

Diversity impact assessment

TITLE Name / description of the issue being assessed	Draft Homelessness and Rough Sleeper Strategy 2019-2024
DATE Date the DIA is completed	02/09/19
LEAD OFFICER Name, title and dept of person responsible for carrying out the DIA.	Helen Miller, Senior Housing Strategy and Partnerships Officer, Housing
1 Summary description of the proposed change <ul style="list-style-type: none"> • What is the change to policy / service / new project that is being proposed? • How does it compare with the current situation? 	
<p>The Homelessness Prevention Strategy 2017-19 was written as a short term strategy to take us through the period of rapid change whilst the Homelessness Reduction Act 2017, and related guidance, came into force during 2018. The strategy's priorities are to;</p> <ul style="list-style-type: none"> • Use early interventions to prevent homelessness before crisis point is reached. • Provide timely housing information enabling people to make informed housing decisions and plan ahead. • Ensure fair access to a supply of housing to meet housing needs. • Ensure access to services to help people with housing support needs to sustain independent living. <p>Good progress has been made against the action plan attached to this strategy. Many changes have occurred due to the Homelessness Reduction Act 2017 and the Rough Sleeper Initiative funded by the Ministry for Housing, Communities and Local Government and the new draft strategy reflects these.</p> <p>The new draft is based on the five themes recommended in the Homelessness Code of Guidance 2018;</p> <ul style="list-style-type: none"> • Providing advice and information to prevent homelessness • Identifying households at risk of homelessness early • Intervening before homelessness occurs • Preventing recurring homelessness • Working with partner agencies <p>It also reflects the government's Rough Sleeping Strategy 2018 with its three themes of Prevention, Intervention and Recovery, and which requires that homelessness strategies consider the needs of rough sleepers and have an annual action plan.</p> <p>There was some overlap in the action plans of the Homelessness Prevention Strategy 2017-19 and the Housing Strategy 2018-2022 and the new draft has a tighter focus of homelessness.</p>	

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

We carried out a Homelessness Review in autumn 2018 as required by the Homelessness Act 2002. The main findings of that were;

Private sector rents are higher than the local housing allowance

The local housing allowance, which can be awarded as housing benefit or as part of universal credit, is lower than the average private sector rent in all sizes of home. This shortfall must be paid by the tenant to avoid falling behind on their rent payments. Some landlords chose not to rent to households in receipt of benefits due to fears they cannot afford the top up and could fall behind on their rent. The council cannot discharge its main homelessness duty unless the new accommodation will be affordable for that household and the high private sector rents can present a barrier.

Increasing numbers of households are seeking assistance

The number of households seeking help in 2018-19 was approximately 20% more than in previous years. However, due to increases in homelessness prevention work, the number of households found to be homeless has decreased from a peak in 2014-15.

Reasons for becoming homeless

The most common reason for a household to become homeless in Medway in 2017-18 was the termination of their tenancy, affecting 27% of cases. Many households struggle to find alternative accommodation they can afford. This was followed by parents no longer willing to accommodate, affecting 21% of cases. Rent arrears in the private rented sector accounted for approximately 5% of cases.

Families becoming homeless

Lone parents with dependent children make up the majority of households accepted as homeless, followed by couples with dependent children. 53% of those accepted as homeless were aged 25-55, with 33% aged 16-24. The most common reason for being in priority needs was having dependent children, followed by having mental health or disability issue, then pregnancy, then physical disability. Rough sleeping is a very small, but highly visible, part of homelessness.

Increase of homelessness prevention and relief work

The number of households whose homelessness was prevented, by resolving rent arrears, resolving housing benefit concerns and other methods has increased significantly. There have also been large increases in the numbers of cases of homelessness relieved by work to help households find a home in the private rented sector, supported by our Private Rented Sector Scheme, and also people moving into supported accommodation.

Low level of affordable rented homes

Medway has a low number of affordable rented homes. From April 2013 to March 2018, 3129 new homes have been built in Medway with an average of 23% being affordable rented or shared ownership. The council continues to work with partners to provide affordable housing and this year aims to support 204 new affordable homes to be provided. Demand for socially rented homes continues to be high and the Tenancy Strategy 2018 encourages social landlords to use fixed term tenancies to ensure homes are let to those in current housing need.

Rough Sleepers and the Rough Sleeper Initiative

The rough sleeper count in November 2018 found 19 people. The council and partner organisations working in Medway recognise the true number of people sleeping rough is higher and that a count just gives a snapshot of one night. The Ministry for Housing, Communities and Local Government awarded Medway Council just over 1.1million pounds to spend between July 2018 and March 2020 on specified activities to support rough sleepers and help them move into accommodation. Outcomes have included helping more than 90 rough sleepers into accommodation, including housing first and supported accommodation and helping them access existing services including mental health services.

Many organisations provide services to homeless people and rough sleepers

There are many statutory and voluntary organisations providing housing related support, advice, food and practical assistance to homeless people and rough sleepers. Voluntary sector organisations can be responsive and the services offered can change frequently and a leaflet is produced and updated to show what is available. The Homelessness Forum aims to encourage these organisations to co-operate and consider each other and respect their expertise when creating new services or changing existing ones. It encourages positive forms of support, including job clubs, and help to access health services, and aims to avoid activities which could be seen as enabling rough sleepers to remain on the streets. There are a very large number of organisations providing food for rough sleepers, particularly on Monday to Fridays and there is no need for more food provision. There is less provision of services in Rainham, Strood and the Hoo peninsular and many based in Chatham.

The picture of homelessness in Medway mirrors the national picture except we don't have many ex service personnel sleeping rough, we have a higher than average proportion of female rough sleepers and we have a low level of social housing in Medway.

We sought feedback from a wide range of partner organisations, and colleagues in areas impacted by homelessness, at an engagement day in

October 2018.

They were asked what was going well so good practice could be identified and continued. Answers included;

- partnership working and communication with a solution, not blame, focus
- an increase in the amount of homelessness prevention and relief work
- the rough sleeper initiative funding new areas of work
- more bed spaces in the winter shelters for rough sleepers
- the rough sleeper outreach work and the support they had received from agencies working with rough sleepers

They were asked about the challenges with answers including;

- The gap between the local housing allowance and the rents
- Fears over what happens when the rough sleeper initiative funding ends
- Lack of affordable/social housing
- Public sector services widely over-stretched
- Myths and misinformation about services
- Lack of provision for rough sleeper women, couples and those with pets

Finally participants were asked what we could do to address the challenges and answers included;

- All services to be bold and less risk averse
- Challenge myths and provide accurate information about homelessness and where to seek help
- Provide more affordable housing
- Ensure services are commissioned using current information and will meet needs of Medway residents

Our advisor for the rough sleeper initiative from the Ministry for Housing, Communities and Local Government said that the draft strategy was suitable and had a good action plan. They also recommend reference to local Adult Safeguarding Strategy which should ensure any identified vulnerable individuals have a plan of action around self-neglect and interventions professional agencies need to consider that prevents further harm. This should include intervention by relevant agencies/services.

Our Legal Services advised we should consult on our strategy only and not the annual action plan.

On 18th June we held a lunch and learn session with colleagues on the five themes of the strategy. 19 colleagues attended from the Strategic Housing Service, Housing Landlord Service, Adults Social Services, Public Health Service, Town Centre Management and Environmental Services. We explained the reasons for drafting a strategy now and the research guiding it. People had discussions in small groups about the 5 themes and completed the feedback forms. All participants agreed with all five themes. We analysed the feedback to identify any matters that were not covered in the strategy or

action plan. This led us to add more detail to the action regarding a communications strategy and to add actions on increasing the range of options we have to current temporary accommodation provision (including e.g. assessing the feasibility of the Council running a lettings agency) and exploring opportunities to work more closely with colleagues in Adult Social Care and Children's Services.

On 28th June we visited AMAT, a non-commissioned supported housing provider, to ask their service users their views on the five themes. 13 AMAT service users attended the consultation, 11 of whom were white men, with one black man and one white woman completing the group. We estimated that all were above 30 years old, with around half over the age of 50. The service users said they had used the Kingsley House homelessness service with some going several years ago and some more recently. This would suggest some had received the service before the Homelessness Reduction Act 2017 changed the way the service is offered. We explained the reasons for drafting a strategy now and the research guiding it. People had discussions in two groups about the five themes and we noted their comments. All participants agreed with all five themes. We checked the points raised to ensure they were in the strategy or action plan and found they were or were already part of our current normal practice.

