

1a. What is changing?

What is the most significant or key change taking place? Can you indicate the type of change in your response (e.g. policy/decision/strategy/ service/procedural/ geographic/procurement etc.) so it is clear what is being equalities assessed? Why is this change happening? What do you aim to achieve? Can you clearly indicate what decision-makers are being asked to take a decision on?

Here you will need to describe clearly and briefly what this change is about (i.e. service change, policy review/update, decision)? Compared against what we do currently, what will be different? Can you explain what will happen if this is approved and when will it be implemented? How will the EIA inform your business case, tender specification, for example?

The re-commissioning of young people's housing-related support in Lambeth, is a transformation programme, which will redesign services for young people with four key aspects: 1. Preventing young people from requiring housing-related support services; 2. Comprehensively assessing young people's needs, 3. Commissioning small, high quality, specialist housing-related support services within Lambeth, and 4. Ensuring timely and sustainable moves into independent living.

This programme will involve de-commissioning the current young people's supported housing pathway and semi-independent living framework. The current contracts of which run to 31st March 2021. In order to allow time to complete this large scale transformation programme, two-year contract extensions are being requested, to ensure continuity of service for young people, whilst the new services are designed, buildings sourced, and contracts put out to competitive tender.

Between November 2019 and October 2020, a comprehensive needs assessment was undertaken to assess the needs of all young people requiring housing-related support. The needs assessment was developed through three main sources: data, consultations, and review of best practice from elsewhere. Data was collated and analysed from databases including Northgate and Hope (Lambeth Council Housing), Mosaic (Lambeth Council Children's and Adult's Social Care), Police, MARAC (Multi-Agency Risk Assessment Conference for victims of domestic abuse), and provider's local databases. Consultations were conducted with all relevant stakeholders including young people, providers, Children's Social Care, Housing, Public Health, and the Youth Offending Service. Best practice was reviewed from services and Local Authorities across the United Kingdom.

The needs assessment highlighted significant problems with our current processes and services, to a greater degree than was anticipated. With that in mind, an options appraisal was presented to Children's Services Management Team and Resident Services Management Team in December 2020. A direction of travel was approved to embark on a large-scale transformation programme, which will commence in January 2021, with a target date of completion of March 2023. Not only will this innovative and trailblazing programme drastically improve outcomes for young people, but it is projected to make significant cost savings.

The outcomes from this EIA will be presented to the relevant groups within the governance structure (see point 4 below) and recommendations incorporated into the commissioning plan, workstream actions plans, service specifications and tender documents as relevant.

2a. What do we know about the people who will be impacted by this change?

What does your information tell you about the people who will be affected by this change? Are protected groups impacted? What information do you hold on the protected characteristics of the people affected by the change? (Age, disability, gender reassignment, pregnancy and maternity, race/ethnicity, religion or belief, gender, sexual orientation, health, socio-economic, language) Are there any gaps or missing information?

This is an opportunity for you to share what you understand about the people who will be affected by what is being proposed whether now and/or potentially in the future. Do you know whether they are from protected groups? What does your service level profile data tell you about them? What if anything does your current and previous consultations, surveys, complaints, contract monitoring data, equalities data monitoring (including from partners and other service areas) reveal about these people and their needs or issues that may be connected/relevant to this change? Are there any gaps in your data? If yes, please note we are under a legal duty to be properly informed before making a decision. If the relevant data is not available, we are under a duty to obtain it and this will often mean some consultation with appropriate groups is required. You will need to provide a reason or justification for why you have missing data/information. You may have to address this by including plans to generate this information within your action plan and responses to questions 3a, 3b and 4.

The transformation programme will impact all 16-21 year old young people who require housing-related support, some of whom will have protected characteristics. The needs assessment revealed significant information about these young people, the sub-groups of whom include: Looked After Children; care leavers; children in need; homeless young people; unaccompanied asylum seeking children; young parents; victims of contextual harm (sexual exploitation; criminal exploitation and harmful sexual behaviour); young people involved in gangs and serious youth violence; young people with mental ill health; and those identifying as LGBTQ.

