London Borough of Hackney
Equality Impact Assessment Form

Title of this Equality Impact Assessment: Homelessness & Rough Sleeping Strategy 2024-2026

Purpose of this Equality Impact Assessment:

Support the Homelessness & Rough Sleeping Strategy 2024-2026

Officer Responsible: *(to be completed by the report author)*

Name: Andrew Croucher	Ext: 1544
Directorate: Finance & Corporate Resources	Department/Division: Benefits & Housing Needs

Director:	Rob Miller	**Date:** 15/11/2023
Comment :		

STEP 1: DEFINING THE ISSUE

1.0 Summarise why you are having to make a new decision

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 and Rough Sleeping Strategy (the Strategy) to refresh the earlier Strategy which ended in 2022.
This refresh of our existing Homelessness Strategy covers the period 2023 – 2025 and builds on the work carried out in our current strategy publication, which ran from 2020 – 2022.

Our 2020-2022 strategy focused on three themes:
- Customer Care: Delivering the best possible service to Hackney residents.
- Early Intervention and Prevention: Reducing the risk of people experiencing homelessness.
- Access for All: Removing barriers and reducing disadvantage, tackling rough sleeping, and assisting other vulnerable single people experiencing homelessness.

Supply of Social Housing has significantly reduced, with significantly fewer properties available than 5 years ago; this is due to a number of factors such as the impact of the right to buy and/or the need for properties to be held back for regeneration decants. Private Sector Renting forms a significant proportion of the housing market in Hackney, but continuing increases in rents and restrictions of benefits as a result of Government welfare reform have meant that this has become largely unaffordable for low income households. Consequently, the options for homeless 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 (in terms of both 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 new strategy sets out our commitment to continue this work. It commits us to put in place the advice, support and tools for residents who are at risk of homelessness or who lose their home to ensure everyone has the help they need and that no one in Hackney is left facing homelessness alone. This commitment extends across the Council; we all have a responsibility to those residents facing homelessness and we all have a role to play in supporting them.

To support this approach, this strategy is centred around seven key themes that have been recognised as the most pressing drivers of homelessness and rough sleeping in Hackney and how they can be addressed:
- Maximising access to short and long-term affordable housing.
- Tackling rough sleeping.
- Supporting homeless residents with complex needs.
- Addressing homelessness amongst young people in Hackney.
- Inequality and the Cost of Living Crisis.
- Advice and assistance for those with no recourse to public funds.

- Managing the Pace of Change in the Homelessness Environment.

2.0 Who are the main people that will be affected? Consider staff, residents, and other

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 a focus on customer care will be affected if the Council changes or reduces services as a result of the Strategy implementation.

Stakeholders and local providers of services for people experiencing homelessness, including:
- Voluntary Community Services
- Social Housing Landlords
- Private landlords

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 & Global Majority groups are making homeless applications than are represented in the overall population living in the borough.
- A higher proportion of females are making homeless applications, especially those in lone-parent households. Between 1.4.2018 through 30.10.2023, there have been a total of 4,813 approaches by females of which 1,450 were single female households.
- A growing proportion of approaches are made from applicants with multiple and complex mental and physical health problems.
- LGBTQI+ people face significant challenges in accessing affordable and secure housing compared to non-LGBT people, with transgender individuals particularly experiencing higher levels of discrimination and risk of homelessness. This discrimination can create or exacerbate housing instability for LGBT+ people across their adult lives.

STEP 2: ANALYSING THE ISSUES

3.0 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 number 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 Department for Leveling Up, Housing and Communities (DLUHC) through HClic.

3.2 The Homelessness Reduction Act placed additional duties on the local authority and changed the reporting requirements to the government. HClic data has demonstrated that, from 2018, approaches to the Council for advice and assistance have increased.

3.3 The 2021 UK Census - the national census provides key local information on the Hackney population, this data is particularly important for informing the Homelessness and Rough Sleeping Strategy concerning:

- Population change
- Ethnicity
- Deprivation
- Housing
- Overcrowding
- Religion
- Health and wellbeing

3.4 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.

3.5 During 2022, Homeless Link was commissioned to refresh the 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.

3.6 Development of the Homelessness and Rough Sleeping Strategy considered the information gathered through public consultation when the Council's Lettings Policy was reviewed and updated in October 2021. Early data provided after this change has been used to inform strategy development.

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 household has its own unique set of circumstances and 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 that will be developed to respond to the priorities set out in the Strategy.

The Council will also monitor the equalities implications of service changes as they develop to assess whether their implementation 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 under 40 year olds. Between 2018 and 2023 there have been a total of 20,631 approaches for assistance. Of these 11,528 were between the ages of 18-40.

It is recognised that the population profile in the borough is aging and will pose particular challenges regarding homelessness for older residents. The strategy aims to maximize the use of existing housing provision and explore new options for this resident group.

The strategy recognises the different causes and drivers of homelessness across age groups and promotes a flexible response.

4.3   Ethnicity - In the 2021 Census, over one half (53.1%) of Hackney residents described themselves as White British. The remainder is made up of black and other ethnic groups, with the largest group Black, Black British, Black Welsh, Caribbean or African, 21.1% followed by Asian, Asian British or Asian Welsh, 10.4%. (2021 Census)

The proportion of Black and Global Majority households approaching as homeless is disproportionate to the general population in the Borough. This may be a result of endemic discrimination as black and global majority households are more likely to experience multiple deprivation.

Overcrowding is often an underlying factor in households being at risk of becoming homeless and generally Black and Global Majority 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 Black and Global Majority households generally.

It is recognised that Black and Global Majority residents face higher levels of deprivation and inequality which is also a driver for homelessness. It is therefore more likely that the proportion of Black and Global Majority residents approaching the council as homeless or at risk of homelessness will be higher than in the general population. This is an issue explored in a wider context by the Council through poverty reduction, anti-racism and other strategies.

