

APPENDIX 4

Southwark's Accommodation Procurement Policy for Homeless Households, Private Rental Sector Offer of Accommodation Policy and Temporary Accommodation Lettings Framework:

Equality and Health Analysis

Section 1: Equality analysis details

Proposed policy/decision/business plan to which this equality analysis relates	Accommodation Procurement Policy for Homeless Households, Private Rental Sector Offer of Accommodation Policy and the Temporary Accommodation Lettings Framework
---	--

Equality analysis author					
Strategic Director:		Michael Scorer, Strategic Director of Housing and Modernisation			
Department		Housing and Modernisation	Division	Customer Experience	
Period analysis undertaken		September 2018 – December 2020			
Date of review (if applicable)		January 2022			
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 Impact Assessment (EIA) forms part of the review of the EIA assessment completed on the 27 September 2018. The initial assessment examined the impacts (individual and cumulative) of a suite of new Southwark Council policies subsequently approved on the 10 July 2019, providing the framework for the use of private rented accommodation to help meet the council's duties to homeless households.

These policies included the following:

- **Private Rented Sector Offers (PRSO) Policy for homeless households** – the policy sets out the council's intention to make more homeless households offers of private rented accommodation to discharge its rehousing duty to them.
- **Accommodation Procurement Policy for homeless households** – this explains the council's temporary accommodation needs, issues in procuring temporary accommodation and the principles the council will follow when procuring rented properties, both for temporary accommodation and private rented sector offers.
- **Temporary Accommodation Lettings Framework** – this sets out how households will be prioritised for properties, both for temporary accommodation and private rented sector offers, in different locations.

Full details of the policies can be found via the link below:

<http://modern.gov.southwark.gov.uk/ieDecisionDetails.aspx?ID=6889>

At the point of the initial EIA, the assessment was based on the available information prior to implementation, but following over 18 months since implementation, we are now aiming to put in place amendments to the existing policies.

The amendments to the existing policies aim to increase access to affordable and suitable accommodation that meets our Good Homes Standards. The new policies:

- remove restrictions on geographical limitations for procuring good quality homes,
- Confirm an approach to offer shared temporary accommodation for singles.

Legal framework

Within the previous EIA assessment, the legal requirements were set out confirm the operating perimeters applicable when devising the policies.

This includes the Housing Act 1996 in which local housing authorities have duties to secure suitable accommodation for homeless people with a local connection and with a

priority need, as defined in the statute. Where permanent housing cannot be provided immediately, homeless households are placed in temporary accommodation.

The Localism Act 2011 gave local authorities the power to discharge this main housing duty to homeless households through an offer of an assured shorthold tenancy in the private rented sector, without any requirement for applicant's prior agreement. This change effectively ended the previously direct link between Parts 6 and 7 of the Housing Act 1996 because where a suitable PRSO is made by the council, the applicant no longer has priority for social housing. Until now, the council has only offered private rented tenancies to a small number of households, and with their consent.

The Homelessness Reduction Act 2017 also places Prevention and Relief duties on local authorities which can also include the provision to secure accommodation.

The 1996 Act and supporting regulations require local authorities to place homeless households in borough wherever "reasonably practicable". Location is one of the factors that must be taken into account when considering whether temporary or permanent accommodation provided to meet any of the homelessness duties is suitable.

The proposed amendments will continue to comply with the relevant legislation, government guidelines and caselaw.

Reasons for the policies existing policies

Overall these policies are intended to ensure availability of enough suitable private sector accommodation for homeless households to allow the council to meet its duties at a cost that it can sustain and which are affordable to homeless households, against the background of an increasingly difficult market, marked by rapid increases in rent costs. Temporary accommodation already costs the council 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 policies will have the effect of off-setting the impact of continuing high numbers of homeless households presenting to the council and the loss of social rented supply.

Modelling suggests that without the policies the cost of temporary accommodation could increase to £7.6m in 2021/22. The policies are also intended to provide more certain and sustainable outcomes for homeless households, enabling them to secure suitable private rented housing more quickly rather than waiting in temporary accommodation for many years (and often subject to multiple moves over this time) until a social home becomes available. For other households, this approach will help free up resources that can be used to help prevent homelessness from arising in the first place – the approach being given increased priority locally, regionally and nationally.