Consultations were conducted with young people and data was collated and analysed as part of the needs assessment, which revealed the following:

- 1. Gender and gender reassignment** - There was a fairly even gender split between males and females accommodated within supported housing. However, there were significantly more males than females accommodated within the semi-independent living provision. Neither Children's Social Care, Adult's Social Care nor commissioned providers record all gender types including transgender and non-binary.
- 2. Age** – There were higher than expected numbers of 16, 17 and 22+ year olds accommodated within supported housing, and higher than expected numbers of 22+ year olds accommodated within semi-independent living provision.
- 3. Sexual orientation**– Data analysed from providers highlighted lower than expected numbers of LGB young people, when compared to national research, therefore suggesting under-reporting. Neither Children's Social Care nor Adult's Social Care, and not all commissioned providers record sexual orientation.
- 4. Ethnicity and nationality** – There are inconsistencies in recording across Children's Social Care and Adult's Social Care. However, the data did reveal 59% of those young people in supported housing identified as black, compared to 23% of the Lambeth population. High numbers in

semi-independent living are non-British nationals, as a result of high numbers of unaccompanied asylum seeking children (UASCs) being accommodated within the services.

5. **Disability** - Neither Children's Social Care nor Adult's Social Care, and not all commissioned providers record disability status. Within the single young people's supported housing services 88% reported that they did not have a disability, 6% reported that they did have a disability, and 6% reported that it was not known. A snapshot of needs of those under the 16+ Team in Children's Social Care and unaccompanied asylum seeking children in semi-independent living revealed at least sixteen of the 502 young people have a learning disability, and 13 of the 502 have serious physical health concerns.
6. **Young mothers and babies/ pregnancy** - Just under 50% of babies accommodated with their mothers in supported housing over the past three years, had Children's Social Care involvement, with 8 babies subsequently removed from the mother's care. Feedback from the consultations with young people was that several of the mother and baby supported housing buildings are not accessible or practical for the client group.
7. **Language** – The majority of young people accommodated within the services are British nationals with English as a first language. However, there are a high number of UASCs accommodated within these services, most of whom speak very little or no English. After English, the most common languages spoken within this group are those native to Eritrea, Albania, and Sudan.
8. **Health** –

A snapshot of health needs of those in supported housing revealed:

- 19% had a support need around mental health
- 19% had a support need around substance misuse

A snapshot of health needs of those under the 16+ Team and UASCs in Children's Social Care revealed:

- 20% had a support need around mental health
- 7% had a support need around substance misuse

Low numbers registered with dentists across both supported housing and semi-independent living.

9. **Socio-economic** – There are overlapping causes to youth homelessness; individual factors such as family breakdown and poverty; structural factors such as lack of housing and low employment rates; and system failures such as a lack of transition support when a person is released from prison or discharged from hospital.¹ Through the needs assessment, data shows extremely high numbers of NEET (not in education, employment or training) young people across both supported housing and semi-independent living.
 10. **Religion or belief** – Where young people practice a religion, commissioned services must provide support to enable their religious and belief needs to be met. Data on religion and beliefs is not recorded by commissioned providers.
 11. **Offending** –
- A snapshot of offending needs of those in supported housing revealed:
- 16% had a support need around offending
- A snapshot of offending needs of those under the 16+ Team and UASCs in Children's Social Care revealed:

¹ FEANTSA, Housing solutions to youth homelessness based on a Human Rights Approach 2017

- 29 of 502 young people under the 16+ Team in Children’s Social Care and unaccommodated asylum seeking children in semi-independent living were in prison, 8 of which were for murder or manslaughter offences. Of these, 14 were accommodated in semi-independent living prior to them being taken into custody
- 7% were involved in offending behaviour

12. Gangs and serious youth violence –

The consultations with young people revealed that safety was a concern in most of the services, especially the two large hostels which were located in crime and gang hot spot areas, with no supported housing options out of the borough.

A snapshot of needs of those in supported housing revealed:

- 11% had a support need around gangs and/ or serious youth violence
- 11% had a support need around criminal exploitation

A snapshot of needs of those under the 16+ Team and UASCs in Children’s Social Care revealed:

- 17% were involved in gangs and/ or criminal exploitation

2b. How will they be impacted by the change?

Would you assess the impact as positive, adverse, neutral? Do you have any uncertainty about the impact of your proposal? Is there a likelihood that some people will more impacted than others? Can you describe the ways in which they will be affected? How might this change affect our ‘general duty’

Can you identify any groups that may be positively or negatively affected by the change you are planning? Does it have a positive or negative effect on our ability to fulfil our duty to eliminate discrimination/harassment and victimisation, promote equality of opportunity or foster good relations between different groups (i.e. those that share protected characteristics and those that do not) in the community. For example might it: increase the likelihood of them: receiving unfair treatment; experiencing a lack of availability which may result in their needs being unmet; reduced opportunities for different peoples to get involved or affect relationships between different groups. Is there a particular impact on one or more of the protected groups? Who are the groups and what is the impact? Are you unsure or unaware of how they might be impacted? If yes, what could you do to provide clarity? What are the barriers to a fuller understanding?

Every young person requiring housing-related support will be impacted by the changes. The transformation programme has been designed in co-production with young people who have fed into consultations and two young people have worked alongside commissioners, as young commissioners to assist and steer the work. We are therefore confident that these positive changes are in line with young people’s views and needs.

At present, the majority of our young people are accommodated in the two large hostels in Stockwell and Camberwell, both being gang hot spots and places where young people can be subjected to harassment, victimisation and exploitation, as the services are magnets to those seeking out vulnerable people. Our newly transformed housing-related support pathway will have a positive impact with specialist, smaller services that will be more discreet, less visible, and designed

specifically to ensure all our young people including those with protected characteristics have their needs met.

That said, due to the size and complexity of the programme, to get to its completion, there will be elements of change for young people, that they may deem negative. Firstly, we are requesting two-year contract extensions for the supported housing and framework semi-independent living contracts. Whilst this will not be disruptive for young people and will provide continuity of service, we know that the current provision is not fully meeting young people's needs. Furthermore, when we de-commission the existing services, and complete the process of decanting and moving young people to different buildings, this will inevitably cause stress and anxiety.

That said, to manage this process for young people, we will be setting up the non-accommodation aspects of the programme first. By doing so, we can ensure that we are preventing as many new young people from requiring the services as possible, and moving those currently accommodated within housing-related support, into independent living as and when the options become available and when individuals are ready. This is in line with meeting our statutory duty to prevent homelessness as well as our duty to Looked After Children and care leavers in ensuring successful transitions to adulthood.

3a. How do you plan to promote and deliver any positive impacts of the proposal?

How might the principles of fairness, equality of opportunity and positive relationships be further promoted as a consequence of this proposal? How do you propose to measure your positive outcomes and the benefits outlined to find out if these have been achieved?

Is there a possibility that you will need to treat certain people differently, to enhance positive outcomes because of greater need; disadvantage; experience of less favourable outcomes, etc.? What opportunities exist to support Lambeth's statutory duty to promote equalities? How does this contribute to your departmental service plan and/or the council's corporate priorities?

A set of recommendations have been made, which address service gaps and needs identified through the needs assessment, which are linked to the groups identified at 2a, including those young people with protected characteristics. The service-level recommendations were approved as options through the options appraisal, the delivery of which is through workstreams, all of which feed into a workstream project group. The practice and procedural-level recommendations were approved through the transformation programme's strategic steering group and now form a workstream. The workstream project group feeds into the strategic steering group for monitoring and accountability.

1. Gender and gender reassignment –

- For Children's Social Care, Adult's Social Care, and commissioned providers to address gaps in data recording for gender categories
- For any future commissioning of housing-related support for 16/17-year olds to address the impact of absent role models on attachment and healthy relationships
- For Children's Social Care to undertake further investigation into why higher numbers of males go into semi-independent living rather than staying in foster care, and to take appropriate action

2. Age –

- For any future commissioning of housing-related support services, to address the need to support children at this young age with their adolescent development, dependency, support needs and role models
- Ensure the commissioned housing-related support services and CSC are working more intensively to support our care leavers to develop independent living skills, and to move on to their own tenancies earlier

3. Sexual orientation–

Future commissioning of housing-related support services, will require:

- A review of processes for recording sexual orientation
- That staff are trained to be able to competently ask questions and provide support in this area
- To ensure the services are openly and visibly LGBTIQ+ friendly
- To commission services that can meet the unique needs of LGBTIQ+ young people, for example, should a transgender young person require a self-contained unit

4. Ethnicity, nationality, and language –

- All commissioned prevention services to ensure there is specific emphasis on black families
- Any commissioned housing-related support services to ensure:
 - Recruitment processes are in place to have diverse staff teams, representative of our young people
 - To ensure the cultural and ethnic needs of our young people are met
 - Ensuring staff can speak a diverse range of languages, in particular those most frequently spoken by UASCs
- To commission a UASC specific service to be jointly commissioned with other local authorities. The design of the service will include:
 - An assessment centre
 - Ensuring staff can speak a diverse range of languages, in particular those most frequently spoken by UASCs
 - Ensuring services can meet cultural needs of UASCs
 - Ensuring services can meet physical and mental health needs
 - Providing asylum and immigration advice

5. Disability –

- Future commissioning of services will be designed to ensure they are able to support the unique needs of young people with physical and learning disabilities

6. Young mothers and babies/ pregnancy –

- Given the level of complexity within these young families, a proposal will be made to fund a qualified social worker to work solely with these young families' in the supported housing services. This will include up skilling the staff teams, and leading on interactions with CSC
- Future commissioning of housing-related support for young families will be designed alongside Children's Social Care to ensure synergy between principles practiced by Social Workers and the services, for example Whole Family Working, attachment, positive reinforcement, and boundaries
- A review of all buildings will be undertaken to ensure the set-up of the buildings can meet the needs of our young families, and are located in a range of areas
- A greater number of units must be commissioned for whole families

- For Children’s Social Care to review the practice of placing young families into semi-independent provision, and instead to place into commissioned young family supported housing in Lambeth

7. Health –

- Any commissioned housing-related support services to address the gaps in engagement, through closer work with Public Health and local mental health and substance misuse services
- Through new service specifications, relevant mental health and substance misuse training requirements for staff will be made, to ensure they are equipped to support our young people
- To commission a Psychology in Young People’s Supported Housing initiative
- To review the quarterly monitoring reports to ensure engagement with statutory services is recorded separately, to engagement with the providers’ organisational practitioners
- Any commissioned housing-related support services to ensure they link in with their local Dentistry Practice and Public Health, to support young people with their oral health

8. Socio-economic –

- To commission prevention services including a family floating support service to work with whole families and foster arrangements, to ensure triggers to family breakdown are addressed, which may include debt management, benefits advice, accessing employment etc.
- Future commissioning of housing-related support services will include the requirement for providers to employ specialist ETE Workers, to have robust ETE plans which include partnership working with ETE agencies, and to work in partnership with Lambeth’s Youth ETE Offer

9. Religion or belief –

- For service specifications of newly commissioned services to outline the need for services to meet young people’s religious and belief needs

10. Offending, gang involvement and serious youth violence –

- To radically change the housing-related support offer for those requiring specialist gang-exiting support out of the borough
- Commissioned services will be designed and delivered in partnership with Youth Offending Service, Community Safety and Lambeth’s grassroots organisations that have been set-up and run by those who have lived experience of gang involvement and contextual harm
- Other commissioned housing-related support services will be designed to ensure recruitment processes are in place so that staff teams are representative of those with lived experience, and that staff receive specialist training to be able to support those affected by gang involvement and contextual harm
- Children’s Social Care, Adult’s Social Care, Public Health & Housing to review the processes and support for 18+ young people who are affected by gang involvement, serious youth violence and contextual harm
- For area checks to be undertaken on any newly commissioned services, in an attempt to locate provision out of gang and crime hot spot locations

As identified above, each of these groups will need specific services and support to ensure fairness and that they achieve the best possible outcomes and equality of opportunity. This comprehensive

programme has been designed specifically around the young people's individual needs, and we can therefore be assured that the impacts will be positive.

In line with the Council's Corporate Priorities of Sustainable Growth, Resilient Communities, Independence and Place, we will be setting up the following services:

- 1. Preventing homelessness and ensuring foster care and staying put arrangements are used rather than housing-related support:**
 - Commissioning a family mediation, early identification, and intervention service
 - Commissioning a family floating support service
 - Commissioning an emergency timeout provision
- 2. Assessment of need:**
 - Recruiting to a Pathway Manager
 - Commissioning an assessment centre
 - Co-locating the Housing Needs Team within Young People's Hubs in the community
- 3. High quality, specialist housing-related support services:**
 - De-commissioning all current supported housing and semi-independent living services
 - Commissioning a co-designed housing-related support pathway to meet the needs of all young people with specialist services for: females-only; complex mental health; LGBTIQ+; additional needs; gang involved young people
 - Joining a Dynamic Purchasing Vehicle for commissioning of a small number of semi-independent living placements
- 4. Successful transition into independent living:**
 - Commissioning providers to rent private-properties and sublet to young people with starter tenancies
 - Let land/ buildings to providers to develop modular or renovate buildings to provide move on accommodation
 - Commission a floating support service for homeless young people
 - Commission a floating support service for care leavers with three levels of support: low-level tenancy support, medium-level support, and a high-support housing first service

As part of the transformation programme, we are requesting two-year contract extensions. Although, these will not deliver immediate positive outcomes, this will provide continuity of service to our young people, and mean that Lambeth will deliver on its statutory duty to homeless young people, Looked After Children and care leavers, whilst the transformation programme is delivered.

3b How do you plan to address and mitigate any negative impacts of the proposal?

What impact has this evidence had on what you are proposing? What can you do differently that might lessen the impact on people within the timeframes i.e. development-implementation? Who can help you to develop these solutions?

What actions can you take to reduce the impacts that you have identified? Are your actions SMART?

Specific, significant, stretching

Measurable, meaningful, motivational

Agreed upon, attainable, achievable, acceptable, action-oriented

Realistic, relevant, reasonable, rewarding, results-oriented

Time-based, time-bound, timely, tangible, trackable

Who will be responsible for making sure these happen? How can you show you have taken these steps? What evidence can you provide? Please note developing mitigating actions is an essential part of the EIA process. These should be comprehensive and clearly align with the issues identified. If there are significant negative impacts without mitigation it is the responsibility of the decision maker/sponsor to challenge and request officers go back to the drawing board.

The transformation programme will deliver positive outcomes for young people, all of which have been detailed above. The negative impacts to young people will be the process of being decanted from current accommodation and moved into new services or independent living accommodation. The impact of disruption will be mitigated through:

1. Subject to approval, extending the supported housing and semi-independent living contracts by two years to allow continuity of service to young people so that they can be moved in a planned way.
2. Commissioning the move on options for homeless young people prior to services being decanted, so that young people can move as and when they are ready.
3. Commissioning a floating support service for homeless young people – This contract will be put out to tender and service delivery commenced prior to the decanting process commencing.
4. Commissioning a three-tier floating support service for care leavers: low-level tenancy support, medium-level support, and a high-support housing first service – Approval will be sought for a one-year floating support service for a smaller number of care leavers, until the larger, longer-term contracts can be put out to tender and service delivery commencing.
5. The recruitment of the Pathway Manager and Bidding Officer positions at the start of the two year programme, so that more move on and resettlement monitoring and oversight will be in place, to ensure young people are being prepared for independent living by the services, and supported to move into independent living.

It will be the responsibility of the workstream project group, feeding into the strategic steering group for the transformation programme, to ensure these actions are all completed on time.

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

Who will you be accountable to for the above actions/outcome? How will those responsible know these actions have worked? What performance indicators will you use to demonstrate this? Are there any other forms of evidence you can use to support this assessment of their effectiveness?

The full impact of a proposal may only be known after the proposals have been implemented; therefore it is important that effective monitoring and feedback processes are in place to assess the impact. Have you identified who (e.g. project board, Steering or user group) will be accountable for reviewing and challenging progress/ achievement of mitigating actions? How will

you feedback on any actions taken and speak to those affected? For example, where disabled people are affected, how might you feedback your initial suggestions for action? Can you demonstrate, where their comments have shaped the final decisions for action/change? When and where will the outcomes/actions from assessment be reviewed e.g. 6 months, annually. Is there scope for these for these mitigations / changes to be included within your service plan and owned at senior level?

In January 2021 eight workstreams have been established to deliver this transformation programme, with cross-departmental officers co-delivering, and each having an action plan with timeframes. A governance structure is in place for this transformation programme, with a monthly workstream project group feeding into a monthly experts by experience panel, and monthly strategic steering group (where progress against actions plans will be reviewed). This group is then accountable to the Resident Services and Children's Social Care Strategic Director's Management Teams and respective Cabinet Members. Furthermore, this transformation programme has been incorporated into the borough-wide Safe Spaces Programme, where actions, outcomes and measures are written into the action plan, and monitored fortnightly. Progress of this transformation programme also reports into the Children's Social Care Sufficiency Strategy and Corporate Parenting Board.

One of the eight workstreams is analysis and evaluation. As this programme is innovative and trailblazing it is essential to measure success and areas of learning. Examples of performance indicators include reducing numbers of young people becoming homeless and increasing numbers of young people moving into independent living from the services. Part of the evaluation will be to develop mechanisms for analysis of progress against these indicators. This will be held by the governance structure.

As the transformation programme will impact high numbers of young people already accommodated within the services, communication will be sent to those young people every quarter, informing of the plans and progress, with information on how the changes will impact individuals. The outcome of the needs assessment was heavily influenced by the feedback from young people through the consultations, so it is essential to keep them abreast of progress to ensure they feel listened to.

On an ongoing basis, and in particular to ensure the existing services are performing as highly as possible for the two-year contract extension period, commissioners will continue to: request quarterly monitoring returns with details of outcomes and indicators, hold quarterly contract monitoring meetings, audit and agree improvement plans as needed. As new contracts are in place, the contract monitoring arrangements will be reviewed to take into account learning from the needs assessment and EIA.