Based on 2021 Census data we see that overcrowding is over 40% within the Black and Global Majority population and just under 40% equally within Asian and Other ethnic groups. While Mixed/Multi ethnicity populations totals are just under 30% and White at slightly over 20%.

In London 38% of Rough Sleepers recorded are Black or Global Majority, 54% are recorded as white. This strategy aims to deliver homelessness prevention measures that will minimise the number of residents rough sleeping and we will look to develop more culturally sensitive supported accommodation provided by and for black and global majority residents.

It is considered that the Homelessness and Rough Sleeping Strategy will have a positive impact for Black and Global Majority Residents. The strategy focuses on those residents most at risk of homelessness, where black and global majority residents are disproportionately represented and the action plan will present culturally sensitive responses in line with the Council's anti-racist values.

4.4   Gender - 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 strategy's flexible and person-centred approach to service delivery.

Outreach services directed towards tackling rough sleeping recognise there are more reported incidents of men sleeping rough than women. In October 2022, a coalition of homelessness and women's sector organisations, supported by researchers, designed and delivered the first pan-London women's rough sleeping census.[1] Female rough sleepers are particularly vulnerable and warrant specific attention to prevent abuse and this has been recognised within the strategy through support for Hackney Winter Night Shelter's dedicated women-only shelter, the Pause and Open Doors projects and Hackney Council's Domestic Abuse Intervention Service (DAIS). The Action Plans to support the Homelessness and Rough Sleeping Strategies will provide specific action points to help prevent women becoming homeless, to provide access to provision of safe and secure emergency accommodation and minimise the risk whilst on the streets.

4.5   Sexual orientation – The sexual orientation of homeless or potentially homeless applicants is not recorded but we know from working with partner organisations that many young people will have been thrown out of home, or otherwise excluded from housing because of their sexuality. Most sources of data suggest that LGBTQI+ people are more likely to experience homelessness than their peers. For example, the 2020 Rough Sleeping Questionnaire found that 7% (of 563 respondents) identified as Homosexual or Bisexual, with 1% identifying as "other" and 5% not responding to the question - even 7% (the lower bound for the actual rate) is almost four times higher than the rate identifying as LGBTQI+ in the ONS' population survey.[2]

The Strategy promotes services which are personalised, flexible and focused on individual circumstances and goals and which are psychologically-informed, the strategy also recognises the specific need to address the issues faced by younger adults experiencing homelessness.

4.6   Religion or belief - Just over a third (36.3%) of Hackney's residents, per the 2021 Census, report 'no religion'. Hackney has significantly more people of Jewish (6.7%) and Muslim (13.3%) faiths than London and England. (2021 Census). Although some data is recorded at the 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.

---

[1] 'Making Women Count'- Lucy Campbell, Head of Multiple Disadvantage, Single Homeless Project, 27 March 2023
[2] Sexuality, gender identity and homelessness, Centre for Homelessness Impact, September 2022

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 expected 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 the Council will use this as an opportunity to further develop relationships to make a positive contribution to mitigate the impacts of homelessness.

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.

4.8. Gender reassignment - there is no suitable data on gender reassignment that would indicate any additional risk of homelessness for this equality group. The strategy supports this through a personalised approach that meets the individual needs of residents.

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. The strategy supports this through a personalised approach that meets the individual needs of residents.

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, and 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 services or partners.

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

4.12. The Homelessness & Rough Sleeping 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 at 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 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 on any of the identified protected groups. Where data is available we will record the incidence of homelessness amongst residents with protected characteristics and monitor changes and trends. Outcomes will be reported to the Council's leadership team and the Homelessness Partnership Board. Where appropriate, key projects will take a consistent approach to measuring outcomes and impact which will be reviewed regularly as part of the strategy monitoring process.

STEP 3: REACHING YOUR DECISION

5. Describe the recommended decision

5.1. It is recommended that Cabinet approve the adoption of the Homelessness & Rough Sleeping 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

6. Equality and Cohesion Action Planning

The table below lists specific actions to be taken that are directly relevant to this Equality Impact Assessment that will enhance the positive impacts identified in section 4(a) and those which will mitigate against the negative impacts identified in section 4(b).

Because of the complex nature of the causes of homelessness, a detailed action plan will be developed to support the strategy. This action plan will be developed in line with equality principles and will be subject to scrutiny by senior managers and the Homelessness Partnership Board.

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 Benefits and Housing Needs Service management. Annual Report to Hackney Homelessness Partnership Board.	Ongoing Quarterly reporting	Assistant Director - Benefits and Housing Needs
2	Understand the underlying causes of	Utilise HClic data and reporting tools in	Quarterly reports to the Benefits and Housing Needs	Ongoing Quarterly reporting	Assistant Director - Benefits and Housing

	homelessness across equality groups, in particular; disability, ethnicity, age, gender and sexuality.	Jigsaw to profile new approaches. Report on outcomes and trends. Develop action plan to deliver early interventions.	Service management. Annual Report to Hackney Homelessness Partnership Board.		Needs
3	Identify women rough sleeping	Participating in London wide women's census. Develop action plan	Outcomes from the annual census will inform the action plan to the strategy	Annually Reporting to the Homelessness Partnership Board	Assistant Director - Benefits and Housing Need
4	Communication - Ensure key objectives are communicated effectively with particular regard to residents with protected characteristics	Promote the Homelessness and Rough Sleeping Strategy to residents and stakeholders in an informed and accessible way.	Through the Action Plan monitoring process - Senior Managers and Homelessness Partnership Board.	Ongoing - Quarterly reporting	Assistant Director - Benefits and Housing Need