### LONDON BOROUGH OF HACKNEY

### Homelessness Strategy 2019-2022

### **Equality Impact Assessment**

## STEP 1: DEFINING THE ISSUE

1. Why are we putting in place a Homelessness Strategy?

It is a statutory duty for each local authority to have a Homelessness Strategy and for this to be reviewed at least every 5 years. Hackney Council is drafting a new Homelessness Strategy to refresh the earlier Strategy which ended in 2018.

That main objectives of the previous Strategy were:

- 1. to offer a high quality and innovative service to homeless households,
- 2. to assist households in crisis to explore all the options available to them and
- 3. to find long term housing solutions for people threatened with homelessness.

Over the last 5 years, the Council has made notable progress in meeting these objectives in an increasingly difficult environment, that has seen significant demographic changes in the borough, substantial increases in property and rental prices, continued austerity and welfare reform and the introduction of the Homelessness Reduction Act.

As accommodation in inner London has become increasingly more unaffordable; the ongoing migration of more affluent households to Hackney is increasing the demand in the private sector removing some properties from the rented market and forcing rents higher. This has had a knock on effect on the council's ability to procure temporary accommodation which has become more difficult to source and more expensive to secure.

The introduction of the Homelessness Reduction Act in 2018 placed additional duties on the council, in particular with regard to single residents. Whilst the council was commended on the manner in which the new obligations were rolled out this has placed increased demand on an already stretched service.

Supply of Social Housing has also significantly reduced with fewer properties available year on year; this is due to a number of factors such as the impact of right to buy and/or the need for properties to be held back for regeneration decants. Consequently, the options for residents already in temporary accommodation have diminished and the period residents remain in TA has increased significantly.

As a result homelessness in the Borough continues to rise (applications and acceptances), and this Strategy is a response to the changing housing landscape in the borough. It builds on the achievements of the previous Homelessness Strategy, whilst responding and adapting to the changing environment in which homelessness and support services are delivered.

This strategy review has focussed on the following workstreams:

- Single People assisting vulnerable individuals and tacking rough sleeping
- Customer Care delivering the best possible service
- Early intervention and prevention reducing the risk of people becoming homeless
- Access for all removing barriers and reducing disadvantage.

### 2. Who are the main people that will be affected?

Anyone that is currently experiencing or facing homelessness, also people who may be at risk of homelessness in the future.

Staff employed by the Council with the focus upon customer care and existing providers will be affected if the Council changes or reduces services as a result of the Strategy implementation.

Analysis has shown that a number of protected groups are overrepresented in homeless applications in comparison to the borough profile.

- A higher proportion of residents from Black and Ethnic Minority groups are making homeless applications than are living in the borough.
- A higher proportion of females are making homeless applications especially those in lone parent households.
- A growing proportion of approaches are made from applicants with multiple and complex mental and physical health problems

# STEP 2: ANALYSING THE ISSUES

3. What information and consultation have you used to inform your decision making?

3.1. There are a number of ways that the extent of homelessness in Hackney can be measured; the numbers of approaches under the Homelessness Reduction Act (prevention and relief), homeless applications, homeless decisions, households in temporary accommodation etc. The majority of this information is collected automatically and reported to the Ministry for Housing, Communities and Local Government (MHCLG) through HClic. Previously much of this data was reported to MHCLG through the P1E return.

3.2 The Homelessness Reduction Act placed additional duties on the local authority and changed the reporting requirements to the government. It is therefore difficult to make direct comparisons between pre and post HRA data however it is clear that there has been an increase in residents approaching the council for advice and assistance.

3.3 Increasing numbers of households in Temporary Accommodation are a reflection of both the increased number of approaches and the limited supply of affordable accommodation in the borough.

3.4. During 2019, Homeless Link were commissioned to refresh of the Homelessness Strategy and engaged with service users, our key partners and the members of the homelessness Partnership Board who were invited to give their views on our approach to help us achieve our objectives, and the responses received form part of the basis for this Strategy.

## **Equality Impacts**

4. Identifying the impacts

4.1 What positive impact could there be overall, on different equality groups, and on cohesion and good relations?

Building on the strengths of previous strategies, the Council's central aim is to deliver comprehensive and accessible services to prevent homelessness and assist homeless households in finding long term affordable and sustainable housing.

