Equality Impact Assessment Form

screentip-sectionA

1. Document Control

1. Control Details

Control Details		
Title:	MHCLG Rapid Rehousing Pathway 2018/19 and 2019/2020	
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2. Document Amendment Record

Version	Author	Date	Approved
1	Bobby Lowen	28.12.18	
2	Bobby Lowen	13.3.19	

3. Contributors/Reviewers

Name	Position	Date
Adisa Djan	Equality Lead (Acting)	28/12/18

4. Glossary of Terms

Term	Description	
MHCLG Ministry of Housing, Communities & Local Government		
JSNA	Joint Strategic Needs Assessment	
RSI	Rough Sleeping Initiative	
RRP	Rapid Rehousing Pathway	
NPRAS	Nottingham Private Rented Assistance Scheme	

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2. Assessment

Brief description of proposal / policy / service being assessed

This assessment is in relation to the implementation of a decision to use funds awarded to Nottingham City Council by MHCLG following NCC's successful application to become an early adopter of the Rapid Rehousing Pathway (RRP). The approval of this decision will facilitate a local pathway towards settled accommodation for rough sleepers in Nottingham City, to comprise the following:

- A new Safe Space to Stay hub providing 24/7 shelter, assessment and routes to accommodation and support for rough sleepers
- Navigators (three posts) to provide intensive and personalised support to help rough sleepers (particularly those who are entrenched) to overcome individual barriers to moving off the streets and on to settled accommodation
- An extension of the Council's Nottingham Private Rented Assistance Scheme (NPRAS) to provide dedicated assistance to help rough sleepers to access accommodation provided by private landlords
- Supported Lettings workers (three posts) to provide practical support and encouragement to help rough sleepers to sustain settled accommodation once they have been helped to resettle into a new home

These new provisions are to be delivered alongside other accommodation and support already available in the City (mainly through other services commissioned by the Council) that work to help prevent and alleviate rough sleeping and homelessness.

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5. Information used to analyse the effects on equality:

The measures included in Nottingham's bid for funding though the Rapid Rehousing Pathway (RRP) were developed with input from the City's multi-agency Rough Sleeping Task Group and with consideration of information collected by the Street Outreach Team through its work to engage and support people sleeping rough in Nottingham. Other sources of information, including the Nottingham City JSNA chapter on Homelessness (2017), feedback from stakeholders collected through the recent Social Exclusion (Homelessness) Commissioning Review (2017) and the report *No Way Out: A Study of Persistent Rough Sleeping in Nottingham* (Nottingham Trent University / Opportunity Nottingham 2018) were also relied upon to prepare Nottingham's bid. The profile of people sleeping rough (and those at risk) and how this interacts with their circumstances (e.g. to form barriers to accessing settled accommodation) has been considered as part of the development of this bid, and used to direct the funding to help address the different causes of rough sleeping. This information has also been used to feed into further arrangements needed (e.g. the content of contracts with service providers, etc) as part of the implementation of services.

6. Impacts and Actions:

screentip-sectionD	Could particularly benefit X	May adversely impact X
People from different ethnic groups.		
Men		
Women		
Trans		

Disabled people or carers.	\boxtimes	
Pregnancy/ Maternity		
People of different faiths/ beliefs and those with none.		
Lesbian, gay or bisexual people.		
Older		
Younger		
Other (e.g. marriage/ civil partnership, looked after children, cohesion/ good relations, <u>vulnerable</u> children/ <u>adults</u>).	\boxtimes	
Please underline the group(s) /issue more adversely affected or which benefits.		

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)
The No Way Out study (2018) identified males as accounting for 84% of persistent rough sleepers in Nottingham City. A mix of interventions have been developed in order to help to offer appropriate options to people of different genders, but (given the higher proportion of males within the population identified as rough sleeping) most beneficiaries of the new services are likely to be male. The same report found that among the cohort of persistent rough sleepers identified through the research:	Clear reporting arrangements are being agreed with service providers in order to monitor the effectiveness of the new services. These arrangements will be underpinned by contacts between the Council and the service providers. Monitoring arrangements will also capture the profile of people accessing services, in order that the effectiveness of interventions for people with different equalities characteristics can be assessed. Contracts (and monitoring arrangements) will be put in place by the Commissioning and Contracting following confirmation of funding in March 2019.

- 81% were of White British ethnicity
- 18% had a disability
- 51% had a mental health problem
- 93% had problems with substance misuse.

