



APPENDIX 4

Southwark Homelessness and Rough Sleeping Strategy: Equality Impact and Needs Analysis

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 effect 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.

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.

Similarly, it is important for the Council to consider the impact of its policies and decisions in relation to tackling the climate emergency. This includes both the potential carbon emissions of a policy or decision and its potential effect on the borough's biodiversity. You are asked to consider the impact on climate of your policy and decision under discussion by completing the Climate impact section below.

Section 1: Equality impact and needs analysis details

Proposed policy/decision/business plan to which this equality analysis relates	Homelessness and Rough Sleeping Strategy 2024-29
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Equality analysis author	Jerome Duffy; Programme, Policy and Change Manager		
Strategic Director:	David Quirke-Thornton		
Department	Housing and Modernisation	Division	Resident Services
Period analysis undertaken	Sep-Oct 2023		
Date of review (if applicable)			
Sig n-off	Cheryl Russel	Position	Director; Resident Services
			Date

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

1.1 Brief description of policy/decision/business plan

This Equalities and Health Analysis (EHA) assesses the impacts (individual and cumulative) of Southwark's Homelessness Strategy 2024-2029 that will provide a framework and plan for tackling homelessness and rough sleeping.

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

The strategy is being implemented 5 years after the introductions of the Homelessness Reduction Act which came into force in April 2018.

Legal framework

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

- Section 179: Duty to provide advisory services
- Section 184: Duty to make enquiries in respect of eligibility and duties owed
- Section 188: Interim duty to accommodate in cases of apparent priority need
- Section 189B: Relief duty to help to secure accommodation
- Section 193: Duties to people found to be in priority need and not homeless intentionally.
- Section 195: Prevention duty to those threatened with homelessness
- Section 198: Referral of case to another local housing authority

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

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

The Homelessness Reduction Act (commenced April 2018) changed the way homelessness advice and assistance is provided by local authorities in England and Wales. The aim of the Act was to reform the current homelessness duties to ensure that local authorities provide meaningful advice and assistance to those people who do not fall into a priority need category or who have been found to be intentionally homeless. Southwark was one of three early adopter trailblazer local authorities, along with Newcastle and Manchester, which trialled and developed new services reflecting the reforms to provide early feedback to the Department for Communities and Local Government (now the Department for Levelling Up, Housing and Communities).

The Act introduced the following:

- The definition of being threatened with homelessness be extended from 28 days to 56 days.
- Local authorities must accept a valid S.21 notice as evidence that the tenant is threatened with homelessness.
- The creation of a stronger advice and information duty.

- The creation of a stronger prevention duty for anyone threatened with homelessness and eligible for assistance.
- Introduce a new relief duty for all eligible applicants who have a local connection meaning local authorities must take reasonable steps to secure accommodation regardless of priority need status.
- Incentivise people to engage in prevention and relief work by allowing local authorities to discharge their duties if an applicant unreasonably refuses to cooperate with the course of action proposed.
- Introduce a right to judicial review at the prevention, relief and main duty stages to ensure local authorities are held to account.
- Collect data in order to monitor the overall effectiveness of the new legislation.

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

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. It provided the following updates:

All local authorities must update their homelessness reviews and strategies and re-badge them as homelessness and rough sleeping strategies.

- Strategies are made available online and submitted to the Ministry for Housing, Communities and Local Government.

Local authorities report progress in delivering these strategies and publish annual action plans.

In September 2022 the Government updated the 2018 Strategy and set out a clear definition of what the Government means by ending rough sleeping, which is that it is prevented wherever possible, and where it does occur it is rare, brief and non-recurrent.

It grouped activities under four key themes - Prevention, Intervention, Recovery and a Transparent and Joined up System.

Reasons for the strategy

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

The net cost of temporary accommodation to the council were £12.9m in 2022-2023 and projected to be £16.7m in 2023-2024, at a time when, in common with other local authorities, it faces medium-term financial pressures. This means that it cannot sustain an uncontrolled increase in costs.

