

Equalities Impacts (Updated)

Annex C

The Council has a duty to ensure that all policy decisions are considered to assess whether they have any equality impacts. All budget changes set out in this report have been screened to ensure that equality impacts have been considered where appropriate for this particular decision making activity.

A summary of the screening exercise is set out below, with most presenting no change to policy or front-line services and all subject to ongoing review by responsible officers and Cabinet Members.

Where necessary, a detailed equalities impact assessment has been carried out and is included here or will be completed prior to any final decision being made on the details of any policy or service change.

SEB	Cab	Proposed Budget Changes	Were Equalities Implications Considered	Explain how due regard to the Councils Equality Duty was given as part of the process of decision making.
		Older People Strategy	Yes	This proposal relates to efficiency savings from re-provision of in-house services in the independent sector, with no change to type of service. Council's procurement processes are adhered to and all Tenderers / potential providers are treated fairly.
		Personalisation	Yes	This is an efficiency saving as service is currently under utilised. There are no specific equalities impacts with this saving.
		Placement Review	Yes	This is an efficiency saving arising from contract negotiations. There are no specific equalities impacts with this saving.
		Procurement	Yes	This is an efficiency saving arising from contract negotiations. There are no specific equalities impacts with this saving.
		Support at Home	Yes	This is an efficiency saving arising from improved business processes. There are no specific equalities impacts with this saving.
		Transport Policy	Yes	The savings relate to removing unused budget and efficiency savings from the relet of Passenger Transport contract. The savings from the re-let of passenger transport have been generated through a competitive procurement process and by combining services to be on a multi-borough basis. There is no impact on the level of service offered to individuals as this is still identified through the assessment process. There will be a change to some of the providers offering 16 seater buses to day centres post the procurement, but this transition will be managed through close working between commissioning, the Transport Commissioning Office and individual day centres. Letters and information updates will be provided to customers of the services and their carers on a regular basis.
		Tri-Borough	Yes	This is an efficiency saving arising from improved business processes. There are no specific equalities issues with this saving.
		Use of Reserves	Yes	The use of existing reserve to smooth the path will not impact on Council's Equality Duty.
		Adults & Public Health Total	-	-
		Adults Services Total	-	-
		Alternative income sources	Yes	Fee's set in collaboration with partners responsible for specific projects. Has no direct equalities impact upon the general public.
		Building Control Income	Yes	This proposed change will contribute towards a reduction in fee levels in order to comply with regulatory framework established by central government for building control authorities.
		Employee Inflation (1%)	Yes	Not a policy change - Anticipated contractual salary uplift for service officers.
		Planning Application Fees	Yes	Additional income relates to fee charges set by central government and is covered by it's own EQIA.
		Built Environment Total	-	-
		Employee Inflation (1%)	Yes	Not a policy change - Anticipated contractual salary uplift for service officers.
		Business & Housing Total	-	-
		Contract Savings	Yes	EQIA undertaken as part of the procurement. Metrics relate to contractual savings.
		Inflation	Yes	Anticipated contractual uplift relating to inflation - not a change in policy
		City Management, Transport & Environment Total	-	-
		Built Environment Total	-	-
		Childcare - interim support budget	Yes	Overall the impact will be neutral. Support will continue to be available at the same level through DSG (dedicated schools grant).

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Children With Disabilities - Children with Disability – Parent Partnerships	Yes	None envisaged as this is a relatively small commissioning exercise.
Children With Disabilities - Creating a Tri-Borough Head of Disabled Children Post	Yes	None envisaged as this is a management level change.
Children With Disabilities - Direct Payments implemented and used for all Care Packages across the three boroughs.	Yes	Potential to have a positive impact as service users will have more choice in provision received.
Children With Disabilities - Rationalising service structures across the three boroughs	Yes	None envisaged at this stage, however any potential impact will be monitored as proposals for service reorganisation are developed.
Children With Disabilities - Tri Borough Children with Disability - Short Breaks Services	Yes	There could be a positive impact for service users by providing more choice in service provision.
Contract inflation estimated at £800k	Yes	No change in policy - inflation on existing policy decisions
Early Years Advisory Team Restructure	Yes	A more significant restructure and potential impact upon children under 5, so this may require a full EIA when the restructure is taken forwards around March 2014.
Family Recovery - post deletion with no frontline impact expected	Yes	Deletion of one Deputy Service Manager post which has been used as pilot by using a Family Therapist to provide consultation to frontline practitioners, so no significant impact upon delivery of the service to service users, no full EIA required.
Looked After Children - Adoption & Fostering trading (trading of adopters to the market)	Yes	No negative impact. Possible positive impact if there becomes a wider pool of adopters and foster carers.
Looked After Children - Children Residential Care	Yes	No negative impact expected but will be kept under review.
Looked After Children - Complex parenting assessments	Yes	There could be a positive impact as this would be a new procurement. It is envisaged that this would be fully 'fit for purpose'.
Looked After Children - LAC Supervised Contact Services	Yes	There could be a positive impact on equalities.
Looked After Children - Revised commissioning of semi-independent accommodation	Yes	Aiming to achieve a positive equalities impact in terms of improving the quality of service provision
Looked After Children - Social Care Legal Services	Yes	Positive impact on equalities through combined approach.
Play savings with no reduction in service	Yes	A possible reduction of budget as parental take-up of the service and their financial contributions enable the council to reduce its level of subsidy. No full EIA required.
Procurement savings – Early Years	Yes	The equality impact of the various contracts will be evaluated in conjunction with the individual business cases.
Procurement savings – Family support	Yes	The impact is expected to be neutral. The reduction reflects planned changes in staffing and business priorities in a range of providers, including administrative efficiencies. Impact will be carefully reviewed through contract monitoring.
Procurment Savings - Information, Advice and Guidance (IAG) for young people with learning difficulties with Destination Tracking	Yes	None envisaged. The savings reflect changes to LA statutory duties in this area. An equivalent duty to provide IAG now rests with secondary schools and is monitored by governing bodies.
Procurment Savings - Passenger Transport	Yes	Overall impact is expected to be neutral. New contract specified to ensure that journey times are not significantly longer but some clients may have changes in transport provider, passenger escort or route taken. Full impact would be known when contracts are awarded and actual contractors are ID.
Procurment Savings - Young Carers	Yes	There will be no reduction in service or change to eligibility for service. The contract award to a national provider may result in improved quality of support for young carers.
Salary Inflation estimated at £200k	Yes	No change in policy - meeting the pay award pressure merely maintains existing policy
Children & Young People Total	-	-
Childrens Services Total	-	-
Licensing legal budget, re-base budget in line with demand for legal cases	Yes	No equalities impact
Potential increase in cleansing cost recharge for markets etc linked to Ed Argar	Yes	No equalities impact (cost neutral proposal linked to saving in Cllr Argar portfolio)
Street licensing fee review - justification of current T&C fee level	Yes	No equalities impact
Business & Housing Total	-	-
2014/15 Inflation	Yes	No equalities impact
Hanging Baskets - Surplus Budget	Yes	No equalities impact

