

**Southwark's Accommodation Procurement Policy for
Homeless Households, Private Rental Sector Offer of
Accommodation Policy and Temporary Accommodation
Lettings Framework:**

Equality and Health Analysis

Section 1: Equality analysis details

Proposed policy/decision/business plan to which this equality analysis relates	Accommodation Procurement Policy for Homeless Households, Private Rental Sector Offer of Accommodation Policy and the Temporary Accommodation Lettings Framework
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Department	Housing and Modernisation	Division	Customer Experience		
Period analysis undertaken	April – May 2017 and September 2018.				
Date of review (if applicable)					
Sign-off	Richard Selley	Position	Director, Customer Experience	Date	

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

1.1 Brief description of policy/decision/business plan

This Equalities Impact Assessment (EIA) assesses the impacts (individual and cumulative) of a suite of new Southwark Council policies that will provide a framework for the use of private rented accommodation to help meet the council's duties to homeless households:

- **Private Rented Sector Offers (PRSO) Policy for homeless households** – the policy sets out the council's intention to make more homeless households offers of private rented accommodation to discharge its rehousing duty to them.
- **Accommodation Procurement Policy for homeless households** – this explains the council's temporary accommodation needs, issues in procuring temporary accommodation and the principles the council will follow when procuring rented properties, both for temporary accommodation and private rented sector offers.
- **Temporary Accommodation Lettings Framework** – this sets out how households will be prioritised for properties, both for temporary accommodation and private rented sector offers, in different locations.

Legal framework

Under the Housing Act 1996, local housing authorities have duties to secure suitable accommodation for homeless people with a local connection and with a priority need, as defined in the statute. Where permanent housing cannot be provided immediately, homeless households are placed in temporary accommodation. Until 2011, permanent accommodation usually took the form of social housing provided by the council or a housing association.

The Localism Act 2011 gave local authorities the power to discharge this main housing duty to homeless households through an offer of an assured shorthold tenancy in the private rented sector, without any requirement for applicant's prior agreement. This change effectively ended the previously direct link between Parts 6 and 7 of the Housing Act 1996 because where a suitable PRSO is made by the council, the applicant no longer has priority for social housing. Until now, the council has only offered private rented tenancies to a small number of households, and with their consent.

The government carried out their own impact assessment on the power on 12 January 2011 which has been drawn on to help inform preparation of this assessment:

(www.parliament.uk/documents/impact-assessments/IA11-010AN.pdf)

The above impact assessment stated that:

The priority given to certain groups of young people and people who are disabled or mentally ill (who are considered most vulnerable and likely to suffer hardship if not secured accommodation), combined with the fact that households that include a pregnant woman or a dependant child are considered to have a priority need for accommodation under the homelessness legislation, means

that women, pregnant women, young people and children, and disabled people are more likely to be affected by any change in the way that the main homelessness duty can be fully discharged. People from black and minority ethnic communities are also more likely to be affected because they are over-represented among homeless acceptances (compared to the general population).

The impact assessment went on to consider equality impacts resulting from, inter alia, the location i.e. distance from where the household was previously living; and less security of tenure but also identified mitigating factors including the safety net of individual suitability assessments tailored to individual circumstances; that private sector accommodation could meet homeless households' needs both in the short term and longer term; the prospect of providing settled accommodation more quickly to duty accepted households; and the wider benefits to others on the waiting list for social housing.

The Government recognised, as does the council, that there is a need to continue to monitor the practical effect of policy changes against empirical data gathered after the policy has been put into effect. At this stage the assessment is based on the available information prior to implementation, but the importance of monitoring the actual impact within the periodic reviews to be undertaken after implementation of any policy changes should not be underestimated.

The 1996 Act and supporting regulations require local authorities to place homeless households in borough wherever "reasonably practicable". Location is one of the factors that must be taken into account when considering whether temporary or permanent accommodation provided to meet any of the homelessness duties is suitable.

Reasons for the policies

Overall these policies are intended to ensure availability of enough suitable private sector accommodation for homeless households to allow the council to meet its duties at a cost that it can sustain and which are affordable to homeless households, against the background of an increasingly difficult market, marked by rapid increases in rent costs. Temporary accommodation already costs the council over £3 million per year, 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 policies will have the effect of off-setting the impact of continuing high numbers of homeless households presenting to the council and the loss of social rented supply.