Details of each of the policies is given below:

Private rented sector offers (PRSO) policy

The private rented sector offers policy is needed to set out clearly and transparently how the council will use its powers under the Localism Act. The policy sets out council's policy intention to make more private rented sector offers to homeless households, where the law allows it. Homeless households might either be offered a private rented tenancy as soon as they are accepted as homeless or from their temporary accommodation – meaning they will spend less time in temporary accommodation. This will help to contain temporary accommodation costs which are described above. Another of the policy's objectives is to help improve outcomes for homeless households. Currently, they can wait for more than 3 years in temporary accommodation for social rented housing (these waits tend to be longest for households requiring two or more bedrooms). This temporary accommodation is increasingly out of Southwark (currently 42% is outside Southwark).

Households often have to move a number of times within temporary accommodation – as an illustration, of a random selection of ten households currently in regeneration estate 'second stage' temporary accommodation at the time this assessment was completed, households moved on average three times, although some move more times than this. The nature of temporary accommodation therefore means it can be difficult for households to settle in an area, establish local links and get on with their lives. The policy (which will be backed by a package of support for the households concerned) is intended to help ensure that the offer of a private tenancy will mean that households can move into more settled accommodation that is affordable to them more quickly, enabling them to settle in a neighbourhood, engage with local services and opportunities and plan their futures with more certainty.

The current long waits in temporary accommodation are due to a significant mismatch between the supply of social housing and demand for it, at the beginning of 2017 there were 10,120 households on the housing register for social housing with around 1,500 of these being homeless households in temporary accommodation. Only around 1,000 social rented housing units became available last year in Southwark and the nature of the social housing stock available is that a proportion of this is comprised of one bedroom units, while the great majority of homeless households (94%) require two bedrooms or more.

The council seeks to maximise provision of new affordable housing in the borough, including through its ambitious estate regeneration programme, but the scarcity and cost of sites in Southwark restricts its ability to meet increasing demand in this way. These supply and demand factors are unlikely to improve as homeless acceptances are forecast to remain high at least in the medium term (primarily as a result of changes to the benefit system) – at around 850 to 950 each year.

Social rented supply is also likely to reduce, at least in the short term, due to a number of national policies mainly imposed by the Housing and Planning Act 2016, such as the extension of right to buy to housing association tenants and introduction of annual payments to government based on anticipated sale of local authority higher value voids to help fund it.

Accommodation Procurement Policy

This policy is needed to provide an action plan for procuring enough accommodation both for PRSO and for temporary accommodation and to meet housing needs for homeless households. It is also needed to set out the principles the council will follow when procuring properties. Having such clear key principles is needed because although the council will, wherever possible, seek to acquire affordable accommodation within Southwark and in neighbouring boroughs, this is becoming increasingly difficult, due to the lack of properties within benefit levels and subsidy thresholds.

Research has confirmed the limited supply of properties available within the resources available (see below) both for PRSO and for temporary accommodation with in Southwark and London. Since this research was carried out, according to landlord insurer HomeLet, rent prices in London dropped by 1.2% in 2016, the first annual drop in eight years. It was also noted that rent increased across England by 0.4% in 2016, the lowest annual increase for seven years. This slowdown was associated with the economic impact resulting from the Brexit referendum decision and general affordability.

A key principle for the procurement of temporary accommodation is that it is affordable to the council within relevant subsidy levels, in order to help to contain temporary accommodation costs and to prevent them from rising excessively.

Another 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 which has now been fully rolled out across Southwark with the exception of a few micro post code areas.

The policy also sets out other factors which will determine where properties are procured – these are needed to ensure the locations are suitable for homeless households and have health, social and employment opportunities.

Temporary Accommodation Lettings Framework

This framework replaces the existing Temporary Accommodation Lettings Framework and Frequently Asked Questions. This revised policy is designed to compliment the Accommodation Procurement and PRSO policies and is needed as the amount of housing available for temporary accommodation (and for private rented sector offers) in Southwark and Greater London is likely to continue to decline while costs are likely to continue to increase. Although, as set out above, the council aims to place households in or as close to Southwark as possible, where sufficient affordable accommodation is not available, it will have to seek alternative accommodation further afield.

The council therefore needs to prioritise households for properties in different locations in ways that take account of their needs. The particular focus of the policy is to

prioritise allocation of accommodation in or near Southwark to households with the greatest need to be housed there. These locations are grouped in bands:

- **Band 1:** Southwark and adjacent boroughs
- **Band 2:** Greater London
- **Band 3:** Further afield.