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	Household Bulk Collections - charge increase	Yes	No equalities impact. Current concessions continue.
	Increase in RMG income	Yes	No equalities impact - revenue generation through enforcement of existing policy/compliance. No specific groups targeted or unfairly disadvantaged.
	Landfill Tax Increase (£8 per tonne)	Yes	No equalities impact
	Parks - reduce grounds maintenance	Yes	No equalities impact - general reduction across the service no specific groups targeted or disadvantaged
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	Reduction in training and supplies & services budget	Yes	No equalities impact
	Street Markets - recover waste collection/disposal costs from traders (linked to Daniel Astaire)	Yes	No equalities impact (cost neutral proposal linked to growth in Cllr Astaire portfolio)
	Trade Waste Charges - increase	Yes	No equalities impact
	Transfer from Reserves	Yes	No equalities impact
	Urinals and similar PC facilities - no budget allocated	Yes	No equalities impact - maintains existing provision
City Management, Transport & Environment Total		-	-
	£50k growth to reverse one off Crossrail income windfall in 13/14 (included in 13/14 budget agreement but needs to be flagged income Pest Control	Yes	No equalities impact
	Reconfigure Response Warden service	Yes	No equalities impact
	LA03 fee review by Home office, due during May but potentially impacted by hemming decision (provisional estimate, likely to be higher)	Yes	No equalities impact
	Reduction in community safety commissioning salary budget offset by grant	Yes	No equalities impact
Community Protection, Premises & Parking Total		-	-
City Management Total		-	-
	Reduced Contrib to Provisions	Yes	No change in policy - corporate financing to fund all other policy decisions (each considered for equalities separately)
Finance, Customer Services & Property Total		-	-
Corporate Items Total		-	-
	City Hall Business Rates Revaluation	Yes	No change in policy - simply a price change
	Council House Rent Income Loss	Yes	Implications already considered as part of Council House redevelopment - this is simply the consequent (temporary) loss of rent income during redevelopment
	Inflation	Yes	No change in policy - rather the acknowledgement of inflationary cost pressures to maintain same level of service
	Tri-Borough Accom Costs	Yes	Recognising the costs of accommodation for Westminster Staff located in other Tri-Borough premises. Equalities impacts previously considered as part of the move to Tri-Borough
	Uplift in Income - Rent Reviews Etc	Yes	Not a change in policy - rent uplifts are in accordance with already agreed leases or conform to the policy of charging for new lettings on commercial property at market rents
Finance, Customer Services & Property Total		-	-
Corporate Property Total		-	-
	Contract Inflation - approx 2%	Yes	Not a change in policy - inflation uplift to continue existing policies
Community Total		-	-
	Contract Inflation - approx 2%	Yes	Not a change in policy - inflation uplift to continue existing policies
	Estimated Salary inflation in 14/15	Yes	Not a change in policy - inflation uplift to continue existing policies
	Increased Insurance Charges to HRA	Yes	Change reflects actual allocation of 2014/15 charges (existing policy (and statute) requires the correct charges to be made
	Savings from Managed Services	Yes	Contract savings not adversely affecting service delivery
	Savings in Serco contract - Customer Contracts	Yes	Considered as part of the MSP proposals
	Savings in Serco contract - Information Services	Yes	Considered as part of the MSP proposals
Finance, Customer Services & Property Total		-	-
Finance And Operations Total		-	-