Often people who experience persistent rough sleeping face a combination of substance misuse, offending histories and/or mental ill-health (known as Multiple and Complex Needs or MCN) that interact with their ability to access and sustain housing. Initiatives put forward in Nottingham's bid to be implemented through this decision will also seek to address the needs of people in this group. In particular:

- The Somewhere Safe to Stay hub will provide shelter and support at short notice, as well as access to longer term accommodation and support options, to provide a responsive form of access to help for rough sleepers ready to move off the streets
- Navigators will offer intensive and flexible support (particularly to longer term / entrenched rough sleepers) to help address individual causes of rough sleeping and to build on individual rough sleepers' strengths and aspirations. Navigators will also provide encouragement and support to engage with mental health support, substance misuse treatment and other services (according to individual needs) that can be difficult for rough sleepers to access and sustain.
- The extended NPRAS service will help people moving away from rough sleeping to access private tenancies, including through the provision of securities (e.g. advance rent) to incentivise landlords to offer their properties

A Rough Sleeping Co-ordinator post has been created to appoint a manager with responsibility for overseeing the effectiveness of the full range of interventions (including those not implemented through contracts). The Co-ordinator will have overall responsibility for the return of performance information required by MHCLG across both contracted and noncontracted services. The new Rough Sleeping Co-ordinator will maintain oversight of the overall performance of the measures funded through the Rapid Rehousing Pathway in order to make sure that they are working effectively to address the needs of people sleeping rough in the City. This will include the oversight of monitoring (including submissions to MHCLG) and regular review through the City's Rough Sleeping Task Group.

The organisations selected to deliver the services put in place through the implementation of this decision have been chosen both for expediency (given short timescales for responding to the bid) and for their experience in working with homeless and socially excluded citizens. This includes evidence of services having been adapted in line with an appreciation of the characteristics of people at risk of sleeping rough and the practices that can help to address common issues, including:

- The recruitment of outreach workers from EU communities affected by rough sleeping to support engagement
- The recruitment of staff with expertise in mental health and rough sleeping
- The delivery of services that seek to understand rough sleepers' own aspirations and strengths that can be built on
- The principle that it is never too late for positive change

 Supported Lettings workers will provide practical support and encouragement to help former rough sleepers to sustain new accommodation following a move off the streets (when they can be vulnerable to abandonment or tenancy failure and a return to rough sleeping).

EU migrants without benefit entitlements account for a significant proportion of people rough sleeping in the City (approx 1/3 in 2017/18 based on data collected by the Street Outreach Team). Opportunities to relieve rough sleeping for people in these circumstances can be limited by the lack of recourse to benefits. The new Safe Space to Stay hub will provide temporary shelter for people without a local connection / without recourse to public funds (where they have been identified as sleeping rough or at risk) and support to reconnect to an area or country of origin. Navigators will also offer holistic and intensive support to help address immigration issues and other problems (e.g. substance misuse, mental ill health, etc) where these create a barrier to regaining life off the streets.

The proposals to be delivered through the implementation of this decision will create access to support, shelter, routes to resettlement and other assistance (e.g. substance / alcohol misuse treatment) for people in accordance with their individual needs.

A series of discussions with stakeholders are to be held in February and March 2019 to re-examine the causes and issues perpetuating rough sleeping in Nottingham. These discussions will also seek to identify possible solutions in order to feed into the development of an action plan on rough sleeping to accompany the City's Homelessness Strategy. A range of agencies from across the statutory and voluntary sectors have been invited to attend to contribute to these discussions.

A new action plan is expected by April 2019 and will be overseen in delivery by NCC's Homelessness Strategy Manager and Rough Sleeping Coordinator.

7. Outcome(s) of equality impact assessment:

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

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

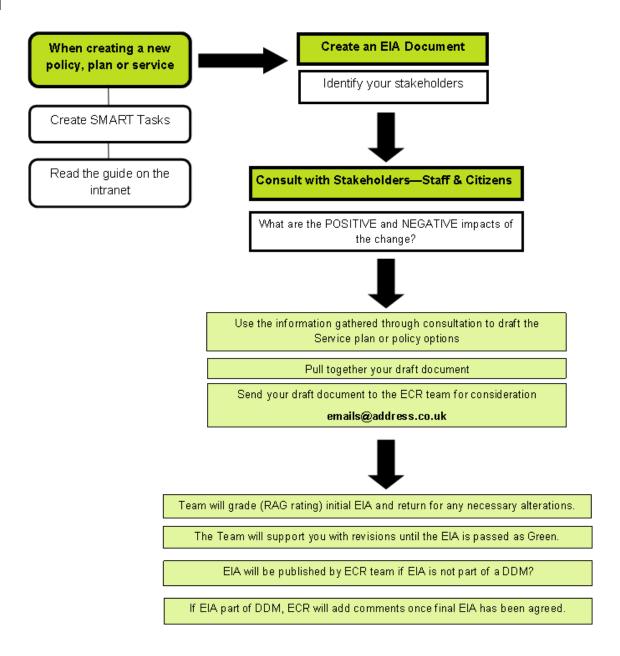
Monitoring of the interventions will be kept under review by the NCC Contracts Team, the Rough Sleeping Initiative Coordinator, and the multi-agency Rough Sleeping Task Group.

9. Approved by (manager signature) and Date sent to equality team for publishing:

Approving Manager: Christine Oliver Acting Director of Commissioning 0115 876 5725 christine.oliver@nottinghamcity.gov.uk	Date sent for scrutiny: 28 th December 2018 Send document or Link to: equalityanddiversityteam@nottinghamcity.gov.uk
SRO Approval:	Date of final approval; 18/03/19 Adisa Djan

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://intranet.nottinghamcity.gov.uk/media/1924/simple-guide-to-eia.doc
- 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.



KEY

EIA— Equality Impact Assessment

ECR— Equality & Community Relations Team

DDM-Delegated Decision Making