The priority categories are designed to apply to those with compelling needs to be accommodated close to Southwark or within Greater London. The needs of children and disabled people and by extension those who care for them are a particular focus of the priority categories.

Alongside this, some priority is given to working households. The council will also consider individual compelling claims to be entitled to locational priority which do not fit into the defined categories, on their own merits. Further, any offer of accommodation under the homelessness legislation is subject to an individual suitability assessment. These factors provide a safety net which allows for the consideration, for example, of cultural reasons for a particular placement which may affect certain ethnic minority households.

Proposed changes

The general trend of increasing number of homeless approaches to the council has been further exasperated as a result of the Covid-19 pandemic. The proposed changes have been suggested in order to meet the needs of our residents while also reducing financial expenditure.

Appendix 1: Accommodation Procurement Policy for Homeless Households

Current policy text	Amendment
4th bullet point under paragraph 21: “The council’s first priority will be to secure accommodation in Southwark, where it is not possible to secure good quality affordable accommodation in Southwark the council will next look in surrounding boroughs, then in other London boroughs and then in other areas within the M25. The council will also work to secure accommodation for those households who wish to live outside of this area.”	Replace text with the following: “The council’s first priority will be to secure accommodation in Southwark, where it is not possible to secure good quality affordable accommodation in Southwark the council will next look in surrounding boroughs, then in other London boroughs and then in other areas increasingly further afield . The council will also work to secure accommodation for those households who wish to live outside of this area.”

Appendix 2: Private Rented Sector Offers Policy for Homeless Households

Current policy text	Amendment
3rd bullet point under paragraph 13: “Accommodation will be in or close to Southwark. Unless the household requests a move to a	Remove text

location that is further away, the accommodation offered will be within 90 minutes reasonable journey time by public transport from the address the household was living at before they became homeless and will also be within the M25. Travel times will be measured using the Transport for London online Journey Planner.”

Appendix 3: Temporary Accommodation Lettings Framework

Current policy text	Amendment
paragraph on page 3: “Unless you request accommodation in a location that is further away, we will offer you accommodation within 90 minutes reasonable journey time by public transport from where you were living before you became homeless, this will also be within the M25 area. Travel times will be measured using the Transport for London online Journey Planner.”	Remove text
page 3 “Other areas within the M25”	Replace with: “Other areas increasingly further afield in line with the policy”
7th bullet point on page 5: “90 minutes travelling distance by bus of their school or college, alternatively where the journey is possible within 90 minutes by train, tube or tram but not by bus the council will meet the cost difference between the bus fare and the fare using the train, tube or tram”	Replace with: “Applicants who have as part of their household, a child or children who are enrolled in public examination courses in Southwark, with exams to be taken within the next six months.”
6th paragraph on page 6: “If you wish to keep your children in their current school the council will seek to offer you accommodation within 90 minutes journey time by public transport from their school. Where this journey to take the children in your household to and from this existing school is possible within 90 minutes by train, tube or tram but not by bus the council will pay the difference in cost between the bus fare and the fare using the train, tube or tram”	Remove text

A further policy change is also proposed to confirm an approach for providing shared nightly rate accommodation for single homeless households. This provision will be in line with legislative requirements and guidance, with *The Homelessness (Suitability of Accommodation) (England) Order 2003* and *The Homelessness (Suitability of Accommodation) (England) Order 2012* of particular relevance. The 2003 Order states that families should not reside in shared B&B for more than 6 weeks, this includes

pregnant households. However, this ruling does not extend to single people.

Access to shared temporary accommodation for single households makes a significant difference to the cost pressures on the General Fund budget.

What is being assessed

The following aims to assess the impacts of the amendments from the existing policy applied. We wish to identify any negative impacts on households and how this can be mitigated.

