

Equality Impact Assessment Form (Page 1 of 2)

Title of EIA/ DDM: Homelessness Commissioning Intentions

Department: Strategy and Resources

Service Area: Strategic Commissioning

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Strategic Budget EIA Y/N (please underline)

Brief description of proposal / policy / service being assessed:

Nottingham City Council has undertaken a review of the assistance it commissions and provides for citizens who are homeless or are at risk of homelessness. This includes; Independent Living Support (ILS), supported accommodation and services for rough sleepers. The review has been informed by substantial research and analysis as well as the views of stakeholders, including people who have experienced homelessness in Nottingham. A number of proposals have been made in line with the findings from this work. The proposals have been developed in the context of significant pressures, including the need to respond more effectively to homelessness in the City and to help manage pressures on the Council's' budgets.

The proposals aim to:

- Increase activity to prevent homelessness
- Increase the number of people able to access and sustain settled accommodation
- Reduce the number of households temporarily housed in bed and breakfast accommodation in order to meet the Council's statutory duties to provide accommodation to families.
- Reduce the number of people sleeping rough in Nottingham.

In summary, key proposals are as follows:

Independent Living Support

- Protect spending on services that work to prevent homelessness i.e. Independent Living Support (ILS)
- Access to ILS will be via referral from Housing Aid only in order to focus assistance where it is most needed (currently citizens can self-refer or be referred by any supporting organisation)
- Commission a single ILS service that can be directed in accordance with demand – currently there is a generic service and a separate service for families

Supported Accommodation

- Funding for supported accommodation will be directed towards assisting people with complex needs, and exempt accommodation (eligible for enhanced housing benefit) will be used to provide support to households with lower support needs.
- Larger, outcomes based contracts will be established for the provision of supported accommodation in order to allow a wider range of accommodation to be used to alleviate homelessness. This will include separate lots for young people (16-21) and adults (22+).
- An increase in the number of units of accommodation (i.e. bedspaces) will be sought to offer more access to supported accommodation for people who have become homeless.

Rough Sleepers

- Funding for the delivery of No Second Night Out will be provided on a recurrent basis.

In addition to the proposed changes to commissioned services, the review has highlighted that the ending of private rented sector (PRS) tenancies is the leading cause of homelessness in Nottingham. Conversely, the PRS is also the main route out of homelessness and is increasingly relied upon to provide settled accommodation, as access to social housing is increasingly limited. The review recommends:

- That Nottingham City Council provides a co-ordinated service to PRS landlords and tenants, with the aim of identifying and addressing issues at an earlier stage and reducing evictions.
- That the Council considers establishing a Private Sector Leasing Scheme (PSLS) which would seek to improve the quality, accessibility, affordability and stability of the sector.

Information used to analyse the effects on equality:

Homelessness has a significant impact on an individual's health and wellbeing. Homeless Link report that on average homeless people die at 47 years old. This is 30 years before the national average of 77.

The commissioning review and the resulting proposals have been informed by extensive research, analysis and consultation. This includes:

- The views and experiences of stakeholders, including those providing services to citizens who are homeless or at risk of homelessness. We have held two open invitation stakeholder events (attended by 125 different individuals) and conducted two follow up surveys to ensure the view of those who couldn't attend were heard. Consultation on the draft proposals has also been conducted via the Council's website and supported by focus groups. In addition the Homelessness Prevention Strategy Implementation Group have regularly inputted as a steering group. Feedback from the events and surveys has been collated and is available on the Council's [website](#).
- Listening to the views and experiences of citizens who have experienced homelessness or who have been at risk of homelessness. This has included in-depth interview with 40 different individuals as well as focus groups of citizens who considered our draft proposals. Citizens with experience of homelessness have also participated in workshop discussions and presented at stakeholder events. We have also worked with citizens who have experienced homelessness to develop specific requirements for services (to be included in service specifications) and we will involve citizens in the decision making process.
- Analysis of statistical data including information available from contract monitoring and Housing Aid.
- Data collated by current providers on the profile of their service users including monthly counts of rough sleepers conducted by the Street Outreach Team.
- A range of research and analysis (e.g. into demographic pressures, causes of homelessness, approaches to tackling homelessness, etc) presented in the refreshed JSNA Homelessness Chapter (currently in draft).

Key findings in relation to equalities impacts are as follows:

Age

- The age [profile of statutory homeless households in England for 2016/17](#) shows those aged 25-44 are the largest group (59%). This has increased from 47% in 2006/07. This is reflected in those accessing supported accommodation in Nottingham City – 54% are aged 24-44 whilst this age group only makes up 34% of Nottingham's total population.
- Homeless Link's, [Young and Homeless](#) (2015) report says, statistics are likely to underrepresent homelessness amongst young people as it is often hidden (e.g. young people who are sofa surfing). Young people are at increased risk of homelessness if, they are in an area of high deprivation, are young care leavers or young refugees.
- Under 35's will only be able to claim the shared accommodation Local Housing Allowance (LHA) rate once Universal Credit is rolled out in Nottingham (June 18). There is currently no shared accommodation social housing in Nottingham. [Research conducted by Sheffield Hallam University](#) concludes that access to the Private Rented Sector is also likely to be challenging for this age group, with 1 in 3 landlords actively seeking to decrease lets to people aged under 35. It is estimated this will affect 2,598 citizens in Nottingham.
- Stakeholders consulted expressed concerns that the provision of supported accommodation through larger hostels

was particularly inappropriate for younger people, and increased their vulnerability.

