

H&F Equality Impact Analysis (EIA) Tool

Conducting an Equality Impact Analysis

An EIA is an improvement process which helps to determine whether our policies, practices, or new proposals will impact on or affect different groups or communities. It enables officers to assess whether the impacts are positive, negative, or unlikely to have a significant impact on each of the protected characteristic groups.

The tool is informed by the [public sector equality duty](#) which came into force in April 2011. The duty highlights three areas in which public bodies must show compliance. It states that a public authority must, in the exercise of its functions, have due regard to the need to:

- 1. Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited under the Equality Act 2010**
- 2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it**
- 3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it**

Whilst working on your Equality Impact Assessment, you must analyse your proposal against these three tenets.

General points

1. In the case of matters such as service closures or reductions, considerable thought will need to be given to any potential equality impacts. Case law has established that due regard cannot be demonstrated after the decision has been taken. Your EIA should be considered at the outset and throughout the development of your proposal. It should demonstrably inform the decision and be made available when the decision is recommended.
2. Wherever appropriate, the outcome of the EIA should be summarised in the Cabinet/Cabinet Member report and equalities issues dealt with and cross referenced as appropriate within the report.
3. Equalities duties are fertile ground for litigation and a failure to deal with them properly can result in considerable delay, expense, and reputational damage.
4. Where dealing with obvious equalities issues (e.g. changing services to disabled people/children), take care not to lose sight of other less obvious issues for other protected groups.
5. If you already know that your decision is likely to be of high relevance to equality and/or be of high public interest, you should contact the Strategy & Communities team for support.

Further advice and guidance can be accessed online and on the intranet:

<https://www.gov.uk/government/publications/public-sector-equality-duty>

<https://officesharedservice.sharepoint.com/sites/Governance/SitePages/Reports.aspx>

H&F Equality Impact Analysis Tool

Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	2020/21 / Q4
Name and details of policy, strategy, function, project, activity, or programme	<p>Title of EIA: Homelessness and Rough Sleeping Strategy 2021 (New)</p> <p>Short summary:</p> <p>The Homelessness and Rough Sleeping Strategy sets out the Council’s approach to the prevention of homelessness and ending rough sleeping.</p> <p>The Tenancy Strategy sets out the Council’s approach to the kinds of affordable housing tenancies granted in the borough.</p>
Lead Officer	<p>Name: Beatrice McGuire</p> <p>Position: Senior Housing Strategy & Growth Officer</p> <p>Email: Beatrice.mcguire@lbhf.gov.uk</p>
Date of completion of final EIA	20 / 01 / 2021

Section 02	Scoping of Full EIA
Plan for completion	<p>Timing:</p> <p>Homelessness and Rough Sleeping Strategy Consultation</p> <p>The Homelessness and Rough Sleeping Strategy consultation follows two major consultation and review processes: work carried out by the Homelessness and Rough Sleeping Commission culminating in the report “Ending Rough Sleeping in Hammersmith & Fulham” published January 2018; and the Housing Strategy Consultation, which took place in 2019.</p> <p>6. The Homelessness and Rough Sleeping Strategy consultation ran between 09 and 28 February 2021.</p>

The views of residents (including Tenants and Residents Association representatives), local Registered Providers and third sector partners were gathered using an accessible online questionnaire hosted on CitizenSpace.

The questionnaire had 10 questions; it was not a requirement to answer all questions. In the spirit of co-production, some questions were aimed at people who have been homeless or at risk of homelessness, involving residents in matters which affect them. It was anonymous and resident details were kept private. Respondents were given the opportunity to join the Resident Involvement mailing list, and residents with experience of homelessness or rough sleeping were invited to express interest if they would like to get involved with improving services. In line with GDPR, permission was expressly sought regarding inclusion of written responses in the strategy document.

The consultation was publicised on H&F's Twitter account (09 February 2021), shared in Council Leader Stephen Cowan's Weekly Report (12 February 2021) and on H&F's 'Get Involved' website (16 February 2021).

An invitation to take part in the consultation was shared via the following Resident Involvement email lists: Get Involved mailing list (750 recipients), TRA network (120 recipients) and the Resident Involvement third sector directory (90 organisations).