Section 3: Overview of service users and key stakeholders consulted

Service users and stakeholders	
Key users of the department or service	<p>The EIA completed in Nov 2018 included contact with all customers who approach the service for housing advice, assistance and support through the related homelessness legislation.</p> <p>Legal representatives who work in partnership with the council related to the homelessness legislation and case law.</p>
Key stakeholders were/are involved in this policy / decision / business plan	<p>Information taken from the EIA Nov 2018 included 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. 2018 visit to Havering peer review who have also implemented this policy. We have since completed further visit to Barking and Dagenham and Haringey whom also operate such policies and was considered when developing the policies.</p> <p>Advice by Arden Chambers. Specialist expertise opinion provided on the placement of homeless applicants out of borough.</p> <p>All Housing Association partners, Citizens Advice Bureau, Shelter, community organisations, local residents, Area Tenant Forums, Children's & Adults' Services, and Southwark Legal Advice Network. Ongoing briefings and feedback will be sought from all partners as part of the yearly review of the policies.</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>As highlighted within the previous EIA, there are some age range of the lead household member makes up the majority of homeless approaches and would therefore be subject to the be affected by changes to the policy.</p> <p>Previously we had reported the age range of applicants making an approach consisted of households aged between 25-44. There is no significant change in this proportion of approaches.</p> <p>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>The proposed changes will positively benefit single residents aged between 18-35 as they will have greater access to a supply of accommodation that the council can offer. Conversely the council will be exercising the discharge of duty ability across all age ranges through the offer of one suitable offer.</p> <p>Age - Children The previous EIA identified children will potentially be negatively affected if they need to move outside of Southwark and London. This was due to the potential requirement to start new schools, which can be disruptive particularly if they are at key exam stages. The policy and legislation however requires children taking exams not to be placed where this would affect their ability to attend schools. This also includes those attending specialist schools.</p> <p>Age – Older people As identified in the previous EIA, older people eligible for Sheltered housing will not usually 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</p>	<p>No current data available.</p>

<p>among homeless people however.</p> <p>Since the introduction of the policy in July 2019, a small proportion of residents of pension age have been placed in private accommodation. However it is not imagined the amended policy will negatively impact this group.</p> <p>It is anticipated the Good homes standard will have a positive impact upon households across all age groups as they will be able to benefit from a better standard of property.</p>	
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>Southwark Demography Factsheet May 2015.</p> <p>www.southwark.gov.uk/assets/attach/5718/JSNA-Factsheet-2017-Protected-Characteristics-20171130.pdf</p> <p>Housing Options iworld database - Snapshot equalities data of households in TA - 8 Jan 2021</p> <p>Hcllc System internal data: August 2019 – Dec 2020.</p>	<p>No current data available.</p>
<p>Mitigating actions to be taken</p>	
<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"> • 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 • Households with a child where Southwark Family Services has demonstrated serious concerns about the child and is working with them intensively • Households where there is a recommendation through a joint assessment with Children's and Adult's Services • Households which include a registered Southwark Council approved foster carer who is fostering a Southwark looked after child • 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</p>	<p>None at this point. Will be reviewed as appropriate.</p>

<p>particularly benefit children.</p> <p>Resettlement support will be offered for some private rented offers. This could include help to enrol children in new schools and to find nursery places. The Housing Solutions service has recently been awarded a Customer Service Excellence renewed accreditation and we have specialist officers to aid support and mitigate the effects of moving outside of the district and into private sector accommodation.</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>The council are building a number of older person's and sheltered accommodation for the aging population. Therefore this will increase the options available to this age range and therefore the changes in the policy will not affect this group.</p> <p>All residents placed in temporary accommodation or placed in private accommodation provided by the council will have a suitability assessment completed which will help to identify any of the above.</p>	
---	--

<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>	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
<p>As identified within the previously EIA completed in Sept 2018, only a small proportion of accepted homeless households have members needing a wheel chair adapted property or a level access property. Overall, less than 9% of homeless households have members with a physical disability which impacts on the type of properties needed. Within the period since from August 2019- Dec 2020 this figure has reduced to 8%. During the same period, the total applicants approaching with mental health or a learning disability is similar with 9%. This data relates to the main applicant and therefore it is likely that household members could be under reported. This is also reflected in the data as the majority of the applicants with mental health or learning disability are single applicants.</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 depression and other mental health problems were two of the most common health conditions reported.</p>