- Local stakeholders have suggested that older people, in particular, are not willing to access Nottingham City Council's Housing Aid.

Ethnicity

- The [Race Equality Foundation reported](#) in 2014 that overcrowding is most commonly experienced by Black African and Bangladeshi groups (with just over a third of households living in overcrowded accommodation).
- The same report found that some minority groups (Other White, Arab) are disproportionately represented in insecure private rented accommodation.
- Many stakeholders expressed concern about the number of homeless individuals who have No Recourse to Public Funds (NRPF). This significantly limits the options available and unless individuals agree to be reconnected there is a high likelihood they will continue to rough sleep. 12% of those found rough sleeping when the September count was undertaken had a local connection outside of the UK.

Gender

- Men are most likely to be rough sleeping or living in support accommodation. 59% of people in supported accommodation in Nottingham are male. 91% of rough sleepers identified by September rough sleeper count were male.
- Common reasons for women becoming homeless are due to domestic violence and abuse. Alternatively, for young women, pregnancy leading to them being asked to leave the family home. Refuges for female survivors and teenage parent accommodation are not in the scope of this review.

Lesbian, gay or bisexual people

- 77% of young people taking part in research by the [Albert Kennedy Trust \(2015\)](#) believe their sexual/gender identity was a casual factor in rejection from home.

Trans

- There are currently separate accommodations for men and women (as well as some that are mixed) but this does not always meet the needs of trans citizens.

Disability

- 1,607 households received an overview assessment by Housing Aid in 2016/17. 3% were identified as needing support with a learning disability and a further 6% due to a mobility issue including physical disability.
- Stakeholders expressed concern that some citizens may physically be unable to access Housing Aid.

The review has also highlighted two other relevant groups:

Mental Health

- National research and local experience shows there is a strong link between homelessness and mental health. [Crisis report](#) that 70% of homeless service users have a mental health issue & homeless people have twice the levels of general mental health problems compared to the general population. This has been echoed in the initial findings of local research commissioned by Nottingham City CCG and being undertaken by Sheffield Hallam University.
- 1,607 households received an overview assessment by Housing Aid in 2016/17. Mental health was identified as a support need for 18% of households assessed. This was the most common support need.

Offenders

- Stakeholders expressed that it is particularly difficult to access suitable accommodation for citizens with an offending history. The local Community Rehabilitation Company (CRC) reports that they regularly have to rely on local Community Interest Company's (CICs) which are of varying quality.

	Could particularly benefit X	May adversely impact X	How different groups could be affected (Summary of impacts)	Details of actions to reduce negative or increase positive impact (or why action isn't possible)
People from different ethnic groups.	<input type="checkbox"/>	<input type="checkbox"/>	<p><u>Independent Living Support</u> Older citizens (and others) may be excluded from accessing ILS if they will not engage with Housing Aid.</p> <p>Citizens, particularly disabled people may not physically be able to access Housing Aid, and therefore be excluded from receiving ILS.</p> <p><u>Supported Accommodation</u> Units of supported accommodation are currently commissioned for very specific cohorts e.g. men with complex needs. If accepted, the proposals will give providers more freedom to use the accommodation available to them to meet current needs and give additional flexibility to change this as required. This could have a positive impact for groups, including trans and vulnerable women, for whom specific accommodation is not currently available.</p> <p>Stakeholders have highlighted a risk that this may make it harder to access accommodation for groups with specific needs and issues, particularly young people and offenders, which can only be met through the provision of specialist</p>	<p>Housing Aid to develop and deliver a communications plan (as part of getting ready for new statutory duties under the Homelessness Reduction Act) which will seek to address these concerns. Oct 17 – Apr 18</p> <p>Commissioning to give consideration to alternative methods of access in development of service specification. Nov 17</p> <p>The demographics of service users will be monitored quarterly as part of the contract monitoring process so that access issues can be identified and addressed. Ongoing from April 18.</p> <p>Consideration to be given to the need to tender for separate lots within the one contract. Sept 17</p> <p>Renew discussions with the CRC regarding the Prison Leaving Protocol.</p>
Men	<input type="checkbox"/>	<input type="checkbox"/>		
Women	X	<input type="checkbox"/>		
Trans	<input type="checkbox"/>	<input type="checkbox"/>		
Disabled people or carers.	<input type="checkbox"/>	<input type="checkbox"/>		
Pregnancy/ Maternity	<input type="checkbox"/>	<input type="checkbox"/>		
People of different faiths/ beliefs and those with none.	<input type="checkbox"/>	<input type="checkbox"/>		
Lesbian, gay or bisexual people.	<input type="checkbox"/>	<input type="checkbox"/>		
Older	<input type="checkbox"/>	<input type="checkbox"/>		
Younger	X	<input type="checkbox"/>		
Other (e.g. marriage/ civil partnership, looked after children, cohesion/ good relations, vulnerable children/ adults). <i>Please underline the group(s) /issue more adversely affected or which benefits.</i>	<input type="checkbox"/>	<input type="checkbox"/>		