This is underpinned by three key objectives:

- 1. to offer high quality, collaborative and innovative services to homeless households,
- 2. to assist households at risk of homelessness to explore all options available to
- prevent homelessness
- 3. to find long term housing solutions for people threatened with homelessness.

The Council recognises that each individual household has its own unique set of circumstances and needs (whether individual or families) will have different needs and support requirements.

The Council is using the Strategy as a framework in which to explore initiatives and services through the Action Plan rather than an analysis of needs through the Strategy.

The Council will also use this to monitor the equalities implications of services as they develop to assess whether their impact has an impact on the protected groups identified earlier.

4.2 Age - Homelessness can affect residents at any age however there is a larger proportion of younger (under 40) residents approaching the council for assistance. This strategy recognises the different causes and drivers of homelessness across age groups and promotes a flexible response.

4.3 Ethnicity - Just over a third (36%) of respondents to the 2011 Census in Hackney described themselves as White British. The remainder is made up of black and minority ethnic groups, with the largest group Other White, followed by Black African, 11.4%. (2011 Census)

It is difficult to compare ethnicity of those who have received homeless application decisions to Census data due to differing categories, and the Government's P1E returns only record at a higher level. However since April 2018 following the introduction of the Homelessness Reduction Act the Benefits and Housing Needs Service has been able to more accurately record ethnicity data of applicants approaching the council for assistance.

The proportion of BME households approaching as homelessness is disproportionate to the general population in the Borough, The trend towards a higher proportion of BME households applying for assistance is not new but has been accentuated by the changes in welfare reform initiated since 2010. The Access for All workstream is intended to remove barriers and reduce disadvantage.

Overcrowding is often an underlying factor in households being at risk of or becoming homeless and generally BME households have proportionately higher levels of overcrowding compared to White households. Although not a direct intention of this strategy, actions taken to reduce or mitigate the impact of overcrowding will benefit all BME households generally.

It is recognised that BME residents face higher levels of deprivation which is also a driver for homelessness. This is an issue explored in a wider context by the council through anti-poverty and other strategies.

4.4 Gender - The figures for homelessness show that households accepted as homelessness are disproportionately headed by a female (63%). Over half of all households accepted as homeless were lone parent households, headed by a female. The strategy will have an overall positive effect on women who are over-represented among homeless households through tackling and preventing homelessness and meeting housing need. Providing comprehensive advice services across all tenures will also benefit women at risk of domestic violence, and those at most risk through the impact of welfare reform changes.

Single homeless applicants however are disproportionately male applicants and this group will benefit from the strategies flexible and person centred approach to service delivery.

Outreach services directed towards tackling rough sleeping will disproportionately benefit men, who form the larger part of the rough sleeping population. This is addressed through the rough sleeper strategy.

We do not consider that the Homelessness Strategy will have an adverse impact on the grounds of gender.

4.5 Sexual orientation – The sexual orientation of homeless or potentially homeless applicants is not recorded but we know from working with partners that many young people will have been thrown out of home, or otherwise excluded from housing because of their sexuality. Aside from this group there is no evidence to indicate that LGBTQI+ individuals are more likely to face homelessness or risk of homelessness. The Homelessness Strategy promotes services which are personalised, flexible and focused on individual circumstances and goals and which are psychologically-informed, the strategy also recognises specific need to address the issues faced by younger adults experiencing homelessness. We do not consider that the Homelessness Strategy will have an adverse impact on the grounds of sexual orientation.

4.6 Religion or belief - Just over a third of Hackney's residents are Christian, although this is a lower percentage than the London and England averages. Hackney has significantly more people of Jewish and Muslim faiths and a higher proportion of people with no religion and those who did not state a religion, than London and England. (2011 Census). Although some data is recorded at application stage, this is not a consideration in the discharge of housing need, it is therefore difficult to determine if there is any discrepancy in outcomes for particular groups. As the Strategy promotes a personalised approach and assistance is not targeted as being exclusively for people of any particular religion, belief or faith, the impact of the strategy is likely to be neutral. It should be noted however that the strategy promotes working with partners and includes Registered Housing Providers, as there are a number of faith based housing associations in the borough there is an opportunity to utilise this relationship to make a positive contribution to mitigate the impacts of homelessness.