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

<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>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>As noted above, the priority categories have a particular focus on disabled people with compelling needs to be accommodated close to Southwark or in London and those who care for them.</p> <p>It is anticipated the Good homes standard will have a positive impact upon households who have a disability as they will be able to benefit from a better standard of property.</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>Housing Options iworld database - Snapshot equalities data of households in TA - 8 Jan 2021</p> <p>Hcllc System internal data: August 2019 – Dec 2020.</p>	<p>Shelter – Living in Limbo²</p>
<p>Mitigating actions to be taken</p>	
<p>We have reviewed the suitability assessment process to ensure all placements have a robust assessment completed when placed in temporary accommodation or placed in private accommodation provided by the council. This will help to ensure any of the policy has been fully implemented and reduce unintended consequences of unsuitable placements. This must be audited at regular intervals.</p> <p>The private rented sector offers policy excludes some disabled households who wouldn't be able to manage a private rented tenancy (for example, those who may have care and support needs or a mental health condition which prevents them from managing a tenancy) and disabled households with members needing wheelchair accessible housing</p> <p>Some people with particular health problems or disabilities will be prioritised for in borough/adjacent borough accommodation, these include:</p> <ul style="list-style-type: none"> Households where at least one member has a severe health condition or disability (including a severe mental health condition) 	

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

<p>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</p> <ul style="list-style-type: none"> 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 <p>Some carers, and people being cared for, will be prioritised for in borough/adjacent borough accommodation</p> <p>Since the introduction of the first policy and the completion of the initial EIA, the services have recruited additional Resettlement staff within the service.</p> <p>Resettlement support is 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</p> <p>Support is also be offered to households moving into temporary accommodation outside London and as above this could include help to transfer care and support packages.</p> <p>The Housing allocations scheme priorities households with physical disabilities to obtain accessible social housing. This is restricted to eligible households and therefore this will aim to meet the required need, limiting the need for a household with physical disabilities to move into private accommodation or temporary accommodation.</p> <p>While it is recognised the Good homes standard will generally be a positive change, there maybe instances where the procurement process may involve additional amendments which would be suitable for the household. This will be processed on an individual basis.</p>	
--	--

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>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. Indeed only 3 households whom approach the service in 2020 are listed as having undergone gender re assignment.</p> <p>There are no specific issues from the proposed changes which are felt could discriminate or disadvantage residents whom have undergone gender reassignment other than general matters detailed elsewhere in this report, and the significant reduction in the availability of affordable in Southwark.</p> <p>However that being said, transgender customers may be particularly at risk of housing crisis and homelessness arising from transphobic reaction by</p>	None identified.

family, neighbours and members of the local community. It is anticipated the Good Homes standard will have a positive impact upon households whom have undergone gender re assignment as they will be able to benefit from a better standard of property.	
Equality information on which above analysis is based.	Health data on which above analysis is based
Housing Options iworld database - Snapshot equalities data of households in TA - 8 Jan 2021 Hcllc System internal data: August 2019 – Dec 2020.	No current data available.
Mitigating actions to be taken	
<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 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.</p> <p>Resettlement services provided to all residents placed into private and temporary accommodation to help link up with the relevant support.</p> <p>The housing solutions service has entered into a partnership with Stonewall Housing dedicated to provide support and advice to residents from the LGBTQ community. This will aim to promote the services and ensure any resident whom has gone through gender reassignment do not face any barriers to access social housing through the allocations scheme.</p>	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)
<p>Our data shows that there are very little residents whom approach our service whom are married or have a civil partnership. Our current snapshot of data shows there are only 4% of households. This has not changed since the implementation of the policy in 2019.</p> <p>A joint income household will likely be able to have more disposable income. Therefore income assessments will take this into consideration when determining where an affordable property would be available in the private sector.</p>	None Identified

<p>Lone parents are disproportionately affected by homelessness compared to their share of the population so are more likely to be affected by the policies.</p> <p>The proposed changes to the policy are not likely to have an impact upon this specific group.</p>	
Equality information on which above analysis is based	
<p>66% of statutory homeless households were single parent households.</p> <p>Housing Options iworld database - Snapshot equalities data of households in TA - 8 Jan 2021</p> <p>Hcllc System internal data: August 2019 – Dec 2020.</p>	
Mitigating actions to be taken	
<p>Housing Solutions service has retained a Customer Service Excellence renewed accreditation and we have specialist officers to aid support and mitigate the effects of moving outside of the district and into private sector accommodation by ensuring households have someone to contact regarding any issues.</p>	