Modelling suggests that without the policies the cost of temporary accommodation could increase to £7.6m in 2021/22. The policies are also intended to provide more certain and sustainable outcomes for homeless households, enabling them to secure suitable private rented housing more quickly rather than waiting in temporary accommodation for many years (and often subject to multiple moves over this time) until a social home becomes available. For other households, this approach will help free up resources that can be used to help prevent homelessness from arising

in the first place – the approach being given increased priority locally, regionally and nationally.

More detail on each of the policies is given below:

- **Private rented sector offers (PRSO) policy**

The private rented sector offers policy is needed to set out clearly and transparently how the council will use its powers under the Localism Act. The policy sets out council's policy intention to make more private rented sector offers to homeless households, where the law allows it. Homeless households might either be offered a private rented tenancy as soon as they are accepted as homeless or from their temporary accommodation – meaning they will spend less time in temporary accommodation. This will help to contain temporary accommodation costs which are described above. Another of the policy's objectives is to help improve outcomes for homeless households. Currently, they can wait for more than 3 years in temporary accommodation for social rented housing (these waits tend to be longest for households requiring two or more bedrooms). This temporary accommodation is increasingly out of Southwark (currently 42% is outside Southwark).

Households often have to move a number of times within temporary accommodation – as an illustration, of a random selection of ten households currently in regeneration estate 'second stage' temporary accommodation at the time this assessment was completed, households moved on average three times, although some move more times than this. The nature of temporary accommodation therefore means it can be difficult for households to settle in an area, establish local links and get on with their lives. The policy (which will be backed by a package of support for the households concerned) is intended to help ensure that the offer of a private tenancy will mean that households can move into more settled accommodation that is affordable to them more quickly, enabling them to settle in a neighbourhood, engage with local services and opportunities and plan their futures with more certainty.

The current long waits in temporary accommodation are due to a significant mismatch between the supply of social housing and demand for it, at the beginning of 2017 there were 10,120 households on the housing register for social housing with around 1,500 of these being homeless households in temporary accommodation. Only around 1,000 social rented housing units became available last year in Southwark and the nature of the social housing stock available is that a proportion of this is comprised of one bedroom units, while the great majority of homeless households (94%) require two bedrooms or more.

The council seeks to maximise provision of new affordable housing in the borough, including through its ambitious estate regeneration programme, but the scarcity and cost of sites in Southwark restricts its ability to meet increasing demand in this way. These supply and demand factors are unlikely to improve as homeless acceptances are forecast to remain high at least in the medium term (primarily as a result of changes to the benefit system) – at around 850 to 950 each year.

Social rented supply is also likely to reduce, at least in the short term, due to a number of national policies mainly imposed by the Housing and Planning Act 2016, such as the extension of right to buy to housing association tenants and introduction of annual payments to government based on anticipated sale of local authority higher value voids to help fund it.

- **Accommodation Procurement Policy**

This policy is needed to provide an action plan for procuring enough accommodation both for PRSO and for temporary accommodation and to meet housing needs for homeless households. It is also needed to set out the principles the council will follow when procuring properties. Having such clear key principles is needed because although the council will, wherever possible, seek to acquire affordable accommodation within Southwark and in neighbouring boroughs, this is becoming increasingly difficult, due to the lack of properties within benefit levels and subsidy thresholds.

Research has confirmed the limited supply of properties available within the resources available (see below) both for PRSO and for temporary accommodation within Southwark and London. Since this research was carried out, according to landlord insurer HomeLet, rent prices in London dropped by 1.2% in 2016, the first annual drop in eight years. It was also noted that rent increased across England by 0.4% in 2016, the lowest annual increase for seven years. This slowdown was associated with the economic impact resulting from the Brexit referendum decision and general affordability.

A key principle for the procurement of temporary accommodation is that it is affordable to the council within relevant subsidy levels, in order to help to contain temporary accommodation costs and to prevent them from rising excessively.

Another key principle is that rents need to be affordable to low income people within benefit levels as otherwise it will not be sustainable to them in the long term. Both of these considerations are likely to become increasingly pressing if private sector rents continue to rise and the tendency for landlords to let to more affluent tenants continues. They are likely to be further exacerbated by the introduction of Universal Credit which has now been fully rolled out across Southwark with the exception of a few micro post code areas.