We ran the public consultation from 5th July to 22nd September. This was publicised to all members of our Homelessness Forum by email and also at both the task and finish groups meetings. It was available on our website and our communications team promoted it with messages on Facebook and Twitter. We received 90 responses, 88 from individuals and two from local organisations. 72% of respondents were female. There were responses from adults of all age groups with the most from people aged 45-54 and 55-64. 85% of respondents described themselves as White-English/Welsh/Scottish/Northern Irish/ British. 1% described themselves as Mixed – white and Black Caribbean, 1% Black/Black British – African, and 1% any other Asian background. 31% described themselves as having a long standing health problem or disability. Due to small numbers of respondents it is not possible to compare the answers of one demographic group to another except that only 69% of those aged 44 and under agreed working with partner agencies was the right theme compared to 94% of those aged 45 and over.

78% of respondents agreed or strongly agreed with the theme 'Providing advice and information to prevent homelessness', with 11% neither agreeing nor disagreeing and 10% disagreeing or strongly disagreeing. Most comments were supportive with some suggesting ways to ensure all knew of the homelessness service.

88% of respondents agreed or strongly agreed with the theme 'Identifying households at risk of homelessness early' with 10% neither agreeing nor

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disagreeing and 1% disagreeing. One respondent suggested a way is found to store rough sleeper's possessions and an action will be added to the action plan to investigate options for doing this.

90% of respondents agreed or strongly agreed with the theme 'Intervening before homelessness occurs' with 9% neither agreeing nor disagreeing and 1% strongly disagreeing. One respondent suggested we work with people being evicted, supporting them to challenge evictions and help with eviction and rent arrear proceedings in Court. The homelessness team provide support for this and we will add an action to the action plan to review the support provided and make recommendations. Many supportive comments were made and some suggested actions already in the action plan.

86% of respondents agreed or strongly agreed with the theme 'Working with partner agencies' with 10% neither agreeing nor disagreeing and 4% disagreeing or strongly disagreeing. Many supportive comments were made and some suggested actions already in the action plan.

Respondents were asked whether there were other themes that should be included and whether there was anything else the Council should consider as part of this strategy. A wide range of opinions were expressed with some conflicting with others as to the way their perceived rough sleepers.

None of the responses raised issues that required amendments to the strategy.

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 (Equality Act 2010)	Adverse impact	Advance equality	Foster good relations
Age			
Disability			
Gender reassignment			
Marriage/civil partnership			
Pregnancy/maternity		/	

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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?

The legislation requires that pregnant women will be found to be in priority need when assessed for homelessness both in the current situation and if the draft strategy is adopted.

The new Homelessness Reduction Act 2017 introduced additional duties regarding the prevention and relief of homelessness. These will continue to be provided under the current strategy and if the draft strategy is adopted.

The new draft strategy aims to address stigma against rough sleepers and perceptions that they have made a life style choice. This should benefit rough sleepers and also help agencies working with rough sleepers to gain greater co-operation from services.

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

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

It will be important to continue to work with colleagues across the council and partner organisations to provide the best services to prevent homelessness and rough sleeping and to help those affected. The importance of partnership working is a theme of the strategy.

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 received input from the Ministry for Housing, Communities and Local Government on the strategy	Chris Giles	15/04/19

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and action plan		
Seek legal advice regarding whether the public consultation should be on the strategy, or on the annual action plan.	Helen Miller	01/04/19
We have sought feedback from colleagues at the lunch and learn session and AMATs service users.	Helen Miller	23/09/19
We are also running a public consultation from 5 th July to 22 nd September and will analyse the feedback from that when the consultation closes	Helen Miller	23/09/19

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.

I recommend that the new strategy is adopted.

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

Dawn Hudd

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 usual P&I contact	
C&A (all other areas):	phone 4013	email: jackie.brown@medway.gov.uk
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