



EQUALITY IMPACT ASSESSMENT TEMPLATE

PLEASE ENSURE YOU READ THE GUIDANCE NOTES BEFORE COMPLETING THIS TEMPLATE

Completing an EIA is the simplest way to demonstrate that the Council has considered the equality impacts of its decisions and it reduces the risk of legal challenge. EIAs should be carried out at the earliest stages of policy development or a service review, and then updated as the policy or review develops. EIAs must be undertaken when it is possible for the findings to inform the final decision.

SECTION 1:

<p>Title</p>	<p>Homelessness Strategy 2019-2024</p>
<p>What are you analysing?</p> <ul style="list-style-type: none"> • What is the policy/project/activity/strategy looking to achieve? • Who is it intended to benefit? Are any specific groups targeted by this decision? • What results are intended? 	<p>Background</p> <p>Following legislative changes, the formulation of a homelessness strategy is a statutory requirement for all councils.</p> <p>The key areas which need to be covered within a Homelessness Strategy are:</p> <ul style="list-style-type: none"> • How the council will prevent their homelessness • How the council will ensure that sufficient accommodation is and will be available for people in the local borough who are or may become homeless • How the council will secure the satisfactory provision of support for people in the local borough who are or may become homeless or who have been homeless and need support to prevent them becoming homeless again <p>Before writing a Homelessness Strategy, local authorities are required to complete a review of homelessness in the local area. Officers compiled a Review of Homelessness for Westminster in early 2019 which sets out the current situation in terms of:</p> <ul style="list-style-type: none"> • The levels of homelessness locally • Who is most affected by homelessness • What actions are being taken currently to prevent homelessness • The legislative and policy framework • The future homelessness challenges ahead

Following this, the Review was used to formulate the Homelessness Strategy for Westminster.

What this Equality Impact Assessment (EIA) is evaluating

This EIA evaluates the council's Homelessness Strategy. The overall five-year aim of the Strategy is to prevent homelessness in the borough at an earlier stage, and to encourage a more open and collaborative working relationship between the council's frontline housing services and stakeholders, including residents and the voluntary and community sector.

Homelessness can take many forms, which include:

- **Rough sleeping:** this is the most visible form of homelessness and includes people bedding down on the streets or sleeping on public transport etc.
- **Statutory homelessness:** this is where people or households have approached the local authority as they are either threatened with homelessness or are actually homeless.

This EIA doesn't analyse the council's approach to rough sleeping as Westminster already has a Rough Sleeping Strategy 2017 – 22, which is being implemented, and was subject to a separate EIA which can be found at: https://www.westminster.gov.uk/sites/default/files/rough_sleeping_strategy_equality_impact_assessment_003.pdf

The Homelessness Review and Strategy summarise the approach to rough sleeping set out in the Rough Sleeping Strategy.

Key features of the Homelessness Strategy

The Homelessness Strategy sets out a ten-point plan for achieving its overall aims, which are set out below:

Preventing People from becoming homeless in the first place

1. To reach more people at risk of homelessness at an earlier stage
2. To make the council's services more visible through information campaigns
3. To proactively offer personalised support to those at risk of homelessness where possible
4. To do more to identify the main causes of homelessness in Westminster

	<p>Improving our services and response when people become homeless:</p> <ol style="list-style-type: none"> 5. To make our housing services more transparent, accountable and accessible 6. To better communicate what we can and can't offer 7. To ensure a range of accommodation is available when needed 8. To review access to supported housing now and for the future <p>Meeting the challenges ahead and having a homelessness system fit for the future</p> <ol style="list-style-type: none"> 9. To become a leader in the field of homelessness prevention by proposing solutions and bringing decision-makers together 10. Make the case for homelessness services and prevention work to be fully funded, by leading the discussion with Government and others on how the welfare system can work better for low income residents in central London, while also utilising every other funding source available to us <p>The ten-point plan aims to have an overall positive impact on anyone in Westminster who might be at risk of homelessness, by empowering them to take earlier action to prevent a housing crisis from occurring through raising awareness of services and by working differently with the community and other stakeholders so they also have a role in homelessness prevention. The council also aims to do more to understand and address the top causes of homelessness in Westminster, including factors such as family breakdown. It also aims to address the wider causes such as debt and low-level mental health issues.</p> <p>For those residents who do have to approach the council for help, the proposals aim to have an overall positive impact by making the council's frontline services easier to navigate and more accountable. Where the council makes a private rented offer, the aim is to do more to explain why these often cannot be in Westminster, due to the high cost of rents in the city and to offer help for people to settle into new communities outside of the borough where necessary.</p> <p>Certain groups and people are more likely to be impacted by homelessness as set out in Section 2.</p>
	<p>(i) Full Name: Isobel Caton Harrison</p> <p>(ii) Position: Policy Officer</p> <p>(iii) Unit: Policy, Performance and Communications</p>

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	(iii) Contact Details: icharrison@westminster.gov.uk
Date sent to Equalities@westminster.gov.uk	
Version number and date of update	1
<p><i>You will need to update your EIA as you move through the decision-making process. Record the version number here and the date you updated the EIA. Keep all versions so you have evidence that you have considered equality throughout the process. However <u>only</u> the most updated version will be saved in the Equalities SharePoint folder.</i></p>	

SECTION 2: Do you need to complete a full Equality Impact Assessment (EIA)?

