

Cambridge City Council Equality Impact Assessment (EqIA)

This tool helps the Council ensure that we fulfil legal obligations of the [Public Sector Equality Duty](#) to have due regard to the need to –

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Guidance on how to complete this tool can be found on the Cambridge City Council intranet. For specific questions on the tool email Helen Crowther, Equality and Anti-Poverty Officer at equalities@cambridge.gov.uk or phone 01223 457046.

Once you have drafted the EqIA please send this to equalities@cambridge.gov.uk for checking. For advice on consulting on equality impacts, please contact Graham Saint, Strategy Officer, (graham.saint@cambridge.gov.uk or 01223 457044).

1. Title of strategy, policy, plan, project, contract or major change to your service
Cambridge City Council's response to homelessness during Covid-19

2. Webpage link to full details of the strategy, policy, plan, project, contract or major change to your service (if available)
https://democracy.cambridge.gov.uk/ieIssueDetails.aspx?IId=24188&PlanId=0&Opt=3#AI23893

3. What is the objective or purpose of your strategy, policy, plan, project, contract or major change to your service?
To establish a framework for achieving positive move-on from hotels and hostels, of street homeless people placed there during the COVID-19 pandemic (as part of the Government's 'Everyone In' policy).

4. Responsible service
Housing Services

5. Who will be affected by this strategy, policy, plan, project, contract or major change to your service? (Please tick all that apply)	<input checked="" type="checkbox"/> Residents <input checked="" type="checkbox"/> Visitors <input checked="" type="checkbox"/> Staff
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Please state any specific client group or groups (e.g. City Council tenants, tourists, people who work in the city but do not live here):

- Applicants who are seeking single person accommodation through our housing register, and who are therefore in competition for resources
- Existing occupants of supported housing accommodation, for whom we seek suitable move on, in order to free up their supported accommodation
- Neighbours of land where pod accommodation is likely to be sited, and/or neighbours of properties selected for Housing First accommodation or shared HMOs
- Residents, workers and visitors to the City, who will witness less street life and begging
- Staff working in housing advice and in roles supporting the single homeless.

6. What type of strategy, policy, plan, project, contract or major change to your service is this?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Major change <input type="checkbox"/> Minor change
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7. Are other departments or partners involved in delivering this strategy, policy, plan, project, contract or major change to your service? (Please tick)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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If 'Yes' please provide details below:

- Key partners in the third sector who provide support to single homeless people and rough sleepers, such as Wintercomfort, Change Grow Live (the Cambridge Street Outreach Team), It Takes a City, Jimmy's Cambridge and the NHS-led Access Surgery
- Planning Department (with regards to siting of new emergency accommodation)
- Private Registered Providers with accommodation in the district (PRPs or 'housing associations')
- Cambridgeshire County Council Adult Social Care.

8. Has the report on your strategy, policy, plan, project, contract or major change to your service gone to Committee? If so, which one?

Scheduled for Housing Scrutiny Committee on 23rd June 2020.

9. What research methods/ evidence have you used in order to identify equality impacts of your strategy, policy, plan, project, contract or major change to your service?

Detailed reports about the characteristics of the group of people currently in Phase 1 accommodation have been generated from the InForm system and interrogated. These have been compared with reports about (for example) the characteristics of applicants to the housing register, and data about the characteristics of the population of the district (from sources such as this: <https://cambridgeshireinsight.org.uk/>).

10. Potential impacts

For each category below, please explain if the strategy, policy, plan, project, contract or major change to your service could have a positive/ negative impact or no impact. Where an impact has been identified, please explain what it is. Consider impacts on service users, visitors and staff members separately.

(a) Age

The average age of the 109 people who are still resident in Phase 1 emergency accommodation (where a date of birth is known) is 43.

The youngest person accommodated is 18, and the oldest, 67. 15 people (14%) are over 55 years old. The strategy of assisting as many as possible into phase 2 accommodation is unlikely to place undue strain on age-specific supported accommodation, which could cause detriment to other applicants.

(b) Disability

Section 6 of the Equality act 2010 states that “(1)A person (P) has a disability if—

(a) P has a physical or mental impairment, and

(b) the impairment has a substantial and long-term adverse effect on P's ability to carry out normal day-to-day activities.”

1 of the 109 people currently accommodated is recorded as being a disabled person. However, 27 (25%) report physical health problems that they are likely to find debilitating, particularly when rough sleeping.

38 report mental ill health of some degree. A total of 35% of the cohort therefore has a physical

and/or mental health issue.

According to Government data, disabled people now make up 22% of the UK population. This suggests that people with a disability are likely to be over-represented in the rough sleeping cohort. If returned to the street when the pandemic no longer presents a risk, this group of people are likely to be more at risk of deteriorating health than the general population. Assisting them into settled accommodation is likely to have a positive impact on their physical and mental health, and could potentially save more lives.

In addition, a large proportion of the affected client group have dependency on drugs, alcohol or both. Moving people into settled accommodation, away from street life, will have a positive impact on the treatment and rehabilitation of those with such conditions.