The policy also sets out other factors which will determine where properties are procured – these are needed to ensure the locations are suitable for homeless households and have health, social and employment opportunities.

- **Temporary Accommodation Lettings Framework**

This framework replaces the existing Temporary Accommodation Lettings Framework and Frequently Asked Questions. This revised policy is designed to compliment the Accommodation Procurement and PRSO policies and is needed as the amount of housing available for temporary accommodation (and for private rented sector offers) in Southwark and Greater London is likely to continue to decline while costs are likely to

continue to increase. Although, as set out above, the council aims to place households in or as close to Southwark as possible, where sufficient affordable accommodation is not available, it will have to seek alternative accommodation further afield.

The council therefore needs to prioritise households for properties in different locations in ways that take account of their needs. The particular focus of the policy is to prioritise allocation of accommodation in or near Southwark to households with the greatest need to be housed there. These locations are grouped in bands:

- **Band 1:** Southwark and adjacent boroughs
- **Band 2:** Greater London
- **Band 3:** Further afield.

The priority categories are designed to apply to those with compelling needs to be accommodated close to Southwark or within Greater London. The needs of children and disabled people and by extension those who care for them are a particular focus of the priority categories.

Alongside this, some priority is given to working households. The council will also consider individual compelling claims to be entitled to locational priority which do not fit into the defined categories, on their own merits. Further, any offer of accommodation under the homelessness legislation is subject to an individual suitability assessment. These factors provide a safety net which allows for the consideration, for example, of cultural reasons for a particular placement which may affect certain ethnic minority households.

What is being assessed

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

Private rented offers

- More private rented offers will be made, where they have only been made in very small numbers in the past – this is compared to households waiting for long periods in temporary accommodation for social housing.
- These offers will be made on a mandatory basis, to discharge the council's duties, rather than on a voluntary basis as at present.
- Households that are made private rented offers retain their priority for social housing in Southwark (subject to consultation on and approval of an updated Social Housing Allocations Policy).
- These private rented offers will be in locations where there is supply and which are affordable to homeless households. As a result it is likely that more households will be housed outside London.

- We will procure properties within or as close to Southwark as possible and make offers based on households' specific needs. For example, if a property is based outside of London and we have not procured anything nearer to Southwark on the day, we would not offer this property to a household that had specific requirements to be based in Southwark.
- The policy will help to give households greater certainty and will avoid the disruption of often repeated moves within temporary accommodation.
- A package of support will be provided to those made PRSOs to help them into and to sustain their tenancy.

Temporary accommodation

- There is an updated action plan setting out how the council will meet requirements for temporary accommodation.
- Temporary accommodation will be procured in locations where it is affordable to the council, which is more likely to be beyond Southwark and, increasingly, outside London where there is supply, and also where properties are affordable to homeless households within benefit levels. Currently 1% of temporary housing is outside London (although 42% is outside Southwark). These numbers are likely to continue growing.
- Although in all cases the council will seek to ensure households are housed in or as near to Southwark to the extent that is reasonably practicable, they will be prioritised for properties in different locations based on their needs. The aim is to ensure those with the greatest needs have priority for placements in or near to Southwark.

Section 3: Overview of service users and key stakeholders consulted

Service users and stakeholders	
Key users of the department or service	<p>All customers who approach the service for housing advice, assistance and support through the related homelessness legislation.</p> <p>Legal representatives who work in partnership with the council related to the homelessness legislation and case law.</p>
Key stakeholders were/are involved in this policy / decision / business plan	<p>All Housing Association partners, Citizens Advice Bureau, Shelter, community organisations, local residents, Area Tenant Forums, Children’s & Adults’ Services, and Southwark Legal Advice Network.</p> <p>Housing Solutions conducted best practice visits to Camden, York and Hart Councils. These councils have already implemented a policy to discharge duty into the private sector. 2018 visit to Havering peer review who have also implemented this policy.</p> <p>Advice by Arden Chambers. Specialist expertise opinion provided on the placement of homeless applicants out of borough.</p>

Section 4: Pre-implementation equality 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.

The first column on the left is for societal and economic issues (discrimination, higher poverty levels) and the second column on the right for health issues, physical and mental. 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 health is given special consideration, as it is the council’s declared intention to reduce health inequalities in the borough. The Public Health Team can assist with research and data.