Not all proposals will require a full EIA, the assessment of impacts should be proportionate to the nature of the project/policy in question and its likely impact. To decide on the level of detail of the assessment required consider the potential impact on persons with protected characteristics.

2.1 Please provide an overview of who uses/will use your service or facility and identify who are likely to be impacted by the proposal <ul style="list-style-type: none"> • <i>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 (indicate where this is the case). Please attempt to complete all boxes.</i> • <i>Consider whether there is a need to consult stakeholders and the public, including members of protected groups, in order to gather information on potential impacts of the proposal</i> 	<p>How many people use the service currently? What is this as a % of Westminster's population?</p> <p>Nearly 5,000 households contacted the council's Housing Solutions Service during 2018/19, which is nearly 4% of all Westminster households. Before the Homelessness Reduction Act 2017 (HRAAct), which came into effect from April 2018, the council received around 1,000 homeless applications each year, which is less than 1% of all households. The HRAAct 2017 significantly changed the way in which homelessness is dealt with, so it is difficult to compare historic levels and trends with current ones.</p> <p>Overall, those approaching the Housing Solutions Service are more likely to be living in the more deprived areas of Westminster. Homeless households in temporary accommodation are more likely to be, compared to their share of the Westminster population, from a Black, Arab, Other and Asian ethnic background, women and lone parents. Homeless applicants are more likely to have low incomes and receive benefits, although they are not necessarily unemployed (around 50% of households in temporary accommodation are working).</p> <p>Analysis of those applying as homeless since the HRAAct 2017 indicates a changing customer base when compared to those in temporary accommodation. During 2018/19 more single people made homeless applications (56%) than families (44%) and 60% of applications made by single people were from men. Black, Arab and Asian households were over represented amongst homeless</p>
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	<p>applicants in 2018/19 and White households were under represented, compared to their population share, although less so than when compared with the temporary accommodation population.</p> <p>The data below shows the number of homeless households (both households in temporary accommodation and households approaching the council for support) falling within each of the protected characteristics, compared to the overall borough figures. The Strategy aims to reach not only residents who are already approaching the council for help, but also those who at risk of homelessness who are not yet known to council services. Therefore the Strategy could potentially impact on any residents in the city.</p> <p>However, the Strategy is most likely to impact on homeless households approaching its services and households in temporary accommodation, and these are also the groups for which council has gathered specific data. These are therefore the groups which are the focus of the analysis below, but it should be noted that the long-term impact of the Strategy has the potential to go beyond these groups.</p>												
Gender	<p>Table 1: Homeless households by gender, compared to the Westminster population</p> <table border="1" data-bbox="354 875 1121 1272"> <thead> <tr> <th></th> <th>Homeless Households in temporary accommodation (lead applicant)</th> <th>Homeless Households (Applicants) 2018/19 (lead applicant)</th> <th>Westminster Population (2017 ONS Mid-year estimates)</th> </tr> </thead> <tbody> <tr> <td>Women</td> <td>71%</td> <td>48%</td> <td>48%</td> </tr> <tr> <td>Men</td> <td>29%</td> <td>52%</td> <td>52%</td> </tr> </tbody> </table> <p>The balance of men and women applying as homeless during 2018/19 was comparable to their respective share in the Westminster population. Notably 52% of applications were from men, which compares to 29% of men living in temporary accommodation.</p>		Homeless Households in temporary accommodation (lead applicant)	Homeless Households (Applicants) 2018/19 (lead applicant)	Westminster Population (2017 ONS Mid-year estimates)	Women	71%	48%	48%	Men	29%	52%	52%
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Disability	<p>Physical Disability</p> <p>Looking at physical health, less than 6% of homeless households living in temporary accommodation in Westminster have members with a physical disability. While city wide data is not directly comparable with the categories below, it identifies that 9% of the working age Westminster population is estimated to have a serious or moderate physical disability¹.</p>												

¹ PANSI information 2015

Table 2: Households in temporary accommodation with a need for different property types

	Fully wheelchair accessible property needed	Property needed for those who use a wheelchair outside the home but can manage in the home without one	Level access property needed with no stairs	Non adapted property needed
Homeless households in temporary accommodation	<1%	<1%	4%	95%

Analysis of those applying as homeless during 2018/19 (see table 12) shows greater proportions have a physical illness or disability (15%) which is more in line with the overall Westminster population. (Note: households are only categorised for the different types of properties in table 2 once they are accepted as homeless).

Physical and Mental Health Issues

Table 3: Homeless Applicants with physical and mental health issues and support needs

2018-19	%
History of mental illness	9%
Physical ill health or disability	15%
At risk or experienced domestic abuse	8%
Offending history	3%
Other support needs	4%

Nine per cent of applicants during 2018/19 had (or had a household member with) a mental health issue. It is likely, however, that other applicants and members of their households may have mental health problems. A national survey conducted by Shelter of 2,000 people in temporary accommodation², found that more than half said that they were suffering from depression and other mental health problems. Across Westminster, an estimated 16% of the working age population may have a common mental health issue³.

