

Equality Impact Assessment:

Purpose of the Equality Impact Assessment:

The Equality Act 2010 introduced a Public Sector Equality Duty (PSED) requiring public bodies to give due regard to the need to:

- Eliminate unlawful discrimination
- Advance equality of opportunity
- Foster good relations

Consideration must be given to the protected characteristics covered by the Equality Act. Assessments should 'consider relevant evidence relating to persons with protected characteristics in relation to assessments of impact'.

The purpose of an Equality Impact Assessment (EQIA) is to ensure that policies, functions, plans or decisions (hereafter referred to as 'policy') do not create unnecessary barriers for people protected under the Act. Where negative impacts are identified these should be eliminated or minimised, and opportunities for positive impact should be maximised.

Screening is a short exercise to determine if a policy is relevant to equality and whether a full EQIA should be carried out.

Title/description of the policy	Rapid Rehousing Transition Plan (RRTP)
Name of the person(s) carrying out the assessment?	Lewis Hannah Rosemary Mackinnon
Service and Department	Community Services (Housing)
Date of assessment	01/05/2019
What are the aims and objectives of the policy/function/strategy?	
<p>This RRTP sets out how Highland Council and key partners plan to make the transition from the current position in respect of homelessness to a Rapid Rehousing approach, over a five year period from 1 April 2019 to 31 March 2024. It sets out proposals to rebalance the local housing system to support improved outcomes for homeless and potentially homeless people, with a focus on increasing prevention and early intervention; reducing length of stay in temporary accommodation and temporary accommodation stock, in favour of providing permanent accommodation and improving flow through the system, increasing access to housing across all tenures. It provides:</p> <ul style="list-style-type: none">• A detailed evidence base in respect of the current and projected homelessness pressures, temporary accommodation position and balance between housing need and supply.• Priority outcomes and a vision for 2019-2024.• An Action Plan setting out how the Council and partners intend to achieve the vision.• The estimated costs / resources required to achieve the transformation by 2024	

Who may be affected by the policy	The provisions contained within the R RTP will impact on: <ul style="list-style-type: none"> • homeless or potentially homeless households seeking advice or assistance under the terms of the homeless legislation; • Highland Council staff • non homeless housing applicants and transfer applicants • 3rd Sector partners and social landlords • Private Rented Sector landlords 		
How have stakeholders been involved in the development of the policy?	Yes – see consultation section		
<i>Which parts of the public sector duty is the policy relevant to?</i>			
1. Eliminate unlawful discrimination	<input checked="" type="checkbox"/>	The service is required to be delivered in a non-discriminatory manner. All homeless/potentially homeless households will be provided with a Homeless/ Housing Options service.	
2. Advance equality	<input checked="" type="checkbox"/>	The service aims to support the most vulnerable households to access a Homeless/ Housing Options service and allow them to sustain or obtain accommodation. This may mean taking steps to meet the needs of people from protected groups where these are different from the needs of other people.	
3. Promote good relations	<input checked="" type="checkbox"/>	The service aims to improve integration into communities for all vulnerable homeless households	

Screening: Which of the protected characteristics is the policy relevant to?
Tick and briefly describe any likely equalities impact (positive/negative/neutral).

The service has the potential to positively impact on groups below through delivery that will meet the needs of individuals.

Characteristic	Positive	Negative	Neutral	comments
Gender	X	X		More men than women present as homeless, but women are also affected as lone parents and victims of domestic / sexual abuse.

Age	X	X		Young people more likely to present as homeless
Disability	X	X		Mental health in particular, and people with complex needs which may be health related.
Religion or Belief			X	No evidence of different impact
Race			X	Some national evidence around impact of homelessness on White Other race group. Also Gypsy Traveller families may have difficulties accessing the service.
Sexual Orientation			X	Some national evidence around impact of homelessness on young LGBT
Gender reassignment			X	As above – but limited
Pregnancy/maternity	X			There is evidence that the needs of pregnant women are more difficult to meet in existing models of temporary accommodation.
Marriage and Civil Partnership*				N/A

*applies only to Employment and the duty to give regard to the elimination of discrimination

Recommend this policy for full Equality Impact Assessment?

Yes/No

If the answer is "Yes", continue to the next section. If the answer is "No", please give brief reasons here.

Yes

Equality impact Assessment:

Evidence and consultation

What existing sources of information have you gathered to help identify how people covered by the protected characteristics may be affected by this policy or service? Eg Consultations, national or local data and/or research, complaints or customer feedback. Are there gaps in available data?

Consultation:

Service user consultation is planned as part of the actions contained within the RRTP, this will commence late 2019.

Initial consultation has been carried out with third sector partners, social landlords have also been consulted through the Highland Housing Register Management and Officer groups. A series of stakeholder conferences will be held from late 2019.

Consultation with the Private Rented Sector is being carried out by national homeless charity Crisis, a programme of engagement and consultation with the sector is planned thereafter commencing late 2019.

Data Analysis

Statistical analysis of homeless households was assessed and key findings have informed this EQIA. Key data is included within the RRTP. There are also Highland and Scotland wide statistics relating to homelessness equality groups in Appendix 1 of this EQIA, specifically for gender, age and disability.

There are also some national reports on the impact of homelessness on particular groups referenced in Appendix 1.

Data Gap

There is limited data on equality groups and homelessness other than those referred to above.

During 2017/18 there were 207 (18.4%) homeless applications closed due to lost contact before a homeless duty could be discharged.

There is limited data available in relation to Private Rented Sector tenants and tenancies in respect of equalities, this will be addressed as part of the consultation and engagement with that sector.

Impact

- a) Describe any evidence of, or potential for, negative impact, and/or
- b) Does the policy contribute positively to the promotion of equality on any particular group

Gender:

44% of all homeless applicants in Highland are single male applicants. Women are more likely to be affected by homelessness due to domestic and sexual abuse and as

	<p>lone parents. The actions contained within the RRTP seek to deliver rapid rehousing for homeless applicants irrespective of gender. Currently housing supply does not meet the demand presented by this equality group, it is hoped the actions contained within the Highland RRTP will have a positive impact on this.</p>
<p>Age:</p>	<p>29% of all homeless applicants in Highland are young people aged 25 or under.</p> <p>Around 8% of homeless applicants have been looked after children. In 2017/18, 62 people had left care 5 or more years ago and 21 within the last 5 years. The Council's strategic approach to homelessness includes the implementation of a protocol on accommodation for looked after children to prevent homelessness;</p> <p>The RRTP contains some prevention measures and alternative temporary accommodation models which will benefit this equality group. Impact likely to be positive.</p>
<p>Disability:</p>	<p>41% of homeless service users assessed for housing support have a mental health issue. In some instance this may overlap with other indicators of complex needs eg. in 2016/17 24% assessed were also found to have a drug or alcohol dependency issue and a further 34% were found to need support with basic independent living skills.</p> <p>The development of a Housing First model within the RRTP will reduce inequalities of outcomes for people with mental health problems, those who have complex or high support needs, or who have experienced repeat homelessness.</p> <p>Service users with complex needs within this Equalities group find it challenging to positively engage with more traditional methods of support delivery / supported accommodation and as a result can be excluded from services due to perceived non-compliance. The Housing First approach will provide an alternative model of addressing the needs of this Equalities group and address this equalities issue.</p> <p>The potential introduction of higher rates of allocation to homeless households to achieve Rapid Rehousing may have a negative impact on the non-homeless applicants and transfer list applicants awaiting accessible or adapted accommodation potentially through longer waiting times. Measures to mitigate this risk will be explored within the HHR Allocations Policy Review and separate EQIA being carried out as part of that process during late 2019. This</p>

	EQIA will be updated in due course with the outcome of that piece of work.
Religion or belief:	There is no evidence of positive or negative impact on this Equality group through the implementation of RRTP
Race:	<p>In terms of homeless applicants, Highland has a higher proportion than national average of white other (Highland 8% , Scotland 3%), this is predominantly Eastern European. Other equalities race statistics shown in Appendix 1 do not indicate any significant issues in Highland. We will ensure that we continue to meet the needs of households who may not have a good understanding of English through the ready provision of interpretation services across all measures contained within the RRTP.</p> <p>There is limited information on Gypsy/Traveller families locally and their ability to access a Homeless / Housing Options Service, this will be addressed in the Actions section of this EQIA. The Impact of the Plan is likely to be positive</p>
Sexual Orientation:	National research indicates that homeless LGBT young people more likely to become homeless than non-LGBT young people, and are less likely to seek help or support than non-LGBT homeless young people and that when they do, a limited understanding of the experience of LGBT homeless youth and an assumption of heterosexuality by some service providers poses further risks of discrimination.
Gender reassignment:	See above for potential impact on Trans people.
Pregnancy/maternity:	<p>20% of all homeless applicants are single parents with children as shown in Appendix 1.</p> <p>Breaches of the Unsuitable Accommodation Order indicate that a local authority has failed to provide accommodation which is suitable for families or pregnant women. Appendix 1 details breaches of the Order in Highland over the past 3 years.</p> <p>The actions contained within the Highland RRTP to use less hostel type (HMO) temporary homeless accommodation and develop alternative self-contained models of temporary accommodation will have a positive impact on this and other Equalities Groups.</p>

Marriage and civil partnership:	Not applicable
General / Non Homeless Housing Applicants	<p>There is potential for a Rapid Rehousing approach to the review of the Highland Housing Register (HHR) Allocations Policy to have a negative impact on non-homeless waiting list as well as transfer list housing applicants. This could potentially be caused by the introduction of higher rates of allocation to homeless households, resulting in less housing allocations being available to non-homeless waiting and transfer list applicants.</p> <p>The full extent of this will be evaluated as part of the HHR Allocations Policy through Points modelling exercises review and will be subject to a separate EQIA as part of that review process. This will potentially have a negative impact on all non-homeless Equalities groups.</p> <p>Measures to mitigate this risk will be explored within the HHR Allocations Policy Review and separate EQIA being carried out as part of that process during late 2019. This EQIA will be updated in due course with the outcome of that piece of work.</p>
<p>Socio-economic impact</p> <p>Socio- economic disadvantage is typified by living on a low income compared with others and which limits access to opportunities and services, eg housing, transport, employment and training, education. It can be experienced in places, living in deprived areas or remote and rural areas and can affect particular groups of people, and may also impact on health inequalities.</p> <p>Homelessness is both a cause and result of socio-economic disadvantage. The RRTP is intended to improve outcomes for homeless people, taking a person-centred approach and which will address socio-economic disadvantage. A key aim of the plan is to reduce the amount of time spent in temporary accommodation and to provide settled, mainstream housing as quickly as possible, minimising the adverse effects of homelessness on health, including mental health, employment, etc.</p> <p>For homeless people with multiple and complex support needs beyond housing, and who may be furthest away from the job market, a Housing First model is recommended which will link the client to other services to help tackle other issues they may have. Further partnership working is required to develop a Housing First model appropriate to Highland and to ensure partner services can provide the intensive holistic support required to make this work. Such an approach should ensure there is a focus across agencies to prevent homelessness and will also support homeless people to engage with the appropriate local services and agencies to improve their health and wellbeing and tackle deprivation, poverty and low incomes</p>	

Justification	
<p>If negative impact is identified, can this be justified?</p>	<p>We do not believe that the RRTP will cause a negative impact on homeless service users. It is expected that the implementation of Rapid Rehousing in Highland will result in positive impacts for those service users due to improved outcomes for homeless households.</p> <p>Throughout Rapid Rehousing a Housing Options/ Homeless service will continue to be provided to all service users regardless of age race, disability, religion or belief, sex, gender re-assignment, sexual orientation, pregnancy or maternity. No groups will be excluded to enable Highland Council to meet its statutory obligations, and, in keeping with the Scottish Social Housing Charter, we will find ways of understanding the rights and needs of different customers and delivering services that recognise and meet these.</p> <p>However as outlined above, there is a risk of negative impact to non-homeless housing applicants irrespective of their Equality group due to the expected increase in the percentage of housing allocations to homeless households required to achieve Rapid Rehousing.</p>
Mitigation	
<p>Can the potential for negative impact on particular groups be removed or minimised?</p>	<p>The Plan is intended to positively impact on homelessness and should have positive impact on homeless applicants with protected characteristics.</p> <ol style="list-style-type: none"> 1. Further modeling of points and allocations quotas will be carried out as part of the HHR Review, this review will be subject to consultation with partners, service users including housing applicants and elected members. 2. Development of closer working relationship and referral processes with Highland Private Rented Sector landlords to improve access to the PRS for HHR Housing Applicants.
Actions	
<p>Are there actions identified to advance or promote equality, or to mitigate potentially negative impact? Please detail or attach an action plan.</p>	
<p>During 2019/20 we will:</p> <ol style="list-style-type: none"> 1. Consult with Homeless service users and Housing Applicants on the delivery of our Housing Options / Homeless Service and the actions contained within our 	

RRTP.

2. Explore how Housing Officers offer / promote availability of the Housing Options / Homeless Service to Gypsy Travelers.
3. Assess information on lost contact Homeless outcomes to understand who is not engaging including whether they fall into a protected group (e.g. young people) with a view to ensuring that a wide range of effective engagement methods are used.
4. Offer LGBT awareness training to Housing Officers
5. Explore training and awareness needs around RRTP with partner agencies, Social Landlords and PRS landlords and how to meet these.
6. Work with Principal Housing Officers to offer mental health / drug & alcohol awareness training to Housing Officers as part of ERD processes and improve awareness and understanding of mental health.
7. Work with Homeless Policy Lead to improve working with partner agencies and voluntary organisations to ensure that there is 'no wrong door' to the service. This will ensure that people who are remote from or who do not wish to engage with formal services have the opportunity to access Homelessness / Housing Options Service by other means.
8. Consult further with the PRS to examine the potential to work closer with the sector and develop housing applicant referral processes. This piece of work will also examine potential Equalities issues around accessing and sustaining tenancies in that sector to address the data gap highlighted above.
9. Work with HHR partners during the HHR Allocations Policy Review to ensure that Equalities issues identified are mitigated through the EQIA carried out as part of that process.
10. Review the delivery of services aimed at preventing homelessness for women and children experiencing domestic or sexual abuse
11. Establish Business Case for developing Council owned Specialist Accommodation for clients with high support needs.
12. Review and update this EQIA and the actions contained within it as required and as the RRTP evolves over its implementation period of 2019-2024

Please provide details of arrangements to monitor and review the policy and any associated actions.

RRTP outcomes and Actions will be monitored and reviewed by the RRTP Management Group and reported to the Council's Care, Learning and Housing Committee.

We will also monitor and evaluate our Feedback Questionnaires completed by Housing Options / Homeless Service Users as part of their homeless journey and incorporate this into the ongoing review and development of the RRTP.

Full impact assessments require to be published, please state where the EQIA will be published:

https://www.highland.gov.uk/downloads/download/404/equality_impact_assessments

Equality Impact Assessment Sign off: For completion by Director or Head of Service

1. Please check if you are satisfied that the following elements of the EQIA have been considered:

- Gathering information
- Consultation and involvement
- Assessing impact for all protected characteristics
- Mitigating actions identified (if required)
- Opportunity to promote equality
- Arrangements to monitor and review
- Publication arrangements

2. a) Are you prepared to sign off the EQIA? YES NO

b) If "NO" provide details of why and next steps

Name



Position HEAD OF HOUSING

Date: 10/7/19

For publication and monitoring, please send a copy of the completed EQIA to: equal.opportunities@highland.gov.uk or contact the Policy Team for support on tel 01463 702094.

Appendix 1

Equalities Impact Assessment, Rapid Rehousing Transition Plan

Highland and National Statistics in relation to the Protected Characteristics

Scotland Wide Analysis 2017 -18 Homeless Applications, Scottish Government Statistics

Table 6a: Age & gender of all main applicants 2017-18 – *Total number Highland may differ slightly due to different collection dates in period*

Gender	Age band	National		Highland	
		Number	Percentage of all claims	Number	Percentage of claims
All applicants		34,972	100%	1171	100%
Male	Total Males	19,112	54.6	636	54.35
	16 to 17yrs	575	1.64	7	0.59
	18 to 24yrs	3,693	10.55	121	10.34
	25 to 34yrs	6,169	17.63	207	17.69
	35 to 49yrs	5,951	17.01	178	15.21
	50 to 59yrs	1,868	5.34	74	6.32
	60yrs and over	856	2.44	49	4.18
Female	Total Females	15,860	45.4	534	45.65
	16 to 17yrs	746	2.13	11	0.94
	18 to 24yrs	3,870	11.06	133	11.36
	25 to 34yrs	5,128	14.66	186	15.89
	35 to 49yrs	4,293	12.27	124	10.59
	50 to 59yrs	1,288	3.68	52	4.44
	60yrs and over	535	1.52	28	2.39

Applications by Banded Age	Highland	
	2017/2018	
	N	%
16 - 17	44	4%
18 - 25	288	25%
26 - 59	748	64%
60+	80	7%
All	1160	

Household type of homelessness applicants in Scotland

Applications by household type and sex 2017/18		Highland	%	Scotland	%
		Total 17/18 1160		34,972	
Single Person	Male	507	44%	15,944	46%
	Female	236	20%	7,208	21%
	All	743	64%	23,152	66%
Single Parent	Male	58	5%	1,513	4%
	Female	175	15%	5,954	17%
	All	233	20%	7,467	21%
Couple	Male	26	2%	1,157	3%
	Female	45	4%	1,592	5%
	All	71			
Couple with Children	Male	42	4%	822	2%
	Female	55	5%	782	2%
	All	97			
Other	Male	6			
	Female	4			
	All	10			
Other with Children	Male	3			
	Female	3			
	All	6			

Applications by household type			
	Highland	%	Scotland %
	Total 17/18		
Single Person	743	64%	66%
Single Parent	233	20%	21%
Couple	71	6%	3%
Couple with Children	97	8%	5%
Other	10	1%	2%
Other with Children	6	0.05%	2%
All	1160		

Note: Totals may not sum to 100% due to rounding.

Table 8a: Ethnicity of all main applicants, 2007-08 to 2017-18

Household type	Highland	Highland	Scotland	Scotland
	2017-18	2017-18	2017-18	2017-18
Total	1,160	100%	34,972	100%
A: White: Scottish	870	75%	26,953	77%
A: White: Other British	153	13%	2,181	6%
A: White: Irish	4	0%	107	0%
A: White: Other	90	8%	913	3%
White: Polish¹	19	2%	570	2%
D: African	*	0%	373	1%
E: Caribbean or Black	*	0%	163	0%
C: Asian,	9	1%	440	1%
B: Mixed or multiple ethnic groups	*	0%	92	0%
F: Other ethnic group	9	1%	1,326	4%
G: Not known or Refused	0	0%	1,854	5%

*Numbers <5 are not published

Housing Support Assessment Data

Type of Support Needs	HIGHLAND		SCOTLAND	
	2016/2017 %	2017/2018 %	2016/2017 %	2017/2018 %
Mental health problem	41	41	45%	49%
Learning disability	6	7	6%	6%
Physical disability	12	13	10%	11%
Medical condition	12	10	19%	21%
Drug or alcohol dependency	24	16	25%	24%
Basic housing management / independent living skills	34	49	46%	47%

Breaches of the Homeless Persons (Unsuitable Accommodation) (Scotland) Amendment Order 2017

Year	No of Households
2016/17	3
2017/18	7
2018/19	21

Other references to equality groups and homelessness

LGBT Homelessness

<https://www.akt.org.uk/Handlers/Download.ashx?IDMF=c0f29272-512a-45e8-9f9b-0b76e477baf1>

<https://www.lgbtyouth.org.uk/national-programmes/policy-and-influencing/youth-commission-housing-and-homelessness/>

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721642/GEO-LGBT-factsheet.pdf

Homelessness and Domestic Abuse

http://www.parliament.scot/S5_Local_Gov/Inquiries/20170615_Homelessness_ScottishWomensAid.pdf

http://safelives.org.uk/sites/default/files/resources/Safe_at_home_Spotlight_web.pdf

<https://womensaid.scot/wp-content/uploads/2018/11/Ending-Homelessness-Together-1.pdf>

<https://www2.gov.scot/Resource/0042/00421042.pdf> (p28-29)

Ending Homelessness Together:

<https://www.gov.scot/binaries/content/documents/govscot/publications/strategy-plan/2018/11/ending-homelessness-together-high-level-action-plan/documents/00543359-pdf/00543359-pdf/govscot%3Adocument/00543359.pdf>