<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</p>	<p>Potential health impacts (positive and negative)</p>
<p>Those aged 25-44 are disproportionately represented among lead applicants from accepted households. Conversely, those aged over 65 are under-represented and so less likely to be directly affected. Households with children (or expecting a first child) are disproportionately represented among homeless households (85%).</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. Again, greater certainty as a result of the policies may make it easier to find school places and other support that can be sustained over time than if those concerned were likely to face repeated relocation, as can be the case with temporary accommodation.</p> <p>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 (although generally waits are much shorter). 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.</p>	<p>No current data available.</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>

<p>Homelessness Statistical Review March 2017, Age profile of statutorily homeless households (derived from P1E data).</p> <p>Southwark Demography Factsheet May 2015.</p>	<p>No current data available.</p>
<p>Mitigating actions to be taken</p>	
<p>Age – Children</p> <p>Some children and families will be prioritised for in borough/adjacent borough accommodation, including:</p> <ul style="list-style-type: none"> o 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 well-being o Households with a child where Southwark Family Services has demonstrated serious concerns about the child and is working with them intensively o Households where there is a recommendation through a joint assessment with Children’s and Adult’s Services o Households which include a registered Southwark Council approved foster carer who is fostering a Southwark looked after child o Households which (a) include a Southwark Council approved person who is caring for a Southwark looked after child, (b) include a Southwark child that is subject to a Southwark Special Guardianship Order or (c) have a private fostering arrangement with a carer resident in Southwark where they have notified the council <ul style="list-style-type: none"> <input type="checkbox"/> 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 <input type="checkbox"/> Any special circumstances demonstrating a compelling need for accommodation in a certain area will be considered and this might particularly benefit children <input type="checkbox"/> 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. The Housing Solutions service has recently been awarded a Customer Service Excellence renewed accreditation and we have specialist officers to aid support and mitigate the effects of moving outside of the district and into private sector accommodation. <input type="checkbox"/> 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>Age – Older people</p> <p>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</p> <ul style="list-style-type: none"> <input type="checkbox"/> The focus on procuring properties in the South East and with good transport connections to London, where possible, will help people in temporary accommodation maintain their location connections and this might be particularly important for older people <input type="checkbox"/> Support will also be offered to households moving into temporary accommodation outside London and this could involve help to transfer any 	<p>None at this point. Will be reviewed as appropriate.</p>

care and support packages	
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<p>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.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan</p>	<p>Potential health impacts (positive and negative)</p>
<p>Only a small proportion of accepted homeless households have members needing a wheel chair adapted property or a level access property. Overall, less than 9% of homeless households have members with a physical disability which impacts on the type of properties needed.</p> <p>Statistics in the Census 2011 shows that Southwark ranks in the lowest 20% for people reporting daily activity limitations. It is grouped as having only 11.2% – 14.6% population reporting daily activity limitations. This could be partly down to its relatively young population.</p> <p>Of accepted homeless households, 5% have been accepted as needing housing due specifically to a member having a mental health issue and the majority of these are single people. It is likely, however, that other applicants and members of their households may have mental health problems, but this information cannot be easily accessed.</p> <p>Nationally, 53% of working age disabled people are in work compared to 70% of non-disabled people. Employment rates vary greatly according to the type of impairment a person has, for example people with severe or enduring mental health conditions have the lowest employment rate of any of the main groups of disabled people. According to the Office for Disability this is 16% for people with mental health issues compared to 43% for all disabled people of working age.</p> <p>As noted above, the priority categories have a particular focus on disabled people with compelling needs to be accommodated close to Southwark or in London and those who care for them.</p>	<p>A national survey conducted by Shelter of 2,000 people in temporary accommodation¹, found that more than half said that they were suffering from depression and depression and other mental health problems were two of the most common health conditions reported.</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>Homelessness Statistical Review March 2017, Age profile of statutorily homeless households (derived from P1E data).</p> <p>Census 2011.</p>	<p>Shelter – Living in Limbo²</p>
<p>Mitigating actions to be taken</p>	

¹ http://england.shelter.org.uk/_data/assets/pdf_file/0012/40116/Living_in_Limbo.pdf

² http://england.shelter.org.uk/_data/assets/pdf_file/0012/40116/Living_in_Limbo.pdf

