Equality Impact Assessment



Assessment Of: Homelessness and Rough Sleeping Strategy		
\Box Policy \boxtimes Strategy \Box Function \Box Service \Box New		
□ Other [please state]	🗆 Already exists / review 🛛 Changing	
Directorate: Council-Wide	Assessment carried out by: Tony	
	Mansour	
Service Area: Council-Wide	Job Role: Housing Needs Lead	
Version / Date Of Sign Off By Director:		

Step 1: What do we want to do?

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the Policy Officer early for advice.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use <u>plain English</u>, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

It is a corporate and statutory requirement for Teignbridge District Council to have a Homelessness and Rough Sleeping Strategy which reviews the circumstances within the district, identifies key challenges and sets out priorities for addressing how we will work to prevent and reduce homelessness.

The Homelessness and Rough Sleeping Strategy 2022-2027 and the accompanying Homelessness Review are designed to:

- Provide a comprehensive evidence base which sets out the issues relating to homelessness within the district.
- Clearly identify the priorities relating to homelessness and rough sleeping for the lifetime of the strategy.
- Sets out the approach to homelessness prevention which is fit for purpose and meets the Requirements of the Homelessness Reduction Act.
- NB: Following approval from our elected members, an action plan will be developed which sets out clear SMART actions which enable the council to meet the priorities contained within the strategy.

The Homelessness and Rough Sleeping Strategy is designed to support the corporate objective set out within the Teignbridge Council Strategy 2020-2030 and the Council's Housing Strategy 2021-2026.

1.2 Who will the proposal have the potential to affect?

\boxtimes Service users \boxtimes The wider community	🛛 Teignbridge workforce
---	-------------------------

1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by your manager.

If 'Yes' complete the rest of this assessment.

X Yes \Box No [please select]

The Homelessness & Rough Sleeping Strategy have been deliberately designed to meet the needs of and support all communities in Teignbridge. It is anticipated it will have a positive impact for all protected groups both directly and indirectly.

In the main, the EIA has found that there are no indications that either strategy will have negative impacts for any protected groups. Failure to deliver the strategies may, however, have negative consequences for some protected groups and in that sense the strategies have been designed to meet identified needs. Data has shown that there are some particular issues associated with certain elements of our local population, and the strategies includes actions specifically geared to ensure services are available to meet the needs of everyone, including marginalised groups.

The Strategy is designed to support social inclusion and to help all residents to thrive. There is potential for vulnerable people and families (both with and without protected characteristics) to be adversely affected by public spending reductions – however, the actions contained in the strategy are intended to minimise any negative effects.

Step 2: What information do we have?

2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics (listed in 2.2).

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data - from national research, local data or previous consultations and engagement activities.

Outline whether there are any over or under representation of equality groups within your service - don't forget to benchmark to local population where appropriate.

For workforce / management of change proposals you will need to look at the diversity of the affected team(s) using available evidence such as the employee profile data. Identify any under/over-representation compared with Teignbridge's economically active citizens for age, disability, ethnicity, gender, religion/belief and sexual orientation.

Data / Evidence Source	Summary of what this tells us
[Include a reference where known]	
LGA Research report - Basic Facts About	Details the demography of the
Teignbridge	Teignbridge District in relation to:
Basic facts about your chosen area	Population
(esd.org.uk)	Age
	Ethnicity
	Health
	Employment

	Education
LGA Research Report- Demographic Report	Provides further detail on population
	changes in Teignbridge, and
LGA Research Report - Demographic Report	demographic information relating to
LG Inform (local.gov.uk)	
	gender and ethnicity in Teignbridge with
	comparisons to the percentage figures
	for the South West and all English Local
	authority areas in totality.
Local Area report for Teignbridge	Provides key demographic information
Local Area Report for areas in England and	and further detail in relation to
Wales - Nomis (nomisweb.co.uk)	household accommodation types,
	employment, household composition,
	education, qualifications.
	Report is broken down into:
	Who we are
	How we Live
	What we do
Office For National Statistics Census 2011	Demographic source data sets and mid-
	year estimates.
http://www.ons.gov.uk/ons/guide-	
method/census/2011/census-data/index.html	
The Homelessness Monitor: England 2022	The Homelessness Monitor: England 2022,
	published by Crisis, is the latest report in a
Homelessness Monitor 2022 England Crisis	longitudinal study providing
<u>UK</u>	independent analysis of the
	homelessness impacts of recent
	economic and policy developments in
	England. This tenth annual report by
	Heriot-Watt University, providing an
	account of how homelessness stands in
	England in 2021, or as close to 2021 as
	data availability allows. It also highlights
	emerging trends and forecasts some of
	the likely future changes, identifying the
	developments likely to have the most
	significant impacts on homelessness.
A comprehensive Review of Homelessness and	This review is a statutory requirement and
Housing Needs in Teignbridge (Teignbridge	was produced in conjunction with the
Homelessness review 2021)	Homelessness and Rough Sleeping
	Strategy. The review was provided as an
	supplement to the Homelessness and
	Rough Sleeping Strategy when we
	conducted our consultation exercises
	(listed below).

