and St Thomas Hospital NHS Homelesslink Hyde Housing Lookahead The Manna Society Mungos Broadway Shelter Solace women's aid Southwark Day Centre for Asylum Seekers Southwark Disability Southwark Law Centre Southwark Carers St Giles Trust Thamesreach <p>Housing Solutions conducted best practice visits to Camden, York and Hart Councils. These councils have already implemented a policy to discharge duty into the private sector.</p> <p>A further best practice visit to Newport helped staff to understand how the Welsh homelessness legislation, which would broadly reflect the Homelessness Reduction Act, was applied in practice and some of the challenges it posed.</p>

Section 4: Pre-implementation equality analysis

This section considers the potential impacts (positive and negative) on groups with 'protected characteristics', the equality information on which this analysis is based and any mitigating actions to be taken.

The first column on the left is for societal and economic issues (discrimination, higher poverty levels) and the second column on the right for health issues, physical and mental. As the two aspects are heavily interrelated it may not be practical to fill out both columns on all protected characteristics. The aim is, however, to ensure that health is given special consideration, as it is the council's declared intention to reduce health inequalities in the borough. The Public Health Team can assist with research and data.

Age - Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
<p>Those aged 25-44 are disproportionately represented among lead applicants from accepted households. Conversely, those aged over 65 are under-represented and so less likely to be directly affected. Households with children (or expecting a first child) are disproportionately represented among homeless households (85%).</p> <p>Southwark's population is predominantly young: 42% are aged 20 to 39 years old compared with 35% in London and 27% in England; 58% of Southwark's population is aged 35 or under.</p> <p>Age - Children Children will potentially be negatively affected if they need to move outside of Southwark and London as they will be more likely to have to start new schools, which can be disruptive particularly if they are at key exam stages. Children with special educational needs or those that are working with Family Services may be particularly affected by changing school. Again, greater certainty as a result of the policies may make it easier to find school places and other support that can be sustained over time than if those concerned were likely to face repeated relocation, as can be the case with temporary accommodation.</p> <p>Outreach work to educate children on the realities of homelessness is anticipated to have a positive outcome on preventing homelessness and therefore should have a positive impact on this cohort.</p> <p>Age – Young adults It is anticipated that more single people will have access to advice and assistance as a result of the increased assistance and advisory services being delivered as a result of the trailblazer and Homelessness Reduction Act which forms part of the overall strategy. Single people, can of course be any age but a large cohort is likely to be young people as they don't yet have dependent children, although the advice and assistance should have a positive impact on all age groups.</p>	<p>Reduction on the usage of temporary accommodation, particularly, nightly rate accommodation is likely to have a positive impact on children's wellbeing and health. (Shelter 2006).</p>

<p>Age – Older people</p> <p>Older people eligible for Sheltered housing will not be made private rented offers. However older people could be offered temporary accommodation outside Southwark and London until this type of housing is available (although generally waits are much shorter). They may potentially be negatively impacted by this, if they have long established links to the local area and also as they are more likely to receive care and support packages which would need to be transferred. Also they may be more likely to receive informal support, possibly from family members, which might be harder to sustain at a distance. The data shows that people in these age groups are significantly under-represented among homeless people however.</p> <p>32% of Southwark residents over the age of 60 years have no access to the internet at home compared to 0% of 16-24 year olds. Access to the internet is directly linked with the ability to use it. A high number of people aged 60 and above are unable to perform basic tasks online such as completing an application form online (52%), using a search engine (41%) or sending or receiving an email (33%). It is identified that those in the community over the age of 60 are more likely to be digitally excluded than those who are younger. Again, though the data shows that people in these age groups are significantly under-represented among homeless people however.</p> <p>Some of the impacts are expected to be positive. Old age is linked with mobility and improvements to online self-serve and telephone advice will allow customers continual access to services from their home.</p>	
Equality information on which above analysis is based	Health data on which above analysis is based
<p>Southwark residents survey - September 2016</p> <p>Homelessness Statistical Review March 2017, Age profile of statutorily homeless households (derived from P1E data).</p> <p>Southwark Demography Factsheet May 2015.</p> <p>Review of Homelessness in Southwark 2017 – Demographics.</p>	<p>Male life expectancy is 78.2 years compared to 78.5 years in England. Female life expectancy is 83.4 years compared to 82.5 years in England.</p> <p>Children who have been in temporary accommodation for more than a year are over three times more likely to demonstrate mental health problems such as anxiety and depression than non-homeless children (Shelter 2006).</p> <p>Living in temporary accommodation puts</p>

	<p>children at greater risk of infection, and accidents (Shelter 2006).</p> <p>Homeless children are more likely to be in poor health than non-homeless children (Shelter 2006).</p> <p>Harker L. Chance of a lifetime: the impact of bad housing on children's lives. Shelter; 2006. https://england.shelter.org.uk/__data/assets/pdf_file/0016/39202/Chance_of_a_Lifetime.pdf (accessed 27 June 2017).</p>
Mitigating actions to be taken	
<p>Age – Children</p> <p>Some children and families will be prioritised for in borough/adjacent borough accommodation, including:</p> <ul style="list-style-type: none"> o Households where at least one of the children has a Statement of Special Educational Needs or an Education, Health and Care Plan, is receiving education or educational support in Southwark and where it is demonstrated that a placement would be significantly detrimental to their well-being o Households with a child where Southwark Family Services has demonstrated serious concerns about the child and is working with them intensively o Households where there is a recommendation through a joint assessment with Children's and Adult's Services o Households which include a registered Southwark Council approved foster carer who is fostering a Southwark looked after child o Households which (a) include a Southwark Council approved person who is caring for a Southwark looked after child, (b) include a Southwark child that is subject to a Southwark Special Guardianship Order or (c) have a private fostering arrangement with a carer resident in Southwark where they have notified the council <p>Some children and families will be prioritised for accommodation in Greater London, where a child is at their final year of Key Stage 4 (generally Year 11) or in Key Stage 5 (A levels or equivalent Level 3 vocational courses, such as BTECs, or GCSE re-sits in English and Maths) at a school or further education college in London</p> <p>Any special circumstances demonstrating a compelling need for accommodation in a certain area will be considered and this might particularly benefit children</p> <p>Resettlement support will be offered for some private rented offers. This could include help to</p>	<p>See mitigation actions which also cover health aspects.</p> <p>In addition, we will increase our access to the private rented sector to seek more suitable accommodation for households to reduce lengthy stays in temporary accommodation.</p>

<p>enrol children in new schools and to find nursery places</p> <p>Support will also be offered to households moving into temporary accommodation outside London and as above this could include help to enrol children in local schools and to find nursery places</p> <p>Age – Older people Some older households will be exempt from private rented sector offers i.e. those that are eligible for sheltered housing and disabled households needing wheelchair accessible housing.</p> <p>The focus on procuring properties in the South East and with good transport connections to London, where possible, will help people in temporary accommodation maintain their location connections and this might be particularly important for older people</p> <p>Support will also be offered to households moving into temporary accommodation outside London and this could involve help to transfer any care and support packages</p> <p>Significant work is being undertaken in the community to minimise digital exclusion which includes Digital Hubs providing one-to-one digital skills and training. An EU funded project will create new community engagement tools for various groups in our communities.</p> <p>‘Digital literacy’ is improving with every generation, so over time, the risk of inequality is reduced.</p> <p>We will monitor customer satisfaction and aim for year on year improvement in satisfaction with fewer formal customer complaints made.</p> <p>We will ensure alternative service access remains available such as face to face appointments, so that no one is excluded from accessing the service.</p> <p>Our partners such as Citizens Advice Bureau offer weekly sessions for helping people with no access to online resources.</p>	
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<p>Disability - A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan</p>	<p>Potential health impacts (positive and negative)</p>