			<p>accommodation.</p> <p>It is proposed to require providers to implement a move towards individual or small, shared tenancies rather than accommodating people in large hostels. This will positively impact those identified as vulnerable and at risk of gaining additional needs whilst in larger hostels, particularly women and younger people. It will also mean that the level of support provided can be tailored much more specifically to the needs of each individual.</p> <p><u>Rough Sleepers</u> Funding to uphold the Council's No Second Night will be put on a recurrent footing. This means that people who are new to rough sleeping who are willing to engage with the Rough Sleepers Outreach Service will be offered accommodation to prevent the further need to sleep rough.</p> <p>For those without a local connection to Nottingham there will be a strong focus on reconnection (i.e. assistance to return to a place of origin). People who refuse this offer of assistance may be at risk of continuing to sleep rough.</p> <p><u>Impact of Budget reductions on men</u> Stakeholders have expressed concern that services (ILS and supported accommodation) will only have capacity to support citizens who are owed a statutory duty under homelessness legislation in line with the increasing demand for assistance. This may reduce access for citizens who are not deemed 'in priority need' (in accordance with The Housing Act 1996).</p>	<p>By April 18.</p> <p>The demographics of service users will be monitored quarterly as part of the contract monitoring process so that access issues can be identified and addressed. Ongoing from April 18.</p> <p>The City Council is working with partners to ensure arrangements are in place over the winter period (Nov-March) to help prevent rough sleepers whilst the weather is at its coldest. This will be accessible by all, including those with NRPF. Planning from Sept 17, measures in place Nov 17-Mar 18.</p> <p>The demographics of service users will be monitored quarterly as part of the contract monitoring process so that access issues can be identified and addressed. Ongoing from April 18.</p> <p>The Homelessness Reduction Act 2017 gives the local authority statutory responsibilities to prevent and relieve homelessness regardless of priority need, so this will not be a barrier to accessing ILS.</p> <p>The commissioned services are being considered as part of a larger programme plan. Alternative solutions</p>
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			<p>This group is primarily men with complex needs, the main users of current services as outlined above.</p> <p><u>Private Rented Sector (PRS)</u> The PRS is increasingly the only settled accommodation option but the evidence shows that this is particularly inaccessible for: younger people and offenders. Establishing a Private Sector Leasing Scheme could significantly benefit these groups, providing them access to affordable and quality private sector accommodation. This will also be of significant benefit to families would be able to maintain independent living who are unable to access accommodation and consequently are housed in bed & breakfast.</p> <p>The evidence also suggest that some ethnicity groups are more likely to be in unstable PRS accommodation.</p>	<p>are being sought for households who have low support needs but are owed a duty under homelessness legislation so that HRS funded services can still accommodate complex males. The success of this will be reviewed on a regular basis by the Homelessness Governance Group who oversee the programme plan. Ongoing from Nov 17.</p> <p>A business case is currently being established by Housing Strategy & NCH. This will be complete by the end of Oct 17.</p> <p>The refreshed Homelessness Prevention Strategy will include a focus on the private rented sector and providing a more co-ordinated offer of support, included tenancy sustainment roles funded by Nottingham Together. April 18.</p>
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Outcome(s) of equality impact assessment:

- No major change needed X
- Adjust the policy/proposal
- Adverse impact but continue
- Stop and remove the policy/proposal

Arrangements for future monitoring of equality impact of this proposal / service:

The equalities impact assessment will be reviewed quarterly based in light of monitoring information supplied by the commissioned service providers.

It was also be reviewed on an annual basis as part of the data review undertaken by the Homelessness Prevention Strategy Implementation Group.

Approved by (manager signature):

Date sent to equality team for publishing:
24.10.2017

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Before you send your EIA to the Equality and Community Relations Team for scrutiny, have you:

1. Read the guidance and good practice EIA's
<http://www.nottinghamcity.gov.uk/article/25573/Equality-Impact-Assessment>
2. Clearly summarised your proposal/ policy/ service to be assessed.
3. Hyperlinked to the appropriate documents.
4. Written in clear user friendly language, free from all jargon (spelling out acronyms).
5. Included appropriate data.
6. Consulted the relevant groups or citizens or stated clearly when this is going to happen.
7. Clearly cross referenced your impacts with SMART actions.