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	Rough Sleeping - Decommission Services no longer Strategically fit for purpose	Yes	<p>As a service delivering a tailored service to individual clients, equalities and diversity have a high degree of relevance to these services.</p> <p>The service will continue to provide housing related support to vulnerable rough sleepers.</p> <p>Equality and Diversity is also a core objective of CLG's Quality Assessment Framework that each contractor will be required to submit annually.</p> <p>Equalities Impact Assessment included here</p>
Adults & Public Health Total		-	-
	Contract inflation - Housing Options Service	Yes	Inflation on contract price allows existing policy to be maintained
	Housing Benefits - Review Bad Debt Provision	Yes	Bad debt provision relates to the efficiency of paying Housing Benefit correctly to eligible households and is then claimed back from central government. The take-up of Housing Benefit is reflective of the local communities who require assistance with housing costs
	Housing Options Service- ICT Telephony	Yes	<p>The annual (housing) equalities reports looks at access to housing and housing services with the outcome to ensure they are fair and accessible. Key findings are the use of the Housing Options Service reflects this. The additional spend reflects increased front-line service costs to meet increasing demand.</p> <p>Equalities Impact Assessment included here</p>
	Housing Options Service- Welfare team etc.	Yes	<p>The annual (housing) equalities reports looks at access to housing and housing services with the outcome to ensure they are fair and accessible. Key findings are the use of the Housing Options Service reflects this. The additional spend reflects increased front-line service costs to meet increasing demand.</p> <p>Equalities Impact Assessment included here</p>
	Housing Options Service- Welfare team etc. (part year)	Yes	<p>The annual (housing) equalities reports looks at access to housing and housing services with the outcome to ensure they are fair and accessible. Key findings are the use of the Housing Options Service reflects this. Front-line service reduction will only take-place should numbers reduce and the availability of housing advice and prevention services will be emphasised.</p> <p>Equalities Impact Assessment included here</p>
	Salary Inflation	Yes	Inflation does not change existing policy - rather maintain it at the same level of delivery
	Supporting People - Renegotiate Supported Housing Contract	Yes	Westminster commissions a range of supported housing services for a variety of vulnerable groups including rough sleepers, single homeless, people with mental health problems and young people. These services are provided from a range of buildings including 24 hour hostels, shared housing and for people living in their own homes. All reductions have been made through negotiating lower unit costs with the service provider organisation without affecting the level of front-line service delivery i.e. all 24 hour services will retain this level of support; savings have been secured across a range of services through for example reducing agency staff cost, reducing levels of management, changing night shift arrangements
	Temporary Accommodation Strategy	Yes	The annual (housing) equalities reports looks at access to housing and housing services and outcome to ensure they are fair and accessible. Key findings are the use of the Housing Options Service reflects this and the provision of good quality affordable and suitable temporary housing will meet the needs of households in housing need
Business & Housing Total		-	-
Housing General Fund Total		-	-
	1% Pay increase	Yes	There is no impact on any groups.

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	Arts Commissioning ceased	Yes	Steps have been taken to mitigate the impact of decision made in 2013/14 budget by giving 12 months notice to groups funding activities for older people, disability groups and vulnerable adults. Additionally the council has and continues to offer advice and information on funding sources and potential partners.
	Church St Libt NNDR increase	Yes	There is no impact on any groups.
	Home Library Service Restructure	Yes	The service is now more efficient as a result of the restructure and therefore the savings do not have any impact on customer groups.
	Income target increase	Yes	This may have a positive impact as additional income will be raised through increasing the provision for nationality checking and offering equal marriage in line with legislative change
	New LMS contract savings	Yes	There is no impact on any groups.
	Premises inflationary costs	Yes	There is no impact on any groups.
	Community Total	-	-
Libraries & Culture Total			
	Bay sensors maintenance	Yes	No equalities impact - implementation of bay sensors allows us to effectively manage parking space. Information on parking availability will be more accessible to all groups.
	fee increase permits	Yes	No equalities impact - no specific groups targeted or disadvantaged
	fee increase suspension	Yes	No equalities impact - no specific groups targeted or disadvantaged
	Growth of internal management function	Yes	No equalities impact
	increase in casual (bay sensors)	Yes	No equalities impact - no specific groups targeted or disadvantaged
	Net cost pressure on income	Yes	No equalities impact
	ON Street Contract Savings	Yes	No equalities impact
	Paid for Parking - Forecast & Cost Savings	Yes	No equalities impact
	Savings from new BPO & Tech Contract	Yes	No equalities impact
	Community Protection, Premises & Parking Total	-	-
Parking Total			
	Smoking Contracts Change	Yes	A Joint Strategic Needs Assessment for Tobacco Control was prepared. Based on the prevalence information, the specification was created and targets were set to increase the number of people quitting smoking for those groups where there is greatest health risk.
	Adults & Public Health Total	-	-
Public Health Total			
	Porchester health and fitness- increase in revenue	Yes	The project involves the expansion of the health and fitness facilities at the Porchester Centre through the utilisation of redundant mechanical and electrical plant space which was previously inaccessible to the public. Groups with a protected characteristic are therefore not affected by this programme of works as the new facility is universal and available to the whole community. The new facilities are fully accessible to those with disabilities and meet the associated Building regulations and 'Inclusive Fitness Initiative' requirements. The delivery of the new project has not resulted in any significant changes to the activity programme or charging policies which both seek to maximise access for the whole community.
	Community Total	-	-
Sports & Leisure Total			
	Contract Inflation across portfolio	Yes	No change in policy - inflation merely allows existing policy to be maintained
	Estimated Salary inflation across portfolio	Yes	No change in policy - increased budget for pay award to maintain same levels of service
	Savings will be found from cost -cutting on stationary, insignia, printing, and	Yes	These are minor savings resulting from procurement efficiencies - they do not alter existing policy
	Built Environment Total	-	-
	Committee Services - savings from print, refreshment, charity income and miscellaneous Members Allowances	Yes	These are minor savings resulting from procurement efficiencies - they do not alter existing policy
	Contract Inflation across portfolio	Yes	Inflation increase to enable existing policies to be continued unchanged
	Coroner Support - savings to goods/services purchased by Coroners	Yes	These are minor savings resulting from procurement efficiencies - they do not alter existing policy
	Coroners Services - additional costs due to legislative changes	Yes	Statutory changes requiring additional staffing resources - no detrimental change to service provision for any group.
	Estimated Salary inflation across portfolio	Yes	Inflation increase to enable existing policies to be continued unchanged

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	Increase in external legal income	Yes	No change in policy - this is an expected increase in customer uptake against existing policies
	Inflation in contracts Pensions Admin CRB OH, training EAP etc	Yes	Inflation increase to enable existing policies to be continued unchanged
	Land Charges - increased income following work to market the service and compete more effectively against private search companies	Yes	No change in policy - this is an expected increase in customer uptake against existing policies
	Managed Services - savings from Serco contract changing to contract with BT.	Yes	The Equalities impacts of this initiative had already been considered as part of the decision to implement MSP - this budget change aligns finances to that earlier policy decision
	Part year saving on pensions contract	Yes	Contractual savings - no change to policy
	Savings from Managed Services	Yes	The Equalities impacts of this initiative had already been considered as part of the decision to implement MSP - this budget change aligns finances to that earlier policy decision
	Finance, Customer Services & Property Total	-	-
	Contract Inflation across portfolio	Yes	Contract inflation pressure to allow existing policies to be maintained
	Estimated Salary inflation across portfolio	Yes	Salary inflation pressure to allow existing levels of service to be maintained
	Leader of the Council Total	-	-
	Strategic Support Total	-	-
	Grand Total	-	-

SECTION 1: DETAILS OF EQUALITY ANALYSIS

1.1	Title of EIA
	Assessment of proposals to reduce level of front-line service provision at Housing Options Service that are above the contract level late (reflecting the increase in homelessness since 2010) in 2014 if homeless numbers reduce.
1.2	What are you analysing?
	<ul style="list-style-type: none"> • What is the purpose of the policy/project/activity/strategy? • In what context will it operate? • Who is it intended to benefit? • What results are intended? • Why is it needed?
	<p>The activity covered by this EIA relates to the provision of the Housing Options Service (HOS.) Since 2010 homelessness numbers have increased as the private rented sector market has become less affordable to households on benefits.</p> <p>To respond to this increase, increased resources of c. £740K p.a. (following a successful bid to CLG via London Councils) were put into HOS over and above the contract level in place when the contract was competitively tendered. This policy relates to the proposal to reduce this additional sum on the basis of reducing homeless applications and acceptances during 2014 as presentation from the private rented sector are expected to reduce.</p> <p>This EIA does not focus on the work of HOS as a whole as this will be covered during future proposals to relet the contract.</p>
1.3	Details of the lead person completing the EIA
	<p>(i) Gregory Roberts</p> <p>(ii) Head of Supporting People and Homelessness Strategy Manager</p> <p>(iii) Housing</p> <p>(iii) grobert2@westminster.gov.uk; 020 7641 2834</p>
1.4	Date sent to Strategy Unit
	13 th February 2014
1.5	Version number and date of update
	<i>Version 1: 13th February 2014</i>

SECTION 2: EQUALITY ANALYSIS

2.1	<p>If you are planning changes to a current service, which customers from the protected groups are using the service currently?</p> <ul style="list-style-type: none"> • If you do not formally collect data about a particular group then use the results of local surveys or consultations, census data, national trends or anecdotal evidence. Do not leave any box blank.
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	<p>The annual equalities reports looks at access to housing and housing services and outcome to ensure they are fair and accessible. Key findings are:</p> <ul style="list-style-type: none"> • Ethnic minority groups continued to have higher levels of housing needs – making up 66% of the total register compared with their 50% share of the population (taking a definition of ethnic minorities as all non White British Groups) • Black and Middle Eastern continued to have the highest levels of housing need and are over represented on housing registers. Black groups made up 17% of the total register compared with their 6% share of the population and Middle Eastern groups made up 14% compared with an estimated 4% share of the population • Asian and Middle Eastern households have the greatest need for larger bedroom units – together making up 44% of those needing 3 bedroom properties or larger • Over half (52%) of housing applicants are between 25-44, which is a slight over representation, compared to their 43% share of the population. The proportion of older people on the registers was similar to their share of the population but they made up only a small proportion (3%) of the homelessness list and compared to their 11% share of the population • Less than 1% of people on the register need a fully wheel chair adapted property, which is similar to the level of need identified in the 2005 Housing Needs Survey. <p>As a result the use of the Housing Options Service reflects this breakdown and will be the groups impacted upon by the decision to reduce opening hours.</p>
2.2	<p>Are there any equality groups that are overrepresented in the monitoring information relative to their size of the population? <i>If so, this could indicate that the proposal may have a disproportionate impact on this group even if it is a universal service. Information about Westminster’s population is on the Equalities page on the WIRE.</i></p>
	<p>See above; the use of the HOS service is driven by the make-up of groups in housing need and in particular for the purposes of this EIA living in the private rented sector and in receipt of welfare benefits.</p>
2.3	<p>Are there any equality groups that are underrepresented in the monitoring information relative to their size of the population? <i>If so, this could indicate that the service may not be accessible to all groups or there may be some form of direct or indirect discrimination occurring.</i></p>
	<p>As above,</p>
2.4	<p>What other evidence can you use to assess impact? For example:</p> <ul style="list-style-type: none"> • Results of consultation or engagement activity • Analysis of enquiries or complaints • Benchmarking monitoring information with other local authorities • National research <p><i>If you do not have enough evidence you may need to take steps to fill in your information gaps – for example meeting with stakeholders, conducting surveys etc (the amount of evidence you need should be proportionate to what it is you are assessing. For example, changes to the eligibility for social care required a substantial consultation, as well as</i></p>

	<i>assessment of the numbers of people affected. However, a change to the frequency of bin collections will require less evidence to effectively assess impact).</i>
	<p>The HOS conducts customer satisfaction surveys that consistently show satisfaction levels of above 90% (even during the recent increase in homelessness)</p> <p>A service user improvement group made up of current and former users of HOS meets regularly to discuss the service and proposed policy changes.</p>
2.5	Will people from all equality groups be able to access the council service in question? Think about the customer journey and whether any barriers may exist for different groups along the way (from finding out about the service, at the access points, when receiving the service etc). <i>Separate guidance on identifying barriers is available on the WIRE.</i>
	HOS performs a statutory housing needs advice and assessment service for the Council and is thus accessible to all groups. This is underlined by the increase in numbers of homeless applications and acceptances since 2010 and illustrates the accessibility of the service. This is further supported by the fact that all individuals impacted by LHA caps were contacted directly and informed of the role of HOS and the support and assistance available.
2.6	What negative impacts or disadvantage could stem from the changes you are proposing on people from the different groups? Could any part of the policy discriminate unlawfully (this includes direct & indirect discrimination, victimisation and harassment)? <i>If there is any discrimination the action must stop immediately and advice sought.</i>
	There will be no unlawful discrimination arising from the policy change as it relates to the reduction to an increase in service provision on the basis of activity levels reducing and returning to approach 2010 levels. It does not relate to any proposal to change the type and range of service provision.
2.7	Is there anything you can do to promote equality of opportunity? This means the need to: <ul style="list-style-type: none"> • Remove or minimise disadvantages suffered by equality groups • Take steps to meet the needs of equality groups • Encourage equality groups to participate in public life or any other activity where participation is disproportionately low • Consider if there is a need to treat disabled people differently, including more favourable treatment where necessary <p>Is there anything you can do to foster good relations between people who share a protected characteristic and those who do not? This means:</p> <ul style="list-style-type: none"> • Tackle prejudice • Promote understanding
	<p>In order to ensure that the service continues to remain accessible we will continue to emphasise the availability of appointments for housing advice and assessment at a convenient time for the household. We will emphasise the importance of making contact with the Housing options Service at the earliest opportunity before any housing crisis occurs that would require attending the service on an emergency.</p> <p>This will include promoting the use of e-mailing the Housing Options Service advisors directly and contact through the website (which is currently increasing) which is not just</p>

	<p>available during opening hours.</p> <p>We will promote the use of and access to the comprehensive WCC website which contains housing advice and information on the service and free access is available in libraries and one stop shops.</p> <p>The emergency out of hours service for housing emergencies outside of the current opening hours will continue to be available.</p>							
2.8	<p>Are there changes proposed in related policy areas or services? How are you taking into account the combined impact of these changes? <i>Small changes in a policy area may cause some disadvantage, but the cumulative effect of changes in related areas could have a significant impact. A separate EIA will need to be undertaken where a number of changes are planned in a service area or where multiple changes are planned in different service areas that could impact on an equality group (for example changes in adult services, children’s service, and transport/public realm changes could lead to a significant impact on disabled people, which may not be identified by looking at the changes individually)</i></p>							
	<p>The service will continue to work closely with Adults and Children’s Services to prioritise the needs of the most vulnerable residents. Work with benefit services in monitoring the impact of welfare reform will continue and will inform decisions and assumptions regarding likely future activity levels.</p>							
2.9	<p>Considering your answers above, what are the issues, barriers, impacts you have identified and what can you do to reduce any negative impacts? Also include any issues you will need to take into account as your policy develops.</p>							
	<table border="1"> <thead> <tr> <th data-bbox="236 1160 730 1330">Column A – Issues or barriers, things to take into account</th> <th data-bbox="730 1160 1517 1330">Column B – what changes can be made to remove or reduce barriers or negative impacts (Remember to think about the Council as a whole, another service area may already be providing services which can help to deal with any negative impact).</th> </tr> </thead> <tbody> <tr> <td data-bbox="236 1330 730 1733">If numbers of homeless applications and acceptances does not reduce and approach 2010 levels then it will not be possible to reduce the level of service provision proposed and still meet the Council’s statutory duties and continued commitment to work with Adults and Children’s Services to support the most vulnerable.</td> <td data-bbox="730 1330 1517 1733">Levels of homelessness will continue to be monitored closely monthly and this will inform future resource allocation</td> </tr> </tbody> </table>	Column A – Issues or barriers, things to take into account	Column B – what changes can be made to remove or reduce barriers or negative impacts (Remember to think about the Council as a whole, another service area may already be providing services which can help to deal with any negative impact).	If numbers of homeless applications and acceptances does not reduce and approach 2010 levels then it will not be possible to reduce the level of service provision proposed and still meet the Council’s statutory duties and continued commitment to work with Adults and Children’s Services to support the most vulnerable.	Levels of homelessness will continue to be monitored closely monthly and this will inform future resource allocation			
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2.10	<p>Now you have considered the potential or actual effect on equality, what action are you taking now? Document the reasons for your decision.</p> <table border="1"> <tbody> <tr> <td data-bbox="236 1850 730 1995">1. No major change (no impacts identified)</td> <td colspan="2" data-bbox="730 1850 1517 1995">Your analysis demonstrates that the policy is robust and the evidence shows no potential for discrimination and you have taken all appropriate steps to advance equality & foster good relations between groups.</td> </tr> <tr> <td data-bbox="236 1995 730 2067">2. Adjust the policy</td> <td colspan="2" data-bbox="730 1995 1517 2067">You will take steps to remove barriers or to better advance equality.</td> </tr> </tbody> </table>		1. No major change (no impacts identified)	Your analysis demonstrates that the policy is robust and the evidence shows no potential for discrimination and you have taken all appropriate steps to advance equality & foster good relations between groups.		2. Adjust the policy	You will take steps to remove barriers or to better advance equality.	
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2. Adjust the policy	You will take steps to remove barriers or to better advance equality.							

	<p>3. Continue the policy (impacts identified)</p>	<p>You will adopt your proposal, despite any adverse effect provided you are satisfied that it does not unlawfully discriminate and it is justified.</p>
	<p>4. Stop and remove the policy</p>	<p>There are adverse effects that are not justified and cannot be mitigated. The policy is unlawfully discriminating.</p>
	<p>2. the implementation of the policy is dependent upon activity levels returning to approach 2010 levels. As a result the policy will be adjusted according to how numbers of homeless households change during the year and is monitored closely on a monthly basis.</p>	

SECTION 3: ACTION PLAN

3.1 Complete the action plan if you need to reduce or remove the negative impacts you have identified, take steps to foster good relations or fill data gaps.

Please include the action required by your team/unit, groups affected, the intended outcome of your action, resources needed, a lead person responsible for undertaking the action (inc. their department and contact details), the completion date for the action, and the relevant RAG rating: R(ed) – action not initiated, A(mber) – action initiated and in progress, G(reen) – action complete.

NB. Add any additional rows, if required.

This section is for actions related any of the 9 protected characteristic: Age, Disability, Gender, Gender reassignment; Pregnancy & maternity Race, Sexual Orientation, , Religion/Belief	Action Required	Equality Groups Targeted	Intended outcome	Resources Needed	Name of Lead, Unit & Contact Details	Completion Date (DD/MM/YY)	RAG
	Continue to update the website and promote the use of direct e-mailing HOS officers and contact through the website	All	Households requiring housing advice do not need to 'drop-in' to HOS to receive this		Vici Midwinter 020 7641 2029 vmidwinter@westminster.gov.uk	30/03/2011	A
	Advise households contacting the Housing Options Service of the option to make appointments to see housing advisors.	All	Households who make use of the Housing Options Service are able to make appointments	Within existing resources	Vici Midwinter 020 7641 2029 vmidwinter@westminster.gov.uk	30/03/2011	A

THIS SECTION TO BE COMPLETED BY THE RELEVANT SERVICE MANAGER

SIGNATURE:

FULL NAME:

UNIT:

EMAIL & TELEPHONE EXT:

DATE (DD/MM/YYYY):

THIS

WHAT NEXT?

Please email your completed EIA to David O'Leary: doleary@westminster.gov.uk

SECTION 1: DETAILS OF EQUALITY ANALYSIS

1.1	Title of EIA
	Assessment of the impact of decommissioning of some housing related support services for rough sleepers and single homeless people and of renegotiating contract values of existing supported housing provision.
1.2	<p>What are you analysing?</p> <ul style="list-style-type: none"> • What is the purpose of the policy/project/activity/strategy? • In what context will it operate? • Who is it intended to benefit? • What results are intended? • Why is it needed?
	<p>The activity covered by this EIA relates to the commissioning of supported housing services.</p> <p>Supported housing services commissioned by the Council are generally those that provide ‘housing related support’ linked to enabling vulnerable people to maintain their independence in the community. This includes:</p> <ul style="list-style-type: none"> • 24 hour hostels for rough sleepers, • women’s refuges, • offender services, • sheltered housing for older people • housing services for people with mental health problems and learning disabilities. <p>Thus there is a direct link between housing related support services and delivery of mainstream Adults, Children’s and Housing budgets e.g. delivering targets to reduce the use of residential care placements for people with mental health problems, learning disabilities and care leavers are dependent upon high quality supported housing services that are the subject of this report</p> <p>Delivery of outcomes</p> <p>The level of acute housing related support need presented in particular by rough sleepers is unique in the country . This demand for such supported housing services in an area of acute housing shortage has required a dynamic approach to service commissioning and this is reflected in the achievements since 2003:</p> <ul style="list-style-type: none"> • Expanded choice by opening 16 new supported housing services, including two extra care housing service and services for people with physical disabilities and young people • Completed 9 tender exercises for services that have expanded capacity, improved service quality and performance and value for money • Improved move-on performance against national performance Indicators from 60% positive move-on in 2004/05 to 75% in 2012/13 with over 1500people moving on positively from services last year <p>As part of delivering a balanced housing commissioning budget in 2014/1 £950K of savings will be delivered through reduced commissioning of housing related supported services. Services that are not meeting a core need for the most vulnerable, delivering wider council objectives and/or are provided from premises that are no longer fit for purpose will be decommissioned. Contracts for other services will be renegotiated to provide existing provision more efficiently without impacting upon front-line service delivery in terms of the vulnerability of individuals supported or the level of service provided.</p>

	<p>The commissioning strategy is designed to continue the approach of investing in services whilst increasing the efficiency and performance of the sector whilst meeting Council’s strategic goals. For example Westminster’s commitment to ending rough sleeping remains and is key to delivering the government and Mayor’s target to end rough sleeping through initiatives such as ‘no second night out’. Westminster continues to support delivery of these targets and initiatives.</p> <p>The approach taken in reaching decisions to decommission services and renegotiate contract values includes the following activities:</p> <ul style="list-style-type: none"> • Value for money. Westminster’s approach has developed over time and has focused on reducing higher cost services, assessing levels of support provided and the strategic relevance of services. • Information about presenting needs on each service area is gathered from a variety of primary and secondary, local and national sources, children and adult services and other official statistics. Based on this data any gaps or changes in presenting needs can be identified and these findings are used to inform future service development work in order to ensure that housing related support needs are met effectively across all the service areas. • Quality Assessment Framework (QAF). Self assessments are completed by all service providers across five objectives which covers, assessment and support planning, health & safety, Equality & fair access, Safeguarding and protection from abuse and client involvement and empowerment. QAF scores are validated and these should be at least level ‘B’ with action plan for each service to attain ‘A’
1.3	Details of the lead person completing the EIA
	<p>(i) Gregory Roberts</p> <p>(ii) Head of Supporting People and Homelessness Strategy Manager</p> <p>(iii) Housing</p> <p>(iii) grobert2@westminster.gov.uk; 020 7641 2834</p>
1.4	Date sent to Strategy Unit
	13 th February 2014
1.5	Version number and date of update
	<i>Version 1: 13th February 2014</i>

SECTION 2: EQUALITY ANALYSIS

2.1	<p>If you are planning changes to a current service, which customers from the protected groups are using the service currently?</p> <ul style="list-style-type: none"> • If you do not formally collect data about a particular group then use the results of local surveys or consultations, census data, national trends or anecdotal evidence. Do not leave any box blank.
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Westminster is part of the Scottish Centre for Social Housing Research (SCSHR) programme which monitors take-up of housing related support services from protected groups. Service provider organisations complete a client record form for each new service user that includes a wide range of (anonymised) data that enables those authorities who subscribe to review the take up and use of services from protected groups (with the exception of 'religion or belief' and 'sexual orientation' which is not currently part of the scheme. Westminster has raised this issue in the past.)

The figures below reflect data from 2009/10 which has been analysed in a format workable for this paper. This will be updated in May 2014 using the most recent data (however routine reviews have not shown any significant change over the past years from the data below.)

Just over 1000 people have moved into services in the first three quarters of the year. Each provider organisation is required to complete a client record form for each new arrival and submit this to The Joint Centre for Scottish Housing Research (JHRS) at St Andrews who commissioned by the Communities for Local Government to record and analyse this data. Based upon client record form data for the period April – December 2009 the table below breaks down the primary client groups of new referrals into services.

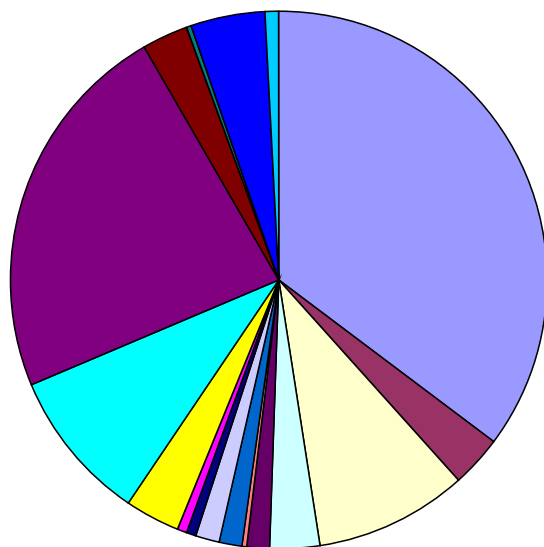
Primary Client Group	%
Older people with support needs	1.5
Older people mental health	0.6
Frail elderly	0.1
Mental health problems	14.0
Learning disabilities	0.1
Physical or sensory disability	0.4
Single homeless with support needs	26.3
Alcohol problems	1.5
Drug problems	3.0
Offenders/at risk of offending	1.0
Young people at risk	7.9
Young people leaving care	1.3
People with HIV/AIDS	0.3
Refugees	1.5
Teenage parents	0.1
Rough Sleeper	31.5
People at risk of domestic violence	4.9
Generic/Complex needs	3.9
Total	100.0

There are concerns over the completeness of this data reported by JCSHR which appears to reflect 70% of new clients and this will continue to be taken forward.

65% of residents were male, 39% were aged 16 to 24 years, 43% aged 25 to 45 years and 19% aged over 45. 2% of clients were recorded as having a mobility, visual or hearing disability.

The proportion of residents from a white ethnic background is nearly 50% which is comparable to Westminster's proportion of residents. The number of people from an Asian or Black background is 41%.

Ethnicity of service users accessing SP funded services in Westminster April - Dec 2009



A breakdown of the above data by service area is available and will be updated in May 2014 using 2013/14 data.

2.2 Are there any equality groups that are overrepresented in the monitoring information relative to their size of the population? *If so, this could indicate that the proposal may have a disproportionate impact on this group even if it is a universal service. Information about Westminster’s population is on the Equalities page on the WIRE.*

Housing related support services in Westminster form part of the housing pathway for a variety of different vulnerable groups, in particular rough sleepers, people with mental health problems, learning disabilities and young people. Thus access to housing related support services in Westminster is through a specific gateway according to service type rather than being accessed directly. Thus access to the rough sleeper hostel services is through the current buildings based services for rough sleepers, for people with mental health problems is through the supported accommodation referral panel (SARP) where the Community Mental Health Teams are able to ensure that available services are targeted at the most vulnerable, for people with learning disabilities through the Learning Disability Housing panel where again Adult services can ensure access for the most appropriate referrals. Thus access into services is reflective of the users of the wider range of services for these vulnerable groups and take up is in line with the make-up of these groups.

2.3 Are there any equality groups that are underrepresented in the monitoring information relative to their size of the population? *If so, this could indicate that the service may not be accessible to all groups or there may be some form of direct or indirect discrimination occurring.*

As above, access to services is as part of the wider housing pathway into independence for vulnerable people

2.4 What other evidence can you use to assess impact? For example:

- Results of consultation or engagement activity
- Analysis of enquiries or complaints

	<ul style="list-style-type: none"> • Benchmarking monitoring information with other local authorities • National research <p><i>If you do not have enough evidence you may need to take steps to fill in your information gaps – for example meeting with stakeholders, conducting surveys etc (the amount of evidence you need should be proportionate to what it is you are assessing. For example, changes to the eligibility for social care required a substantial consultation, as well as assessment of the numbers of people affected. However, a change to the frequency of bin collections will require less evidence to effectively assess impact).</i></p>
	<p>In addition to the data provided through the client record system described above each service area has a wide range of service user engagement processes and quality assurance systems in place that drive the commissioning of services.</p> <p>For example the use of the Quality Assurance Framework (QAF.) As highlighted above QAF Self assessments are completed by all service providers across five objectives which covers, assessment and support planning, health & safety, Equality & fair access, Safeguarding and protection from abuse and client involvement and empowerment.</p> <p>Part of the validation of QAF assessments involves commissioners visiting services to assess the quality of front-line service delivery. This includes speaking directly with service users and their experience of support planning, knowledge of safeguarding practice, review of complaints etc.</p> <p>In particular recent reviews of young persons and mental health services have involved panels of current and former service users visiting services and talking directly to users to obtain feedback. The outcome of these visits is available on request but generally this practice has seen the average QAF score increase over the past 8 years and has informed commissioning decisions.</p>
<p>2.5</p>	<p>Will people from all equality groups be able to access the council service in question? Think about the customer journey and whether any barriers may exist for different groups along the way (from finding out about the service, at the access points, when receiving the service etc). <i>Separate guidance on identifying barriers is available on the WIRE.</i></p>
	<p>As above services form part of the housing pathway for different vulnerable groups which, in the example of rough sleeper services, describes the journey from sleeping on the streets into independent accommodation and support to sustain their tenancies and access work etc.</p> <p>At the same time floating support services (which are housing related support services provided to people living in their own homes) can be accessed by anyone living in Westminster. Information is available in Council offices and on the website for any individuals whose independence in the community is at risk and requires a housing related support service to maintain this.</p>
<p>2.6</p>	<p>What negative impacts or disadvantage could stem from the changes you are proposing on people from the different groups? Could any part of the policy discriminate unlawfully (this includes direct & indirect discrimination, victimisation and harassment)? <i>If there is any discrimination the action must stop immediately and advice sought.</i></p>

The proposals are to reduce the total amount of spending on housing related support services. This is being undertaken in a planned way through decommissioning services that are not strategically relevant, where there is suitable alternative provision and are being provided out of properties that are no longer fit for purpose and by providing other services more efficiently. The Council remains committed to commissioning housing related support services for the vulnerable and as set out above has a strong track record in developing new more efficient services (and has opened two new mental health services in the past 18 months for example.) No part of the policy will discriminate unlawfully and where services are decommissioned the needs of vulnerable service users across the protected groups will be at the forefront of planning:

Gender:

- There will be a long lead in period for a decant process to begin.
- There is a single homeless pathway model in place for vulnerable clients to access further supported accommodation within borough. Decant arrangements are in place to assist those with move on.
- There is adequate supported provision enabling access for both genders
- Appropriate advice and assistance is also being offered by the Housing Options Service.

Race:

- The City Council closely monitors access to supported housing services to ensure that systems do not discriminate on the groups of ethnicity.
- The analysis of the client records forms shows that people from a range of different ethnic groups are accessing supported housing and this will continued to be monitored to ensure exclusivity.

Disability:

Generally the support need of the residents accessing the service is low. Arrangements have been made for statutory placements with higher support needs to access alternative supported housing within Westminster.

2.7 Is there anything you can do to promote equality of opportunity? This means the need to:

- Remove or minimise disadvantages suffered by equality groups
- Take steps to meet the needs of equality groups
- Encourage equality groups to participate in public life or any other activity where participation is disproportionately low
- Consider if there is a need to treat disabled people differently, including more favourable treatment where necessary

Is there anything you can do to foster good relations between people who share a protected characteristic and those who do not? This means:

- Tackle prejudice
- Promote understanding

New services have been developed in recent years and are targeted at vulnerable groups such as people with mental health problems. The focus of service provision is on supporting independence and assisting vulnerable individuals to access employment and other positive activities.

<p>2.8</p>	<p>Are there changes proposed in related policy areas or services? How are you taking into account the combined impact of these changes? <i>Small changes in a policy area may cause some disadvantage, but the cumulative effect of changes in related areas could have a significant impact. A separate EIA will need to be undertaken where a number of changes are planned in a service area or where multiple changes are planned in different service areas that could impact on an equality group (for example changes in adult services, children’s service, and transport/public realm changes could lead to a significant impact on disabled people, which may not be identified by looking at the changes individually)</i></p>									
	<p>As set out above housing related support services are commissioned as part of a housing pathway for different vulnerable groups and all decisions are thus taken to minimise the impact on mainstream services for vulnerable adults and younger people.</p>									
<p>2.9</p>	<p>Considering your answers above, what are the issues, barriers, impacts you have identified and what can you do to reduce any negative impacts? Also include any issues you will need to take into account as your policy develops.</p>									
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	policy	cannot be mitigated. The policy is unlawfully discriminating.
	3. there is no unlawful discrimination, there is a commitment to improving the range and quality of service provision and the impact, the impact will be on improving the efficiency of services and decommissioning those that are no strategically relevant and provided out of properties no longer fit for purpose and the Council has a strong track record of reducing levels of resources in this area whilst maintaining and improving service outcomes and delivering housing pathways for the vulnerable.	

SECTION 3: ACTION PLAN

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Please include the action required by your team/unit, groups affected, the intended outcome of your action, resources needed, a lead person responsible for undertaking the action (inc. their department and contact details), the completion date for the action, and the relevant RAG rating: R(ed) – action not initiated, A(mber) – action initiated and in progress, G(reen) – action complete.

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	Ensure website information on availability of and access to supported housing service provision is up to date	All	Services are accessible	No additional resources	Gregory Roberts; grobert2@westminster.gov.uk	1/6/2014	A
	Housing Commissioning will develop an a housing related support needs analysis that assesses how existing supported housing provision meets presenting need	All	Trends in homelessness amongst vulnerable people are analysed and support delivery of service commissioning plans	No additional resources	Greg Roberts grobert2@westminster.gov.uk	15/8/2014	A
	Housing Commission/SP Team will take into account and mitigate the possible negative impacts listed in 2.9 through the management of the	All	<ul style="list-style-type: none"> Has no negative impacts on equality groups Has no negative impact on the numbers of rough sleepers presenting 	No additional resources	Greg Roberts x 2834	15/3/2015	A

	different vulnerable housing pathways to ensure the needs of the vulnerable are effectively met		in Westminster <ul style="list-style-type: none">• Has no impact on the number of homeless vulnerable people					
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THIS SECTION TO BE COMPLETED BY THE RELEVANT SERVICE MANAGER

SIGNATURE:

FULL NAME:

UNIT:

EMAIL & TELEPHONE EXT:

DATE (DD/MM/YYYY):

THIS

WHAT NEXT?

Please email your completed EIA to David O'Leary: doleary@westminster.gov.uk