Third sector partners and all Registered Providers with housing stock in the borough were also invited by email to take part in the consultation. These partners were also asked to publicise a link to their service users.

The views and experiences of residents and partners informed the planning and development of the Homelessness and Rough Sleeping Strategy.

Full details of the consultation are set out in the Homelessness and Rough Sleeping Strategy Consultation Summary (Homelessness and Rough Sleeping Strategy Cabinet Report - Appendix C).

Resources:

The consultations and focus groups were delivered by the Senior Housing Strategy & Growth Officer working with the Resident Involvement Team and Head of Communications, with advice from the Strategic Commissioner for the Economy, and the Co-Production Lead.

Analyse the impact of the policy, strategy, function, project, activity, or programme

Analyse the impact of the policy on the protected characteristics (including where people / groups may appear in more than one protected characteristic). You should use this to determine whether the policy will have a positive, neutral, or negative impact on equality, giving due regard to relevance and proportionality.

Protected characteristic	Analysis	Impact: Positive, Negative, Neutral
Age	<p>Older Residents</p> <p>In Hammersmith & Fulham, the largest predicted population growth over the next 10 years is expected to be in the over 85 age group. The number of people aged 65 to 85 is also expected to grow by a fifth.</p> <p>The adoption of the Homelessness and Rough Sleeping Strategy and the Tenancy Strategy are not expected to have a positive or negative impact on people based on age.</p>	Neutral
Disability	<p>The 2011 Census shows that 12.6% of H&F residents reported having long-term illness or physical disability (14.7% in 2001). As regards learning difficulties, the Learning Disabilities Joint Strategic Needs Assessment (JSNA) shows that there were 1,014 people aged 18 to 64 with a learning disability known to Adult Social Care in 2013/14.</p> <p>The adoption of the Homelessness and Rough Sleeping Strategy is expected to have a positive impact on disabled people in the borough. Over 50% of rough sleepers have a mental health problem which requires support. Rough sleeping and homelessness also have a negative impact on mental health as well as physical health. Ending rough sleeping in Hammersmith and Fulham will have a positive impact on people who sleep rough and have a mental illness, which is often an invisible disability.</p> <p>The adoption of the Tenancy Strategy is expected to have a broadly neutral impact on disabled people in the borough as the priorities expressed in the document are broadly in line with previous tenancy strategies; restating a preference for lifetime tenancies.</p>	<p>Positive</p> <p>Neutral</p>

	Gender reassignment	The adoption of the Homelessness and Rough Sleeping Strategy and Tenancy Strategy are not expected to have a negative or positive impact on people who have transitioned or are transgender.	Neutral
	Marriage and Civil Partnership	At the time of the 2011 Census, 29.6% of the borough residents aged 16 and over stated they were married. 0.5% of H&F residents were in a registered same-sex civil partnership, above national average of 0.2%. 10.3% of the population are separated or divorced and 3.7% are widowed. The adoption of the Homelessness and Rough Sleeping Strategy and Tenancy Strategy are not expected to have a negative or positive impact on people on the basis of marriage or civil partnership status. There are no specific services to be delivered to people on the basis of marriage or civil partnership.	Neutral
	Pregnancy and maternity	The adoption of the Homelessness and Rough Sleeping Strategy and Tenancy Strategy are not expected to have a negative or positive impact on people based on their pregnancy or maternity status.	Neutral
	Race	H&F is diverse, and our population is constantly changing. In 2015, 61% of residents were of an ethnicity other than white British. Our population is 12% of Black origins, 9% of Asian ethnic origin, 6% of mixed origin, and 4% of Irish origin, the third highest of any local authority in England & Wales. The adoption of the Homelessness and Rough Sleeping Strategy and Tenancy Strategy are not expected to have a negative or positive impact on people based on their race.	Neutral
		The Equalities Act 2010 describes Romany Gypsies and Irish Travellers as ethnic groups. The inclusion of action points for the provision of additional pitches on caravan sites for Gypsies and Travellers is likely to have a positive impact on people in these groups.	Positive
Religion/belief (including non-belief)	54.1% of H&F's population are Christian, above the London average. 13.5% of residents are of a non-Christian religion, 10% are Muslim. The Muslim population in H&F has grown, but not at the rate of other London Boroughs such as Barking and Dagenham. 24% of the population have no religion, above the London average. The adoption of the Homelessness and Rough Sleeping Strategy and Tenancy Strategy are not expected to have a negative or positive impact on people based on their religion/belief (including non-belief). There are no specific services to be delivered to people on the basis of religion/belief or non-belief.	Neutral	