2.2 Do you currently monitor relevant activity by the following protected characteristics?

🛛 Age	🛛 Disability	🛛 Gender Reassignment
🛛 Marriage and Civil Partnership	🛛 Pregnancy/Maternity	🛛 Race
🛛 Religion or Belief	⊠ Sex	oxtimes Sexual Orientation

2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps please state this clearly with a justification.

For workforce related proposals all relevant information on characteristics may need to be sought from HR (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require action to address and identify the information needed.

There are no identifiable gaps in the evidence base, however we recognise that the issue of 'hidden homelessness' i.e. people living in unsuitable accommodation, or with little security of tenure is very difficult to quantify. We are committed to continuing to promote our services and widely, and via our partner agencies and local networks, so that local residents understand what support is available to them.

2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this has been of Teignbridge's diverse communities.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to HR for advice on how to consult and engage with employees. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups, trades unions as well as affected staff.

Consultation on our Homelessness and Rough Sleeping Strategy was undertaken using the following 5 methods:

- A workshop conducted with local representatives of the community and voluntary sector in Teignbridge
- An open formal consultation undertaken between 2nd December 2021 and 4th January 2022.
- Feedback provided by staff working in the field of Housing and Homelessness at Teignbridge Council
- Focused interviews with the leads of key agencies including those supporting young people and commissioners of substance misuse services.
- Interviews with people with lived experience of homelessness in Teignbridge.

NB, a detailed report on the consultation exercise, including insight, findings and amendments resulting from consultation has been produced and will be published alongside the Strategy.

2.5 How will engagement with stakeholders continue?

Γ

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Consultation Officer for help in targeting particular groups.

- We are committed to a proactive approach to consultation with a diverse range of organisations that can provide key insights into the issues facing people with protected characteristics in Teignbridge.
- The following groups have been identified as suitable for further continued consultation in relation to the delivery of our Homelessness Strategy over the next five years.

—	
Equality/	
Operational Strand	Organization
	Organisation
LGBT	Intercom Trust
Disability	Living Options
Older People	Alice Cross
Older People	Devon Senior Voice
Older People	Kingscare
Youth	SPACE, Young Devon
Youth	ROC Dawlish
Youth	Young Devon
Deprived	
communities	Newton Abbot CIC Buckland et al
Deprived	
communities	West Teignmouth - Meadowside
Deprived	
Communities	Ashburton Foodbank
Deprived	Ruckfootlaigh Foodbank
Communities Deprived	Buckfastleigh Foodbank
Communities	Homelessness in Teignbridge Support (HITS)
Deprived	
Communities	Teignbridge Homelessness Action Today (THAT)
Deprived	
Communities	Homestart Teignbridge
Community	
Groups	Teignbridge CVS
G&T	Forum via Graham Davey
Racial Equality	PDREC (Plymouth and Devon Racial Equality Council
	Hikmat & Refugee Support Devon
Faith	Devon Faith & Belief Forum
Town & Parishes	via Gary Powell
Residents Panel	via Comms

Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal.

3.1 Does the proposal have any potentially adverse impacts on people on the basis of their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)

PROTECTED CHARAC	TERISTICS
Age: Young People	Does your analysis indicate a disproportionate impact? Yes 🗆 No 🗵
Potential impacts:	
Mitigations:	
Age: Older People	Does your analysis indicate a disproportionate impact? Yes 🗆 No 🖂
Potential impacts:	
Mitigations:	
Disability	Does your analysis indicate a disproportionate impact? Yes 🗆 No 🛛
Potential impacts:	
Mitigations:	
Sex	Does your analysis indicate a disproportionate impact? Yes \square No \boxtimes
Potential impacts:	
Mitigations:	
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes 🗆 No 🛛
Potential impacts:	
Mitigations:	
Pregnancy /	Does your analysis indicate a disproportionate impact? Yes 🗆 No 🖂
Maternity	
Potential impacts:	
Mitigations:	
Gender	Does your analysis indicate a disproportionate impact? Yes 🗆 No 🛛
reassignment	
Potential impacts:	
Mitigations:	
Race	Does your analysis indicate a disproportionate impact? Yes \Box No $igtimes$
Potential impacts:	
Mitigations:	
Religion or	Does your analysis indicate a disproportionate impact? Yes 🗆 No 🖂
Belief	
Potential impacts:	

Mitigations:	
Marriage &	Does your analysis indicate a disproportionate impact? Yes 🗆 No 🛛
civil partnership	
Potential impacts:	
Mitigations:	
OTHER RELEVANT CHA	ARACTERISTICS
Socio-Economic	Does your analysis indicate a disproportionate impact? Yes 🗆 No 🛛
(deprivation)	
Potential impacts:	
Mitigations:	
Other group(s) Please	add additional rows below to detail the impact for other relevant groups as
	ns and Refugees; Rural/Urban Communities, Homelessness, Digital Exclusion,
Access To Transport	
Potential impacts:	NA
Mitigations:	NA

3.2 Does the proposal create any benefits for people on the basis of their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our <u>Public Sector Equality Duty</u> to:

- ✓ Eliminate unlawful discrimination for a protected group
- Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

• Actions to support all age groups, and with particular actions to support both younger and older people who may have particular needs or who may be vulnerable as a result of their age.

• Actions to ensure affordable housing provision is maximised to assist those of working age and who are identifiably likely to struggle most to sustain themselves in the local housing market without support.

• Actions to ensure that people with mobility needs can access support including adaptations to enable them to remain in their homes.

• Actions to assist people who may be affected by a breakdown in their relationship with their partner, family or friends, and including support for couples to secure homes.

• Actions to ensure suitable provision for couples (married or otherwise), households with dependent children and those who may be pregnant.

• Specific actions to address identifiable priorities and/or gaps in provision, for example, to support single females to prevent or relieve female rough sleeping in the borough and/or to ensure the right provision is in place to assist those who may be fleeing the effects of domestic abuse.

• Actions to ensure there is adequate temporary accommodation provision and capacity to provide support for people, including where they may be affected by other forms of violence, abuse or harassment.

• The evidence base that underpins the strategy has reviewed demographic data and compared this with the operational delivery of services, and ensured that the strategy will continue to achieve the right balance of support and assistance including for those from BME backgrounds.

• Generic actions to improve service delivery across a range of deliverables, that seek to raise the bar for all those who require help and support with housing or a related support need. This will have a positive impact on all groups.

Additionally:

- The Homelessness Forum will provide a platform for representatives of people with protected characteristics to ensure that discrimination is eliminated and that their voices are heard.
- The forum will also provide a mechanism for the fostering of good relations between people who share protected characteristics, and those who don't.
- Our Combined Data Analysis Pilot will also seek to ensure that support and key interventions provided by Devon County Council, Teignbridge Council and the Citizens Advice Bureau are targeted towards those areas, families and individuals that need help through a proactive and preventative approach to service delivery.
- All future projects derived from this Strategy will also be designed, promoted and implemented in such a way as to promote quality of opportunity and equals access for those with protected characteristics

Step 4: Impact

4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This content should be used as a summary in reports, where this full assessment is included as an appendix.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary and appropriate despite this.

Summary of significant negative impacts and how they can be mitigated or justified:

There are no foreseeable negative impacts to our proposed Strategy. It has been designed with our equality duties in mind, and on the basis of extensive consultation and research into the impacts and effects of homelessness on local residents.

Summary of positive impacts / opportunities to promote the Public Sector Equality Duty: Please see section 3.2 above which provides a comprehensive list of positive benefits and

opportunities to promote the Public Sector Equality Duty.

4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

Improvement / action required	Responsible Officer	Timescale
Further pro-active consultation with key stakeholders and	Housing Needs	Annually
groups representing people with protected characteristics on	Lead	
an annual basis throughout the life-time of this strategy.		

4.3 How will the impact of your proposal and actions be measured?

How will you know if have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective and your approach is still appropriate. Include the timescale for review in your action plan above.

Proposals and actions derived from this strategy will be monitored and reported on internally through our quarterly reporting process, and externally via the Teignbridge Homelessness Forum.

Step 5: Review & Sign-Off

ElAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek review and feedback from management before requesting it to be signed off. All working drafts of ElAs and final signed-off ElAs should be saved in G:\GLOBAL\ElA Once signed-off please add the details to the 'Central Register of all Council ElAs' saved in the same directory.

Reviewed by Service Manager: Yes ⊠	Strategic Leadership Team Sign-Off:
No 🗆 Instead was reviewed by:	
Tony Mansour	
Date: 05/04/2022	Date: