

# **Equality Impact Assessment Homeless Hostel Reconfiguration Project**

## **1. Summary**

This report sets out details of the equality impact assessment undertaken in relation to the strategy to improve the standards of the Hostels used for meeting the Council's homeless duties.

The Hostel Reconfiguration Project was commenced in 2007 with two partner Housing Associations. The assessment concludes that the proposals will not lead to unlawful discrimination.

It identifies actions to be taken in order to mitigate the projects potential adverse effects on people for whom the scheme is targeted - i.e. the homeless

## **2. Background**

2.1 The Housing/Homelessness and Temporary Accommodation (TA) reduction strategies all include aims around improving the standard and location of TA and increasing the supply and options of suitable TA. These aims are reflecting those of other Portfolios and the Council around improving health, educational attainment and choice.

2.2 The main purposes of the project is to improve the standard and location of the hostels and, in particular, remove the shared facility hostel accommodation altogether.

2.3 Under the Race Relations Act 1976 (amended in 2000 and 2003) all local authorities must have due regard to the need:

- to eliminate unlawful racial discrimination
- to promote equality of opportunity
- to promote good relations between persons of different race

The act requires public bodies to assess the impact of all functions and policies on the promotion of race equality. Bromley Council has broadened the scope of impact assessments to include gender, age, disability and sexuality. Equality Impact Assessments, which are carried out for any proposed new policy, are intended to ensure that policies do not discriminate and that, where possible, they actively promote equality.

## **3. Relevance to Equality**

3.1 The Hostel Reconfiguration Project is relevant in relation to its potential impact for the following equality groups.

- 3.2 ***Ethnicity/race:*** Black and Minority Groups are known to be over-represented in the numbers presenting as homeless.
- 3.3 ***Disability:*** Some households approaching the Housing service have disabled people within the household or consist of a single disabled person household. The existing hostel accommodation does not cater appropriately for the need of such households
- 3.4 ***Gender:*** a sizeable proportion of homeless households consist of adults - with or without children - affected by domestic violence or that are young mothers.
- 3.5 ***Sexual orientation:*** homeless households consist of lesbian, gay, bisexual and transgender people including, for example, those affected by domestic violence or violence from others in or around their home.
- 3.6 ***Age :*** homelessness has no age boundaries.

#### **4. Areas of Focus for the Equalities Impact Assessment**

- 4.1 The project does not directly discriminate in terms of any of the relevant legislation (Race Relations Act, Disability Discrimination Act, Sex Discrimination Act, Equal Pay Act and Human Rights Act).
- 4.2 The focus of the assessment is therefore to consider whether the project might indirectly discriminate against any of the equality groups in any of the following ways:
  - by excluding a specific equality category or sub group
  - by affecting some equality categories or sub-groups disproportionately
  - if the service cannot be accessed equally by all equality categories
  - if there are barriers that might inhibit access to the service or its benefits
- 4.3 Arising from this analysis, a number of issues have been identified where the project might have an adverse effect on one of more of the equality categories and appropriate action has been identified to mitigate each effect. (See Appendix A).

#### **5. Information and Data**

- In carrying out the assessment, a number of data sources were used. These included:
- information available from the Housing service in respect of households applying as homeless, threatened with homelessness or already living in the hostels.

## **6 Consultation**

Consultation to inform this assessment has included the following:

- Service users, Housing Association, other partners and staff were all consulted in the course of homeless service reviews during 2007 and further reviews in 2008

## **7 General**

The Hostel Reconfiguration Project was developed with a focus on equality particularly by aiming to provide temporary housing that could better meet the needs of the range of households requiring temporary accommodation (TA).

As TA contains a proportionately larger number of the more vulnerable households in the Borough the project is, by its nature, benefiting those households who might more frequently appear in the groups that are most disadvantaged or, possibly, discriminated against. For example, households from a BME background feature considerably higher in the housing service compared to the proportion in the Borough's population and, thereby, feature in a higher proportion in TA.

In addition the existing hostels consist of half the properties actually being rooms in a shared house where occupants of different families share bathrooms, toilets and kitchens. The hostel units are also not suitable for people with more than a minor mobility problem

## **8. Mitigating measures**

Appendix A below sets out actions which have, or will be, taken to mitigate potential for adverse effects that the project might have for individual equality groups. These can be summarised as follows:

- Ensuring accessibility is a feature of refurbishment works and reprovision
- Ensuring properties of different sizes and geographic areas are created.
- Ensuring that the Council retains nomination rights to the hostel units
- Ensuring that the SLA and Supporting People contract for Housing Management and SP services reflect the needs for support and services for the range of clients whom will occupy the hostel units
- Ensuring equality of access to the permanent rented stock being created

**Appendix A: Temporary to Permanent Housing Initiative - Equality Impact Assessment Issues and Mitigating Measures**

<i>Issue</i>	<i>Potential Adverse Effect</i>	<i>Actions to date</i>	<i>Future action(s)</i>	<i>Target Outcome</i>	<i>Lead officer</i>	<i>Timescale</i>
Ensuring accessibility is a feature of refurbishment works and re-provision	People with a mobility difficulty would not be catered for and might have to be placed in poorer standard Temporary Accommodation	Accessibility is feature of works to remaining hostels and two new hostels created will meet accessibility requirements	Ensure works are completed to meet standards required	Hostels cater for mobility needs of clients	David Gibson	By completion of works in 2008
Ensuring properties of different sizes and geographic areas are created.	Unable to cater for range of client groups and/or too many households placed away from roots, support, schools, GP, work, etc.	Change of use of some hostels to permanent housing and being replaced with new provision with better geographic spread	Ensure proposed works and new hostels are created as planned	Hostel provision has better geographic spread	David Gibson	By completion of Project in 2008
Ensure the Council retains nomination rights to the hostel units	Hostels being used for non priority need groups or not the client groups for which Project intended	New SLA to include full nomination rights for LBB as agreed in preliminary negotiations	Complete work to agree and sign SLA	Full nomination rights for LBB	David Gibson	June 2008
Services reflect the needs for support and services for the range of clients	Amongst the most vulnerable people in the Borough not receiving adequate services and support	Plans in place for revised SLA and for new Supporting People contract	Complete new SLA and SP contract	Suitable support services available	David Gibson	July 2008
equality of access to the permanent rented stock being created	Permanent stock ends up being let in inequitable way	Intention to publicise refurbished stock through Choice Based Lettings system	Ensure advertise stock via CBL system	Stock is let reflecting the Allocations Plan	Lynnette Chamielec	End 2008/9 financial year