

Equality Impact and Needs Analysis: Placement Policy for Temporary Accommodation and Private Rented Sector Offers - Jan 2024

Guidance notes

Things to remember:

Under the Public Sector Equality Duty (PSED) public authorities are required to have due regard to the aims of the general equality duty when making decisions and when setting policies. Understanding the affect of the council's policies and practices on people with different protected characteristics is an important part of complying with the general equality duty. Under the PSED the council must ensure that:

- Decision-makers are aware of the general equality duty's requirements.
- The general equality duty is complied with before and at the time a particular policy is under consideration and when a decision is taken.
- They consciously consider the need to do the things set out in the aims of the general equality duty as an integral part of the decision-making process.
- They have sufficient information to understand the effects of the policy, or the way a function is carried out, on the aims set out in the general equality duty.
- They review policies or decisions, for example, if the make-up of service users changes, as the general equality duty is a continuing duty.
- They take responsibility for complying with the general equality duty in relation to all their relevant functions. Responsibility cannot be delegated to external organisations that are carrying out public functions on their behalf.
- They consciously consider the need to do the things set out in the aims of the general equality duty not only when a policy is developed and decided upon, but when it is being implemented.

Best practice guidance from the Equality and Human Rights Commission recommends that public bodies:

- Consider all the [protected characteristics](#) and all aims of the general equality duty (apart from in relation to marriage and civil partnership, where only the discrimination aim applies).
- Use equality analysis to inform policy as it develops to avoid unnecessary additional activity.
- Focus on the understanding the effects of a policy on equality and any actions needed as a result, not the production of a document.
- Consider how the time and effort involved should relate to the importance of the policy to equality.
- Think about steps to advance equality and good relations as well as eliminate discrimination.
- Use good evidence. Where it isn't available, take steps to gather it (where practical and proportionate).
- Use insights from engagement with employees, service users and others can help provide evidence for equality analysis.

Equality analysis should be referenced in community impact statements in Council reports. Community impact statements are a corporate requirement in all reports to the following meetings: the cabinet, individual decision makers, scrutiny, regulatory committees and community councils. Community impact statements enable decision makers to identify more easily how a decision might affect different communities in Southwark and to consider any implications for equality and diversity.

The public will be able to view and scrutinise any equality analysis undertaken. Equality analysis should therefore be written in a clear and transparent way using plain English. Equality analysis may be published under the council's publishing of equality information, or be present with divisional/departmental/service business plans. These will be placed on the website for public view under the council's Publications Scheme. All Cabinet reports will also publish related

Equality analysis should be reviewed after a sensible period of time to see if business needs have changed and/or if the effects that were expected have occurred. If not then you will need to consider amending your policy accordingly. This does not mean repeating the equality analysis, but using the experience gained through implementation to check the findings and to make any necessary adjustments.

Engagement with the community is recommended as part of the development of equality analysis. The council's Community Engagement Division and critical friend, the Forum for Equality and Human Rights in Southwark can assist with this (see section below on community engagement and www.southwarkadvice.org.uk).

Whilst the equality analysis is being considered, Southwark Council recommends considering Socio-Economic implications, as socio-economic inequalities have a strong influence on the environment we live and work in. As a major provider of services to Southwark residents, the council has a legal duty to reduce socio-economic inequalities and this is reflected in its values and aims. For this reason, the council recommends considering socio-economic impacts in all equality analyses, not forgetting to include identified potential mitigating actions.

Section 1: Equality impact and needs analysis details

Proposed policy/decision/business plan to which this equality analysis relates		Placement Policy for Temporary Accommodation and Private Rented Sector Offers			
Equality analysis author		Ricky Bellot, Budget Recovery Board Programme Manager			
Strategic Director:		David Quirke-Thornton			
Department		Housing	Division		Resident Services
Period analysis undertaken					
Date of review (if applicable)					
Sign-off	Cheryl Russell	Position	Director of Resident Services	Date	31 Oct 2023

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

1.1 Brief description of policy/decision/business plan

This Equalities Impact and Needs Analysis EINA assesses the impacts (individual and cumulative) of Southwark's placement policy for Temporary Accommodation (TA) and Private rented sector offers (PRSO). This policy replaces the councils existing TA placement and Private Rented sectors offer policy and seeks to review the past period and bring the policy in line with current factors surrounding homelessness and temporary accommodation as well as ensuring the policy meets statutory requirements.