The strategy sets out plans for how we aim to off-set the impact of continuing high numbers of homeless households presenting to the council and the reduction in the supply of affordable suitable settled accommodation.

The main objectives for the strategy are to offer a high-quality and innovative service to homeless households, to encourage self-service where possible and assist households in crisis to explore all the options available to them and to find long-term housing solutions for people threatened with homelessness.

What is being assessed

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

Improving the timeliness and quality of initial advice.

Ensuring residents can easily access and be supported to understand their entitlements and budgets as part of our advice and assessment processes.

Improving the timeliness and quality of homeless applications.

Improving the support to resolve and sustain accommodation arrangements.

Improving the partnership and joint work across Council service and its external partners.

Commencing prevention forums and rogue landlord taskforce meetings.

Improving the use of data held by the Council and partners to identify those at risk and tailoring targeted support.

Improving customer feedback and insight.

Improving our online advice provision and access.

Section 3: Overview of service users and key stakeholders consulted

2. Service users and stakeholders	
Key users of the department or service	<p>All customers who approach or are referred to the service for housing advice, assistance and support through the related homelessness legislation.</p> <p>Third sector partners who work with the council in delivering its duties.</p>
Key stakeholders were/are involved in this policy/decision/business plan	<p>The following stakeholders were involved in reviewing this strategy -</p> <ul style="list-style-type: none"> • Centre for Homelessness Impact • Change Please • Childrens and Adults Services • Citizens Advice Southwark • DWP • Environment and Leisure • Guys and St Thomas Hospital NHS • Homelesslink • Homeless Outreach Team (START) • Housing Action Southwark and Lambeth • Hyde Housing • It takes a village • Kineara • The Manna Society • Public health • Robes Society • Service users with lived experience • Shelter • Southwark Council Public Health • Southwark Wellbeing Hub • Social Prescribers Southwark • Southwark Law Centre • Southwark Housing Solutions • Single Homeless Project

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 underrepresented 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

<p>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).</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>Those aged 45-54 are disproportionately represented among lead applicants from homeless approach households (17% of applicants compared to 13% of Southwark population). Conversely, those aged over 65 are under-represented and so less likely to be directly affected (8.5% of the population compared to 3% of main applicants). Households with children are proportionately represented among homeless approach households (25%).</p> <p>Southwark's population is predominantly young: The average age is 33.6 years compared to 36 in London as a whole. 53% of Southwark's population is aged 34 or under.</p> <p>Age - Children Children will potentially be negatively affected if they need to move outside of Southwark and London as they will be more likely to have to start new schools, which can be disruptive particularly if they are at key exam stages. Children with special educational needs or those that are working with Family Services may be particularly affected by changing school.</p> <p>Age – Young adults More single people have been able to access advice and assistance as a result of the increased assistance and advisory services included in the Homelessness Reduction Act. Single people can of course be any age but a large cohort is</p>	<p>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)</p> <p>1 in 4 parents of children who are in temporary accommodation say their children are often unhappy or depresses 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)</p> <p>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.</p>

likely to be younger as they do not yet have dependent children, although the advice and assistance should have a positive impact on all age groups.

Age – Older people

Older people eligible for Sheltered housing will not be made private rented offers. However older people could be offered temporary accommodation outside Southwark and London until this type of housing is available. They may potentially be negatively impacted by this, if they have long established links to the local area and also as they are more likely to receive care and support packages which would need to be transferred. Also they may be more likely to receive informal support, possibly from family members, which might be harder to sustain at a distance. The data shows that people in these age groups are significantly under-represented among homeless people however (6% of approaches in 21/22 compared to 8% of the population in Southwark).

It is identified that those in the community over the age of 60 are more likely to be digitally excluded than those who are younger; 26% of those over 75. (Ofcom 2022). This increases further when looking at access to the internet when over 70 and with a limiting condition.

Again, though the data shows that people in these age groups are significantly under-represented among homeless people however. Some of the impacts are expected to be positive. Old age is linked with mobility and improvements to online self-serve and telephone advice will allow customers continual access to services from their home.

<p>Equality information on which above analysis is based</p>	<p>Socio-Economic data on which above analysis is based</p>
<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>A new Older Persons Housing Strategy is being developed which will support and bolster information about the needs and best response to this group.</p> <p>A review of the approach to sheltered and the identification of sheltered needs will also be part of our strategic priorities of support and quality outcomes to ensure improved assessments of resident need and easier access to specialist accommodation types such as sheltered and extra care are achieved.</p> <p>We will be working with Children’s Services to deliver a Housing and Children’s Services Care leaver Protocol which will harness the work of Council services and key partner organisations to achieve the best outcomes to care leavers.</p>	
<p>Age – Children</p> <p>Some children and families will be prioritised for in</p>	<p>See mitigation actions which also cover health aspects.</p> <p>In addition, we will increase our access to the private rented sector to seek more suitable accommodation</p>

<p>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 <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. These families will be prioritised for 'zone b' accommodation - Zone B: London area and adjoining Counties with reasonable travel connections</p> <p>Any special circumstances demonstrating a compelling need for accommodation in a certain area will be considered and this might particularly benefit children. It will be our duty to determine that the accommodation provided is not for a short period and that the household will be able to plan for the longer term. It is also our duty to ensure that we have confirmed that places are available at local schools subject to specific admission criteria for some schools.</p> <p>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</p>	<p>for households to reduce lengthy stays in temporary accommodation.</p> <p>Improvements to the access of advice around debt and entitlements for residents will likely mitigate the risks of housing insecurity or loss of homes.</p> <p>Improvements in the coordination of agencies through prevention forums and expanding the network of the homelessness forum will help align and enhance prevention work for families in the Borough.</p> <p>Greater use of Council and partners' data to identify those at the earliest stages of risk and provide tailored, targeted advice will likely mitigate risk to children and families.</p>
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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.

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

<p>and this could involve help to transfer any care and support packages</p> <p>'Digital literacy' is improving with every generation, so over time, the risk of inequality is reduced.</p> <p>We will monitor customer satisfaction and aim for year-on-year improvement in satisfaction with fewer formal customer complaints made.</p> <p>We will ensure alternative service access remains available such as face to face appointments, so that no one is excluded from accessing the service.</p> <p>Our partners such as Citizens Advice Bureau offer weekly sessions for helping people with no access to online resources.</p>	
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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.

Please note that under the PSED due regard includes:

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>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>A national survey conducted by Shelter of 1,112</p>

<p>Only a small proportion of accepted homeless households have members needing a wheelchair adapted property or a level access property.</p> <p>Statistics in the Census 2021 shows that Southwark has 17.6% of people reporting da disability under the equality Act. This has increased from 14.6% of the population in 2011.</p> <p>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.</p> <p>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)</p> <p>Accommodating households in temporary accommodation for long periods could have a detrimental impact on mental and physical health.</p> <p>Placing disabled households away from their support networks and associated facilities could have a detrimental impact on their health.</p>	<p>people in Temporary accommodation, found that two thirds reported a negative impact on their physical or mental health. (Shelter, 2022)</p>
<p>Equality information on which above analysis is based</p>	<p>Socio-economic data on which above analysis is based</p>
<p>ONS, Employment of disabled people 2022</p> <p>JSNA, Annual Report 2022, Southwark Public Health</p> <p>ONS Census 2021 data</p>	<p>Still Living in Limbo, Shelter, 2022</p>

Mitigating and/or improvement actions to be taken

The delivery of some aspects of service remotely has the potential to have a positive impact on disabled households, particularly those with mobility issues, as it can allow them to access services from the convenience of their own accommodation or avoid travelling to the Housing Options Centre.

The private rented sector offer policy excludes some disabled households who would not 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).

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

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

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

<p>We will keep all types of service access (e.g. telephone, face to face and online) available so that people with different needs can find an access route which suits them best.</p> <p>Our website has a Read Speaker facility for visually impaired as well as offering different font size. Different coloured font is also available for people with colour vision deficiency.</p> <p>The Personal Housing Plan takes account for every household's unique circumstances and households will collaboratively work on what realistic steps they can take to attempt to resolve their own homelessness situations.</p> <p>We will be improving additional assessments to identify eligibility for supported accommodation and improving the move on plans of residents.</p> <p>We will improve the timeliness of access to specialist accommodation such as sheltered and extra care so the needs of those with disabilities can be met more quickly.</p> <p>With the development of feedback and insight sessions from residents and partner agencies, we will be able to gather information to improve service access and outcomes for those with disabilities.</p>	
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<p>Gender reassignment - The process of transitioning from one gender to another.</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>Having assessed our HCLIC reports on this subject to see if there is a link between homelessness and gender re-assignment we do not hold sufficient data in this area to determine to analyse.</p> <p>The council began including equalities questions about the sexual orientation and gender reassignment of the lead applicant for homeless households in the homelessness application in 2017. However, applicants can decline answering</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</p>

<p>these and as this was only included in HCLIC return data in early 2023 so analysis is limited. We have amended our system to assess those who approach to ensure it is mandatory to enquire and record this protected characteristic and help tailor and inform our support.</p>	<p>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 people aren’t captured and are often missing from the homelessness narrative - akt & Homeless Link, 2022</p> <p>“Improving data collection practices, with a particular focus on gender identity, adopting an intersectional approach, increasing awareness of LGBTQ+ identities and LGBTQ+ homelessness Developing LGBTQ+ inclusive operational policies, strategies, and procedures, including trans inclusive policies, strategies, and procedures” were all identified by akt in their paper ‘Building Inclusive Housing Support for LGBTQ+ communities’ (2022)</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</p> <p>ONS, Census 2021</p> <p>Building inclusive housing support for LGBTQ+ communities (2022)</p> <p>Homelesslink: Supporting LGBTQ+ people in homelessness services</p>	<p>About LGBTQ+ homelessness, Crisis, 2022</p> <p>How Homeless Services can be more Inclusive and Support Young Trans People, akt & Homeless Link, 2022</p>
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Mitigating and/or improvement actions to be taken

<p>Staff will be put forward to attend training on inclusive language and awareness of LGBTQ+ identities.</p> <p>We will improve our data collection on LGBTQ+ homelessness and ensure experiences of trans people are being recorded by increasing reporting on gender identity. It is also important to note that there will be options for those who wish not to disclose this information to the council.</p> <p>We will make sure partners who work in this area are aware of our referral pathways to ensure that we are as accessible as possible to this cohort.</p>	<p>We will ensure staff are aware of local and regional support services available to those who would like to be referred or signposted for more specialist assistance and advocacy.</p>
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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>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>
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In terms of treating marriage or civil partnership more or less favourably, no issues have been identified.	Please see comments to the left
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
No current data available.	No current data available.
Mitigating actions to be taken	
None at this point. Will be reviewed as appropriate and any negative impacts from our service delivery will be sought through feedback and insight initiatives.	None at this point. Will be reviewed as appropriate

Pregnancy and maternity - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.	
Potential impacts (positive and negative) of proposed policy/decision/business plan; 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)
A significant number of lead applicants from accepted households are pregnant women. 5% (35 of 692) of accepted homeless households were pregnant with no other children in 2022/23.	The majority of households living in TA are families with children, and over 50% of these are lone mother led. (Shelter 2023) 99% of midwives reported seeing mothers who were

	<p>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>
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
HCLIC data April 2022 – March 2023	<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>
Mitigating and/or improvement actions to be taken	
<p>Reducing the amount of time spent in temporary accommodation and limiting the number of moves between accommodation is part of the aim of our TA policy which should have positive health impacts.</p> <p>Every offer of accommodation will take into account the household's individual circumstances and suitability of the accommodation offered to meet their needs. Any special circumstances will be taken into account 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>The expanded provision and access to advice around entitlements and affordability will likely have a positive impact on residents expecting or with young children.</p>

<p>Resettlement support will be offered to households being made private rented sector offers or temporary accommodation where they are relocating out of London and where needed when they are moving from Southwark.</p> <p>As noted above, the Temporary Accommodation policy has mitigations for those with children with particular needs to be accommodated close to Southwark or in London and those who care for them.</p> <p>The Council recognises that pregnant women and new mothers could be especially vulnerable when facing homelessness. Therefore, we will ensure extra support is provided through also through our resettlement services. Where any special circumstances are identified, we will look at available options to transfer the household into alternative suitable temporary accommodation when it becomes available should their offer not meet the households needs.</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>A great proportion of homeless approaches are made by ethnic minority households (based on main applicant data) 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. English not first language – Language barriers create difficulties providing advice on personal resilience,</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</p>

<p>collaborating on the Personal Housing Plan and receiving housing advice. There is disadvantage with access to the same materials and advice on rights, entitlements and options under the Homelessness Reduction Act.</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>Southwark is a diverse borough, 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 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).</p> <p>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.</p>	<p>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> <p>In 18% of households in Southwark, English is not the main language spoken. (Census 2021)</p>
<p>Equality information on which above analysis is based</p>	<p>Socio-economic data on which above analysis is based</p>
<p>HCLIC data returns</p>	<p>Still Living in Limbo – Shelter 2023</p>
<p>Mitigating and/or improvement actions to be taken</p>	
<p>Households will also be given opportunities to identify areas of preference taking account of affordability and availability when looking for private rented properties. Procurement of properties outside London will, wherever possible, be focussed on areas with reasonable transport</p>	<p>Services commissioned to provide employment and skills support will likely improve</p>

<p>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 (NEC) housing system which enables a series of reports that monitor by relevant equality characteristics.</p> <p>The Service ensures that people from any ethnicity can apply for assistance on an equal basis; this includes Gypsy and traveller communities.</p> <p>Translation services are made widely available upon request or where required, including British Sign Language. We are considering the need for induction loops.</p> <p>Literacy is an issue that is not specifically related to ethnicity but is relevant as a general issue. The homeless application process is designed so that council officers record the application details for 100% of cases, so this avoids the requirement of homeless applicants from making their own application. We are continuing to provide more information online which can be freely translated through internet services such as Google Translate. Google Translate is also embedded in our Homeseach website.</p> <p>The employment of resettlement officers will assist households to resolve any issues and also signpost and link to other services which can assist in resolving the impact of decisions.</p> <p>The overall aim of this policy is to prevent homelessness and reduce the necessity for people to remain in less suitable temporary accommodation. The delivery of the actions identified will have positive impact for everyone of any race, disabled people, vulnerable individuals, young people and women, all of whom are over represented amongst those who are at risk of homelessness.</p>	<p>outcomes in this area.</p> <p>Data collected in performance reviews with our partners will enable insight into those being supported and identify service delivery improvements.</p>
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Religion and belief - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism).

Generally, a belief should affect your life choices or the way you live for it to be included in the definition.	
<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>Of those who responded to the question on their religion when applying for a homelessness assessment 25% reported they were Christian, 8% reported they were Muslim, 10% selected 'prefer not to state', 4% chose 'other'.</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 applications by people of different faith groups can pinpoint adverse trends in relation to individual faith groups, the information should be treated only as an issue for further investigation since much will depend on the respective priorities of applicants and the particular areas they are aspiring to. Therefore, close monitoring in this area is essential to identify any patterns that may arise.</p>	
<p>Equality information on which above analysis is based</p>	<p>Socio-economic data on which above analysis is based</p>
<p>ONS, 2021 - Religion - Census Maps, ONS</p>	
<p>Mitigating and/or improvement actions to be taken</p>	

<p>Under the Homelessness Reduction Act, the aim is for the household to receive advice but ultimately have a say in deciding which area they would realistically like to be housed in based on their preferences and taking account of aspects such as their income. 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, have 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>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>None at this point. Will be reviewed as appropriate.</p>
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<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>Implementing our new strategy and expanding our off the street provision to secure accommodation should positively impact on reducing rough sleeping, which will predominantly impact on men because 85% of Southwark’s rough sleepers are male. (CHAIN data) Women are disproportionately represented among lead applicants from approach households (59% compared to 52%). (ONS)</p>	

<p>People with children, and lone parents (who are more likely to be women) in particular, will potentially be negatively affected if they move outside Southwark and London as they are more likely to rely on local support networks for child care arrangements.</p> <p>Women of a working age are less likely than men of a working age to be in employment – 72% compared to 79% (Commons Library). Those not in work are more likely to be offered a private sector tenancy further away from Southwark where nothing nearer is available and so could be more impacted by PRSO placements.</p>	
<p>Equality information on which above analysis is based</p>	<p>Socio-economic data on which above analysis is based</p>
<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>	<p>No data available currently.</p>
<p>Mitigating and/or improvement actions to be taken</p>	
<p>The cumulative effect of the policies is intended to help provide households with greater certainty, which may make it easier to establish lasting care networks and support, than if those concerned were likely to face repeated relocation as can be the case with temporary accommodation.</p> <p>A commitment to provide specialist and rapid advice and assistance to those who are experiencing domestic abuse will have a positive impact on women and their families.</p> <p>Mitigations for households with children are set out in the Section 4: Age – Children. Resettlement support will be offered for private rented offers which are out of London, and for moves within London where</p>	<p>Improving access to debt advice and support will help those who are not in work or not working full time and will help both men and women.</p> <p>Support will also be offered to households moving into temporary accommodation</p>

<p>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>outside London and as above this could include help to enrol children in local schools and to find nursery places.</p>
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<p>Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan; 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 the JSNA Annual Report 2022- "Southwark has one of the largest LGBTQI+ communities in the country. There is 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.</p> <p>The proportion of the LGBTQI+ population in the UK is estimated to be 3.1% compared to Southwark's 8%. There may be impacts arising from the relative lack of support and other services designed specifically for</p>	<p>"The evidence for the general cohort of homeless individuals, young people who identify as LGBTQI+ reported that the top three reasons for their homelessness were parental rejection, abuse within the family, and aggression/violence in the family. Nearly one in five LGBT people (18%) including 25% of trans people and 28% of LGBT disabled people have experienced homelessness at some point in their lives" - Homeless Link 2020</p>

LGBTQI+ people in some places outside London, but again this would very much depend on the area where the offer was made.	
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
JSNA Annual Report 2022 ONS, Census 2021	Supporting LGBTQI+ people in homelessness services – Homeless Link, 2020.
Mitigating and/or improvement actions to be taken	
To coordinate tailored support for our residents by improving data collections on vulnerable groups, especially those who identify as LGBTQI+ to ensure we are offering an inclusive service that meets the needs of residents. The importance of this data collection and the need to create a safe environment to disclose information needs to be promoted through training and regularly raised in team meetings and in staff forums where appropriate to improve knowledge and confidence in this area.	Through joint work with specialist advocacy services such as Stonewall, a positive impact in this area would be likely. We need to ensure all services are welcoming and inclusive of all groups through training on best practise, inclusive language and signposting to support services specific to this group.

<p>Human Rights</p> <p>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</p>
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan</p>

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 form part of the work within this strategy.

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.

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:

Section 5: Further equality actions and objectives

Finalised mitigating and/or improvement actions will be included in the EINA to complete post-consultation.

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			
2			
3			
4			
5			
6			
7			

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