

## **Equalities Assessment – Initial Assessment**

### **Name of project/ proposal**

Homelessness and Rough Sleeping Strategy and Action Plan

### **Author**

Ellie Hopkinson

### **Who will sign off the assessment?**

Candida Thompson

### **Q1a. What is changing?**

Under the Homelessness Act 2002, local housing authorities must have in place a homelessness strategy based on a review of all forms of homelessness in their district. The last full review of the Homelessness and Rough Sleeping Strategy was in 2012, and the document requires updating.

Since 2012 there has been a significant change in legislation and the introduction of the Homelessness Reduction Act 2017. This placed new duties on local authorities to intervene at earlier stages to prevent homelessness in their areas. It also requires housing authorities to provide homelessness services, including personalised housing plans, to all applicants, not just those in 'priority need'. The act has also introduced a 'Duty to Refer' on certain public bodies to refer service users who they think may be threatened with homelessness.

The previous Strategy was centred on the themes of addressing the challenges brought by welfare reform, helping those at risk of homelessness to find accommodation and developing a model of tenancy sustainment. There was good progress made towards these outcomes over the course of the 2012 Strategy, yet the key priorities for Lambeth in 2019 have widened to include better partnership working and improving the pathways available to vulnerable homeless adults; reducing expenditure on temporary accommodation whilst improving the supply; helping all households to find accommodation; maintaining the supply of accommodation; and supporting people off the streets. Coupled with the changing legislation, the new priorities to act more holistically in solving homelessness and rough sleeping in Lambeth are a departure from the 2012 Strategy, and the offer is a strengthened, more joined up, service which includes more preventative support for more people in the borough.

As before, we owe a legal duty to provide accommodation to those in priority need, such as pregnant women, families with children and people who may be considered 'vulnerable' because of their age, health or another reason. Yet now we offer housing advice services to a far wider group of non-priority need individuals. Earlier this year the government guidance changed, requiring that Homelessness Strategies include the borough's approach to Rough Sleeping. Lambeth approved its Rough Sleeping Strategy in 2018, which has been summarised to form the final chapter of the Strategy.

Before the implementation of the Act, Lambeth already delivered a robust person-centred offer to homeless people and those facing housing difficulty, with a highly effective homelessness prevention service, a pathway approach and by providing access to accommodation for some

non-priority households. As we were ahead of the curve, the impact of the HRA 2017 on the borough's strategic approach to homelessness has been more limited than elsewhere, although it has led to a fresh approach to considering how services can be delivered in a joined up way.

The other change to the Homelessness Strategy since 2012 is the approach to temporary accommodation. In March 2012, there were 1,276 households in TA. This has risen to over 2,380 today. As the number of households in TA has increased the profile has also changed. Government support to cover actual costs has reduced and the market has changed. As a consequence of this, the use of nightly paid self-contained accommodation has risen substantially, from 3 per cent of temporary accommodation on 31 March 2012 to 54 per cent on 1 July 2019. The use of long-term private sector leasing, which has tended to be more cost-effective, has correspondingly declined. There is a new objective to increase the supply of suitable temporary accommodation.

The Strategy introduces five new priorities for the borough's action on homelessness to;

- Support all households in their homes and helping them to find accommodation
- Establish effective pathways internally, with public authorities and partner agencies
- Ensure there is a supply of suitable accommodation
- Improve the supply and sustainability of Temporary Accommodation while reducing expenditure
- Ensure that all people sleeping rough in Lambeth are supported off the streets and assisted so that they do not return to the streets

#### **Q1b. Who will be involved in approving this decision?**

Cabinet

Housing Services has the overall responsibility for Homelessness but works in partnership with other council departments such as Children's, Adult Social Care, Housing Benefit and Public Health.

#### **Q2a. What do we know about the people who will be impacted by this change?**

##### Rough Sleeping

The Combined Homelessness and Information Network (CHAIN) collects and collates data on rough sleeping and the wider street population of London. These reports can be broken down to borough level and provide comprehensive information on rough sleeping. Services that provide the data for CHAIN reports are outreach teams, accommodation projects, day centres and specialist services such as the GLA's No Second Night Out scheme. The range of sources involved means that this information constitutes the most reliable data we have on the protected characteristics of Lambeth's rough sleepers. These reports do not contain details of the 'hidden homeless' however, those who are sofa surfing or living in squats, these groups remain largely unknown as they neither bed down on the streets nor engage with the council's homelessness services.

The 2018/2019 report for Lambeth shows that there was a 30% increase in overall numbers of people sleeping rough in the borough from 2017/2018. 48% of these people were new to the streets whilst 30% had been seen rough sleeping 2017/2018 and 2018/2019 and 22% had

returned to the streets after a year or more away. In terms of nationality, 54% of those rough sleeping 2018/2019 were UK nationals with 25% Central and Eastern European and 13% Other European. The smaller groups were 4% Africo-Caribbean, 1% Asian and 3% Central and South American. Breaking this down to ethnicity, the White Other/ Irish/ British group made up 63.9% of the rough sleeping population, whilst 10.2% were Gypsy/Romany/ Irish Traveller, 15.7% were Black or Black British and 3.3% were mixed ethnicity. Comparing this with the previous year, 2017/2018, much remains the same with White Other/ Irish/ British consistently the largest group seen rough sleeping, 76% in 2017/2018. In terms of ethnicity, the only marked change was that of the Gypsy/Romany/ Irish Traveller group with just 1% in 2017/2018 and 10.2% in 2018/2019.

In terms of gender, males remain the largest group rough sleeping, with the number of females rough sleeping consistently remaining under 20%. The age of the rough sleeping population has also remained consistent, with even distribution between the ages 26-35, 36-45 and 46-55 (around 28% each) and a smaller population of 9% for both those aged 18-25 and those aged over 55 years of age. Of all groups, drugs, alcohol and mental health issues remain the largest support needs and 43% had past experience of prison.

Assessing this information, it is possible to conclude that although the rough sleeping population changes, their demographics remain consistent, with the largest group across years being white males aged 26-55. It is difficult to assess the outcomes for these individuals and to compare this data with information on protected characteristics. This is because the rough sleeping population is incredibly mobile and individuals may make contact with multiple London boroughs.

### Wider Homelessness

Aside from rough sleeping, there is extensive data recorded and regularly updated about those who come to the council to present as homeless; those who apply online for housing advice; and those who are residing in temporary accommodation or seeking transfer. There is a monthly digest in which information concerning homelessness is pulled from the relevant databases and interpreted so that trends and changes in numbers or demographics can be picked up on. This allows us to keep a relatively good picture of the groups that are engaging in housing and homelessness services. However, there are gaps in our knowledge about the scale and demographics of the borough's homeless, particularly around those regarded as 'hidden homeless' who may be sofa surfing or staying in overcrowded homes. With rising rents and ever tighter restrictions on the financial support individuals can receive, we know that local people in Lambeth are being affected by housing challenges, with rising homelessness a symptom of this.

Looking at the profile of Lambeth, we know from the [State of the Borough Report](#) 2016, that around 40% of Lambeth's population is white with a UK background (White British or Irish), in line with the central London statistic of 43%. 15% of our population are of other White backgrounds with 2/3 of these people from Europe, 8% from central or South America and 4% from North America and the Caribbean, and 8% from Australasia.

Black people make up a quarter of the population (25%). Lambeth's largest non-white ethnic group is Black African (11.5%), followed by Black Caribbean (9.8%). Lambeth has the second largest proportion of black Caribbean people in London (9.5%) after Lewisham (11%). Lambeth has a small Asian population compared to many places in London. Only 7.8% of

Lambeth residents are from Asian backgrounds (including Chinese), much less than the inner London average (14.5%). Around 150 different languages are spoken in families in the borough. Around 17,000 people (6% of the population) speak a main language other than English, mostly EU and African languages. In sum, 56% of the population belong to a White group and 44% to Black, Asian and Minority Ethnic group.

Estimates suggest that Lambeth has one of the largest Lesbian Gay Bisexual and Transgender (LGBT) populations in London. Over 60% of Lambeth residents have a religion and 28% have no religion. Christians (53%) and Muslims (7%) are the largest group of residents with a religion. About 37,000 people in Lambeth have their day-to-day activities limited by a long term illness or disability. About 60% of people with a limiting health condition are aged over 50. Our gender split is 49.7% women, 50.3% male.

In terms of interaction with the homelessness service, we can see that most households engaging with the services covered by the Strategy are headed by a person from the Black Caribbean, Black African or Black Other community. During 2017/2018 48% of households seeking housing advice were from this group and it was found that members of this group were more likely to require assistance with 54% of households found to be eligible from this group as well as 49% of those requiring homelessness prevention assistance. It is also demonstrable that a disproportionately high number of people who are EU nationals (excluding UK nationals) are found to be sleeping rough.

In terms of age, 53% of Lambeth's households are headed by a person under 45 years of age and this group also constitutes 76% of households seeking housing advice. For gender, single males were overwhelmingly more likely to be sleeping rough and to seek housing or homelessness assistance. Leading charities, including Stonewall, also estimate that members of the LGBT+ community are likely to constitute a large proportion of the 'hidden homeless' community due to family exclusion, and with Lambeth likely to have a high proportion of LGBTQ+ residents it is thought that this group will constitute a higher than average percentage amongst those engaging with the homelessness service.

In the absence of reliable figures on the numbers of people in the borough, or indeed accessing the homelessness service, for whom English is not a first language, it is important that an effort is made to mitigate the effects of language barriers and to ensure that the service is accessible for all. The Council wide [Translation and Interpretation Policy](#) is designed to ensure that the council provides appropriate and high quality translation services, including British Sign Language, to those that need it. This policy covers housing whilst supplementary policies ensure that translation is provided by an independent body rather than a family member or friend of the client, which ensures that those who may be suffering from domestic abuse or other personal issues are able to speak open and honestly.

We intend and anticipate that all applicants who are currently assisted by the homelessness and rough sleeping services in the borough will keep or obtain the level of support that has been available to them to date. As part of the incoming Strategy, new options and priorities have been identified to support those facing homelessness or rough sleeping meaning there will be no anticipated adverse influences on any protected characteristic. Homelessness affects all communities regardless of ethnicity. However, a disproportionately large number of Black households are affected in the borough. It is likely therefore that this group will positively benefit from the increased emphasis on homelessness prevention in the Strategy. Similarly, there is additional provision in the Strategy and action plan for LGBTQ+ residents who are

affected by homelessness and rough sleeping. In this sense, this group is also likely to positively benefit from the measures outlined in the Strategy.

### Protected Characteristics and Accommodation

In 2018/19, Black, Asian and Minority Ethnic households accounted for 80% of all homeless households; White households accounted for 19% of homeless households; 1% of ethnicities were not recorded. Across the period 2018/2019, 72% of households that successfully bid for permanent accommodation were BME, 27% were White and 3% were from households whose ethnicity was not recorded. In 2018/19, 55% of cases opened were single men and women; 43% were families with children/ pregnant women and 2% were all adult households. 52% of main applicants were female, 40% male, 1% transgender and 7% not disclosed. In terms of housing allocation, 35% of households that successfully secured permanent accommodation were female single parents, 24% single male, 23% single females. 66% of all households permanently housed in 2018/19 were female and 34% were male. These figures have remained comparable across the years since 2014 however all households are remaining in temporary accommodation for longer and the supply of properties available for permanent lettings reduces.

Since this report was drawn, we have begun collecting information on the vulnerabilities of those who present as homeless and we have found that a larger than average number of service users are ex-offenders, have mental health problems and have substance misuse issues. To combat this, the service includes a Vulnerable Women's Navigator, Ex-Offenders Navigator, Substance Misuse Navigator and Mental Health Navigator.

### Homelessness Strategy Consultation

Recent service users, partners, providers and the public have been consulted on the Homelessness and Rough Sleeping Strategy in its draft form. The responses so far have been considered and a list of changes drawn up. The main concerns of those consulted relate to better mental health and crisis support, more publicity and communications, and a commitment to lobby the government to improve and regulate the private rented sector. These considerations have been added to a list of amendments to be made to the Strategy to be added once the consultation is complete. The table of amendments thus far is included as appendix 1.

More thought has also been put in to how we inform the public and service users about their options and the support available to them. Information on communications and the commitment to ensure that web information is up to date has been included as a new area of the Strategy. Improving the private rented sector has also been considered as an issue wider than the Homelessness Strategy, with Lambeth supporting the Government initiative to ban no fault section 21 evictions and we have commissioned a report into the merits of introducing licenses for landlords in the borough.

Equalities monitoring questions were asked as part of the consultation process. Of those who responded to the survey, 45% were male, 45% female and 10% chose not to say. The age of respondents was relatively evenly distributed across the ranges 25-75+, whilst responses from those under 24 was just 1.52%. In terms of ethnicity, the White British/ Irish/ Other group constituted the largest response group, with 69.7% of respondents from this group. 9.6% were Black British/ African/ Caribbean or Mixed and 13.64% preferred not to say. 15% of respondents answered yes to the question 'Do you consider yourself to be disabled?' whilst

74% said no and 11% chose not to say. 74% of respondents self-identified as heterosexual, 20% chose not to say, and 4% were homosexual. Comparing these figures with data on the population of Lambeth, we can see that the Black British/ African/ Other group are underrepresented amongst survey respondents, with Lambeth's 25% BAME population not reflected by just 9.6% of survey responses.

### Overall Affect

Overall, we intend and anticipate that all applicants who are currently assisted by the homelessness and rough sleeping services in the borough to keep the level of support that has been available to them to date. In this sense, no group will be adversely impacted by the refreshed Strategy and the support available to all has improved.

### **Q2b. How will they be impacted by the change?**

The Strategy concerns mostly those who come into contact with Lambeth's homelessness prevention or relief service. It seeks to explain the reality of housing availability in the borough and seeks tangible solutions to some of these challenges, for example, participation in the London PLACE scheme. The Strategy sets out Lambeth's past learnings and future approach to finding suitable accommodation for families, reducing the cost of temporary accommodation and establishing effective internal pathways so that people can be best supported to find lasting solutions when they are facing homelessness. In this sense, a client's interaction with housing and the service they are offered will be affected by the Strategy.

The Strategy contains learnings from the housing review which, in April 2019, assessed and monitored the demographics and trends of Lambeth's homeless population. This information has been used to inform the wider strategy. No particular group of protected characteristics will be adversely affected by the changes incoming in the Strategy, the priorities identified are inclusive and aim to improve the housing supply and accessibility for all groups.

- Priority 1:- Preventing homelessness by supporting all households in their homes and helping them to find accommodation.
- Priority 2:- Establishing effective pathways internally, with public authorities and partner agencies, to prevent homelessness.
- Priority 3:- Making sure there is a supply of suitable accommodation for people to move into.
- Priority 4:- Improving the supply and sustainability of Temporary Accommodation while reducing expenditure.
- Priority 5:- Ensuring that all people sleeping rough in Lambeth are supported off the streets and assisted in improving their lives and do not return to the streets.

National and local figures indicate that the BME population is most at risk of becoming homeless and are 3 times more likely to be statutory homeless than the majority white population. Each ethnic group within the BME population has its own cultural patterns (which in some cases may reflect religious beliefs) and specific needs that must be taken account of. Potential difficulties can arise if there is lack of staff understanding about different ethnic groups and their housing needs, preferences and aspirations and a lack of understanding regarding cultural issues such as extended families living together. BME households are over-represented within Lambeth's homeless population and provision within the Strategy to work with providers to ensure that staff are trained in specific approaches to homelessness relief and safeguarding.

Homeless households in priority need are placed into temporary accommodation. Our aim is to provide accommodation within Lambeth wherever possible, but unfortunately this is not always achievable. The Council is dependent on the supply of accommodation that is available, and ongoing benefit changes mean that for some households, accommodation in Lambeth will not be affordable. As a result, there will be an increasing need to use accommodation that may be at a distance from Lambeth. [Lambeth's Placement Policy](#) describes the process we have in place to ensure that we prioritise those who have the greatest need to be in or close to a particular location.

The strategy describes how we intend to increase the supply of locally available temporary accommodation through a programme of building, investing and buying. Outside the scope of the homelessness strategy, increasing the supply of affordable housing, including through the council-owned company, Homes for Lambeth is a major strategic objective for the council.

There is specific provision for members of the LGBTQ+ community. This is because leading charities, including Stonewall, report that members of this community are likely to constitute a large proportion of the 'hidden homeless' community due to family exclusion. The strategy makes reference to Lambeth's recent commitment to sign up to the House Proud Pledge and gather better data on sexual and gender identity. From the 2016 State of the Borough Report, it is identified that Lambeth hosts a higher than average population of LGBTQ+ residents, meaning that this cohort is likely to be positively impacted by the Strategy. There is also a particular commitment to work more closely with the VAWG team, with the leading cause of female homelessness both nationally and locally being recorded as domestic violence. The Strategy will therefore improve the service for these groups.

### **Q3a. How do you plan to promote and deliver any positive impacts of the proposal?**

An action plan to deliver the five priorities coming out of the Homelessness Strategy has been drafted. It includes specific measures which will lead to improved outcomes for service users in terms of employment, education and training; specific provision for members of the LGBTQ+ community; and the employment of a resettlement officer to ensure that vulnerable adults have access to safe and secure accommodation. The promotion and monitoring of these outcomes will be undertaken during reviews where policies, procedures and the relationships between providers are redesigned where needed. The delivery of the Strategy will be via the Homelessness Strategy Steering Group. This is a new group, chaired by the Cabinet Member for Housing which includes representatives from across the council and its partners. The steering group will meet on a biannual basis.

### **Q3b How do you plan to address and mitigate any negative impacts of the proposal?**

The outcomes of clients engaging with the homelessness services, and the nature of rough sleeping in the borough, will continued to be monitored by the housing strategy and information team. New trends or significant changes will be picked up this way and measures put in place to mitigate any negative effects which are picked up on. We intend and anticipate that all applicants who are currently assisted by the homelessness and rough sleeping services in the borough to keep or obtain the level of support that has been available to them to date. As part of the incoming Strategy, new options and priorities have been identified to support those facing homelessness or rough sleeping meaning there will be no anticipated adverse influences on any protected characteristic. The Strategy will be tracked twice a year by the review group, with a full formal review every five years or before should any issues arise, in

line with the statutory requirements of the Homelessness Act 2002. The resident, stakeholder and service user consultation, prior to the finalising of the Strategy, will also inform the final publication ensuring that any issues picked up here are included. Monitoring will be undertaken throughout to ensure that none of the groups of protected characteristics is experiencing adverse impacts from the Strategy.

**Q4. How will you review/evaluate your proposal, mitigating actions and/or benefits? Who will be responsible for this?**

The Homelessness Strategy Steering Group will be responsible for tracking delivery of the action plan which includes the monitoring of any equality impacts.

**Section to be completed by Sponsor/Director/Head of Service**

**Outcome of equality impact assessment**

- No adverse impact, no change required
- Low adverse impact, minor adjustment required
- Significant adverse impact, further action required
- Significant impact identified unable to mitigate fully
- Unlawful in/direct discrimination, stop and rethink

**Comments from Sponsor/Director/Head of Service**

**Appendix 1 - Post Consultation Action Plan**

<b>Comment by</b>	<b>Comment</b>	<b>Action</b>
Informal cabinet	Risks of welfare reform could be expanded upon	Page 7 – welfare reform section → explain what we can do e.g. DHP, Hardship Fund, explain what LHA is and how this compares to average rates. Explain why universal credit has caused spike in homelessness.
Informal cabinet	Big up what partners are doing and partnership working it's undersold	Explain new links to ASC – e.g. data sharing agreement, explain Gaia link, Early Help and CSC, health in all policies board etc.
Informal cabinet	More about what we're doing to create new homes	Page 23: include new TA – examples and numbers of things we've bought/ invested in. Expand on work of homes for Lambeth. Include remodelling new properties not just hostels.
Informal cabinet	More about support for the mayor of London	Incorporate in GLA pledges into main body of the text.
Informal cabinet	Councillors have been asked to provide any comments on the 'our asks' section	Wider councillors comments to be included.
Informal cabinet	Could there be more support for people in TA; Cllr Dickson referred to someone on one of the	Have a section detailing support available to residents e.g. tenancy sustainment, vulnerable person navigator, mental health coordinator, substance misuse coordinator etc.

	regen estates not being properly supported and that causing issues for the neighbours	
Informal cabinet	Expand what we're doing on tenancy sustainment	Expand on info in page 13.
Informal cabinet	Include case studies	Include case studies from the commissioning team to showcase work.
Public consultation	Better mental health support	Page 17 – expand section and link back to mental health features in mayor's strategy
Public consultation	Better crisis support	Reintroduce the MHCLG rough sleeping strategy and its support for people in crisis in the rough sleeping section.
Public consultation	More publicity/ comms work	Work with comms team to ensure messages get out there – have communications strategy within strategy to say we are going to do this to ensure public are updated when things change/ notable new developments.
Public consultation	Confusion over 'supporting people in their homes' priority	Change this priority to 'Take action to prevent homelessness by tackling the root causes and supporting people to sustain their tenancies'.
Public consultation	Lobby government to improve and regulate the PRS	Include in asks for government.
Public consultation	Ensure the strategy and proposals are carried out	Explain how we're held to account/ monitoring.
EIA	The Homelessness Strategy Steering Group will be responsible for tracking delivery of the action plan which includes the monitoring of any equality impacts.	Add into the action plan how we are going to monitor equalities.