The policy provides guidance on the placement of households in temporary accommodation. It highlights the process for decision-making on the type of accommodation and the location of accommodation to meet interim placements and longer term placements. The policy notes that due to a shortage of supply, an increasing number of households are likely to be placed outside the borough, on the periphery of London and in some circumstances, further afield. The policy outlines the circumstances in which priority will be given to households for accommodation in the borough or in neighbouring boroughs.

Legal framework

The requirement for the policy is a legal obligation based on Part VII of the Housing Act 1996 ("HA96") which imposes duties on the Council to secure suitable temporary accommodation for the homeless while enquiries are made into their entitlement to assistance and, thereafter if certain conditions are satisfied.

The Homelessness (Suitability of Accommodation) (England) Order 2012 ("the 2012 Order") and the accompanying Supplementary Guidance issued by the Secretary of State, establishes that the location of the accommodation – including, where the accommodation is out of the borough, its distance from the borough - is relevant to the issue of the suitability of the accommodation secured. The 2012 Order also sets out other matters related to location that the authority must have regard to when considering suitability of accommodation.

The Supreme Court decision in the case of *Nzolameso v Westminster City Council* ("Nzolameso") emphasises the need for local authorities to have regard to their statutory duties as set out above and specifically that *"...Ideally, each local authority should have, and keep up to date, a policy for procuring sufficient units of temporary accommodation to meet the anticipated demand during the coming year. That policy should reflect the authority's statutory obligations under both the 1996 Act and the Children Act 2004..."* and: *"...each local authority should have, and keep up to date, a policy for allocating those units to individual homeless households.*

Where there was an expected shortfall of "in borough" units, that policy would set out the factors which would be considered in offering households those unit of accommodation, the factors which would be taken into account in offering units close to home, and if there was a shortage of such units, the factors that make it suitable to accommodate a household further away..."

In addition, a number of other Acts which have shaped the national framework for homelessness services and the development of a placement policy. this includes the following:

The Localism Act (2011) also amended the 1996 Housing Act by allowing local authorities to discharge their homelessness duty by arranging a suitable offer of accommodation in the private rented sector.

The Homelessness Reduction Act (2017) made significant changes to the Housing Act (1996) and placed a number of new duties upon local authorities. These include:

To assess the cause of homelessness, circumstances and needs of all household members, including children.

To develop and agree with applicants a personalised plan of the steps that will be taken to prevent or relieve homelessness.

Extending the time frame a household is threatened with homelessness from 28 days to 56 days, meaning that local authorities have a duty to prevent homelessness from an earlier stage.

New duties to assess all eligible applicants (not just those unintentionally homeless and in priority need), and new duties to take reasonable steps to prevent and relieve homelessness.

A duty on public authorities to refer service users who may be homeless or threatened with homelessness to the housing authority (with the consent of the individual)

Services must be designed to meet the needs of specific groups including care leavers, people leaving hospital / prison and victims of domestic abuse.

The Domestic Abuse Act (2021) places a duty on local authorities in England to provide support to victims of domestic abuse and their children. It makes provision that all eligible homeless victims of domestic abuse automatically have 'priority need' status for homelessness assistance.

The Homelessness Act 2002 and the Homelessness (Priority Need for Accommodation) requires a homelessness strategy for every housing authority district, to be renewed at least every five years and consulted upon by other local or public authorities or voluntary organisations.

The Government Rough Sleeping Strategy 2018 delivery plan set out the Government target of halving rough sleeping by 2022 and eradicating all street homelessness by 2027.

Key changes

The review of the Placement policy for TA and PRSO proposes the following changes:

- Reducing the number of offers of accommodation down to a single offer of temporary accommodation whether on an interim or longer term basis, post acceptance of a full duty.
- A requirement on the Council to carry out suitability assessments to ensure that it can evidence the suitability of accommodation that is offered.
- a strictly defined set of factors to enable the determination of suitability and geographical locations;
- a robust transfer process for those that cannot immediately or subsequently be allocated suitable accommodation.

The council is seeking to implement the new Placement Policy for TA and PRSO and arrangements for annual monitoring of placements. This analysis relates to the Council's new approach to meeting the housing needs of households in temporary accommodation, including those that share the protected characteristics. It is therefore of high relevance to the Council's Equality Duty. In doing so, the council will also analyse the impact of the previous policy implemented in Oct 2021.

The aim is to implement the changes in January 2024.

Section 3: Overview of service users and key stakeholders consulted

2. Service users and stakeholders	
Key users of the department or service	Homeless household are usually defined as being residents in the borough that require assistance from the Council to resolve their housing situation. There may be single individuals, couples, or families.
Key stakeholders were/are involved in this policy/decision/business plan	The following stakeholders were involved in reviewing this strategy - <ul style="list-style-type: none">• Southwark Children's and Adults Services• Southwark Housing

Section 4: Pre-implementation equality impact and needs 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, including improvement actions to promote equality and tackle inequalities. An equality analysis also presents as an opportunity to improve services to meet diverse needs, promote equality, tackle inequalities and promote good community relations. It is not just about addressing negative impacts.

The columns include societal issues (discrimination, exclusion, needs etc.) and socio- economic issues (levels of poverty, employment, income). 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 socio-economic issues are given special consideration, as it is the council's intention to reduce socio-economic inequalities in the borough. Key is also the link between protected characteristics and socio-economic disadvantage, including experiences of multiple disadvantage.

Socio-economic disadvantage may arise from a range of factors, including:

- poverty
- health
- education
- limited social mobility
- housing
- a lack of expectations
- discrimination
- multiple disadvantage

The public sector equality duty (PSED) requires us to find out about and give due consideration to the needs of different protected characteristics in relation to the three parts of the duty:

1. Eliminating discrimination, harassment and victimisation
2. Advancing equality of opportunity, including finding out about and meeting diverse needs of our local communities, addressing disadvantage and barriers to equal access; enabling all voices to be heard in our engagement and consultation undertaken; increasing the participation of under represented groups
3. Fostering good community relations; promoting good relations; to be a borough where all feel welcome, included, valued, safe and respected.

The PSED is now also further reinforced in the two additional Fairer Future For All values: that we will

- Always work to make Southwark more equal and just
- Stand against all forms of discrimination and racism

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; this also includes needs in relation to each part of the duty.

Potential Socio-Economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)

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.

57% of parents report that their children's health has been harmed by being in temporary accommodation. 47% reported that their children have had to move school as well as 52% reporting that their children have missed days of school due to the disruption of temporary accommodation (Shelter, 2023)

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. 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%). The proposed changes will have a neutral impact on single residents aged between 18-35 as they will have greater access to a supply of accommodation that the council can offer, although this more likely to be outside of the borough. Conversely the council will be exercising the discharge of duty ability across all age ranges through the offer of one suitable offer.

1 in 4 parents of children who are in temporary accommodation say their children are often unhappy or depressed as a result of their living situation. (Shelter, 2022). Living in temporary accommodation affects children's attendance to school as well as 45% arriving late, tired or hungry. (Shelter, 2022)

Age - Children

The revised changes to the policy and growing demand may mean that more children may need to move outside of Southwark and London if the children are not at specific stages in the education, i.e. examinations. This is due to the potential requirement to start new schools, which can be disruptive. The policy and legislation however requires children taking exams not to be placed where this would affect their ability to attend schools. The new changes puts an onus on the Council to take this factor into account

Male life expectancy is 79.6 years compared to 79.4 years in England. Female life expectancy is 84.1 years compared to 83.1 years in England.

when allocating homes although there is no longer an assumption that only in-borough may be suitable. Those attending SEN schools are recognised as being prioritised for in borough accommodation. The allocations process will mean that if it is recognised a household needs to be prioritised for an in borough move, this will be prioritised for a TA transfer.