Many people with these complex needs find it difficult to engage with the statutory homelessness assessment process. Moreover, the statutory framework does not favour those who do not clearly fall into a priority need category, or whose behaviour in the past has led to their current homelessness. Moving people with complex needs out of the 'revolving door' of repeat homelessness will have a positive impact on staff working in the Housing Advice service. It is hoped that they will be presented with fewer difficult-to-resolve cases.

However, the strategy suggests that persons who have failed to engage with the rules and requirements of being provided with hotel or hostel accommodation (i.e. those that have been evicted from or have abandoned that accommodation) will not be assisted further with move on accommodation. This will have a negative impact on persons whose mental ill-health or incapacity renders them unable to comply with rules and structure.

There is a risk that placing additional persons who have a history of mental ill-health or substance abuse into the settled community will impact negatively on existing residents who are themselves vulnerable to mental illness or addiction.

Where existing residents of supported accommodation are being moved on, in order free up the supported accommodation for those in phase 1 accommodation who need it, a rigorous assessment has been carried out to ascertain that they are definitely ready for independent living, and are also supported as much as possible to transition to independent living. Where there are disabilities, long term health needs or mental illness, particular care will be taken to assess needs and ensure that move on accommodation is suitable.

As staff members have different responsibilities for assessing, supporting and sourcing accommodation for applicants with complex needs, this may exacerbate mental health problems or cause stress/anxiety amongst these members of staff. Additional training is being provided. We will also be raising awareness of an existing independent and confidential support service for City Council employees, PAM Assist. Officers can call the service whenever this is required.

(c) Gender reassignment

There are currently no persons within the cohort who have identified as gender reassigned individuals. However, the strategy suggests that any persons who become street homeless whilst the COVID-19 pandemic continues will be accommodated. This presents the possibility that one or more gender-reassigned individuals will access the services described in the strategy.

It is likely that persons with this characteristic will be positively affected by a strategy of sourcing suitable settled accommodation. There is likely to be a lower risk of hate crime through abuse and/or assault whilst in settled accommodation, and readier access to an ongoing support service that will ensure that harassment and abuse is not tolerated.

(d) Marriage and civil partnership

There have been 3 street homeless couples accommodated under this initiative so far. The remainder are single persons.

For people whose street life had prevented them from considering creating a settled partnership with another, the strategy of providing settled move on will have a positive impact. New opportunities for settled, mutually supportive partnerships will be created in the longer term.

The strategy has the potential to disadvantage single people in the settled community, by creating greater demand for limited housing resources. We are seeking to mitigate that with a range of alternative housing options offers to rough sleepers including generous inducements to private landlords to increase the range of private rented sector opportunities.

(e) Pregnancy and maternity

This policy / strategy relates to street homeless people who have been brought into hotel/ hostel accommodation during the pandemic, but who ordinarily may not be owed a statutory duty under Housing Act 1996 Part VII. Households with a pregnant member would be considered to be in priority need under this legislation, and when brought to the housing authority's attention, would be owed a statutory duty to provide interim accommodation. There are therefore no pregnant households or parents amongst this cohort..

For people whose street life had prevented them from considering creating a settled family, the strategy of providing settled move on will have a positive impact. New opportunities for maternity / parenthood will be created in the longer term.

(f) Race – Note that the protected characteristic ‘race’ refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

Nationality: just over half of the persons currently accommodated are UK nationals. Of the remainder, 30 (28%) are European nationals. 2 are from other continents, and for 8, their nationality has not yet been recorded.

Immigration status, linked to nationality, is key to whether an individual has recourse to public funds. Due to national policy, the Council cannot provide social housing or statutory homeless help to those people who have no recourse to public funds. The Government has not committed any additional ring-fenced funds to house those with NRPF and has said there are no plans to amend legislation to allow Councils to assist under homelessness duties. In phase 1, officers have assessed that around 20 of the current cohort have NRPF but we have 44 foreign nationals in the group as a whole and more detailed work is going on to see if there are more with NRPF than the initial assessment suggested. Where it is not possible to assist individuals to access public funds, other assistance will be given to try and avoid repeated street homeless, including, where appropriate, assisted repatriation.

Ethnicity: Around half of the accommodated individuals self-identify as White British or White Irish. This compares with 67% of the population of Cambridge as a whole. 6% are people of colour or mixed race, compared with around 16% of the general population of Cambridge. A quarter belong to other white ethnic groups, principally European – compared with 15% of the general population of Cambridge. Therefore there is an over-representation of non-British white groups in the street homeless cohort. These are likely to be some of those who cannot access public funds, so the comments above apply.

(g) Religion or belief

There is scant data on the religious beliefs of the accommodated group, with the vast majority not wishing to divulge any beliefs. It is therefore assumed that none are practising members of religious groups that are likely to be subject to prejudice or harassment.

If there are personal beliefs that have not been disclosed, it is likely that finding settled accommodation will have a positive impact on the holder’s ability to practice their religion in privacy and without fear of harassment.

(h) Sex

84% of the accommodated individuals are male. Females are therefore disproportionately under-represented in this group.

On the housing register:

- 62% of those households awarded Band A as unintentionally homeless in priority need were headed by a female;
- 60% of those households awarded Band B because they are owed a statutory prevention or relief duty were headed by a female;
- 24% of those households awarded Band C as 'Other homeless' were headed by a female.

The figures above from the housing register suggest that women are more likely to navigate the statutory homeless route, rather than sleeping rough. This could mean that women are less able to access the specialist help that is being offered as part of this strategy, however they will, of course, be receiving other help under the statutory framework, where eligible.

This data will be regularly reviewed, to ensure that women are able to access statutory homeless services in the district when they need them. There is national research carried out by Homeless Link that suggests the single females are more likely to be 'hidden homeless' than men (i.e. 'sofa surfing' rather than being verified as rough sleepers). The Council will regularly review how applicants access our advice services, homeless services and housing register, and will ensure female-led homeless households are not unfairly disadvantaged.

(i) Sexual orientation

There is no available data about the sexual orientation of the group.

It is likely that persons with this characteristic will be positively affected by a strategy of sourcing suitable settled accommodation. There is likely to be a lower risk of hate crime through abuse and/or assault whilst in settled accommodation, and readier access to an ongoing support service that will ensure that harassment and abuse is not tolerated.

(j) Other factors that may lead to inequality – in particular, please consider the impact of any changes on low income groups or those experiencing the impacts of poverty

The persons that are the subject of this strategy are almost all in extreme poverty, and are less able than the general population to resolve their own homelessness without assistance. Many have previously existed on begging as their only source of income. This concerted programme of support will have a positive impact on some of the poorest members of the community. The wrap-around support seeks to provide learning and employment opportunities, alongside accommodation, so that impoverished individuals can start to build a stable economic future. Where it proves difficult to help individuals into paid employment, support will be provided to claim appropriate benefits.

Providing accommodation in itself is unlikely to redress the balance completely. The Council will continue to dissuade the public from giving directly to people who may beg on the streets when this occurs, and will continue to promote its alternative giving scheme, [Street Aid](#). This scheme provides a fund, to which people who live or have lived on the streets can apply.

Eligibility for recourse to public funds is an issue for a proportion of those we are seeking to assist. The City Council is limited by statute in how it can assist people who have no recourse to public funds. Where it is not possible to assist individuals to access public funds, other assistance will be given to try and avoid repeated street homelessness, including, where appropriate, assisted repatriation.

11. Action plan – New equality impacts will be identified in different stages throughout the planning and implementation stages of changes to your strategy, policy, plan, project, contract or major change to your service. How will you monitor these going forward? Also, how will you ensure that any potential negative impacts of the changes will be mitigated? (Please include dates where possible for when you will update this EqlA accordingly.)

The strategy involves analysing the support needs of each individual, and sourcing a solution which most nearly meets those support needs. It will be necessary to ensure that the client groups on-going support needs are being properly met. It will also be necessary to monitor the impact on the more vulnerable members of the existing settled community. With regards to City Homes stock, this will involve:

- Resourcing pro-active follow up by housing management staff;
- Analysing changes in levels of ASB and rent arrears in single person accommodation;
- Monitoring volumes of complaints that might indicate emerging problems.

A clear and regular dialogue with housing management in partner PRPs will also be necessary.

We are investigating how and whether the enhanced volunteer support that has gone in to phase 1 can continue beyond the initial resettlement of these individuals. This will help to act as an 'early

warning system’.

Additional social housing allocation to rough sleepers may come at the expense of others already on the register. We are seeking to mitigate that with a range of alternative housing options offers to rough sleepers including generous inducements to private landlords to increase the range of private rented sector opportunities.

Those individuals whose behaviour has led to them being evicted from, or abandoning the phase 1 hotel or hostel accommodation will be excluded from the move on plan. It is known that some have returned to the streets and it is expected that there will be others who cannot follow through with resettlement plans. There will need to be adequate resourcing to continue to offer whatever outreach work is required to minimise the risk to these individuals, and the risk that their presence on the streets might pose to the public at large.

12. Do you have any additional comments?

Some members of the client group have complex needs, including violent offending histories and issues with drugs and alcohol. This could present a risk to support workers. Mitigating measures include conducting support assessments by telephone, and the lone working procedures put in place by the employing organisations.

13. Sign off

Name and job title of lead officer for this equality impact assessment: David Greening, Head of Housing

Names and job titles of other assessment team members and people consulted: Ruth Trown, Policy & Performance Officer

Date of EqIA sign off: 19 June 2020

Date of next review of the equalities impact assessment: EqIA will be produced in line with publication of the Homelessness Strategy due to go to committee in Jan 2021

Date to be published on Cambridge City Council website: June 2020

All EqIAs need to be sent to Helen Crowther, Equality and Anti-Poverty Officer. Ctrl + click on the button below to send this (you will need to attach the form to the email):

Send form