

## **LBHF Equality Impact Analysis Tool**

### **Conducting an Equality Impact Analysis**

An EqIA 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 has been updated to reflect the new public sector equality duty (PSED). 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 this Act;**
- 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 the three tenets of the Equality Duty.

## 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 Equality Officer for support.
6. Further advice and guidance can be accessed from the separate guidance document (link), as well as from the Opportunities Manager: [PEIA@lbhf.gov.uk](mailto:PEIA@lbhf.gov.uk) or ext 3430

## LBHF Equality Impact Analysis Tool

Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	2015/16 quarter 4
Name and details of policy, strategy, function, project, activity, or programme	<p>Title of EIA: Homelessness Prevention Strategy - New</p> <p>The 2002 Homelessness Act places a duty on local authorities to undertake a review of Homelessness for their district and formulate and publish a strategy based on the results of that review. This strategy delivers on this duty and replaces the Homelessness Strategy adopted by the Council in 2012. <b>The adoption of the proposed Homelessness Prevention Strategy delivers on a key action from the Council's Housing Strategy, adopted in May 2015, and captured in the related action plan as Housing Strategy Action 8: 'The Council will work with third sector agencies and clients to develop and adopt a homelessness prevention strategy.</b></p> <p>The strategy builds on the administration's manifesto pledge to attack homelessness. It sets out an approach for homelessness prevention in the borough and identifies priority areas to be developed further in partnership with other agencies.</p>
Lead Officer	<p>Name: Helen McDonough            Position: Homelessness Prevention Strategy Lead            Email: helen.mcdonough@lbhf.gov.uk            Telephone No: 7926</p>
Date of completion of final EIA	23/ 02 /16

Section 02	Scoping of Full EIA
Plan for completion	<p>Timing: The homelessness Prevention Strategy is complete and is tabled for discussion at Cabinet on 11 April 16.            Resources: No additional resources are required.</p>
Analyse the impact of the policy, strategy, function, project, activity, or programme	<p>The Homelessness Prevention Strategy sets out how the Council will work with the third sector and other stakeholders on homelessness prevention. It is intended to set out a direction of travel, outlining key principles that will underpin the Council's work in this area and the key priority areas for action.</p> <p>The focus of the strategy is to set out the principles underpinning the Council's work in this area and the priorities we want to focus on. This will inform future collaboration with partners agencies and set the agenda for developing future projects and initiatives. The Council is already doing some innovative work in homeless</p>

prevention and this is captured within the strategy. However there are a number of ongoing local challenges and factors that contribute to homelessness in the borough. These include high rents, high housing prices and a shortage of housing supply alongside a national policy context of welfare reform reducing benefit levels, Local Housing Allowances (capping the level of Housing Benefit that can be paid often well below the market rent), continued cuts to local government funding and reduced social rented stock.

Given all of these challenges the council wants to use its resources to the best effect by tackling the causes of homelessness, acting early to prevent people becoming homeless and support those experiencing homelessness and those at risk through the impact of welfare reform. The council needs to align efforts and services across the council with those of external agencies with a focus on early intervention and prevention to deliver improved outcomes and budget savings over the medium to long term.

The three principles and priorities for actions set out in the strategy are:

**Early intervention and prevention** – *we want to shape council services around better identifying and working with those at risk of homelessness and shaping services to address issues at an early stage.*

**Partnership working** – *The Council has a statutory framework which determines our responsibilities to homeless households. However we recognise that there is a wealth of expertise in the local third sector agencies and we want to ensure better collaboration between council departments and partner agencies to ensure a customer focused cost effective response to homelessness.*

**Customer focused approach** – *through better partnership working, early intervention and a case management approach we want to make every contact count and reduce customers having to unnecessarily navigate multiple departments and agencies.*

Through consultation with stakeholders we have identified the following priorities which will contribute the most towards reducing homelessness in the borough and we have identified some actions that will contribute towards success:

**Priority One - Shaping services around early intervention/prevention and a case management approach.**

**Priority Two - Mitigating the effects of welfare reform.**

**Priority Three - Improving customer experience and making every contact count.**

**Priority Four - Delivering a range of affordable housing solutions.**

**Priority Five - Working with landlords to improve private sector rented housing.**

The next step is to agree with stakeholders the best mechanism to further developing the actions under these priorities and identifying measures of success.

There is a risk that current and future welfare reform may increase the numbers of those accepted as homeless and placed in temporary accommodation. The overall aim of the homelessness prevention strategy is to act early to help prevent homelessness as well as to increase the supply of affordable housing options. This should benefit the protected groups described in the section below as they are often disproportionately represented in the homelessness figures.

Protected characteristic	Analysis	Impact: Positive, Negative, Neutral
Age	<p><u>Older People</u>            In Hammersmith and Fulham 9 % of the population is aged 65 and over. This is lower than West London which is 11.3% and Greater London 11.1%. According to the GLA population projections the expected population growth in Hammersmith and Fulham between 2014 – 2025 is 3.1% which is lower than the expected growth across London at 10.8%. The main growth is expected within the over 85 population (38%). For the 2011- 21 period the main predicted population growth in LBHF occurs at age 65 and over with an estimated 19.2% growth. Almost 32% of the population of the borough aged 65 or over are receiving Pension Credit. This is high compared to London as a whole (at 25%) and England (at 19%). In 2014/15 homelessness acceptances for people over 65 makes up around 8.3% of overall acceptances compared to the population figure of 9%. The emphasis on prevention and early intervention will be positive for this protected group. Activity across the priority areas will support people to remain in their own homes as long as possible and look for practical solutions for those at risk of homelessness.</p> <p><u>Young people</u>            The profile of the borough is relatively young with 26% of the population aged 25 – 34. Current figures show 12% of applicants on the housing register and 14% of households in temporary accommodation are aged 24 years and</p>	Positive