Age – Young adults

Due to the benefit cap, many young people approaching as homeless cannot access private rented accommodation in London as it is not affordable. The placement policy allows the borough to seek private accommodation further afield in areas which may be more affordable. Therefore this will have a positive impact on this age range.

Age – Older people

Older people eligible for Sheltered housing, being more readily available, will not usually be made private rented offers. However, if required, 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. 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.

Equality information on which above analysis is based	Socio-Economic data on which above analysis is based
<p>JSNA, Annual Report 2022, Southwark Public Health</p> <p>Age profile of statutorily homeless households (Derived from HCLIC data).</p> <p>ONS Census 2021 data</p> <p>A review of Ofcom’s research on digital exclusion among adults in the UK, 2022</p> <p>Southwark Homelessness Data Review, 2023</p> <p>Shelter’s Growing Up Homeless Research, 2022</p> <p>Shelter, Not a Home, Temporary Accommodation, 2022</p>	<p>Shelter 2022 - https://blog.shelter.org.uk/2022/12/not-a-home-temporary-accommodation/</p> <p>Shelter 2023 – Still Living in Limbo, Why the Use of Temporary Accommodation Must End.</p>
<p>Mitigating and/or improvement actions to be taken</p>	
<p>Each household placed in TA or made a PRSO will be subject to a full suitability assessment. This assessment will consider the specific needs of the individual household and identify what type of accommodation and location is required. This will mitigate adverse impacts to households.</p> <p>Where there has been a requirement for a household to be placed in unsuitable TA, the transfer details will help to prioritise households for a move based on urgency and not simply length of time waiting.</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 wellbeing

- Households where there is a recommendation through a joint assessment with Children's and Adult's Services

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. These families will be prioritised for 'zone b' accommodation - Zone B: London area and adjoining Counties with reasonable travel connections

The Council recognises that in many cases it may be in the best interests of children to remain at existing schools where they are settled. Unfortunately, due to the difficulties in procuring accommodation referred to above it is not always possible to offer accommodation which avoids the need for parents to consider moving their child's school and we have to prioritise the needs of the most vulnerable children.

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

Southwark's 16/17 pathway for those at risk or presenting as homeless has been an effective joint working initiative between Housing and Children's services. Accommodation provision and advice and support is delivered well and approaches from 16/17 year olds is small.

With Southwark's off the street provision and offer when a rough sleeper is

identified, those in this age group would be supported quickly to access accommodation and support.

Age – Young adults

Care leavers from 18 years considered here -

The development of Southwark's joint housing protocol has greatly improved homeless prevention from care placements, access to supported or private rented accommodation and securing permanent accommodation through our choice-based lettings scheme.

Due to the benefit cap, many young people who are in a housing need cannot access private rented accommodation in London as it is not affordable. The placement policy allows the borough to see private accommodation further afield in areas which may be more affordable. Therefore this will have a positive impact on this age range.

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.

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

'Digital literacy' is improving with every generation, so over time, the risk of inequality is reduced.

The council will monitor customer satisfaction and aim for year-on-year improvement in satisfaction with fewer

<p>formal customer complaints made. The council 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> <p>The council will also consider cases that are deemed exceptional in order to determine if there are exceptional circumstances which may warrant a direct allocation of permanent social housing.</p> <p>The council will also support households to move into social housing via Housing Moves or any other mobility scheme the council has signed up to.</p> <p>Policy will be kept under constant review and where necessary, improvement actions can be taken.</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>Please note that under the PSED due regard includes:</p> <p>Giving due consideration in all relevant areas to “the steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.” This also includes the need to understand and focus on different needs/impacts arising from different disabilities.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</p>	<p>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</p>
<p>The previous policy took in to account that only a small proportion of accepted homeless households have members needing a wheel</p>	<p>A national survey conducted by Shelter of 1,112 people in Temporary accommodation,</p>

chair adapted property or a level access property. Overall, this was less than 9% of homeless households have members with a physical disability which impacts on the type of properties needed. The 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.

Statistics in the Census 2021 shows that Southwark has 17.6% of people reporting a disability under the equality Act. This has increased from 14.6% of the population in 2011.

Of those approach as homeless, 21% of households reported mental health as a support need, compared to 22% in London (average) and 23% in England. It is important to note that it is likely, that other applicants and members of their households may have mental health problems, but this information cannot be easily accessed as it is self-reported. 19% reported a physical disability of ill health (compared to 15% of England as a whole) which shows an over representation of this group in the borough.

Nationally, 65% of working age disabled people are in work compared to 83% of non-disabled people. In London, 22.6% of disabled people are unemployed which is one of the lowest rates in the country (joint with the West Midlands). Employment rates vary greatly according to the type of impairment a person has, for example people with severe or enduring mental health conditions are more likely to move in and out of work more often. (ONS, 2023)

Accommodating households in temporary accommodation for long periods could have a detrimental impact on mental and physical health.

Placing disabled households away from their support networks and associated facilities could have a detrimental impact on their health.

found that two thirds reported a negative impact on their physical or mental health. (Shelter, 2022)

<p>The introduction of a new TA transfer procedure will enable the council to ensure households quicker based on the urgency of the case. This will benefit households with a disability who have been placed in unsuitable TA due to limited availability.</p>	
<p>Equality information on which above analysis is based</p>	<p>Socio-economic data on which above analysis is based</p>
<p>JSNA, Annual Report 2022, Southwark Public Health</p> <p>Disability profile of statutorily homeless households (Derived from HCLIC data).</p> <p>ONS Census 2021 data</p> <p>A review of Ofcom’s research on digital exclusion among adults in the UK, 2022</p> <p>Southwark Homelessness Data Review, 2023</p>	
<p>Mitigating and/or improvement actions to be taken</p>	
<p>We have reviewed the factors that will inform 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. 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 Some people with particular health</p>	

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 Since the introduction of the first policy and the completion of the initial EINA, the services have recruited additional Resettlement staff within the service. 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 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. 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.

The council will also consider cases that are deemed exceptional in order to determine if there are circumstances which may warrant a direct allocation of permanent social housing.

<p>The council will also support households to move into social housing via Housing Moves or any other mobility scheme the council has signed up to.</p> <p>The policy will be kept under constant review and where necessary, improvement actions can be taken.</p>	
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<p>Gender reassignment: - The process of transitioning from one gender to another.</p> <p>Gender Identity: Gender identity is the personal sense of one's own gender. Gender identity can correlate with a person's assigned sex or can differ from it.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</p>	<p>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</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. Indeed only 3 households whom approach the service in 2020 are listed as having undergone gender re assignment. 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 family, neighbours and members of the local community.</p>	<p>77% of LGBTQ+ young people gave, 'family rejection, abuse or being asked to leave home' as a cause of their homelessness. - Crisis, 2022</p> <p>The most common cause of young trans people's homelessness is family abuse and rejection. Young trans people's exclusion from their family home is usually related to their gender identity: most trans young people cite this exclusion because of coming out or being outed. - akt & Homeless Link, 2022</p> <p>Data on LGBTQ+ youth homelessness is limited, particularly on trans youth homelessness. akt found that only one third (35 per cent) of LGBTQ+ young people recall "being asked to provide information about [their] gender identity and sexual orientation". As a result, the needs, and experiences of trans young</p>

	people aren't captured and are often missing from the homelessness narrative - akt & Homeless Link, 2022
Equality information on which above analysis is based.	Socio-economic data on which above analysis is based
<p>JSNA, Annual Report 2022, Southwark Public Health</p> <p>Gender profile of statutorily homeless households (Derived from HCLIC data).</p> <p>ONS Census 2021 data</p> <p>Southwark Homelessness Data Review, 2023</p>	
Mitigating and/or improvement 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. Resettlement services provided to all residents placed into private and temporary accommodation to help link up with the relevant support. 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> <p>Policy will be kept under constant review and where necessary, improvement actions can be taken.</p>	