We do not consider that the Homelessness Strategy will have an adverse impact on the grounds of religion or belief.

4.7. Pregnancy and maternity - Homelessness legislation provides protection to residents who are pregnant or have dependent children, recognising these applicants as having a priority need. The strategy supports this through a personalised approach that meets the individual needs of residents. We do not envisage that there will be any adverse impact on the grounds of pregnancy or maternity because of the introduction of the Homelessness Strategy.

4.8. Gender reassignment - there is no suitable data on gender reassignment that would indicate any additional risk of homelessness for this equality group. As the strategy supports a personalised approach to meet the individual needs of residents we do not envisage that there will be any adverse impact on the grounds of pregnancy or maternity because of the introduction of the Homelessness Strategy.

4.9. Marriage and civil partnership - there is no suitable data on marriage or civil partnership that would indicate any additional risk of homelessness for this equality group. We do not envisage any adverse impact on the grounds of marriage and civil partnership because of the introduction of the Homelessness Strategy.

4.10. Disability - Although there is little data to indicate that disabled residents are more or less likely to experience homelessness than other residents, physical and mental health issues are a relevant consideration. Physical disabilities can render existing accommodation unsuitable or in need of significant adaptation, poor mental health can lead to actions and behaviours that make sustaining or securing a tenancy more difficult. The Strategy promotes a person centred approach to provide individual support and advice through individualised personal housing plans and

access or signposting to appropriate service or partners. We do not envisage any adverse impact on the grounds of disability because of the introduction of the Homelessness Strategy.

4.11. What negative impact could there be overall, on different equality groups, and on cohesion and good relations?

4.12. The Homelessness Strategy seeks to bring together all the strands of support provided for residents who are homeless or at risk of homelessness. The causes of homelessness are complex and the council's response to support residents experiencing homelessness or risk of homelessness are equally diverse. There are a number of different initiatives, projects and services that both directly and indirectly help to prevent homelessness and help residents to retain or obtain suitable affordable accommodation. Responsibility for delivering these programmes falls to a number of different departments across the Council, as well as statutory and voluntary organisations that work in partnership with the Council. The Homelessness Strategy seeks to draw this provision into a more cohesive and responsive offer.

4.13. The Strategy does not directly advocate the redirection of services or funding. Consequently, we do not envisage that there will be any adverse impact to any of the identified protected groups

## STEP 3: REACHING OUR DECISION

5. The recommended decision

5.1. It is recommended that Cabinet approve the adoption of the Homelessness Strategy. In developing this strategy, we sought the views of our internal and external partners that are engaged in providing advice and support to residents. The strategy will be monitored by the Hackney Homelessness Partnership Board to ensure it remains relevant and continues to meet the needs of homeless households in Hackney.

# STEP 4 DELIVERY - MAXIMISING BENEFITS AND MANAGING RISKS

Equality and Cohesion Action Planning

Please list specific actions which set out how you will address equality and cohesion issues identified by this assessment. For example,

- Steps/ actions you will take to enhance positive impacts identified in section 4 (a)
- Steps/ actions you will take to mitigate again the negative impacts identified in section 4 (b)

• Steps/ actions you will take to improve information and evidence about a specific client group, e.g. at a service level and/or at a Council level by informing the policy team (equality.diversity@hackney.gov.uk)

No	Objective	Actions	Outcomes highlighting how these will be monitored	Timescales/ milestones	Lead Officer
1	Understand and monitor the profile of residents approaching as homeless or at risk of homelessness	Utilise HClic data and reporting tools in Jigsaw to profile existing caseload and new approaches. Report on outcomes and trends. Develop action plan to deliver early interventions.	Quarterly reports to the Head of Benefits and Housing Needs Service. Annual Report to Hackney Homelessness Partnership Board.	Ongoing Quarterly reporting	Head of Benefits and Housing Needs
2	Understand the underlying causes of homelessness across equality groups, in particular; disability, ethnicity, age, gender and sexuality.	Utilise HClic data and reporting tools in Jigsaw to profile new approaches. Report on outcomes and trends. Develop action plan to deliver early interventions.	Quarterly reports to the Head of Benefits and Housing Needs Service. Annual Report to Hackney Homelessness Partnership Board.	Ongoing Quarterly reporting	Head of Benefits and Housing Needs