<p>Only a small proportion of accepted homeless households have members needing a wheel chair adapted property or a level access property.</p> <p>Statistics in the Census 2011 shows that Southwark ranks in the lowest 20% for people reporting daily activity limitations. It is grouped as having only 11.2% – 14.6% population reporting daily activity limitations. This could be partly down to its relatively young population.</p> <p>Of accepted homeless households, 5% have been accepted as needing housing due specifically to a member having a mental health issue and the majority of these are single people. It is likely, however, that other applicants and members of their households may have mental health problems, but this information cannot be easily accessed.</p> <p>Nationally, 53% of working age disabled people are in work compared to 70% of non-disabled people. Employment rates vary greatly according to the type of impairment a person has, for example people with severe or enduring mental health conditions have the lowest employment rate of any of the main groups of disabled people. According to the Office for Disability this is 16% for people with mental health issues compared to 43% for all disabled people of working age.</p> <p>Accommodating households in temporary accommodation for long periods could have a detrimental impact on mental and physical health.</p> <p>Placing disabled households away from their support networks and associated facilities could have a detrimental impact on their health.</p> <p>Channel shift and the development of services such as an online Personal Housing Plan has the potential to have a positive impact on disabled households, particularly those with mobility issues, as it can allow them to access services from the convenience of their own accommodation or avoid travelling to the Homeseach Centre.</p>	<p>A national survey conducted by Shelter of 2,000 people in temporary accommodation¹, found that more than half said that they were suffering from depression and that depression and other mental health problems were two of the most common health conditions reported.</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>Homelessness Statistical Review March 2017, Age profile of statutorily homeless households (derived from P1E data).</p> <p>Census 2011.</p> <p>Priority need categories for statutorily homeless cases (2011/12 to 2015/16). In 2015/16 the number of accepted homelessness cases showed 10% were due to physical disability or mental ill-health/disability (Review of Homelessness in Southwark 2017)</p>	<p>Shelter – Living in Limbo²</p> <p>People with a disability are more likely to suffer poor health (Review of Homelessness in Southwark 2017)</p>
<p>Mitigating actions to be taken</p>	
<p>The private rented sector offer policy excludes some disabled households who wouldn't be able to manage a private rented tenancy (for example,</p>	

¹ http://england.shelter.org.uk/_data/assets/pdf_file/0012/40116/Living_in_Limbo.pdf

² http://england.shelter.org.uk/_data/assets/pdf_file/0012/40116/Living_in_Limbo.pdf

those who may have care and support needs or a mental health condition which prevents them from managing a tenancy).

Some people with particular health problems or disabilities will be prioritised for in borough/adjacent borough accommodation, these include:

- Households where at least one member has a severe health condition or disability (including a severe mental health condition) that requires intensive and specialised medical/mental health treatment/ aftercare that is either (a) only available in Southwark or (b) where a transfer of care would create a serious risk to their safety or the sustainability of the treatment or care
 - Households where at least one member is receiving support through a significant commissioned care package or package of health care options provided in Southwark, where a transfer of care would create a serious risk to their safety or the sustainability of the care
 - Some carers, and people being cared for, will be prioritised for in borough/adjacent borough accommodation
 - Resettlement support will be offered to households being made private rented offers who are relocating out of London, and where needed where they are moving from Southwark to another London borough
- This support could include help to transfer care and support packages
- Support will also be offered to households moving into temporary accommodation outside London and as above this could include help to transfer care and support packages.

Our partners such as Citizens Advice Bureau offer weekly sessions for helping people with no access to online resources.

We will keep all types of service access (e.g. telephone, face to face and online) available so that people with different needs can find an access route which suits them best.

Our website has a *ReadSpeaker* facility for visually impaired as well as offering different font size. Different coloured font is also available for people with colour vision deficiency.

The Personal Housing Plan takes account for every household's unique circumstances and households will collaboratively work on what realistic steps they can take to attempt to resolve their own homelessness situations.

A representative from Housing Solutions will attend a focus group on 28 Feb 2018 on accessing housing advice, hosted by Imogen Blood and Associates. Feedback from customers with disabilities will help assist us with good practice.

The overall aim of this policy is to prevent homelessness and reduce the necessity for people to remain in inappropriate temporary accommodation. The delivery of the actions identified will have positive impact for BME, disabled and vulnerable, young people and women, all of whom are over represented amongst those who are at risk of homelessness.

Gender reassignment - The process of transitioning from one gender to another.	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
<p>Having assessed recent reports from Stonewall (see analysed information below), there is a link between homelessness and gender reassignment and although there are no policies and impacts from the strategy that specifically seem to impact this, we will be reviewing our information and services to ensure we are providing a good service to this group.</p> <p>The council has begun including equalities questions about the sexual orientation and gender reassignment of the lead applicant for homeless households in the homelessness application. However, applicants can decline answering these and as this was only implemented in April 2017, it is too early to analyse any data collected.</p>	None identified.
Equality information on which above analysis is based.	Health data on which above analysis is based
LGBT in Britain – Trans report (Stonewall, 2017) research by YouGov showed that a quarter of trans people (25 per cent) have experienced homelessness. http://www.stonewall.org.uk/lgbt-britain-trans-report?mc_cid=29c04bb01d&mc_eid=e8a58a7e13	No current data available.
Mitigating actions to be taken	
The focus on procuring properties in more urban areas, where their diversity as far as possible reflects that of Southwark, might help to ensure there are facilities for transgender people, which may be more likely where the population is more diverse. In addition the focus on also procuring properties in areas with reasonable transport links to London might help transgender people in particular to continue to use local support services if there are fewer where they live.	None at this point. Will be reviewed as appropriate.

Marriage and civil partnership – In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couple. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples and must be treated the same as married couples on a wide range of legal matters. (Only to be considered in respect to the need to eliminate discrimination.)	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)

In terms of treating marriage or civil partnership more or less favourably, no issues have been identified.	Please see comments to the left
Equality information on which above analysis is based	Health data on which above analysis is based
No current data available.	No current data available.
Mitigating actions to be taken	
None at this point. Will be reviewed as appropriate.	None at this point. Will be reviewed as appropriate.

Pregnancy and maternity - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
<p>A significant number of lead applicants from accepted households are pregnant women. 10% (20 of 206) of accepted homeless households were pregnant with no other children between January and March 2017.</p> <p>As noted above, the Temporary Accommodation Lettings Framework policy has a particular focus on children with compelling needs to be accommodated close to Southwark or in London and those who care for them.</p>	None identified.
Equality information on which above analysis is based	Health data on which above analysis is based
Jan – Mar 2017 P1E data.	No current data available.
Mitigating actions to be taken	
<p>Reducing the amount of time spent in temporary accommodation and limiting the number of moves between accommodation is part of the strategic aim of the Homelessness Strategy, all of which should have positive health impacts.</p> <p>Every offer of accommodation will take into account the household's individual circumstances and suitability of the accommodation offered to meet their needs. Any special circumstances will be taken into account</p>	None at this point. Will be reviewed as appropriate.

<p>when making offers to households – taking into account if there is a compelling need for the accommodation to be in a particular location</p> <p><input type="checkbox"/> Resettlement support will be offered to households being made private rented sector offers where they are relocating out of London and where needed when they are moving from Southwark</p> <p><input type="checkbox"/> Support will also be offered to households moving into temporary accommodation outside London</p>	
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<p>Race - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others</p>	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
<p>A great proportion of homeless decisions are made for ethnic minorities and therefore the policies will have a disproportionate effect on ethnic minority households.</p> <p>There may also be fewer cultural facilities for some ethnic groups in locations outside London, although this would very much depend on the area where the offer was made.</p> <p>English not first language – Language barriers create difficulties providing advice on personal resilience, collaborating on the Personal Housing Plan and receiving housing advice. There is disadvantage with access to the same materials and advice on rights, entitlements and options under the new Homelessness Reduction Act guidance.</p> <p>Members of gypsy and travelling communities may be reluctant to approach the Council for help due to suspicion of official organisations. In addition to this, a lack of understanding of homelessness in gypsy and traveller communities means that this group may not be adequately planned for.</p>	None identified.
Equality information on which above analysis is based	Health data on which above analysis is based
<p>In 11% of households nobody speaks English as a first language. (Review of Homelessness in Southwark 2017)</p> <p>Southwark Demography 2015 report: 52% of the population belong to the White group, 48% to Black, Asian and Minority Ethnic group.</p> <p>31% Black ethnicity compared to 17% in London. 16% African ethnicity compared to 7% in London. 6% Caribbean ethnicity compared to 4% in London. 9% Black Other compared to 5% in London 11% Asian ethnicity compared to 21% in London.</p> <p>In summary, Southwark is ethnically diverse with 48% of its population being black and minority ethnic.</p>	No current data available.

<p>The p1e statutory information which Southwark provides to the Government shows that ethnic minorities make up a greater proportion of homelessness. In the three months between April 2016 and June 2016, Southwark made 606 homeless decisions. 112 were for white British/Irish/other applicants, 281 were black (African/Caribbean/other) applicants, nine were for Asian/Chinese, 113 for other ethnicity and 91 not stated.</p> <p>Of the 515 where ethnicity was recorded, we can calculate that 22% of the decisions were for white British/Irish/other ethnicity. In conclusion we can see that a great proportion (78%) of the homeless decisions are made for ethnic minorities and therefore the policies will have a disproportionate effect on ethnic minority households.</p>	
<p>Mitigating actions to be taken</p>	
<p>Places will be identified for procuring properties, where the diversity as far as possible reflects that of Southwark, focussing on more urban areas where there are likely to be more facilities and support networks. This might particularly benefit households of different ethnic origins. Households will also be given opportunities to identify areas of preference taking account of affordability and availability.</p> <p>Procurement of properties outside London will, wherever possible, be focussed on urban areas in the South East in areas with reasonable transport links to Southwark – in order to help households maintain local connections. This might particularly benefit households of different ethnic origins</p> <p>Discharge into the private sector decisions will be monitored by ethnicity. As applicants move on in the process, progress is monitored through the iWorld Northgate housing system which enables a series of reports that monitor by relevant equality characteristics.</p> <p>The Service ensures that people from any ethnicity can compete on an equal basis; this includes Gypsy and traveller communities. Translation services are made widely available upon request or where required, including British Sign Language. We are considering the need for induction loops.</p> <p>Literacy is an issue that is not specifically related to ethnicity, but is relevant as a general issue. The homeless application process is designed so that council officers record the application details for 100% of cases, so this avoids the requirement of homeless applicants from making their own application.</p> <p>We are continuing to provide more information online which can be freely translated through internet services such as Google Translate. Google Translate is also embedded in our Homesearch website.</p> <p>The employment of resettlement officers will assist households to resolve any issues and also signpost and link to other services which can assist in resolving the impacts.</p> <p>The overall aim of this policy is to prevent homelessness and reduce the necessity for people to remain in less suitable temporary accommodation. The delivery of the actions identified will have positive impact for BME, disabled and vulnerable, young people and women, all of whom are over represented amongst those who are at risk of</p>	<p>None at this point. Will be reviewed as appropriate.</p>

homelessness.	
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Religion and belief - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
<p>Homeless applicants may, for example, regularly attend a place of worship. If they are allocated a private sector accommodation out of the borough it may make it difficult for them to continue to attend regularly.</p> <p>Whilst the detailed recording of homeless applications and housing allocations by people of different faith groups can pin point adverse trends in relation to individual faith groups, the information should be treated only as an issue for further investigation since much will depend on the respective priorities of applicants and the particular areas they are aspiring to. Therefore, close monitoring in this area is essential to identify any patterns that may arise.</p>	<p>None identified.</p>
Equality information on which above analysis is based	Health data on which above analysis is based
<p>No data sets record religion or belief.</p>	<p>No data sets record religion or belief.</p>
Mitigating actions to be taken	
<p>Under the Early Adopter Trailblazer and Homelessness Reduction Act, the aim is for the household to receive advice but ultimately have a say in deciding which area they would realistically like to be housed in based on their preferences and taking account of aspects such as their income.</p> <p>Places will be identified where their diversity as far as possible reflects that of Southwark, focussing on more urban areas where there are likely to be more facilities and support networks for people. This might particularly benefit people with different faiths and beliefs.</p> <p>Procurement of properties outside London will, wherever possible, be focussed on urban areas in the South East in areas with reasonable transport links to Southwark – in order to help households maintain local connections. This might particularly benefit people with different faiths and beliefs.</p> <p>During the homelessness application, information is collected which ensures that a suitable offer of accommodation can be made in the private rented sector. Religious beliefs can be taken into account by reviewing the suitability of accommodation and its proximity to relevant places of worship.</p>	<p>None at this point. Will be reviewed as appropriate.</p>

<p>We have revised the homelessness application form so that it requests information about protected characteristics in the body of the form, instead of at the end, with the aim that this best practice helps to improve data collection. The data collection has also been expanded to collect data on all nine of the protected characteristic groups which should improve data monitoring on impacts to religion and belief.</p>	
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Sex - A man or a woman.	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
<p>Implementing the new relief duty and S189B duty to secure accommodation should positively impact on reducing rough sleeping, which will predominantly impact on men because 87% of Southwark's rough sleepers are male.</p> <p>Women are disproportionately represented among lead applicants from accepted households.</p> <p>Women are also more likely to be lone parents, who are disproportionately affected by homelessness in Southwark³.</p> <p>Women are also more likely to be carers⁴, who can be impacted by moves away from the people they are caring for, they are also more likely to be impacted if they move outside Southwark and London and have to travel greater distances to maintain that care.</p> <p>People with children, and lone parents (who are more likely to be women) in particular, will potentially be negatively affected if they move outside Southwark and London as they are more likely to rely on local support networks for child care arrangements.</p> <p>Women of a working age are less likely than men of a working age to be in employment. Those not in work are more likely to be offered a private sector tenancy further away from Southwark where nothing nearer is available and so could be more impacted by PRSO placements.</p>	<p>None identified.</p>
Equality information on which above analysis is based	Health data on which above analysis is based
<p>The p1e statutory information which Southwark provides to the Government shows that females make up a greater proportion of the borough's homeless decisions. In the three months between April 2016 and June 2016, 73% (95 out of 130) of homeless decisions for single parents and single people were for female applicants.</p> <p>Therefore, although Southwark is evenly split between male and females (Southwark Demography 2015), a higher proportion of the decisions are made for females.</p>	<p>No data available currently.</p>

³ According to [Gingerbread](#), around 90% of single parents are women

⁴ Carers UK estimates that 58% of carers are women.

<p>Evidence on gender and employment rates: http://www.poverty.org.uk/48/index.shtml</p>	
<p>Mitigating actions to be taken</p>	
<p>The cumulative effect of the policies however is intended to help provide households with greater certainty, which may make it easier to establish lasting care networks and support, than if those concerned were likely to face repeated relocation as can be the case with temporary accommodation.</p> <p>All housing decisions are assessed for suitability and the intention of the Homelessness Reduction Act is to develop a collaborative process between the council and the household, so that the household has an input into the locations of preference and this is reflected in the development of the Personal Housing Plan.</p> <p>Mitigations for households with children are set out in the <i>Section 4: Age – Children</i>.</p> <p>Some carers (who are more likely to be women) will be prioritised for in borough/adjacent borough accommodation</p> <p>Resettlement support will be offered for private rented offers which are out of London, and for moves within London where they are needed and this could include help to register children in local schools</p> <p>Support will also be offered to households moving into temporary accommodation outside London and as above this could include help to enrol children in local schools and to find nursery places</p>	<p>None at this point. Will be reviewed as appropriate.</p>

<p>Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan</p>	<p>Potential health impacts (positive and negative)</p>
<p>While many people identify as heterosexual, many people also do not in the wider community. The Government estimates that approximately 6% of the population are gay men, lesbians or bisexuals.</p> <p>It is acknowledged that local data on sexual orientation is unlikely to be accurate and on-going efforts should be made to encourage such information being given at the point of application.</p> <p>Members of the LGBT community may face specific barriers not currently considered, and it may be that more information about this client group is needed.</p> <p>Insufficient monitoring customer engagement and feedback means that it is not possible at this time to properly evaluate with any certainty what impact the service has and whether some customers may be disadvantaged through their sexual orientation. There is a</p>	<p>None identified.</p>

<p>risk albeit small, that anyone in this position could be discriminated against and this could lead to an inequality in treatment.</p> <p>A survey published in 2000, National Survey of Sexual Attitudes and Lifestyles, concluded that 5-7% of the UK population were likely to be lesbian, gay and bisexual. There is no evidence to suggest that people in these categories are likely to be disproportionately represented among those presenting themselves as homeless.</p> <p>Homeless household sexual orientation information is not available but moves outside London may impact on the support networks and services available to Lesbian, Bisexual, Gay and Transgender (LGBT) groups, although there is no actual evidence of this, and it would very much depend on the location of any properties offered.</p> <p>ONS data (2015) indicates that areas outside London have a smaller LGBT population. The proportion of the LGBT population in London is estimated to be 2.6% compared to 1.8% in the South East and 1.2% in the East of England⁵. There may be impacts arising from the relative lack of support and other services designed specifically for LGBT people in some places outside London, but again this would very much depend on the area where the offer was made.</p>	
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>National Survey of Sexual Attitudes and Lifestyles (2000)</p>	<p>No data sets record sexual orientation.</p>
<p>Mitigating actions to be taken</p>	
<p>The focus on procuring properties in more urban areas, where their diversity as far as possible reflects that of Southwark, might help to ensure there are facilities for people of different sexual orientations, which might be more likely where the population is more diverse. In addition the focus on also procuring properties in areas with reasonable transport links to London might help people of different sexual orientations to continue to use support services, if there are fewer where they live.</p> <p>Under the Early Adopter Trailblazer and Homelessness Reduction Act, the aim is for the household to receive advice but ultimately have a say in deciding which area they would realistically like to be housed in based on their preferences and taking account of aspects such as their income.</p> <p>Staff have been fully trained by Albert Kennedy Trust in 2016. Therefore, the service should be well placed to identify and deal with potential discrimination.</p> <p>The Housing solutions services will employ resettlement officers to provide a customer care to all households placed out of the borough to ensure households have someone to contact regarding any issues.</p>	<p>None at this point. Will be reviewed as appropriate.</p>

⁵<https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualidentityuk/2015>

Monitoring of this sector will enable specific issues for different segments of the population to be identified and addressed appropriately.	
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<p>Socio-economic disadvantage – although the Equality Act 2010 does not include socio-economic status as one of the protected characteristics, Southwark Council recognises that this continues to be a major cause of inequality in the borough. Socio economic status is the measure of an area's, an individual's or family's economic and social position in relation to others, based on income, education, health, living conditions and occupation.</p>	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
<p>Homeless households are more likely to have low incomes and not be working compared with the Southwark population so are more likely to be impacted by the policies.</p> <p>The percentage of households in temporary accommodation (TA) that have been on "passport benefits" (i.e. in receipt of non working benefits such as JSA or ESA where Housing Benefit would be paid automatically) has dropped significantly. Previously, around 90% of households would have had TA paid through Housing Benefit. A survey of TA tenants carried out in 2015 showed that this figure has dropped to around 50%. This is likely to be because of the increase in the number of people in part time employment (declaring themselves as self-employed).</p> <p>A key principle is that rents need to be affordable to low income people within benefit levels as otherwise it will not be sustainable to them in the long term. Both of these considerations are likely to become increasingly pressing if private sector rents continue to rise and the tendency for landlords to let to more affluent tenants continues. They are likely to be further exacerbated by the introduction of Universal Credit.</p> <p>The higher rents in private rented housing might mean low income working households will need to claim benefits for longer than they would in social housing where rents are lower.</p> <p>There is also a risk that members of homeless households that are in employment may not be able to sustain their job if they had to move outside London and this is important, given that those in homeless households are disproportionately more likely to be non working and to be affected by the overall benefit cap than other households.</p> <p>There also might be fewer employment opportunities in some areas outside of London, although the proportion of the working age population claiming out of work benefits is 1.9% for London which is similar to Great Britain⁶, but there are obviously regional variations.</p> <p>Households that are not currently in work, particularly larger families that are benefit capped, are more likely to be made a</p>	<p>There is also considerable policy research that supports the proposition that working contributes towards individual wellbeing⁷.</p>

⁶ www.nomisweb.co.uk

⁷ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/214326/hwwb-is-workgood-for-you.pdf

<p>private rental sector offer which is further from Southwark on grounds of affordability.</p> <p>Increasing services online could negatively impact people with a socio-economic disadvantage because they are less likely to be able to access online services. Whilst it is not a like for like comparison with homeless households Southwark's social housing resident survey shows the disparity that 13% of those not in work have no internet access at home compared to only 3% of those in work.</p> <p>This disparity is also noted in the ability to perform basic online tasks between the two groups. Only 75% of those not in work have completed an online application before, compared to 93% of those in work.</p>	
Equality information on which above analysis is based	Health data on which above analysis is based
<p>Data on benefit rates across Britain can be found in the official labour market statistics: www.nomisweb.co.uk</p> <p>In 2015, Southwark was ranked the 23rd most deprived local authority in England (out of 326) and the 9th most deprived borough in London (out of 33) according to The Index of Multiple Deprivation (IMD).</p> <p>In September 2016 Southwark's unemployment rate was 6.9% compared to a London average of 6.0% and a national rate of 4.9% with 24,420 of working age residents (10.8%) claiming a key out of work benefit (these include JSA, ESA / Incapacity Benefit and other income related benefits).</p> <p>Between May 2012 and May 2016 the number of working age benefit claimants in Southwark reduced by 28%. The data below shows that the main reduction has been in Job Seekers Allowance claimants with fewer than half the claimants in 2016, than in 2012.</p> <p>Southwark Resident Survey (September 2016)</p>	<p>Socio-economic challenges such as unemployment and poor housing result in high rate of child poverty and social exclusion which subsequently contribute to poor physical and mental health manifesting health inequalities. (Review of Homelessness in Southwark 2017)</p> <p>People in significant financial hardship are more likely to suffer poor health (Review of Homelessness in Southwark 2017)</p>
Mitigating actions to be taken	
<p>Mitigation measures have been developed to reduce the impact the policies might have on homeless people that are working, given that unemployment, and being affected by the overall benefit cap, can be causes of homelessness in themselves.</p> <p>However, it might be argued that prioritising working homeless households for properties in certain locations might disadvantage those that find it harder to work, such as: those with disabilities; lone parents; larger households with greater needs for child care; and those for whom English is not their first language. The council aims to help mitigate this by engaging with non working homeless households and helping them into work and by considering the factors which are barriers to work, as well as by targeting within its priority categories certain groups that have a strong correlation with those who may find it harder to work, including people with disabilities and households with dependant children.</p>	<p>None at this point. Will be reviewed as appropriate.</p>

Certain workers (i.e. those where they or their partner works more than 16 hours per week in Southwark or an adjoining borough) will be prioritised for accommodation in Greater London so they can maintain their employment.