<p>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 couples. 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.)</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan</p>	<p>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</p>
<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 2021. 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. Lone parents are disproportionately affected by homelessness compared to their share of the population so are more likely to be affected by the policies. The proposed changes to the policy are not likely to have an impact upon this specific group.</p> <p>No issues have been discovered which relates to the policy implementation.</p>	
<p>Equality information on which above analysis is based</p>	<p>Socio-economic data on which above analysis is based</p>
<p>Southwark Homelessness Data Review, 2023</p>	
<p>Mitigating or improvement actions to be taken</p>	
<p>There are no actions to be taken at this point. Policy will be kept under constant review and where necessary, improvement actions can be taken.</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>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</p>	<p>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</p>
<p>As identified under the previous EINA, a significant number of lead applicants from accepted households are pregnant women. 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. Additional properties identified further afield will assist in clients being offered permanent accommodation at an earlier stage and spend less time in temporary accommodation. In assessing the amended policy, the changes have not identified any additional direct or indirect discrimination on the basis of pregnancy or maternity.</p>	<p>The majority of households living in TA are families with children, and over 50% of these are lone mother led. (Shelter 2023)</p> <p>99% of midwives reported seeing mothers who were homeless, 66% felt the numbers were higher than ever before (Centre Point, 2020)</p> <p>Access to appropriate healthcare can be a challenge when living in TA with 4 in 10 reporting TA made it harder to access services. (Groundswell)</p>
<p>Equality information on which above analysis is based</p>	<p>Socio-economic data on which above analysis is based</p>
<p>Southwark Homelessness Data Review, 2023 HCLIC data April 2022 – March 2023</p>	<p>Pregnant and homeless: a guide to support during pregnancy – Centre Point, 2020</p> <p>Improving the health of people living in Temporary Accommodation in London, Groundswell, 2023</p> <p>As stated above</p>
<p>Mitigating and/or improvement actions to be taken</p>	
<p>Every offer of accommodation will take into account the household's individual circumstances and suitability of the</p>	

<p>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. 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. Each household with a pregnant mother placed into temporary accommodation will be contacted by our resettlement service. In order to identify any additional support needs or changing needs, pregnant mothers and new mothers will be contacted within one month of a placement outside of the borough. Regular contact will then be maintained through regular email, postal and telephone contact. Where identified specific needs to move back into the borough, the policy allows the transfer of temporary accommodation into alternative accommodation. The completion of a suitability form will be completed for all households whom move into temporary or private accommodation</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>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</p>	<p>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</p>
<p>The make up of the borough in relation to race is represented with 54% of residents being of white ethnicity, 25% Black, 11% Asian & 10% of other ethnicities. In 2021/22 22% of applicants were of a white ethnicity, 27% were of a black ethnicity and Asian applicants made up 3%. This shows that black homeless households are over represented in our approach figures compared to the overall makeup of ethnicity in the borough. This is a statistic reflected nationally also (although on a smaller scale), Black main applicants</p>	<p>Over half of households in TA identify as Black, Asian, or Mixed ethnicity which is an over representation as just 15% of people are from a ethnic minority group in England (Shelter 2023)</p> <p>Black households are 11 times more likely to be in TA than white households. (Shelter 2023)</p>

accounted for 10% of those owed a prevention or relief duty in England in 2021-22, but Black people make up only 4% of England's population (according to the 2021 census). Analysis of HCLIC data shows that 27% of approach households for homelessness assistance in Southwark identifies as Black/African/Caribbean/Black British which shows this group is overrepresented in approaches.

As identified within the previous EINA, a greater proportion of homeless decisions are made for ethnic minorities and therefore the policies will have a disproportionate effect on ethnic minority households.

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. Poor quality information or language problems could impact negatively. English not first language – if households are allocated a private rented home they will need to receive adequate guidance to explain the rent charged and the ability to pay. 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. 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. In assessing the amended policies, the changes have not identified any additional direct or indirect discrimination on the basis of race. It is anticipated the Good Homes standard will continue to have a positive impact upon households across all races as they will be able to benefit from a better standard of accommodation.

In 18% of households in Southwark, English is not the main language spoken.
(Census 2021)

Equality information on which above analysis is based	Socio-economic data on which above analysis is based
HCLIC data returns	Still Living in Limbo – Shelter 2023
Mitigating and/or improvement actions to be taken	
<p>The council will aim to procure properties in London which is likely to 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. 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 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. 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. Southwark has committed in the Homelessness Strategy 2018-22 Action Plan (Action 1.6) to exploring factors behind Black, Asian and minority ethnicities 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. 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 Black, Asian and minority ethnicities, disabled and vulnerable, young people and women, all of whom are over represented amongst those who are at risk of homelessness.</p>	<p>The Homelessness and Rough Sleeping Strategy review 2024 and other council policies seeks to mitigate and include improvement actions to address any impacts based on race.</p>

<p>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.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</p>	<p>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</p>
<p>According to census data, 43% of Southwark residents are Christian, 37% reported no religion and 10% are Muslim. The remaining 10% are made up of other religions.</p> <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. 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. 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. There is no evidence of inequality taking place as a result of amended policy. 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>	

Equality information on which above analysis is based	Socio-economic data on which above analysis is based
ONS, 2021 - Religion - Census Maps, ONS	
Mitigating and/or improvement actions to be taken	
<p>Residents who approach will be given full advice in order to aid their individual search for permanent accommodation in the private sector. The council will work with households to assist them in their home search and understanding of amenities if moving further afield from London.</p> <p>Places will be identified where the diversity is, as far as possible reflective 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. 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. 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. The resettlement services will be able to assist households to new places of worship where they move away from the existing area.</p> <p>We will continue to collect information on all protected characteristics through our assessment forms, as this improves our data collection and helps inform best practise.</p>	

<p>Sex - A man or a woman.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.</p>	<p>Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)</p>
<p>As identified within the previous EINA, women are disproportionately represented among lead applicants from accepted households. Women are also more likely to be lone parents, who are disproportionately affected by homelessness in Southwark. 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. 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. 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. Women of a working age are less likely than men of a working age to be in employment. 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. In assessing the amended policies, the changes have not identified any additional direct or indirect discrimination on the basis of sex. 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>	

Equality information on which above analysis is based	Socio-economic data on which above analysis is based
<p>HCLIC returns for 2022/23</p> <p>ONS, Census 2021 data</p> <p>CHAIN Annual Report, Southwark, April 22-March 23</p> <p>Commons Library - Women and the UK economy - House of Commons Library (parliament.uk)</p>	
Mitigating and/or improvement actions to be taken	
<p>Some carers (who are more likely to be women) will be prioritised for in borough/adjacent borough accommodation. 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. 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. 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; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
According to the JSNA Annual Report 2022- "Southwark has one of the largest LGBTQI+ communities in the country. There is	