	13% of those currently in temporary accommodation are aged 25. In 2014/15 homelessness acceptances within this age group was 16.4%. The homelessness prevention strategy will have a positive impact on this protected group as it seeks to deliver more affordable housing options, improve private sector rented housing and target efforts around prevention and mitigating the effects of welfare reform.	
Disability	The overall population of physically disabled people in LBHF is not greatly different to other London Boroughs although the percentage on higher rate DLA components and therefore with a more severe disability are higher than many other London boroughs - 24% of all working age claimants of DLA in LBHF were getting the higher care rate (17th highest in London. [ Source: Disability Benefit Claimants – Borough Overview Performance and Information Team LBHF March 2012 ]. 70% of all disability claimants in LBHF are of working age which is higher than the rest of London at 65% and of those claiming DLA the majority are of working age. Mitigating the effects of welfare reform will be beneficial to those disabled residents that are claiming benefits – activities across all priorities will support disabled people in their housing options. The homelessness prevention strategy should have a positive impact on this protected group.	Positive
Gender reassignment	The adoption of the Homelessness Prevention Strategy is not expected to have a negative or positive impact on people who have transitioned or are transgender.	Neutral
Marriage and Civil Partnership	The adoption of the Homelessness Prevention Strategy is not expected to have a negative or positive impact on those who are married or in a Civil Partnership.	Neutral
Pregnancy and maternity	The adoption of the homelessness prevention strategy is expected to have a positive impact on this protected group. In 2014/15 5.5% of those accepted as homeless have a priority need based on the applicant or partner being pregnant but 72% will have a priority need based on dependent children. A focus on early engagement with those at risk of homelessness and with landlords across tenures should improve homelessness prevention and will benefit this group.	Positive
Race	The 2011 census figures found 55% of the population of Hammersmith and Fulham are from a population group other than White British and of these 31.9% of residents belong to an ethnic group other than White. The main ethnic	Positive

	<p>minorities identifies in the borough are Black African (5.8%), Mixed (5.5%). 40% of all council tenants identify themselves as from Black and Minority Ethnic groups and the majority of these tenants live on Council Estates. 74.2% of the working age population are from white ethnic backgrounds compared to 59.4% for those from black, Asian and minority ethnic backgrounds with varying employment rates between ethnic groups. (Source: Annual Population Survey 12 months to June 2013). The high levels of deprivation that continues to be experienced by some ethnic minority households translates into an inevitable high level of representation with homeless and housing demand figures.</p> <p>In 2014/15 around 44% of homeless acceptances were from white or white other groups and 54% of acceptances were from BME groups. The Homelessness Prevention Strategy's work on prevention an early intervention will benefit BME groups that are disproportionately represented within homelessness figures.</p>	
Religion/belief (including non-belief)	The adoption of the Homelessness Prevention Strategy is not expected to have a negative or positive impact for reasons of religious belief.	Neutral
Sex	In 2014/15 66.4% of homelessness acceptances by household type were either female with children or female lone person. There is a marked difference in employment rates by gender with 61% of women aged 16-64 in employment compared to 74.2% of men. (Source – LBHF Draft SHMA 2014) As well as the difference in employment rates women are more likely to be over-represented in low paid and part time employment. Therefore increasing the availability and quality of affordable rented accommodation in the borough will have a positive impact on both sexes but proportionately more on women in line with their representation in the statistics and economic status. Actions across all priorities and the emphasis on prevention and early intervention will have a positive impact for women	Positive
Sexual Orientation	The adoption of the Homelessness Prevention Strategy is not expected to have a negative or positive impact on the basis of sexual orientation.	Neutral

**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>Will it affect Human Rights, as defined by the Human Rights Act 1998? No</p> <p>Will it affect Children's Rights, as defined by the UNCRC (1992)? No</p>

<b>Section 03</b>	<b>Analysis of relevant data</b> 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.
<b>Documents and data reviewed</b>	<b>LBHF SHMA 2014</b> <b>LBHF Housing Strategy 2015</b>
<b>New research</b>	If new research is required, please complete this section – <b>N/A</b>

<b>Section 04</b>	<b>Consultation</b>
<b>Consultation</b>	<p>As part of the strategy development process a number of meetings were held with stakeholder organisations to discuss the priorities and In the development of this strategy the Council has undertaken an informal consultation with a range of stakeholder groups working in the advice and homelessness sector. The organisations we have consulted are listed in Annex C of the Cabinet report .</p> <p>Stakeholders have broadly endorsed the priorities and approach contained with the strategy and agreed to work with the Council to further develop the areas for action.</p>
<b>Analysis of consultation outcomes</b>	<b>N/A</b>

<b>Section 05</b>	<b>Analysis of impact and outcomes</b>
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<b>Analysis</b>	Stakeholders are keen to work alongside the Council to develop a joint approach to tackle and prevent homelessness and have agreed to work with officers to identify the best mechanisms to do this.
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<b>Section 06</b>	<b>Reducing any adverse impacts and recommendations</b>
<b>Outcome of Analysis</b>	There are no adverse impacts

<b>Section 07</b>	<b>Action Plan</b>					
<b>Action Plan</b>	N/A					

<b>Section 08</b>	<b>Agreement, publication and monitoring</b>					
<b>Chief Officers' sign-off</b>	Name: Position: Email: Telephone No:					
<b>Key Decision Report (if relevant)</b>	Date of report to Cabinet/Cabinet Member: 11 /04 /2016 Key equalities issues have been included: Yes/No					
<b>Opportunities Manager (where involved)</b>	Name: Position: Date advice / guidance given: Email: Telephone No:					