The consultation on the Homelessness Strategy identified that low to moderate mental health issues were a common issue amongst Westminster residents who are most at risk of homelessness. As a

² http://england.shelter.org.uk/_data/assets/pdf_file/0012/40116/Living_in_Limbo.pdf

³ PANSI information 2015

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	<p>result of this, the Strategy was adapted to include more actions around signposting housing applicants to resources to help them manage their mental health.</p>																								
Sexual orientation	<p>Table 4: Sexual orientation of homeless applicants 2018/19</p> <table border="1"> <thead> <tr> <th>Sexual orientation</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Gay / Lesbian</td> <td>1%</td> </tr> <tr> <td>Heterosexual</td> <td>46%</td> </tr> <tr> <td>Unknown/Prefer not to say</td> <td>53%</td> </tr> </tbody> </table> <p>The sexual orientation of residents in temporary accommodation is not available.</p> <p>The Office of National Statistics estimate the Lesbian, Gay and Bisexual population of London to be 2.2-3%, while this is higher than the proportion of Gay/Lesbian people applying as homeless, it is not possible to make comparisons given the sexual orientation of 53% of applicants is unknown.</p>	Sexual orientation	%	Gay / Lesbian	1%	Heterosexual	46%	Unknown/Prefer not to say	53%																
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Gender Reassignment	<p>Data on gender reassignment is not currently gathered from either households currently in temporary accommodation or households presenting as homeless.</p>																								
Race	<p>The groups most affected by homelessness during 2018/19, compared to their population share were:</p> <ul style="list-style-type: none"> • Black African • Black Caribbean • Arab • Other ethnic background (including Chinese). <p>The table below shows this in more detail.</p> <p>Table 5: Homeless applicants by ethnicity</p> <table border="1"> <thead> <tr> <th>Ethnicity</th> <th>Homeless Households (Applicants) 2018/19* (lead applicants)</th> <th>Westminster Population (GLA Ethnic Projections for 2018 – persons)</th> </tr> </thead> <tbody> <tr> <td>White: English/Welsh/Scottish/Northern Irish/British</td> <td>19.7%</td> <td>31%</td> </tr> <tr> <td>White: Gypsy or Irish Traveller</td> <td>0.08%</td> <td>-</td> </tr> <tr> <td>White: Irish</td> <td>1.1%</td> <td>-</td> </tr> <tr> <td>Any other White background</td> <td>8.4%</td> <td>29%</td> </tr> <tr> <td>Black: African</td> <td>16.6%</td> <td>4%</td> </tr> <tr> <td>Black: Caribbean</td> <td>6.8%</td> <td>2%</td> </tr> <tr> <td>Any other Black/African/Caribbean background</td> <td>2.4%</td> <td>1%</td> </tr> </tbody> </table>	Ethnicity	Homeless Households (Applicants) 2018/19* (lead applicants)	Westminster Population (GLA Ethnic Projections for 2018 – persons)	White: English/Welsh/Scottish/Northern Irish/British	19.7%	31%	White: Gypsy or Irish Traveller	0.08%	-	White: Irish	1.1%	-	Any other White background	8.4%	29%	Black: African	16.6%	4%	Black: Caribbean	6.8%	2%	Any other Black/African/Caribbean background	2.4%	1%
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Arab	20.8%	8%
Asian: Bangladeshi	2.3%	3%
Asian: Indian	1.1%	3%
Asian: Pakistani	1.2%	1%
Any other Asian background	4.3%	5%
Mixed/Multiple ethnic groups: White and Asian	0.5%	-
Mixed/Multiple ethnic groups: White and Black African	0.8%	-
Mixed/Multiple ethnic groups: White and Black Caribbean	1.7%	-
Any other Mixed/Multiple ethnic background	2.7%	5%
Any other ethnic group, including Chinese	9.0%	6%

*The data does not include households where their ethnic origin is unknown

Table 6: Households in temporary accommodation by ethnicity

Ethnicity	Homeless Households in temporary accommodation (lead applicants)*	Westminster population (GLA Ethnic Projections for 2018 – persons)
White	21%	60%
Black	25%	7%
Arab	21%	8%
Asian	16%	12%
Mixed	3%	5%
Other (includes Chinese)	13%	6%

*Doesn't include households where ethnic origin is unknown

Age

Table 7: Homeless Households by Age

Age	Homeless Households in temporary accommodation (lead applicants)	Homeless Households (Applicants) 2018/19 (lead applicants)	Westminster Population (2017 ONS Mid-year estimates, for adult population)
16-24	7%	17%	13%
25-44	65%	54%	45%
45-64	25%	27%	27%
65-74	2%	3%	8%
75+	1%	1%	7%