<p>increasing academic evidence that key public health challenges disproportionately impact this population group, with higher levels of smoking, alcohol use, incidence of some cancers and mental ill-health. LGBTQI+ individuals also experience discrimination and homophobia when accessing health, care and other services. While the evidence base continues to improve, robust data on health outcomes is lacking at both a national and local level. As with ethnicity, additional work is required to collect data on sexual orientation within local services to enable better monitoring and tackle local inequalities”</p> <p>ONS data (2021) indicates that LGBTQI+ residents are more likely to live in private rentals and much less likely to live in social rentals areas which means they could be disproportionately affected by housing insecurity and potentially require TA or a PRSO.</p> <p>The proportion of the LGBT population in the UK is estimated to be 3.1% compared to Southwark’s 8%.</p> <p>There may be impacts arising from the relative lack of support and other services designed specifically for LGBTQI+ people in some places outside London, but again this would very much depend on the area where the offer was made.</p> <p>No issues have been discovered which relates to the policy implementation.</p>	
<p>Equality information on which above analysis is based</p>	<p>Socio-economic data on which above analysis is based</p>
<p>JSNA Annual Report 2022 ONS, Census 2021</p>	
<p>Mitigating and/or improvement actions to be taken</p>	
<p>The initial assessment and suitability assessment at the point of placement, will help to identify any additional support required for households this is part of the business as usual.</p> <p>There are no additional actions identified to be taken at this point. The policy will be kept under constant review and where necessary, improvement actions can be taken.</p>	

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

According to some estimates there are over 16,000 refugees in Southwark and this group are adversely affected by the current economic climate and the aftermath of the pandemic which has increased isolation, unemployment, poverty, ill health and significant delays in claims being processed by the Home Office. (SDCAS)

Information on which above analysis is based

SDCAS, [Our impact - Southwark Day Centre for Asylum Seekers \(sdcas.org.uk\)](http://sdcas.org.uk)

Mitigating and/or improvement actions to be taken

Targeted work with asylum seeker applicants who have recently gained their status from the Home Office is ongoing and will likely require consideration as part of the impact of placement outside of the borough and further afield.

We will work with partners including advice services, specialist refugee agencies and rough sleeping services to ensure that this cohort are assisted as quickly and effectively as possible to help to reduce the number of instances households require TA.

This will be through co-location, new referral pathways and better more joined up working. Working groups will be continued with local services to help to encourage joined up and cooperative working for this vulnerable group.

Conclusions

Summarise main findings and conclusions of the overall equality impact and needs analysis for this area:

The review of the policy identified little changes and therefore the mitigating actions and assessment from the previous EINA continue to be relevant. Ongoing monitoring of these are required and will continue to be done throughout the

operation of the policy. The legal requirements in place to conduct a suitability assessment will help to ensure the council is able to pick up

The changes that have been identified to the policy will have minimal impact upon the protected groups. While we understand that on the face of it, reducing the number of offers for TA and PRSO is seemingly a negative for residents, the process and procedures will enable the council to improve the overall outcomes for residents. The focus away from making multiple offers to one single and suitable offer will enable the council to support residents earlier and reduce levels of homelessness across all the protected groups.

The changes to implement a new transfer of TA process will also have a greater impact across specific groups as identified in the above groups namely Disability, Age and exceptional cases in other groups. This will enable households to be able to move from unsuitable accommodation to suitable accommodation in a timely way based on need and not simply based on time listed on a transfer list.

The revised policy will also help to ensure we have the right level and type of support, information and guidance for residents in housing need through the support provided through resettlement services. This will help prevent homelessness and length of time in TA in a person centred way operating across all groups.

The findings of this EINA supports the implementation of the revised policy and will be subject to future reviews to ensure all the aspects of the policy remain relevant and appropriate. With the review will come a further EINA.

Section 5: Further equality actions and objectives

5. Further actions			
Based on the initial analysis above, please detail the key mitigating and/or improvement actions to promote equality and tackle inequalities; and any areas identified as requiring more detailed analysis.			
Number	Description of issue	Action	Timeframe
1	Providing sufficient support to groups placed outside of Southwark and further afield	Review resettlement procedures	Jan 2024
2	Monitoring of further data of protected groups.	Produce statistical data review	Jan 2025

5. Equality and socio-economic objectives (for business plans)				
Based on the initial analysis above, please detail any of the equality objectives outlined above 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

6. Review of implementation of the equality objectives and actions			

Implementation Equality Impact and Needs Analysis