<p>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.</p>	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
<p>As identified under the previous EIA, a significant number of lead applicants from accepted households are pregnant women.</p> <p>A potential move outside of the borough for a pregnant mother or mother on maternity leave may impact upon services received from the health service. This will likely require services to be transferred to the new area if moved away from the area.</p> <p>Additional properties identified further afield will assist in clients being offered permanent accommodation at an earlier stage and spend less time in temporary accommodation.</p> <p>In assessing the amended policies, the changes have not identified any additional direct or indirect discrimination on the basis of pregnancy or maternity.</p> <p>It is anticipated the Good homes standard will have a positive impact upon households with a pregnant woman or a woman on maternity leave as they will be able to benefit from a better standard of property.</p>	<p>None identified.</p>

Equality information on which above analysis is based	Health data on which above analysis is based
Housing Options iworld database - Snapshot equalities data of households in TA - 8 Jan 2021 Hcllc System internal data: August 2019 – Dec 2020.	No current data available.
Mitigating actions to be taken	
<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 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>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>Support will also be offered to households moving into temporary accommodation outside London.</p> <p>The completion of a suitability form will be completed for all households whom move into temporary or private accommodation.</p>	None at this point. Will be reviewed as appropriate.

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	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
<p>As identified within the previous EIA, a greater proportion of homeless decisions are made for ethnic minorities and therefore the policies will have a disproportionate effect on ethnic minority households. (Government impact assessment, 12 January 2011).</p> <p>Based on the Southwark Demography report 2015, Southwark is ethnically diverse with 48% of its population being black and minority ethnic. This is reflective in the snapshot of residents in temporary accommodation with exactly the same figure.</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>Poor quality information or language problems could impact negatively.</p> <p>English not first language – if households are allocated a private rented home they will need to receive adequate guidance to explain the rent</p>	None identified.

<p>charged and the ability to pay.</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> <p>Larger properties with three, four, five or six bedrooms are often a requirement of some racial groups and lack of availability could disadvantage some families. The additional stock anticipated from procurement work further afield will be able to meet the needs of larger families.</p> <p>In assessing the amended policies, the changes have not identified any additional direct or indirect discrimination on the basis of race.</p> <p>It is anticipated the Good Homes standard will have a positive impact upon households across all races as they will be able to benefit from a better standard of home.</p>	
Equality information on which above analysis is based	Health data on which above analysis is based
<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>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> <ul style="list-style-type: none"> ▪ https://raceequalityfoundation.org.uk/wp-content/uploads/2018/02/Housing-Briefing-23.pdf ▪ https://data.london.gov.uk/census/reports/ ▪ https://www.npi.org.uk/files/6614/7316/1332/Demography_and_deprivation_in_Southwark_and_Tower_Hamlets.pdf ▪ BME National. 2017. BME Housing Sector Offer. https://bmenational.files.wordpress.com/2017/06/the-bme-housing-sector-offer.pdf <p>BME National and Human City Institute (HCI). 2015. Summary of research study exploring legacy of BME housing organisations. http://www.housingdiversitynetwork.co.uk/wp-content/uploads/BME-National-and-HCI-Deep-roots-diverse-communities-dedicated-service-summary-Aug-2015.pdf</p> <p>Housing Options iworld database - Snapshot equalities data of households in TA - 8 Jan 2021</p> <p>Hcllc System internal data: August 2019 – Dec 2020.</p>	<p>No current data available.</p>

Mitigating actions to be taken	
<p>Places will be identified for procuring properties, 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. This might particularly benefit households of different ethnic origins.</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>All literature, forms and other information is readily available in the languages most commonly used. The Service ensures that people from whatever ethnicity can compete on an equal basis; this includes Gypsy and traveller communities. Translation services are made widely available.</p> <p>Southwark has committed in the Homelessness Strategy 2018-22 Action Plan (Action 1.6) to exploring factors behind BME households being over-represented as accepted homeless cases. With a better understanding it could be possible to improve prevention of homelessness in the first place.</p> <p>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.</p>	None at this point. Will be reviewed as appropriate.

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</p>	None identified.

<p>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>Please note that religion or belief alone would not have any bearing on the ability to access services. However this could impact on a household decision to move away for the existing community.</p> <p>There is no evidence of inequality taking place as a result of amended policy.</p> <p>It is anticipated the Good Homes standard will have a positive impact upon households across all faiths as they will be able to benefit from a better standard of property.</p>	
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>Housing Options iworld database - Snapshot equalities data of households in TA - 8 Jan 2021</p> <p>Hcllc System internal data: August 2019 – Dec 2020.</p>	<p>No data sets record religion or belief.</p>
<p>Mitigating actions to be taken</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>The resettlement services will be able to assist households to new places of worship where they move away from the existing area.</p>	<p>None at this point. Will be reviewed as appropriate.</p>

<p>Sex - A man or a woman.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan</p>	<p>Potential health impacts (positive and negative)</p>

<p>As identified within the previous EIA, 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 Southwark.</p> <p>Women are also more likely to be carers, 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>Households with children with special educational needs, where Family Services are working with them and where children are at key exam stages could be particularly affected.</p> <p>Women of a working age are less likely than men of a working age to be in employment.</p> <p>Women are 8 times more likely to be a victim of domestic abuse. Therefore, obtaining accommodation further afield will enable greater choice to women whom require permanent and temporary accommodation.</p> <p>In assessing the amended policies, the changes have not identified any additional direct or indirect discrimination on the basis of sex.</p> <p>Women are 8 times more likely to be victims of domestic abuse. Therefore they may require specific suitable temporary accommodation. The increase in the geographical area will enable the provision of more temporary accommodation available for this client group.</p>	<p>None identified.</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>Housing Options iworld database - Snapshot equalities data of households in TA - 8 Jan 2021</p> <p>Hcllc System internal data: August 2019 – Dec 2020.</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>Evidence on gender and employment rates: http://www.poverty.org.uk/48/index.shtml</p> <p>According to Gingerbread, around 90% of single parents are women carers UK estimates that 58% of carers are women</p>	<p>No data available currently.</p>
<p>Mitigating actions to be taken</p>	
<p>Some carers (who are more likely to be women) will be prioritised for in borough/adjacent borough accommodation.</p>	<p>None at this point. Will be reviewed as appropriate.</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>Provision of temporary accommodation for victims of domestic abuse. Ensure suitability assessments are completed to ensure victims of domestic abuse are removed from area's of risk.</p>	
---	--

Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
<p>As identified within the previous EIA, it is acknowledged that data on resident's sexual orientation has the potential to be inaccurate and on-going efforts should be made to encourage such information being given at the point of application.</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>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 be 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 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</p>	<p>None identified.</p>

<p>1.2% in the East of England³. 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>In assessing the amended policies, the changes have not identified any additional direct or indirect discrimination on the basis of sexual orientation.</p> <p>It is anticipated the Good Homes standard will have a positive impact upon households across all groups as they will be able to benefit from a better standard of property.</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>Housing Options iworld database - Snapshot equalities data of households in TA - 8 Jan 2021</p> <p>Hcllc System internal data: August 2019 – Dec 2020.</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>The housing Solutions service responsible for the administration of the policies, have partnered with Stonewall housing. This will help to continually examine the practices of the policy ensuring residents from the LGBTQ community are represented. Ensuring there is access to households from this group to access the service</p> <p>Stonewall will focus on advice and advocacy including viewings, applying for benefits, referring to other agencies for assistance. In addition to the above, Stonewall will focus upon wider community and outreach work.</p> <p>It is acknowledged there is an over representation of homeless approaches from the LGBTQ community and greater work must be completed to prevent homelessness.</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>Monitoring of this sector will enable specific issues for different segments of the population to be identified and addressed</p>	<p>None at this point. Will be reviewed as appropriate.</p>

³<https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualidentityuk/2015>

appropriately.	
----------------	--

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. Still very little information available on the performance of the policies implemented in 2019. The services has amended the Homeless application and the suitability assessments on several occasions therefore further time is required.	Ensure regular scheduled reviews and analysis of data is recorded.	These impacts will be reported on an annual basis from the date of implementation.
2	Develop improved understanding of why some BME communities are disproportionately represented within homelessness services together with the development of appropriate early intervention and prevention measures to address this over representation.	Improve our customer insight through focus group involvement and improved data collection. Develop appropriate early intervention and prevention measures to address this over representation.	Focus groups held beginning in early 2018 and new prevention measures assessed and implemented by March 2019. Monitor national and local data and reports on this and consider good practice recommendations.
3	Affects of the National Covid 19 pandemic on BAME.	Close monitoring and work with public health.	Regular monitoring.
4	Changing housing market may make some area's over populated with a specific client group.	Monitoring of where households are being placed.	12 month review
5	Ensuring households with mental health issues are able to successfully sustain a private tenancy.	Resettlement service to ensure 12 month tenancy review are completed.	Ongoing

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