	Sex	The adoption of the Homelessness and Rough Sleeping Strategy and the Tenancy Strategy are not expected to have a negative or positive impact on people based on their sex.	Neutral
	Sexual Orientation	The adoption of the Homelessness and Rough Sleeping Strategy and Tenancy Strategy are not expected to have a negative or positive impact on people based on their sexual orientation.	Neutral
<p>Human Rights or Children's Rights If your decision has the potential to affect Human Rights or Children's Rights, please contact your Equality Lead for advice</p> <p>Will it affect Human Rights, as defined by the Human Rights Act 1998? Yes / No</p> <p>Will it affect Children's Rights, as defined by the UNCRC (1992)? Yes / No</p>			

Section 03	<p>Analysis of relevant data Examples of data can range from census data to customer satisfaction surveys. Data should involve specialist data and information and where possible, be disaggregated by different equality strands.</p>		
Documents and data reviewed	<p>Data and research were provided by the Principal Performance & Information Officer and Principal Business Intelligence Analyst. Data included:</p> <p>GLA Ethnic Projections H&F GLA Population projections H&F Indices of Deprivation, LBHF briefing H&F Borough Profile 2018d The 2017 Strategic Housing Market Assessment 2011 Census</p>		
New research	<p>If new research is required, please complete this section</p> <p>None</p>		

The Homelessness and Rough Sleeping Strategy Consultation

The Council is committed to doing things with residents, not to them. This means involving residents in decisions that affect them. That's why we wanted to gather the views of residents as well as third sector partners and local registered providers to help shape the strategy.

Full details of the consultation are set out in the Homelessness and Rough Sleeping Summary Report (Homelessness and Rough Sleeping Strategy Consultation Cabinet Report – Appendix D).

The Homelessness and Rough Sleeping Strategy consultation follows two major consultation and review processes: work carried out by the Homelessness and Rough Sleeping Commission culminating in the report “Ending Rough Sleeping in Hammersmith & Fulham” published January 2018; and the Housing Strategy Consultation which took place in 2019.

The views of residents (including Tenants and Residents Association representatives), local Registered Providers and third sector partners were gathered using an accessible online questionnaire hosted on CitizenSpace.

The questionnaire had 10 questions; it was not a requirement to answer all questions. In the spirit of co-production, some questions were aimed at people who have been homeless or at risk of homelessness, involving residents in matters which affect them. It was anonymous and resident details were kept private. Respondents were given the opportunity to join the Resident Involvement mailing list and residents with experience of homelessness or rough sleeping were invited to express interest if they would like to get involved with improving services. In line with GDPR, permission was expressly sought regarding inclusion of written responses in the strategy document.

The consultation was publicised on H&F's Twitter account (09 February 2021), shared in Council Leader Stephen Cowan's Weekly Report (12 February 2021) and on H&F's 'Get Involved' website (16 February 2021).

An invitation to take part in the consultation was shared via the following Resident Involvement email lists: Get Involved mailing list (750 recipients), TRA network (120 recipients) and the Resident Involvement third sector directory (90 organisations).

Third sector partners and all Registered Providers with housing stock in the borough were also invited by email to take part in the consultation. These partners were also asked to publicise a link to their service users.

As this strategy concerns homelessness and rough sleeping, it was particularly important that we heard from residents with experience of homelessness or rough sleeping. We asked partners working with homeless or rough sleeping clients to assist us in publicising the consultation among their service users, to involve residents in matters which affect them. To make the consultation accessible, the questionnaire was hosted on CitizenSpace which is powered by Delib software. Delib test the software against the Web Content Accessibility Guidelines V2.1 AA standard. Easy read guidance on accessible language was followed when developing the questionnaire and communications materials. Partnered Disabled People's Organisations were invited to take part in the consultation and asked to publicise the consultation among their service users.

The objective in delivering the online questionnaires was to ensure that the strategy reflects the priorities and needs of residents and other stakeholders. The answers to the questionnaire served to identify what is important to residents and stakeholders about how we approach preventing homelessness and ending rough sleeping. Ultimately, the views, experiences and ideas would inform and shape H&F's Homelessness and Rough Sleeping Strategy and help improve services, prevent homelessness, and end rough sleeping in the borough.

Tenancy Strategy Consultation

The Localism Act 2011 requires that when preparing or modifying its tenancy strategy, a local authority must consult with all private registered providers of social housing (PRPSHs) in its area. The Council is committed to doing things with residents, not to them. This means involving residents in decisions that affect them. That's why we wanted to gather the views of residents as well as local registered providers, to help shape the strategy from the outset.

Full details of the consultation are set out in the Tenancy Strategy Consultation Summary Report (Homelessness and Rough Sleeping Strategy Consultation Cabinet Report – Appendix E).

The objective in delivering the online questionnaire and inviting comments on the draft strategy was to ensure that the strategy is in line with the priorities and needs of residents and partners, and to keep them informed of work underway to modify the strategy.

The draft tenancy strategy was sent by email to all PRPSHs with stock in H&F, as well as the Mayor of London with comments requested by 26 February 2021.

On 9 February, we launched an online questionnaire for residents, requesting comments on the draft strategy and a short survey. The resident consultation was publicised on the H&F's 'Get Involved' website.

	An invitation to take part in the consultation was shared via Resident Involvement email lists.
Analysis of consultation outcomes	<p>Homelessness and Rough Sleeping Strategy</p> <p>Key messages taken from the questionnaires and focus groups are presented in the Strategy section 'What You Said'. These messages, as well as specific suggestions and comments, also shape the strategy more broadly.</p> <p>Tenancy Strategy</p> <p>Comments and suggestions raised in consultation responses were considered by housing managers for inclusion where viable, or not already addressed in linked strategies referred to in the strategy.</p> <p>Reference to the Defend Council Homes policy was added to the strategy.</p> <p>It was concluded that the draft strategy accurately reflects the key messages from residents and partners.</p>

Section 05	Analysis of impact and outcomes
Analysis	As described in detail in the Scoping section, the adoption of the Homelessness and Rough Sleeping Strategy and Tenancy Strategy are expected to have a positive or neutral impact on people with protected characteristics. There are not expected to be any negative impacts or outcomes.

Section 06	Reducing any adverse impacts and recommendations
Outcome of Analysis	<p>Include any specific actions you have identified that will remove or mitigate the risk of adverse impacts and / or unlawful discrimination. This should provide the outcome for LBHF, and the overall outcome.</p> <p>Not applicable</p>

Section 07	Action Plan
Action Plan	Note: You will only need to use this section if you have identified actions as a result of your analysis

	Issue identified	Action (s) to be taken	When	Lead officer and department	Expected outcome	Date added to business/service plan
	Monitoring the effects of implementation of the Homelessness and Rough Sleeping Strategy and Tenancy Strategy documents on protected groups	Ongoing monitoring of the impact of key policies	Ongoing	To be confirmed	Early identification of adverse impacts regarding the implementation of the Homelessness and Rough Sleeping Strategy and Tenancy Strategy documents on protected groups	To be confirmed

Section 08	Agreement, publication and monitoring
Senior Managers' sign-off	Name: Glendine Shepherd Position: Assistant Director Email: Glendine.shepherd@lbhf.gov.uk Telephone No: 020 8753 5610 Considered at relevant DMT: Yes
Key Decision Report (if relevant)	Date of report to Cabinet/Cabinet Member: May 2021 Key equalities issues have been included: Yes
Equalities Advice (where involved)	Name: Position: Date advice / guidance given: Email: Telephone No: