

Appendix 7 – Council 26 Nov 2019

Equality Analysis Evidence Document					
(Please note, this will form part of a public facing document. If you have any questions about this, please contact Equalities@wiltshire.gov.uk)					
Title: What are you completing an Equality Analysis on?					
Homelessness Strategy 2019-24					
Why are you completing the Equality Analysis? (please tick any that apply)					
Proposed New Policy or Service X	Change to Policy or Service	MTFS (Medium Term Financial Strategy)	Service Review		
Version Control					
Version control number	4.0	Date	01/08/2019	Reason for review (if appropriate)	The Council is required by law to update its Homelessness Strategy every five years
Risk Rating Score (use Equalities Risk Matrix and guidance) **If any of these are 3 or above, an Impact Assessment must be completed. Please check with equalities@wiltshire.gov.uk for advice					
Criteria	Inherent risk score on proposal		Residual risk score after mitigating actions have been identified		
Legal challenge	6				
Financial costs/implications	6				
People impacts	9				
Reputational damage	8				
Section 1 – Description of what is being analysed					
<p>Section 1(1) of the Homelessness 2002 Act gives housing authorities the power to carry out a homelessness review for their district and formulate and publish a homelessness strategy based on the results of the review. Section 1(4) requires housing authorities to publish a new homelessness strategy, based on the results of a further homelessness review, within the period of five years beginning with the day on which their last homelessness strategy was published.</p> <p>This is Wiltshire Council’s first Homeless Strategy since the introduction of the Homeless Reduction Act 2017 and takes into account new duties placed on Local Authorities. The strategy has been informed by Wiltshire Council’s Homelessness Data Review and Homeless Health Needs Assessment. The strategy ensures that we identify the key needs and challenges and have an action plan that sets out how we intend to support households at risk of homelessness. The aims and objectives of the strategy are designed to:-</p> <ul style="list-style-type: none"> Address the causes and prevent homelessness where possible Deal effectively with those the Council has a duty to accommodate Provide temporary accommodation for those who are homeless Ensure support and options are provided to any Rough sleeper Ensure that appropriate support is available to prevent repeat homelessness 					

The data review considered the definitions of homelessness, former and current levels of homelessness nationally and locally as well as a breakdown of homeless decisions made. These decisions were then further analysed taking into consideration reason for priority need such as children, pregnancy, physical or mental health disability, violence, age, family profile, ethnicity and reasons for homelessness.

Section 2A – People or communities that are currently **targeted or could be affected** by any change (please take note of the Protected Characteristics listed in the action table).

All households that are potentially vulnerable to or are at risk of homelessness with a particular focus on those in priority groups such as families with children, those expecting child, young or older people and those with a physical or mental health disability

Section 2B – People who are **delivering** the policy or service that are targeted or could be affected (i.e. staff, commissioned organisations, contractors)

Staff in Housing Options and Advice teams

Registered Housing providers (Housing Associations)
Supported Housing providers
Homeless shelters and day services
Mental Health practitioners
Adult Care and Children services teams
Public Health
Drug & alcohol misuse organisations and workers
Probation & prison services
Domestic abuse refuges and safe houses
Voluntary and charitable organisations
Police and Fire Services
Health practitioners
Private landlords and lettings agencies

Section 3 –The underpinning **evidence and data** used for the analysis (Attach documents where appropriate)

Prompts:

- What data do you collect about your customers/staff?
- What local, regional and national research is there that you could use?
- How do your Governance documents (Terms of Reference, operating procedures) reflect the need to consider the Public Sector Equality Duty?
- What are the issues that you or your partners or stakeholders already know about?
- What engagement, involvement and consultation work have you done? How was this carried out, with whom? Whose voices are missing? What does this tell you about potential take-up and satisfaction with existing services?
- Are there any gaps in your knowledge? If so, do you need to identify how you will collect data to fill the gap (feed this into the action table if necessary)

The Homelessness Code of Guidance for Local Authorities states:

1.10 Housing authorities need to ensure that policies and decisions relating to homelessness and threatened homelessness do not amount to unlawful conduct under the [Equality Act 2010](#) and also comply with the [public sector equality duty](#).

1.12 The public sector equality duty in [section 149\(1\) of the Equality Act 2010](#) requires public authorities, including housing authorities, to integrate equality considerations into the decision-making process from the outset, including in the development, implementation and review of their policies and services. This includes policies and services relating to homelessness and threatened homelessness. Other agencies and bodies who carry out public functions on behalf of local authorities also have a duty to comply with the public sector equality duty in the delivery of those public functions.

1. 1.13 Specifically, under section 149(1) Equality Act 2010, public authorities in exercising their functions (or a person exercising public functions that is not a public authority (section 149(2)) must have due regard to the need to:
 1. (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
 2. (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and,
 3. (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

1.14 The 3 limbs of the duty, listed above, apply to all protected characteristics apart from marriage and civil partnership, which is only relevant to the first limb (eliminating discrimination and so on).

1. 1.15 In order to comply with the public sector equality duty housing authorities need to do the following:
 1. (a) plan how to factor in equality considerations;
 2. (b) collect sufficient information to develop a reasonable understanding of what the equality impacts might be;
 3. (c) identify any equality impact the policy or service might have;
 4. (d) justify any decision that it takes;
 5. (e) re-evaluation to consider whether any alternative approaches might be possible;
 6. (f) record how many equality impacts are taken;
 7. (g) inform decision-makers; and,
 8. (h) continue to review equality impacts as the policy or service is implemented or developed.

1.16 The duty to have due regard to these equality issues will also apply when decisions are taken in respect of individual applications for homelessness assistance. Applicants should receive fully considered decisions which, in accordance with the public sector equality duty, show due regard to any equality impacts of the decision.

Protected characteristics:

Ethnic profile of applicants accepted as homeless in Wiltshire:

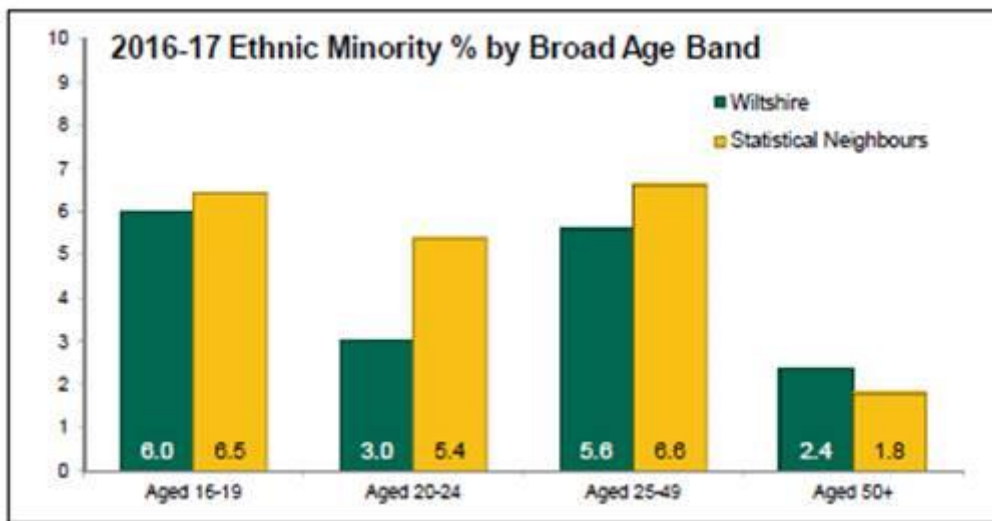
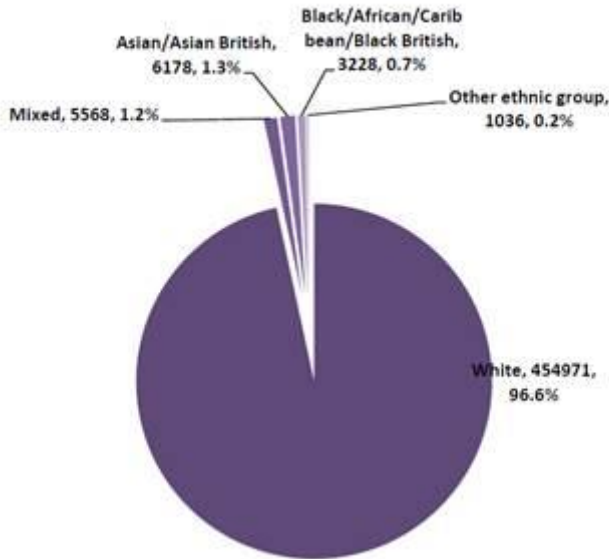
	2014-15	2015-16	2016-17	2017-18
White	384	255	241	216
Black or Black British	47	14	16	22
Asian or Asian British	5	9	--	--
Mixed	-	5	--	--
Other ethnic origin	-	-	10	--
Ethnic Group not Stated	-	-	--	--
Totals	437	285	269	249

Based on the above, the stat homelessness rates amongst BAME groups are as follows:

- 2014-15: 11.9%
- 2015-16: 9.8%
- 2016-17: 9.7%
- 2017-18: 8.8%

Comparing these figures to the 2011 Census & more recent JSNA stats below, it appears that BAME groups are disproportionately represented amongst homeless households. This is not isolated to just Wiltshire and has been flagged through national government statistics as an emerging issue.

Chart 1: Ethnic groups, Wiltshire, 2011



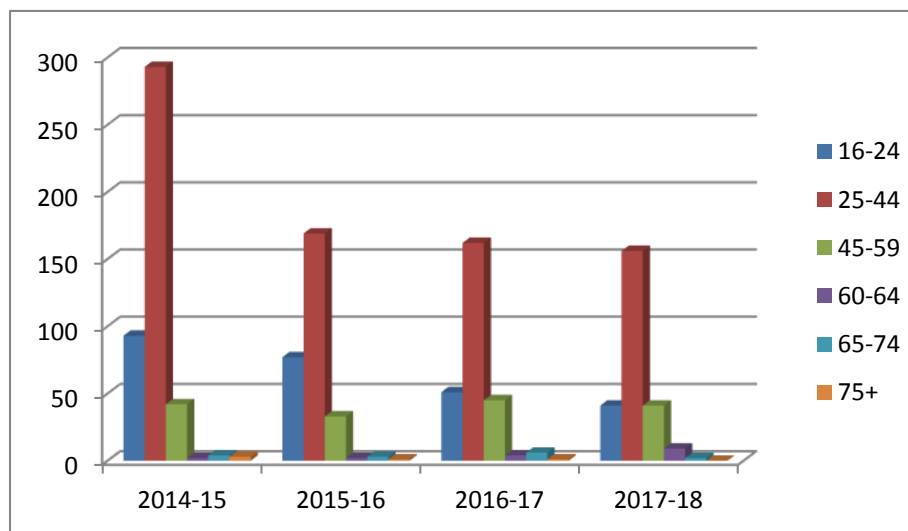
Age & Gender

Wiltshire has a population of 486,000 with a 13% growth expected within the next 25 years, with most growth expected in the 65+ age group. The number of people aged over 75 is projected to increase from 45,000 in 2015 to 76,000 in 2025 – an increase of 68%. The population of Wiltshire as a whole is evenly split between males and females according to the census data. The homelessness legislation doesn't distinguish between males and females although single parent households are most likely to be adult women with children rather than men. The strategy is also not age specific but seeks to ensure that services are accessible to households and individuals of all ages.

Year	Couple with dependent children	Lone parent household with dependent children		One person household		All other household groups	Total
		Male Applicant	Female Applicant	Male Applicant	Female Applicant		
2014-15	166	5	180	35	0	16	437
2015-16	79	26	126	23	10	0	285
2016-17	73	13	136	27	11	9	269
2017-18	68	10	118	28	15	10	249

Our data review evidences that the majority of homeless applications are made by households including females expecting a child or who have dependent children, with the greatest proportion of applications being received from 25 – 44 year old's, although there are small number of people seeking assistance aged between 16/17 and 70+ years.

Age profile of applicants accepted as homeless, Wiltshire



Rough sleeping has also been an issue in Wiltshire, however following government funding we have seen a noticeable decrease in those people rough sleeping. In Wiltshire both in 2017 and 2018, the majority of rough sleepers were male UK nationals over the age of 25 years, which is consistent with the national picture, however we have seen a gradual increase in the number of woman rough sleeping. The strategy has identified the need to reduce rough sleeping as a priority with 17 agreed actions to ensure appropriate support and housing options can be provided to all clients.

Profile of Nov 2018 Rough Sleeper Count

	Under 18	18-25	Over 25	Age unknwn	Total
Women	0		6	1	7
Men	0	1	12	2	15
Total	0	1	18	3	22

The strategy recognises, in particular the challenges facing young people and proposes a clear pathway and close working with children services to ensure that young people are protected and supported if they become homeless. Various actions have been identified in the strategy action plan to address this.

Marital status

The homeless legislation takes no account of whether or not someone is married or in a civil partnership and would treat people as in a relationship if they were married, in a civil partnership or just living together, therefore the actions within the strategy do not impact adversely on this group. The strategy recognises the councils commitment to provide an inclusive approach to supporting all households at risk of homelessness including single people, families and childless couples.

Pregnancy/Maternity

The strategy recognises pregnant women and those that have recently given birth are a priority group and the Council is committed to supporting all households with children at risk of homelessness

Sexual orientation

The homeless legislation takes no account of a client's sexual orientation and this information is not asked for or recorded, therefore the actions within the strategy do not impact adversely on any client due to their sexual orientation

Disability

The Equality and Human Rights Commission has published an [allocations toolkit](#) for local authorities on housing and disabled people

Armed Forces and Former Armed Forces Personnel

Housing have already recognized the needs of armed forces and former armed forces and in accordance with the Councils commitment to Armed Forces personnel we have already reviewed our services to give additional priority for accommodation to those currently serving in the armed forces or those who have left within the last 5 years.

Consultation

A joint homelessness and health needs assessment project board was set which included directors from public health and housing, cabinet member from both areas the housing portfolio and a member representative from the Environment Select Committee. The board has monitored progress and development of the data review, the homeless strategy and health needs assessment and helped to provide strategic direction. Alongside the project board the Environment Select Committee put together a homeless task and finish group which included members from cross parties to undertake a review of homelessness across Wiltshire to identify some of the issues and gaps as well as the positive work being done.

Consultation involvement methodology

The recently completed data review of homelessness involved joint informal consultation events with public health held in both the south and north of the County with a wide range of statutory services, voluntary and supported sector organisations, housing and health providers as well as staff and members. Once the homeless strategy was written in draft following the informal consultation we commenced a 3 month formal consultation period which ended on 21st June 2019. The consultation was made available on the Council's website on both the consultation and housing pages, circulated to all members, Wiltshire MPs, parish and town councils, Wiltshire area boards, Housing providers, voluntary sector, supported housing providers, police and probation, fire service, rough sleeping charities, housing providers, Wiltshire council staff and representatives of service users

It was also discussed at the following meetings:-

Homeless Project Board
Public Services Board
Health and Wellbeing Board
Environment Select Committee Task and Finish Group
Homes4wiltshire Partnership meeting
Rough Sleepers Operational meetings (North and South)
Preferred Development Partnership
Staff team meetings

*Section 4 – Conclusions drawn about the impact of the proposed change or new service/policy

Prompts:

- What actions do you plan to take as a result of this equality analysis? Please state them and also feed these into the action table
- Be clear and specific about the impacts for each Protected Characteristic group (where relevant)
- Can you also identify positive actions which promote equality of opportunity and foster good relations between groups of people as well as adverse impacts?
- What are the implications for Procurement/Commissioning arrangements that may be happening as a result of your work?
- Do you plan to include equalities aspects into any service agreements and if so, how do you plan to manage these through the life of the service?
- If you have found that the policy or service change might have an adverse impact on a particular group of people and are **not** taking action to mitigate against this, you will need to fully justify your decision and evidence it in this section

The homeless strategy recognizes that although any household can become at risk of homelessness, those most vulnerable include a high proportion of households without social/family networks that can support them, are most likely to be from deprived areas and on low or welfare based incomes. The strategy is specific in seeking to tackle exclusions, improve accessibility and assessment and enable individuals to achieve sustained outcomes that include improved health, wellbeing and choices.

The proposals priorities and actions identified within the strategy are designed to address the needs of those who are disadvantaged and a number of the equality groups within the EIA are positively targeted with actions designed to support and help them to maintain a home. The emphasis is on providing an accessible service and effective pathways to ensure sufficient advice and support is in place to make sure that once accommodation is found it is maintained.

***Section 5 – How will the outcomes from this equality analysis be monitored, reviewed and communicated?**

Prompts:

- Do you need to design performance measures that identify the impact (outcomes) of your policy/strategy/change of service on different protected characteristic groups?
- What stakeholder groups and arrangements for monitoring do you have in place? Is equality a standing agenda item at meetings?
- Who will be the lead officer responsible for ensuring actions that have been identified are monitored and reviewed?
- How will you publish and communicate the outcomes from this equality analysis?
- How will you integrate the outcomes from this equality analysis in any relevant Strategies/Polices?

***Copy and paste sections 4 & 5 into any Committee, CLT or Briefing papers as a way of summarising the equality impacts where indicated**

Please send a copy of this document to Equalities@wiltshire.gov.uk

Completed by:	
Date	
Signed off by:	
Date	
To be reviewed by:	
Review date:	
For Corporate Equality Use only	Compliance sign off date:

