



Equality Impact Assessment (EqIA)

Template reviewed Nov 2021

The Public Sector Equality Duty (PSED) was introduced as part of the Equality Act 2010, which protects people from discrimination in the workplace, in the provision of services and in wider society.

The duty requires all public bodies to have due regard to the need to:

- Eliminate discrimination
- Advance equality of opportunity
- Foster good relations between different people

Public bodies demonstrate this due regard in different ways, including producing robust equality impact assessments when considering changes to policies and services.

An EqIA enables us to check the potential impacts on residents and employees of our policies, services and projects. It's an opportunity to challenge how we currently do things.

Carrying out an EqIA should not create extra work; it should be part of your normal service planning process. Most of the information required should already be available to you through other work already undertaken e.g. service user monitoring, analysis of complaints and national research.

The purpose of an EqIA is to *take account* of equality as plans develop, to promote and assist the consideration of equalities issues arising in plans and proposals and to ensure that where possible adverse or disproportionate impacts are minimised and positive impacts are maximised. As such where possible an EqIA should be started at the outset of a project/proposal and continually be developed and reviewed until a final proposal is adopted. An EqIA should be used to ensure decision makers have all the information they need regarding potential impacts to ensure they have due regard to the Public Sector Equality Duty when making judgements.

Carrying out EqIAs should be an integral part of policy or service development/change and larger projects may need more than one EqIA if different areas are impacted by the change.

Any project that requires consultation will automatically require an EqIA.

All approved and signed EqIAs are recorded in a central register. Please email your completed draft EqIA to equalities@buckinghamshire.gov.uk. Previous EqIAs can be made available for information upon request. For any questions or if you require support in completing your EqIA please contact Maria Damigos and Natalie Donhou Morley directly.



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Part A (Initial assessment) - Section 1 - Background

Proposal/Brief Title: Homelessness and Rough Sleeping Strategy 2022-2025

OneDrive link to report/policy: **Strategy attached**

Related policies: Existing Aylesbury Vale, Wycombe and Chiltern&South Bucks Homelessness Strategies which are being replaced by this strategy.

Date: 04/04/2022

Type of strategy, policy, project or service:

Please tick one of the following:

- ☐ Existing
- ☐ New or proposed
- ☐ Changing, update or revision **YES**
- ☐ Other (please explain)

This assessment was created by:

Name: Michael Veryard

Job Title: Head of Housing

Email address: Michael.Veryard@buckinghamshire.gov.uk

Briefly describe the aims and objectives of the proposal below:

The drafting, agreement and adoption of the Buckinghamshire Council Homelessness and Rough Sleeping Strategy 2022-2025 to replace the Council's existing Homelessness Strategies which were carried forward to the unitary from the former District Councils.

What outcomes do we want to achieve?

The adoption of the Buckinghamshire Council Homelessness Strategy 2022-2025

Does this proposal plan to withdraw a service, activity or presence? ~~Yes~~/No

Please explain your answer: The Homelessness service is a statutory duty and the development and adoption of the strategy does not impact on the BAU service delivery

Does this proposal plan to reduce a service, activity or presence? ~~Yes~~/No



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Please explain your answer: The Homelessness service is a statutory duty and the development and adoption of the strategy does not impact on the BAU service delivery

Does this proposal plan to introduce, review or change a policy, strategy or procedure?

Yes/~~No~~

Please explain your answer: The proposals will see Buckinghamshire Council adopt a new Homelessness Strategy to replace the existing Homelessness Strategies that were carried forward from the District Councils

Does this proposal affect service users and/or customers, or the wider community? Yes/~~No~~

Please explain your answer: The Council has a statutory duty to provide homelessness advice and support to those persons who require it. The delivery of this advice and support is unaffected by the strategy. The strategy does set down the Council's higher level direction of travel for tackling homelessness and rough sleeping across Bucks and this guide what wider work and service are developed going forward.

Does this proposal affect employees? Yes/~~No~~

Please explain your answer: The strategy will not generally impact on the day to day delivery of the BAU homelessness service that is delivered by officers. There will be potential adjustments to service processes and the support that is provided to clients as part of the work to meet the priorities set down in the strategy

Will employees require training to deliver this proposal? ~~Yes~~/No

Please explain your answer: No specific training required for the adoption of the strategy

Has any engagement /consultation been carried out, or is planned in the future? Yes/~~No~~

Please explain your answer: A series of stakeholder engagement sessions were undertaken to get input into the strategy development. Sessions were undertaken with external stakeholders and partners (2 x sessions), housing officers, other (non-Housing) service areas in the Council and Members. The initial draft strategy document took account of the input from these sessions. This draft document was then subject to a 4-week public consultation period (21/2/22 to 21/3/22) and the final version has taken account of the feedback from this consultation exercise.



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Section 2 - Impacts

Please highlight potential impacts (including unintended impacts or consequences) for each protected characteristic*/equality groups below. Where there are negative or positive impacts please give more details of the impact. Where the impacts are unclear please explain why.

Age*

Positive Y	Negative	Unclear	None
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Details: The strategy will ensure that the Council's statutory homelessness services continue remain fully accessible to persons with protected characteristics and support the delivery of targeted and appropriate support services where required.

For younger people, those aged under 18 are covered by other statutory duties. The duty to prevent homelessness applies to those over 18. Many of these are being asked to leave by family and friends; the new strategy seeks to enable young people to remain in their existing accommodation, with housing officers being able to negotiate with parents/friends and mediate where required. Younger people who have been in the care of the local authority are considered vulnerable and where homelessness cannot be prevented it is more likely that a statutory duty will be accepted, leading to the provision of accommodation.

Those aged under 35 are only eligible for the Single Room Rate for Housing benefit and may therefore find it more difficult to access affordable accommodation. Private sector rents in Bucks are generally higher than the maximum level of Housing Benefit, although it is possible to source accommodation which is affordable to those on benefits. Housing officers will complete an affordability assessment with clients before suggesting they look for accommodation in the private rented sector; they will not suggest solutions which are unaffordable. Some short-term additional financial support may be available but only in a small number of cases.

Older people are also considered vulnerable and it is more likely that the Council will accept a duty to provide accommodation. Relatively few older people become homeless and there is a reasonable supply of social housing aimed at older people, meaning they are more likely to be rehoused.

Disability*

Positive Y	Negative	Unclear	None
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Details: The strategy will ensure that the Council's statutory homelessness services continue remain fully accessible to persons with protected characteristics and support the delivery of targeted and appropriate support services where required.



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The duty to prevent homelessness applies to everyone, including those with a disability. An assessment of support needs will be carried out as part of the homelessness application. Where homelessness cannot be prevented, those with a disability may be considered vulnerable and therefore it is more likely that a duty to provide accommodation will be accepted.

Data analysis of a sample of applications indicates that 36% of applicants owed a prevention or relief duty under the legislation require support with mental health needs and 22% physical health needs. This does suggest that those with disability may be more likely to become homeless. This may be around accommodation becoming unsuitable as a condition deteriorates, or it may be as a result of harassment. As with national figures, there are a significant number of people sleeping rough who have experienced mental ill-health. Work to prevent homelessness includes support for those with a disability to remain in their existing accommodation. The strategy includes actions to improve access to mental health services for those who need them. It also includes an action to create a database of adapted properties suitable for meeting the needs of those with physical disabilities.

Pregnancy & maternity*

Positive Y	Negative	Unclear	None
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Details: The strategy will ensure that the Council's statutory homelessness services continue remain fully accessible to persons with protected characteristics and support the delivery of targeted and appropriate support services where required.

As with all groups, the priority will be to maintain existing accommodation wherever possible. Where the existing accommodation is unsuitable because of pregnancy or a recent birth, housing officers will help to support a planned move to more suitable accommodation. If homelessness cannot be prevented, it is more likely that a duty to provide accommodation will be accepted for those who are pregnant or have recently given birth.

Race & Ethnicity*

Positive Y	Negative	Unclear	None
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Details: The strategy will ensure that the Council's statutory homelessness services continue remain fully accessible to persons with protected characteristics and support the delivery of targeted and appropriate support services where required.

An analysis of ethnicity of those approaching the service is included in the main evidence base. 71% of customers are White British, 11% Asian or Asian British, 8%



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Black/African/Caribbean/Black British. There are no changes in the proposed strategy which would have a differential impact on different ethnic groups. There is no evidence to suggest that those who are not White British are more likely to become homeless or to experience more difficulty in obtaining accommodation. Housing officers are sensitive to any potential discrimination on the part of landlords when seeking to negotiate for a family to remain in their existing accommodation.

Marriage & Civil Partnership*

Positive Y	Negative	Unclear	None
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Details: The strategy will ensure that the Council's statutory homelessness services continue remain fully accessible to persons with protected characteristics and support the delivery of targeted and appropriate support services where required.

When customers approach for support with preventing homelessness, they define the household for themselves. Couples living together are treated with the same status, regardless of whether or not they are married or in a civil partnership. As with all customers, the first priority will be to prevent homelessness wherever possible. Where homelessness cannot be prevented, couples with children will be a priority need, and it is more likely that a duty to provide accommodation will be accepted. This will apply regardless of whether the couple are married or in a civil partnership and reflects national legislation rather than local policy.

Religion & Belief*

Positive	Negative	Unclear	None Y
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Details: The strategy will ensure that the Council's statutory homelessness services continue remain fully accessible to persons with protected characteristics and support the delivery of targeted and appropriate support services where required.

Again, the priority will be to maintain existing accommodation wherever possible, and to be sensitive to any potential discrimination or harassment on the part of landlords or neighbours. There are no proposals in the strategy which would have a differential impact on those with religious beliefs. This information is not currently monitored.

Sex*

Positive Y	Negative	Unclear	None
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Details: The strategy will ensure that the Council's statutory homelessness services continue remain fully accessible to persons with protected characteristics and support the delivery of targeted and appropriate support services where required.

Prevention services are offered to all, regardless of sex/gender. Decisions on what statutory duty to accept are also made regardless of gender. There are no proposals in the strategy which would have a differential impact on different genders. We will continue to monitor this information to ensure this remains the case.

Sexual Orientation*

Positive Y	Negative	Unclear	None
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Details: The strategy will ensure that the Council's statutory homelessness services continue remain fully accessible to persons with protected characteristics and support the delivery of targeted and appropriate support services where required.

As with other groups, prevention is at the heart of the service, and we would seek to maintain the existing accommodation wherever suitable, remaining sensitive to any potential discrimination or harassment.

There are no proposals in the strategy which would have a differential impact in terms of sexuality. The main evidence base includes a breakdown of applicants by sexuality. There are relatively low numbers self-identifying as lesbian or gay and a relatively high number who prefer not to say. While it is reasonable for people to decide they don't want to disclose their sexuality, it is important to ensure that customers have confidence in the service and feel confident that they can share their sexuality where they wish to do so without fear of any discrimination or differential treatment.

Gender Reassignment*

Positive	Negative	Unclear	None Y
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Details: There are no specific provisions in the strategy for those who have transitioned to a different gender to the gender assigned at birth. Customers are able to state their preferred gender and how they would like to be addressed.

Gender identity

Positive	Negative	Unclear	None Y
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Details: The strategy will ensure that the Council's statutory homelessness services continue remain fully accessible to persons needing the Council's assistance and will



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provide appropriate support. Customers are able to state their preferred gender identity and how they would like to be addressed.

Carers

Positive **Y** Negative Unclear None

Details: Carers will continue to be able to access the support and assistance that they need should they become homeless or threatened with homelessness.

Rural isolation

Positive **Y** Negative Unclear None

Details: Homelessness services will continue to be assessable remotely and via a range of methods.

Single parent families

Positive **Y** Negative Unclear None

Details: Single parent families will continue to be able to access the full range of homelessness support that is required

Poverty (social & economic deprivation)

Positive **Y** Negative Unclear None

Details: The single homelessness strategy will include the continued targeting of homelessness service at specific groups with social and economic deprivation, including rough sleepers.

Military families / veterans

Positive **Y** Negative Unclear None

Details: The single homelessness strategy will ensure continued work between the service and the armed forces champion and ensure that the service is fully accessible to those who've served in the armed forces

Section 3 – Is a full assessment required?

If you have answered yes to any of the initial assessment questions in section 1 of this EqIA, or have indicated a negative or unclear impact in section 2, it is likely you will need to complete part B of the EqIA form. Should you need guidance as to whether a full EqIA is needed at this time please contact Maria Damigos or Natalie Donhou Morley before continuing.

Following completion of part A, is part B completion required?



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- ☒ Yes
☐ No
☐ ~~Not required at this time~~

Explain your answer:

The strategy does not affect the day to day operation of the Council's BAU homelessness service because this has to be delivered in line with the specific statutory requirements of Part 7 (Homelessness) of the Housing Act 1996 and the Council cannot alter or amend any aspects of these statutory requirements. The homelessness service has full regard to compliance with the PSED (Public Sector Equality Duty) when delivering the service and managing cases. Existing homelessness strategies are already in place to support the delivery of the service. The purpose of this proposal is to replace and consolidate the existing strategies into a single Council Homelessness Strategy which sets the wider framework for delivering homelessness prevention and support services going forward in Bucks. This will ensure positive outcomes for clients wherever possible including those with protected characteristics etc.

Have you completed an DPIA for this project/change? ~~Yes~~/No

(As you are completing an EqIA, you may also require a DPIA - for more information please contact dataprotection@buckinghamshire.gov.uk)

Section 4 – Sign off (Only complete when NOT completing Part B)

Officer completing this assessment: **Michael Veryard** Date: **04/04/22**

Equality advice sought from: (Please insert name) Date: (Please insert Date)

Service Director sign off: (Please insert name) Date: (Please insert Date)

CMT sign off (*if deemed necessary by Service Director*) sign off: (Please insert name) Date: (Please insert Date)

Next review Date: (Please insert Date)

If required please complete part B (full assessment)

Part B (Full assessment) - Section 5 – Further information

Not Applicable