<p><input type="checkbox"/> The private rented sector offers policy excludes some disabled households who wouldn't 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) and disabled households with members needing wheelchair accessible housing</p> <p><input type="checkbox"/> Some people with particular health problems or disabilities will be prioritised for in borough/adjacent borough accommodation, these include:</p> <ul style="list-style-type: none"> - 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 <p><input type="checkbox"/> Some carers, and people being cared for, will be prioritised for in borough/adjacent borough accommodation</p> <p><input type="checkbox"/> 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</p> <p><input type="checkbox"/> 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</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</p>	<p>Potential health impacts (positive and negative)</p>
<p>There are no areas of focus or key work streams within the policies that specifically target gender reassignment. It is therefore probable that the policies will have no particular positive or negative impacts on the transgender community.</p> <p>The council has begun including equalities questions about the sexual orientation and gender reassignment of the lead applicant for homeless households in the homelessness application. However, applicants can decline answering these and as this was only implemented in April 2017, it is too early to analyse any data collected.</p>	<p>None identified.</p>
<p>Equality information on which above analysis is based.</p>	<p>Health data on which above analysis is based</p>

No current data available.	No current data available.
Mitigating actions to be taken	
The focus on procuring properties in more urban areas, where their diversity as far as possible reflects that of Southwark, might help to ensure there are facilities for transgender people, which may be more likely where the population is more diverse. In addition the focus on also procuring properties in areas with reasonable transport links to London might help transgender people in particular to continue to use local support services if there are fewer where they live.	None at this point. Will be reviewed as appropriate.

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 couple. 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.)	
Potential impacts (positive and negative) of proposed policy/decision/business plan	Potential health impacts (positive and negative)
In terms of treating marriage or civil partnership more or less favourably, no issues have been identified. Lone parents are disproportionately affected by homelessness compared to their share of the population so are more likely to be affected by the policies.	Please see comments to the left
Equality information on which above analysis is based	Health data on which above analysis is based
66% of statutory homeless households were single parent households. Homelessness Statistical Review March 2017, Age profile of statutory homeless households (derived from P1E data).	No current data available.
Mitigating actions to be taken	
Housing Solutions service has recently been awarded a Customer Service Excellence renewed accreditation and we have specialist officers to aid support and mitigate the effects of moving outside of the district and into private sector accommodation by ensuring households have someone to contact regarding any issues.	None at this point. Will be reviewed as appropriate.

<p>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.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan</p>	<p>Potential health impacts (positive and negative)</p>
<p>A significant number of lead applicants from accepted households are pregnant women. 10% (20 of 206) of accepted homeless households were pregnant with no other children between January and March 2017.</p> <p>As noted above, the Temporary Accommodation Lettings Framework policy has a particular focus on children with compelling needs to be accommodated close to Southwark or in London and those who care for them.</p>	<p>None identified.</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>Jan – Mar 2017 P1E data.</p>	<p>No current data available.</p>
<p>Mitigating actions to be taken</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> <ul style="list-style-type: none"> <input type="checkbox"/> Resettlement support will be offered to households being made private rented sector offers where they are relocating out of London and where needed when they are moving from Southwark <input type="checkbox"/> Support will also be offered to households moving into temporary accommodation outside London 	<p>None at this point. Will be reviewed as appropriate.</p>

<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</p>	<p>Potential health impacts (positive and negative)</p>
<p>A greater proportion of homeless decisions are made for ethnic minorities and therefore the policies will have a disproportionate effect on ethnic minority households. (Government impact assessment, 12 January 2011).</p> <p>There may also be fewer cultural facilities for some ethnic groups in</p>	<p>None identified.</p>