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	<p>The proportion of young people in temporary accommodation (aged 16 – 24) is below their population share, although applicants were over represented during 2018/19. The 25 – 44 age group are over represented, amongst temporary accommodation households and applicants during 2018/19 compared to their population share. This is the group that are most likely to have children. Older people are generally under represented.</p>																				
<p>Pregnancy and maternity/children in household</p>	<p>Table 8: Homeless Households and Family Composition</p> <table border="1" data-bbox="352 589 1273 1238"> <thead> <tr> <th data-bbox="352 589 571 875"></th> <th data-bbox="571 589 778 875">Homeless Households in temporary accommodation (lead applicant)</th> <th data-bbox="778 589 1066 875">Homeless Households (Applicants) 2018/19 (lead applicant)</th> <th data-bbox="1066 589 1273 875">Westminster Population (2011 Census)</th> </tr> </thead> <tbody> <tr> <td data-bbox="352 875 571 947">Pregnant women</td> <td data-bbox="571 875 778 947">13%</td> <td data-bbox="778 875 1066 947">See below*</td> <td data-bbox="1066 875 1273 947">See below**</td> </tr> <tr> <td data-bbox="352 947 571 1128">Households with children</td> <td data-bbox="571 947 778 1128">86%</td> <td data-bbox="778 947 1066 1128">44%</td> <td data-bbox="1066 947 1273 1128">19%</td> </tr> <tr> <td data-bbox="352 1128 571 1238">Of which are lone parents</td> <td data-bbox="571 1128 778 1238">48%</td> <td data-bbox="778 1128 1066 1238">8%</td> <td data-bbox="1066 1128 1273 1238">6%</td> </tr> <tr> <td data-bbox="352 1238 571 1238">Single people</td> <td data-bbox="571 1238 778 1238">14% (43% men 57% women)</td> <td data-bbox="778 1238 1066 1238">56% (60% men 40% women)</td> <td data-bbox="1066 1238 1273 1238">81% (54% men 46% women)</td> </tr> </tbody> </table> <p>*Details about pregnancy are not collected at this stage. **Information not available</p> <p>Households with children were over represented in those applying as homeless during 2018/19 compared to their share of the Westminster population and single people were under represented. However, during 2018/19, 56% of applications were from single people which compares to 14% living in temporary accommodation. Notably during 2018/19, 60% of applications from single people were from men.</p>		Homeless Households in temporary accommodation (lead applicant)	Homeless Households (Applicants) 2018/19 (lead applicant)	Westminster Population (2011 Census)	Pregnant women	13%	See below*	See below**	Households with children	86%	44%	19%	Of which are lone parents	48%	8%	6%	Single people	14% (43% men 57% women)	56% (60% men 40% women)	81% (54% men 46% women)
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<p>Religion or belief</p>	<p>This data is not gathered by the current reporting systems for either homeless applicants or households living in temporary accommodation. However, the data above on the ethnic backgrounds of applicants and households in TA gives some potential indication of different religions amongst homeless households. For instance, the fact that Arabic households were the most likely to be homeless applicants in 2018-19 (at a fifth of the total number) gives some indication that there is likely to be a larger proportion of Muslims amongst homeless households in Westminster than there is in the general Westminster population.</p>																				
<p>Economic activity</p>	<p>Homeless households, and those threatened with it, generally have low incomes, for example at least 46% of applicants were in receipt of benefits in 2018/19. This figure may well be higher as it includes those unable to clarify their benefits. Sometimes when households apply as homeless they are unable to confirm the benefit they receive and this is established later.</p> <p>Currently c50% of households in temporary accommodation are working either full or part time. As market rents are charged in temporary accommodation, nearly 100% of residents receive housing benefit.</p>																				

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Table 9: Households receiving benefits

Benefit	Percentage of homeless applicants 2018-19 claiming benefit	Total Households in Westminster claiming benefits (residential units only) - Household Projections, ONS 2018 (2019 figures used)
Disability Benefits	4%	10.4%
Employment and Support Allowance	7%	2.7%
Income Support	3%	0.4%
Jobseeker's Allowance	5%	0.8%
State Pension and/or Pensioner Credit	2%	15%
Tax Credits	12%	0.6%
Universal Credit	12%	1.8%
Carer's Allowance	Unknown	2%
Other (including bereavement)	Unknown	1%
No benefits claim made / not able to clarify benefit	54%	65.3%
Total in receipt of benefits (where known)	46%	33.7%

This excludes housing benefit

The table above shows that homeless applicants are more likely to be in receipt of 'working age' benefits (e.g. ESA, Tax Credits, Universal Credit) than the local population, and less likely to be in receipt of disability benefits (which include DLA, PIP and SDA) or state pension and/or pensioner credit. The data above is not completely precise as some benefit claimants are in the process of being transferred over to Universal Credit.

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<p>2.2 Are there any groups with protected characteristic 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.</p>	<p><i>If yes, provide details.</i></p> <p>Households who are currently in temporary accommodation (TA), are more likely to be (according to the data which is currently available):</p> <ul style="list-style-type: none"> • Female: 72% are in TA compared to 48% in the general population. However, since the introduction of the HRA Act, more men (especially single men) have been approaching the council for housing support, and the numbers of men who approached in 2018/19 was comparable to the local population • From certain ethnic backgrounds, particularly Black (25% compared to 7% in the local population), Arab (21% compared to 8% in the local population) and Other minority (13% compared to 6% in the local population) • In the 25-44 age category (65% compared to 45% in the local population) • In a household with children (86% compared to 19% in the local population), and a lone parent (48% of households in TA with children, compared to 8% of households with children in the general population). <p>Households who approach the council as homeless are more likely to be (according to the data which is currently available, and based on approaches in 2018-19):</p> <ul style="list-style-type: none"> • From certain ethnic backgrounds, particularly Black African (16.6% compared to 4% of the local population), Black Caribbean (6.8% compared to 2% of the local population), Arab (20.8% compared to 8% of the local population) and Other ethnic minority including Chinese (9% compared to 6% in the local population). • In the 25-44 age category (54% compared to 45% in the local population) and in the 16-24 age category (17% compared to 13% in the local population) • In a household with children (44% compared to 19% in the local population). The numbers of lone parents amongst households with children who approach the council as homeless is only slightly higher than the proportion of lone parents within the local population (8% as opposed to 6%). • In receipt of working-age benefits, with 39% of homeless applicants receiving either Tax Credits, Universal Credit, Jobseeker's Allowance, Employment and Support Allowance or Income Support, compared to 6.3% of the local population. This excludes Housing Benefit. <p>The most notable difference between households in TA and households approaching as homeless during 2018-19 (homeless applicants) is that applicants have included a higher proportion of men and fewer lone parent households.</p>
<p>2.3 Are there any groups with protected characteristics that are underrepresented in the</p>	<p><i>If yes, provide details.</i></p> <p>Overall, households who either approach the council as homeless or who are currently in temporary accommodation, are less likely to be:</p> <ul style="list-style-type: none"> • Men (Although during 2018/19, 60% of applications from single people were from men) • From certain ethnic backgrounds, particularly White, Asian or Other Mixed ethnicity • Older (from the 65+ age category)

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<p>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.</p>	<ul style="list-style-type: none"> • Single people (However, during 2018/19, 56% of applications were from single people which compares to 14% living in temporary accommodation).
<p>2.4</p>	<p>Does the project, policy or proposal have the potential to disproportionately impact on people with a protected characteristic? If so, is the impact positive or negative?</p>
	<p>There are a few proposals within the Homelessness Strategy which might have the potential to negatively impact on certain people. These proposals come from points 5,6 and 7 of the Strategy’s ten-point plan, and are laid out below:</p> <p><u>Point 5: Making our housing services more transparent, accountable and accessible:</u></p> <p>Improving Digital Access to the Housing Solutions Service</p> <p>The Strategy envisages that digital access to the council’s frontline housing services will be improved, so that more people can make a full homelessness application online. This has the potential to negatively impact on people with lower digital/computer literacy, which may include older people or people with certain disabilities, or people with less access to the internet, which may include people with lower incomes.</p> <p><u>Point 6: Better communicate what we can and can’t offer:</u></p> <p>This Strategy proposal will include carrying out an information campaign targeting areas of Westminster where people are more at risk of homelessness, explaining the council’s frontline housing services and what people can expect from it. It will also involve publishing ‘what you can expect’ leaflets and distributing these widely. These leaflets will explain, amongst other matters, why many households can expect a private rented rather than a social home, and will also convey the message that tackling homelessness requires the council and households affected by homelessness to work together collaboratively.</p> <p>The effect of this should largely be positive, as households at risk should be better informed of their housing support options at an earlier stage. However, there is a possibility that some households may be negatively impacted by the information campaign, if it causes them to choose not to approach the council when they would otherwise have done, or to approach the council later. There is a possibility that this may happen if residents interpret the campaign in negative terms, primarily noting the</p>

message that the council will often not be able to offer a social home, rather than the positive message around the services that the council can offer to those who are at risk of homelessness. If more households choose to delay their approach as a result of the campaign, this could lead to more households only approaching once they have reached a crisis stage and once homelessness can no longer be prevented. This could therefore have negative impacts on homeless households, who are more likely to have the protected characteristics outlined in section 2.1 above.

Point 7: Ensuring a range of accommodation is available for homeless households when homelessness cannot be prevented:

Continuing to make developing more affordable housing a priority for the council

The Strategy highlights the council's aim to develop at least 1,850 new affordable homes by 2023. Whilst this is clearly positive for homeless households, the council's City Plan 2019-2040 sets out that 40% of these newly developed affordable homes will be social rent or London Affordable Rent whilst 60% will be intermediate housing. Favouring intermediate housing could have a negative impact on homeless households who are more likely not to have the financial means to access it. Less social housing may also lead to homeless households being in temporary accommodation for longer, of which c50% is outside Westminster.

This 60/40% split of intermediate and social housing is broadly in line with the findings of Westminster's most recent Housing Needs Analysis, which estimates that 44% of the affordable homes required annually are social and 56% are intermediate. However, the Analysis differentiates between both types of affordable housing by describing social housing as 'need' i.e. for households with few choices and intermediate housing as 'demand', although it acknowledges there is cross over between the two.

However, the potential negative impacts of building more intermediate than social housing should be balanced against the fact that intermediate housing currently makes up less than 2% of Westminster's housing stock. This housing is primarily intended for people on moderate incomes, and there are currently very few opportunities for people on moderate incomes to secure any kind of accommodation in Westminster.

Further details on this affordable housing split and its potential impacts can be found in the City Plan Integrated Impact Assessment, available here:

https://www.westminster.gov.uk/sites/default/files/cityplan2040_integrated_impact_assessment_june_2019.pdf

Increasing the number of private rented sector offers we make

The Strategy envisages that the council will continue to make offers of settled accommodation in the private rented sector to certain homeless households rather than offering a social home, and that the number of these offers will increase. Whilst the council makes every effort to secure these offers in Westminster, the high cost of local market rents combined with the Local Housing Allowance levels not covering market rents means that these offers often have to be outside of Westminster. From January 2017 to January 2018, 24% of offers in the private rented sector were in Westminster or an adjoining borough, 71% were in Greater London, and 5% were outside London (Surrey and Berkshire).

Moving into private rented accommodation outside of Westminster can have a negative impact on homeless households (who are more likely to have the protected characteristics outlined above), as it

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can disrupt support networks and schooling. Generally, private rented sector properties also have shorter tenancy periods on average than social homes, tend to have higher rents and can sometimes be of poorer quality than social homes.

However, these factors have to be balanced against the positive impacts of being offered an offer of settled accommodation in the private rented sector, which often allow homeless households to have a housing offer made more quickly (compared to a current 10-year average waiting time for a 2-bed social home), and therefore provide households with the opportunity to end potentially very long waits in insecure temporary accommodation.

A full EIA has already been completed on the policy of making private rented sector offers for homeless households in Westminster, and this considers all these factors in greater detail. This can be found here: <https://committees.westminster.gov.uk/documents/s21009/Appendix%20-%20EIA.pdf>

The majority of proposals within the Homelessness Strategy will impact positively on all residents, especially those who are homeless or at risk of homelessness. However, due to the potential impact of the few proposals outlines above, the overall impact of the Strategy on all protected groups could in some instances be both positive and negative.

	None	Positive	Negative	Not sure
Men or women	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
People of a particular race or ethnicity (including refugees, asylum seekers, migrants and gypsies and travellers)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Disabled ⁴ people (consider different types of physical, learning or mental disabilities)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
People of particular sexual orientation/s	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
People in particular age groups (consider in particular children, under 21s and over 65s)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
People who are intending to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Impact due to pregnancy/ maternity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
People of particular faiths and beliefs	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
People on low incomes	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

⁴ Disability discrimination is different from other types of discrimination since it includes the duty to make reasonable adjustments.

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	<p>If any of the answers to the questions above is, “negative” or “unclear” you will need to undertake a detailed impact assessment.</p>
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2.5	Based on your responses, should a full, detailed EIA be carried out on the project, policy or proposal
	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
2.6	Provide brief reasons on how have you come to this decision?
	A small number of the proposals within the Homelessness Strategy have the potential to have both positive and negative impacts on households at risk of homelessness, who are more likely to have certain protected characteristics. As set out in section 3 below, the final Strategy will seek to mitigate these potential negative impacts.

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SECTION 3: ASSESSING THE IMPACT

This section of the EIA assesses the potential impact of the policy (positive and negative) of the homelessness strategy on all groups with protected characteristics.

Table 3.1 lays out the potential impacts from the first section of the strategy: **Preventing more people from becoming homeless in the first place**. This section includes the following sub-proposals:

1. To reach more people at risk of homelessness at an earlier stage
2. To make the council's services more visible through information campaigns
3. To proactively offer personalised support to those at risk of homelessness where possible
4. To do more to identify the main causes of homelessness in Westminster

Positive impacts:

- Preventing households from becoming homeless and offering early support should positively impact on all residents who are at risk of homelessness, including all groups with protected characteristics. It may have a particularly positive impact for groups that are currently unlikely to be able to be supported with housing from the council (often because they do not qualify for priority social housing), particularly single people.

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Table 3.1

Protected Group	Positive impact?			Negative impact? If so, please specify the nature and extent of that impact*	No specific impact	If the impact is negative how can it be mitigated? Please specify any mitigation measures and how and when they will be implemented	What , if any, are the cumulative effects of this decision when viewed in the context of other Council decisions and their equality impacts
	Eliminate discrimination	Advance equality	Good relations				
Points 1-4 of the Strategy: Preventing more people from becoming homeless in the first place							
Gender	Men	X	X	X			
	Women	X	X	X			
Race	White	X	X	X			
	Mixed/Multiple ethnic groups	X	X	X			
	Asian/Asian British	X	X	X			
	Arab	X	X	X			
	Black/African/Caribbean/Black British	X	X	X			
	Gypsies / travellers	X	X	X			
	Other ethnic group	X	X	X			
Disability	Physical	X	X	X			

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	Sensory	X	X	X				
	Learning Difficulties	X	X	X				
	Learning Disabilities	X	X	X				
	Mental Health	X	X	X				
Sexual Orientation	Lesbian, gay men, bisexual	X	X	X				
Age	Older people (50+)	X	X	X				
	Younger people (16 - 25)	X	X	X				
	Children	X	X	X				
Gender Reassignment		X	X	X				
Impact due to pregnancy/maternity		X	X	X				
Groups with particular faiths and beliefs		X	X	X				
People on low incomes		X	X	X				

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Table 3.2 lays out the potential impacts from the second section of the strategy: **Improving our services and response when people become homeless**. This section includes the following sub-proposals:

5. To make our housing services more transparent, accountable and accessible
6. To better communicate what we can and can't offer
7. To ensure a range of accommodation is available when needed
8. To review access to supported housing now and for the future

Positive impacts:

- Most of the proposals within this section should have a positive impact on existing and future homeless residents, and some of the proposals should have a particularly positive impact on more vulnerable residents. These include the proposal to apply learning from our Making Every Adult Matter (MEAM) pilot and rolling this out across services, because this aims to make the council better at supporting the needs of people at risk of homelessness who face multiple disadvantages. These disadvantages could include mental or physical disability, and this could therefore have a particularly positive impact on residents with this protected characteristic.
- The proposal to review how people access the council's supported housing stock and ensure it meets needs in the future could also have a particularly positive impact on vulnerable residents. This should especially include young people (e.g. care leavers and unaccompanied asylum-seeking children) whose needs will be reviewed as part of the wider supported housing review. The council will also be re-procuring its offender services contract and considering how to better support the needs of young offenders.
- This section also includes a proposal to set up a new annual Partnership Board, which would be made up of people that use the council's homelessness services and members of the community. The aim of the Board would be to get views on the council's services and hold the council to account, as well as giving the council an opportunity to more clearly explain some of its decisions. This should have a positive impact on all groups by bringing together individuals who would not usually meet and fostering greater collaboration and understanding between Westminster's communities.

Negative impacts:

- The proposal to ensure that a range of accommodation is available for homeless households includes an action to increase the number of settled private rented sector offers the council makes. As laid out in section 2.4 above, this could impact both positively and negatively upon homeless

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households, with negative impacts including households having to move out of the borough and having potentially lower quality and less secure housing through the private rented sector than through having a social home.

- The proposal to build 1,850 new affordable homes in Westminster by 2023, whilst generally positive for all groups, does envisage that these homes will favour intermediate housing (60% of the total) more than social housing (40% of the total). This could potentially have a negative impact on homeless households, who are less likely to be able to afford intermediate housing and may therefore have to spend longer in temporary accommodation.
- The proposals to improve digital access to the Housing Solutions Service and to develop an online referral system for supported housing could have potential negative impacts on people with lower digital literacy or access.
- The proposal to carry out an information campaign setting out what the council can and can't offer could have potential negative effects on households at risk of homelessness if it discourages them from making an approach to the council until after their homelessness cannot be prevented (see section 2.4 above).

Table 3.2

Protected Group		Positive impact?			Negative impact? If so, please specify the nature and extent of that impact*	No specific impact	If the impact is negative how can it be mitigated? Please specify any mitigation measures and how and when they will be implemented	What, if any, are the cumulative effects of this decision when viewed in the context of other Council decisions and their equality impacts
		Eliminate discrimination	Advance equality	Good relations				
Points 5-8 of the Strategy: Improving our services and response when people become homeless								
Gender	Men	X	X	X	Possible private rented sector offer impacts: lower quality housing, higher rents, geographical displacement Possible delay in approaching council resulting from		Offers of settled accommodation in the private rented sector: <ul style="list-style-type: none"> • All offers of settled accommodation in the private rented sector will be carefully reviewed to ensure they meet needs of households (e.g. housing is of sufficient quality, 	

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					<p>information campaign, resulting in poorer outcomes</p> <p>Possible lack of available social housing in future due to council’s affordable housing target envisaging 60% intermediate housing and 40% social housing</p>		<p>meets affordable rent levels). For more information, see the EIA on the PRSO Policy for Homeless Households: https://committees.westminster.gov.uk/documents/s21009/Appendix%205%20-%20EIA.pdf</p> <ul style="list-style-type: none"> • The council will lobby for changes to the welfare system so it works better in central London • The council will recruit ‘Community connectors’ to help people settle in new areas • The council will look at ways to offer households more choice over the location of their PRSOs <p>Information campaign:</p> <ul style="list-style-type: none"> • The council will ensure the information campaign puts strongest emphasis on the wide range of support services for residents and makes clear that households should still approach the council and/or other sources of support <p>Affordable housing target (intermediate and social):</p> <ul style="list-style-type: none"> • Households on the council’s social housing register will have a high priority for any intermediate housing. • Targets will be set to ensure a proportion of new intermediate housing is affordable to households on the register with lower quartile incomes – and so may be affordable to households also registered for social 	
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							<p>housing. Westminster Employment Service also helps homeless households into employment which will help homeless households to be eligible for intermediate housing.</p> <ul style="list-style-type: none"> • By setting a higher housing target than is required by the London Plan and by increasing the affordable housing requirement to 35% - this will increase social housing provision to levels that may otherwise not have been delivered. 	
	Women	X	X	X	PRSOs, delayed approach following information campaign (as above)		As above	
Race	White	X	X	X	PRSOs, delayed approach following information campaign (as above)		As above	
	Mixed/Multiple ethnic groups	X	X	X	PRSOs, delayed approach following information campaign (as above)		As above	
	Asian/Asian British	X	X	X	PRSOs, delayed approach following information campaign (as above)		As above	
	Arab	X	X	X	PRSOs, delayed approach following information campaign (as above)		As above	
	Black/African/Caribbean/Black British	X	X	X	PRSOs, delayed approach following information campaign (as above)		As above	
	Gypsies / travellers	X	X	X	PRSOs, delayed approach following information campaign (as above)		As above	
	Other ethnic group	X	X	X	PRSOs, delayed approach following information campaign (as above)		As above	

