

Diversity impact assessment

Appendix 4

TITLE <i>Name / description of the issue being assessed</i>	Homelessness Prevention Strategy 2017-2019
DATE <i>Date the DIA is completed</i>	14 June 2016
LEAD OFFICER <i>Name, title and dept of person responsible for carrying out the DIA.</i>	Helen Miller, Senior Housing Strategy and Partnerships Officer, Strategic Housing

1 Summary description of the proposed change

- *What is the change to policy / service / new project that is being proposed?*
- *How does it compare with the current situation?*

- Section 1 (4) of the Homelessness Act 2002 requires that the authority publish a Homelessness Prevention Strategy based on the findings of the Homelessness Review. This strategy refreshes the previous Homelessness Prevention Strategy 2014-2016 and has the very similar key priorities of;

1. Use early interventions to prevent homelessness before crisis point is reached
2. Provide timely housing information enabling people to make informed housing decisions and plan ahead
3. Ensure fair access to a supply of housing to meet housing needs
4. Ensure access to services to help people with housing support needs to sustain independent living

The action plan reflects the information provided in the Homelessness Review regarding levels of homelessness, reasons for homelessness and the social context of high housing costs and welfare reform.

2 Summary of evidence used to support this assessment

- *Eg: Feedback from consultation, performance information, service user records etc.*
- *Eg: Comparison of service user profile with Medway Community Profile*

The Homelessness Prevention Strategy used P1E returns and other data sources and to consider the households who are affected by homelessness.

- Age; 86% of those accepted as homeless between 2013-14 to 2015-16 are aged 44 years or younger however, the ONS mid year estimates for 2014 showed that in Medway just 59.5% of the population are aged 44 or younger. 35% were aged between 16-24 year with 4% being 16-

Diversity impact assessment

17 year olds. This indicates that younger people are more likely to present as homeless and so the strategy will be more likely to have an impact on younger people than people 45 and older.

- **Disability;** of the 418 applicants found to be eligible for assistance, unintentionally homeless and in priority need in 2015-16 13% were households with a person with a physical or mental disability or mental illness. In the 2011 census 16.4% of people self identified as having a long term limiting illness, however not all of these would be considered to be physically or mentally disabled or having a mental illness under the homelessness legislation so this may not be comparing like with like. However, the homelessness legislation does consider that some physical or mental disabilities or mental illness could make an applicant more vulnerable and makes provision for this.
- **Sex;** of the 418 applicants found to be eligible for assistance, unintentionally homeless and in priority need 7.9% were households included a pregnant woman with no dependent children and 72% included dependent children. In the last three years in Medway 100% of households fleeing domestic violence and seeking support from the Council were headed by a woman. The homelessness legislation is likely to find more women than men will be considered in priority need than men and so will receive a higher level of support.
- **Ethnicity;** Of the households on who a homeless decision was made in 2013-14 to 2015-16 79.6% were white, 6.4% were black, 2.8% were Asian, 2.2% were mixed race, 1.6% were other and 7.4% did not state their ethnicity. In 2011 10.4% of the Medway population was Black and Minority Ethnic and that proportion had increased from 5.4% in 2001 and the proportion may have risen further since then. As such the proportion of Black and Minority Ethnic households where a decision was made on homelessness was a little higher than that found in the Medway population.

3 What is the likely impact of the proposed change?

Is it likely to :

- *Adversely impact on one or more of the protected characteristic groups?*
- *Advance equality of opportunity for one or more of the protected characteristic groups?*
- *Foster good relations between people who share a protected characteristic and those who don't?*

(insert ✓ in one or more boxes)

Protected characteristic groups	Adverse impact	Advance equality	Foster good relations
Age		✓	
Disability		✓	

Diversity impact assessment

Gender reassignment			
Marriage/civil partnership			
Pregnancy/maternity		✓	
Race			
Religion/belief			
Sex		✓	
Sexual orientation			
Other (eg low income groups)			

4 Summary of the likely impacts

- *Who will be affected?*
- *How will they be affected?*

Statutory homelessness is where local authorities have determined a household as homeless within the terms of the homelessness legislation. Where they are found to be in priority need and not intentionally homeless, the local authorities will have a duty to offer accommodation. Those in priority need can include households with dependent children, pregnant women and adults who are assessed as vulnerable. The legal provisions are contained in the Housing Act 1996, the Homelessness Act 2002, and the Homelessness (Priority Need for Accommodation) (England) Order 2002. The council must follow the legislation and relevant guidance when carrying out housing authority functions.