<p>locations outside London, although this would very much depend on the area where the offer was made.</p> <p>English not first language – if households are allocated a private rented home they will need to receive adequate guidance to explain the rent charged and the ability to pay.</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>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>Southwark Demography 2015 report: 52% of the population belong to the White group, 48% to Black, Asian and Minority Ethnic group.</p> <p>31% Black ethnicity compared to 17% in London. 16% African ethnicity compared to 7% in London. 6% Caribbean ethnicity compared to 4% in London. 9% Black Other compared to 5% in London 11% Asian ethnicity compared to 21% in London.</p> <p>In summary, Southwark is ethnically diverse with 48% of its population being black and minority ethnic.</p> <p>The p1e statutory information which Southwark provides to the Government shows that ethnic minorities make up a greater proportion of homelessness. In the three months between April 2016 and June 2016, Southwark made 606 homeless decisions. 112 were for white British/Irish/other applicants, 281 were black (African/Caribbean/other) applicants, nine were for Asian/Chinese, 113 for other ethnicity and 91 not stated.</p> <p>Of the 515 where ethnicity was recorded, we can calculate that 22% of the decisions were for white British/Irish/other ethnicity. In conclusion we can see that a great proportion (78%) of the homeless decisions are made for ethnic minorities and therefore the policies will have a disproportionate effect on ethnic minority households.</p>	<p>No current data available.</p>
<p>Mitigating actions to be taken</p>	
<p><input type="checkbox"/> Places will be identified for procuring properties, 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. This might particularly benefit households of different ethnic origins.</p> <p><input type="checkbox"/> Procurement of properties outside London will, wherever possible, be focussed on urban areas in the South East in areas with reasonable transport 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</p>	<p>None at this point. Will be reviewed as appropriate.</p>

<p>iWorld Northgate housing system which enables a series of reports that monitor by relevant equality characteristics.</p> <p>All literature, forms and other information is readily available in the languages most commonly used. The Service ensures that people from whatever ethnicity can compete on an equal basis; this includes Gypsy and traveller communities. Translation services are made widely available.</p> <p>Southwark has committed in the Homelessness Strategy 2018-22 Action Plan (Action 1.6) to exploring factors behind BME households being over-represented as accepted homeless cases. With a better understanding it could be possible to improve prevention of homelessness in the first place.</p> <p>The overall aim of this policy is to prevent homelessness and reduce the necessity for people to remain in inappropriate temporary accommodation. The delivery of the actions identified will have positive impact for BME, disabled and vulnerable, young people and women, all of whom are over represented amongst those who are at risk of homelessness.</p>	
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<p>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>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan</p>	<p>Potential health impacts (positive and negative)</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.</p> <p>Whilst the detailed recording of homeless applications and housing allocations by people of different faith groups can pin point 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>None identified.</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>No data sets record religion or belief.</p>	<p>No data sets record religion or belief.</p>
<p>Mitigating actions to be taken</p>	
<p><input type="checkbox"/> Places will be identified where their diversity as far as possible reflects that of Southwark, focussing on more urban areas where there are likely</p>	<p>None at this point. Will be reviewed as</p>

<p>to be more facilities and support networks for people. This might particularly benefit people with different faiths and beliefs.</p> <p><input type="checkbox"/> Procurement of properties outside London will, wherever possible, be focussed on urban areas in the South East in areas with 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 have revised the homelessness application form so that it requests information about protected characteristics in the body of the form, instead of at the end, with the aim that this best practice helps to improve data collection. The data collection has also been expanded to collect data on all nine of the protected characteristic groups which should improve data monitoring on impacts to religion and belief.</p>	<p>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</p>	<p>Potential health impacts (positive and negative)</p>
<p>Women are disproportionately represented among lead applicants from accepted households.</p> <p>Women are also more likely to be lone parents, who are disproportionately affected by homelessness in Southwark³.</p> <p>Women are also more likely to be carers⁴, who can be impacted by moves away from the people they are caring for, they are also more likely to be impacted if they move outside Southwark and London and have to travel greater distances to maintain that care.</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>Households with children with special educational needs, where Family Services are working with them and where children are at key exam stages could be particularly affected.</p> <p>Women of a working age are less likely than men of a working age to be in employment.</p>	<p>None identified.</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>

³ According to [Gingerbread](#), around 90% of single parents are women

⁴ Carers UK estimates that 58% of carers are women.

<p>The pie statutory information which Southwark provides to the Government shows that females make up a greater proportion of the borough's homeless decisions. In the three months between April 2016 and June 2016, 73% (95 out of 130) of homeless decisions for single parents and single people were for female applicants.</p> <p>Therefore, although Southwark is evenly split between male and females (Southwark Demography 2015), a higher proportion of the decisions are made for females.</p> <p>Evidence on gender and employment rates: http://www.poverty.org.uk/48/index.shtml</p>	<p>No data available currently.</p>
<p>Mitigating actions to be taken</p>	
<p>The cumulative effect of the policies however 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> <ul style="list-style-type: none"> <input type="checkbox"/> Mitigations for households with children are set out in the <i>Section 4: Age – Children</i>. <input type="checkbox"/> Some carers (who are more likely to be women) will be prioritised for in borough/adjacent borough accommodation <input type="checkbox"/> Resettlement support will be offered for private rented offers which are out of London, and for moves within London where they are needed and this could include help to register children in local schools <input type="checkbox"/> 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>None at this point. Will be reviewed as appropriate.</p>

<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</p>	<p>Potential health impacts (positive and negative)</p>
<p>While many people identify as heterosexual, many people also do not in the wider community. The Government estimates that approximately 6% of the population are gay men, lesbians or bisexuals.</p> <p>It is acknowledged that local data on sexual orientation is unlikely to be accurate and on-going efforts should be made to encourage such information being given at the point of application.</p> <p>Members of the LBGT community may face specific barriers not currently considered, and it may be that more information about this client group is needed.</p> <p>Insufficient monitoring customer engagement and feedback means</p>	<p>None identified.</p>

<p>that it is not be possible at this time to properly evaluate with any certainty what impact the service has and whether some customers may be disadvantaged through their sexual orientation. There is a risk albeit small, that anyone in this position could be discriminated against and this could lead to an inequality in treatment.</p> <p>A survey published in 2000, National Survey of Sexual Attitudes and Lifestyles, concluded that 5-7% of the UK population were likely to be lesbian, gay and bisexual. There is no evidence to suggest that people in these categories are likely to be disproportionately represented among those presenting themselves as homeless.</p> <p>Homeless household sexual orientation information is not available but moves outside London may impact on the support networks and services available to Lesbian, Bisexual, Gay and Transgender (LGBT) groups, although there is no actual evidence of this, and it would very much depend on the location of any properties offered.</p> <p>ONS data (2015) indicates that areas outside London have a smaller LGBT population. The proportion of the LGBT population in London is estimated to be 2.6% compared to 1.8% in the South East and 1.2% in the East of England⁵. There may be impacts arising from the relative lack of support and other services designed specifically for LGBT people in some places outside London, but again this would very much depend on the area where the offer was made.</p>	
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>
<p>National Survey of Sexual Attitudes and Lifestyles (2000)</p>	<p>No data sets record sexual orientation.</p>
<p>Mitigating actions to be taken</p>	
<p><input type="checkbox"/> The focus on procuring properties in more urban areas, where their diversity as far as possible reflects that of Southwark, might help to ensure there are facilities for people of different sexual orientations, which might be more likely where the population is more diverse. In addition the focus on also procuring properties in areas with reasonable transport links to London might help people of different sexual orientations to continue to use support services, if there are fewer where they live</p> <p>Staff have been fully trained by Albert Kennedy Trust in 2016. Therefore, the service should be well placed to identify and deal with potential discrimination.</p> <p>The Housing solutions services will employ resettlement officers to provide a customer care to all households placed out of the borough to ensure households have someone to contact regarding any issues.</p> <p>Monitoring of this sector will enable specific issues for different segments of the population to be identified and addressed</p>	<p>None at this point. Will be reviewed as appropriate.</p>