One of the considerations of the Personal Housing Plan will be for the household to identify locations they would be willing to live in that takes into account the employment opportunities in the different areas.

All private sector offers of housing should be affordable in the longer term i.e. within benefit levels.

The cumulative effect of the policies however is intended to help provide households with greater certainty, which may make it easier to establish lasting care networks and support, than if those concerned were likely to face repeated relocation as can be the case with temporary accommodation. Repeated relocation also carries a cost of transportation, removals and refurnishing essentials.

All housing decisions are assessed for suitability and the intention of the Homelessness Reduction Act is to develop a collaborative process between the council and the household, so that the household has an input into the locations of preference and this is reflected in the development of the Personal Housing Plan.

The policies within the homelessness strategy will look to allow households in temporary accommodation that have been placed outside of Southwark to continue bidding for permanent social housing inside Southwark for as long as they remain in TA.

Resettlement officers will assist all households with settling in to new communities if they have been moved out of borough and require assistance.

Significant work is being undertaken in the community to minimise digital exclusion which includes Digital Hubs providing one-to-one digital skills and training. An EU funded project will create new community engagement tools for various groups in our communities.

We will monitor customer satisfaction and aim for year on year improvement in satisfaction with fewer formal customer complaints made.

For customers who need help to get online we will refer them to one of our libraries or Digital Inclusion Hubs for free training and they can also access the internet for free in libraries.

We will ensure alternative service access remains available such as face to face appointments, so that no one is excluded from accessing the service.

Our partners such as Citizens Advice Bureau offer weekly sessions for helping people with no access to online resources.

Human Rights

There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour, Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol.

Potential impacts (positive and negative) of proposed policy/decision/business plan

There are no anticipated negative impacts on Human Rights as a result of these policies.

Information on which above analysis is based

No current data available.

Mitigating actions to be taken

None at this point. Will be reviewed as appropriate.

Section 5: Further actions and objectives

5. Further actions

Based on the initial analysis above, please detail the key mitigating actions or the areas identified as requiring more detailed analysis.

Number	Description of issue	Action	Timeframe
1	Monitor the impact of implementing the policies. Equalities data collection has been revised in April 2017 to follow best practice whereby homeless applications capture data on protected characteristics mid-form, instead of at the end, to encourage a better completion rate and improve the quality of information for monitoring.	The policies will be monitored to assess the impacts on those households with protected characteristics (and more widely) and to identify whether any further additional mitigation measures (particularly as regards support packages offered to those concerned) are needed.	These impacts will be reported on an annual basis from the date of implementation.
2	Customer Satisfaction Surveys.	An online survey has been developed to collate all feedback from across the service. This survey collects data on all 9 protected characteristics. It will be analysed annually to assess any	Analysed annually in April each year. The survey will also be reviewed periodically at management meetings to ensure it is reaching as wide an audience as possible and that all

		issues arising.	households have the opportunity to complete the survey.
3	Homeless prevention pathways and advice for all cohorts.	Develop homelessness LGBT online advice.	May 2018.

5. Equality objectives (for business plans)

Based on the initial analysis above, please detail any equality objectives that you will set for your division/department/service. Under the objective and measure column please state whether this objective is an existing objective or a suggested addition to the Council Plan.

Objective and measure	Lead officer	Current performance (baseline)	Targets	
			Year 1	Year 2
None at this point	None at this point	None at this point	None at this point	None at this point

5. Health objectives (for business plans)

Based on the initial analysis above, please detail any health objectives that you will set for your division/department/service. Under the objective and measure column please state whether this objective is an existing objective or a suggested addition to the Council Plan.

Objective and measure	Lead officer	Current performance (baseline)	Targets	
			Year 1	Year 2
None at this point	None at this point	None at this point	None at this point	None at this point