Age; All households including a dependent child will be considered to be in priority need. People aged 16-17, and care leavers up to the age of 21, are considered vulnerable and will be in priority need when homeless. Those aged 16-17 will attend a joint assessment with housing and social care in accordance with legislation and guidance.

Disability; People with a disability are more likely to be considered vulnerable when homeless and the legislation and guidance requires the council to give due regard to their disability when regarding whether they would be in priority need.

Pregnancy/maternity/sex; It is likely that more women than men will be helped as the legislation and guidance recognises pregnant women as vulnerable and in priority need when homeless. Households including dependant children are considered vulnerable and women are more likely than men to be single

Diversity impact assessment

parents.

It is likely that more women than men will be helped as the legislation and guidance recognises those fleeing domestic violence as vulnerable and in priority need when homeless.

5 What actions can be taken to mitigate likely adverse impacts, improve equality of opportunity or foster good relations?

- *Are there alternative providers?*
- *What alternative ways can the Council provide the service?*
- *Can demand for services be managed differently?*

Single people and childless couples more likely to be assessed as non priority and only owed advice and support through the legislation. The action plan addresses supports non priority households by;

- ensuring they are given full support to prevent homelessness,
- the provision of an updated homebond scheme, including for renting rooms, to help them find new accommodation
- ensuring they are able to access advice and support from Kingsley House and non statutory organisations
- recognising the need for a range of accommodation, including smaller homes, in the Local Plan
- providing supported housing to help them prepare for independent living
- activities to help rough sleepers access services

6 Action plan

- *Actions to mitigate adverse impact, improve equality of opportunity or foster good relations and/or obtain new evidence*

Action	Lead	Deadline or review date
We will consult with a wide range of partner organisations on the strategy and action plan and use the feedback to amend the strategy as needed	Helen Miller	April 2017
We will consult with those who have been homeless or at risk of homelessness by seeking the views of tenants in supported housing and use the feedback to amend the strategy as needed	Helen Miller	April 2017

Diversity impact assessment

7 Recommendation

The recommendation by the lead officer should be stated below. This may be:

- to proceed with the change, implementing the Action Plan if appropriate
- consider alternatives
- gather further evidence

If the recommendation is to proceed with the change and there are no actions that can be taken to mitigate likely adverse impact, it is important to state why.

A consultation was held in March and April 2017. Many organisations were contacted to inform them of the consultation including organisations representing ethnic minorities, women, young people, older people and disabled people. Responses from service users were sought by visiting supported housing and sending a shorter version of the strategy and survey to supported housing providers. The consultation received 15 responses from service users, 10 from members of the public and 10 from organisations. The responses did not highlight any new groups likely to experience adverse impacts from the strategy. Responses were received from men and women of all age groups. The majority described their ethnic origin as White - English/ Welsh/ Scottish/ Northern Irish/ British, with a small number of responses from people describing themselves as Black / Black British – Caribbean, Asian, and other mixed / multiple ethnic background with some choosing not to give that information.

The responses supported the strategic priorities and some suggested additional items to be considered. After careful consideration an additional action was included around bringing empty homes back into use.

In the meantime the Homelessness Reduction Bill has been enacted. This strategy would be used until the guidance is released and a subsequent strategy is drafted.

The recommendation is for this strategy to be used.

8 Authorisation

The authorising officer is consenting that:

- the recommendation can be implemented
- sufficient evidence has been obtained and appropriate mitigation is planned
- the Action Plan will be incorporated into the relevant Service Plan and monitored

Assistant Director

Date

Contact your Performance and Intelligence hub for advice on completing this assessment

RCC:	phone 2443	email: annamarie.lawrence@medway.gov.uk
C&A: (Children's Social Care)	contact your normal P&I contact	
C&A (all other areas):	phone 4013	email: chrismckenzie@medway.gov.uk
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Send completed assessment to the Corporate Performance & Intelligence Hub (CPI) for web publication (corppi@medway.gov.uk)