⁵<https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualidentityuk/2015>

appropriately.	
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<p>Socio-economic disadvantage – although the Equality Act 2010 does not include socio-economic status as one of the protected characteristics, Southwark Council recognises that this continues to be a major cause of inequality in the borough. Socio economic status is the measure of an area’s, an individual’s or family’s economic and social position in relation to others, based on income, education, health, living conditions and occupation.</p>	
<p>Potential impacts (positive and negative) of proposed policy/decision/business plan</p>	<p>Potential health impacts (positive and negative)</p>
<p>Homeless households are more likely to have low incomes and not be working compared with the Southwark population so are more likely to be impacted by the policies.</p> <p>The percentage of households in temporary accommodation (TA) that have been on “passport benefits” (i.e. in receipt of non working benefits such as JSA or ESA where Housing Benefit would be paid automatically) has dropped significantly. Previously, around 90% of households would have had TA paid through Housing Benefit. A survey of TA tenants carried out in 2015 showed that this figure has dropped to around 50%. This is likely to be because of the increase in the number of people in part time employment (declaring themselves as self-employed).</p> <p>A key principle is that rents need to be affordable to low income people within benefit levels as otherwise it will not be sustainable to them in the long term. Both of these considerations are likely to become increasingly pressing if private sector rents continue to rise and the tendency for landlords to let to more affluent tenants continues. They are likely to be further exacerbated by the introduction of Universal Credit.</p> <p>The higher rents in private rented housing might mean low income working households will need to claim benefits for longer than they would in social housing where rents are lower.</p> <p>There is also a risk that members of homeless households that are in employment may not be able to sustain their job if they had to move outside London and this is important, given that those in homeless households are disproportionately more likely to be non working and to be affected by the overall benefit cap than other households.</p> <p>There also might be fewer employment opportunities in some areas outside of London, although the proportion of the working age population claiming out of work benefits is 1.9% for London which is similar to Great Britain⁶, but there are obviously regional variations.</p>	<p>There is also considerable policy research that supports the proposition that working contributes towards individual wellbeing⁷.</p>
<p>Equality information on which above analysis is based</p>	<p>Health data on which above analysis is based</p>

⁶ www.nomisweb.co.uk

⁷ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/214326/hwwb-is-workgood-for-you.pdf

<p>Data on benefit rates across Britain can be found in the official labour market statistics: www.nomisweb.co.uk</p>	<p>No data available currently.</p>
<p>Mitigating actions to be taken</p>	
<p>Mitigation measures have been developed to reduce the impact the policies might have on homeless people that are working, given that unemployment, and being affected by the overall benefit cap, can be causes of homelessness in themselves.</p> <p>However, it might be argued that prioritising working homeless households for properties in certain locations might disadvantage those that find it harder to work, such as: those with disabilities; lone parents; larger households with greater needs for child care; and those for whom English is not their first language. The council aims to help mitigate this by engaging with non working homeless households and helping them into work and by considering the factors which are barriers to work, as well as by targeting within its priority categories certain groups that have a strong correlation with those who may find it harder to work, including people with disabilities and households with dependant children.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Certain workers (i.e. those where they or their partner works more than 16 hours per week in Southwark or an adjoining borough) will be prioritised for accommodation in Greater London so they can maintain their employment <input type="checkbox"/> One of the procurement principles (set out in the Accommodation Procurement Policy for Homeless Households) is to take into account the employment opportunities in the areas where properties are being procured given that homeless households as more likely not to be working <input type="checkbox"/> All offers of housing should be affordable in the longer term i.e. within benefit levels 	<p>None at this point. Will be reviewed as appropriate.</p>

<p>Human Rights 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>
<p>There are no anticipated negative impacts on Human Rights as a result of these policies.</p>
<p>Information on which above analysis is based</p>

27 September 2018

No current data available.
Mitigating actions to be taken
None at this point. Will be reviewed as appropriate.

Section 5: Further actions and objectives

5. Further actions			
Based on the initial analysis above, please detail the key mitigating actions or the areas identified as requiring more detailed analysis.			
Number	Description of issue	Action	Timeframe
1	Monitor the impact of implementing the policies. Equalities data collection has been revised in April 2017 to follow best practice whereby homeless applications capture data on protected characteristics mid-form, instead of at the end, to encourage a better completion rate and improve the quality of information for monitoring.	The policies will be monitored to assess the impacts on those households with protected characteristics (and more widely) and to identify whether any further additional mitigation measures (particularly as regards support packages offered to those concerned) are needed.	These impacts will be reported on an annual basis from the date of implementation.
2	Develop improved understanding of why some BME communities are disproportionately represented within homelessness services together with the development of appropriate early intervention and prevention measures to address this over representation.	Improve our customer insight through focus group involvement and improved data collection. Develop appropriate early intervention and prevention measures to address this over representation.	Focus groups held beginning in early 2018 and new prevention measures assessed and implemented by March 2019. Monitor national and local data and reports on this and consider good practice recommendations.

5. Equality objectives (for business plans)				
Based on the initial analysis above, please detail any equality objectives 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
None at this point	None at this point	None at this point	None at this point	None at this point

5. Health objectives (for business plans)

27 September 2018

Based on the initial analysis above, please detail any health objectives 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
None at this point	None at this point	None at this point	None at this point	None at this point