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Disability	Physical	X	X	X	<p>PRSOs, delayed approach following information campaign (as above)</p> <p>Possible disadvantage from increasing digital access to frontline housing services and developing an online referral system for supported housing</p>		<p>As above</p> <p>Digital access to frontline housing services:</p> <ul style="list-style-type: none"> The council will continue to offer face to face appointments for frontline housing services and traditional methods for supported housing referral 	
	Sensory	X	X	X	<p>PRSOs, delayed approach following information campaign (as above)</p> <p>Digital access (as above)</p>		As above (plus the mitigation around access to front line housing services)	
	Learning Difficulties	X	X	X	<p>PRSOs, delayed approach following information campaign (as above)</p> <p>Digital access (as above)</p>		As above (plus the mitigation around access to front line housing services)	
	Learning Disabilities	X	X	X	<p>PRSOs, delayed approach following information campaign (as above)</p> <p>Digital access (as above)</p>		As above (plus the mitigation around access to front line housing services)	
	Mental Health	X	X	X	<p>PRSOs, delayed approach following information campaign (as above)</p> <p>Digital access (as above)</p>		As above (plus the mitigation around access to front line housing services)	
Sexual Orientation	Lesbian, gay men, bisexual	X	X	X	<p>PRSOs, delayed approach following information campaign (as above)</p>		As above	

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Age	Older people (50+)	X	X	X	PRSOs, delayed approach following information campaign (as above) Digital access (as above)		As above (plus the mitigation around access to front line housing services)	
	Younger people (16 - 25)	X	X	X	PRSOs, delayed approach following information campaign (as above)		As above	
	Children	X	X	X	PRSOs, delayed approach following information campaign (as above)		As above	
Gender Reassignment		X	X	X	PRSOs, delayed approach following information campaign (as above)		As above	
Impact due to pregnancy/maternity		X	X	X	PRSOs, delayed approach following information campaign (as above)		As above	
Groups with particular faiths and beliefs		X	X	X	PRSOs, delayed approach following information campaign (as above)		As above	
People on low incomes		X	X	X	PRSOs, delayed approach following information campaign (as above) Digital access (as above)		As above (plus the mitigation around access to front line housing services)	

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Table 3.3 lays out the potential impacts from the third section of the strategy: **Meeting the challenges ahead and having a homelessness system fit for the future**. This section includes the following sub-proposals:

9. To become a leader in the field of homelessness prevention by proposing solutions and bringing decision-makers together
10. To make the case to Government for homelessness services and prevention work to be fully funded by leading the discussion with Government and others on how the welfare system can work better for low income residents in central London, while also utilising every other funding source available to us.

Positive impacts:

- The impacts from these strategy proposals should be positive for all protected groups. In particular, point 10 aims to highlight to central government the problems with the existing benefits system (and especially that Local Housing Allowance levels for central London need to be more reflective of actual rents), which could eventually result in changes with positive impacts for all groups and especially those with lower incomes.
- The proposals also envisage that the council will lobby the government to allow the council to pilot new local levies related to service use, and to give the council the ability to introduce additional council tax bands. The revenue from these would be used to invest in communities and vulnerable residents. There is the possibility that future new levies and council tax bands may impact financially on some residents, however it is expected that the impact would predominantly be on residents with higher incomes.

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Table 3.3

Protected Group		Positive impact?			Negative impact? If so, please specify the nature and extent of that impact*	No specific impact	If the impact is negative how can it be mitigated? Please specify any mitigation measures and how and when they will be implemented	What , if any, are the cumulative effects of this decision when viewed in the context of other Council decisions and their equality impacts
		Eliminate discrimination	Advance equality	Good relations				
Points 9-10 of the Strategy: Meeting the challenges ahead and having a homelessness system fit for the future								
Gender	Men	X	X	X				
	Women	X	X	X				
Race	White	X	X	X				
	Mixed/Multiple ethnic groups	X	X	X				
	Asian/Asian British	X	X	X				
	Arab	X	X	X				
	Black/African/Caribbean/Black British	X	X	X				
	Gypsies / travellers	X	X	X				
	Other ethnic group	X	X	X				
Disability	Physical	X	X	X				
	Sensory	X	X	X				

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	Learning Difficulties	X	X	X				
	Learning Disabilities	X	X	X				
	Mental Health	X	X	X				
Sexual Orientation	Lesbian, gay men, bisexual	X	X	X				
Age	Older people (50+)	X	X	X				
	Younger people (16 - 25)	X	X	X				
	Children	X	X	X				
Gender Reassignment		X	X	X				
Impact due to pregnancy/maternity		X	X	X				
Groups with particular faiths and beliefs		X	X	X				
People on low incomes		X	X	X				

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SECTION 4: ACTION PLAN

4.1	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. <i>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.</i> NB. Add any additional rows, if required.						
	Action Required	Equality Groups Targeted	Intended outcome	Resources Needed	Name of Lead, Unit & Contact Details	Completion Date (DD/MM/YY)	RAG
	Refine planned information campaign on our services and ‘what you can expect’ leaflets to achieve positive message, and test these with a service user group See 6.1 of the Homelessness Strategy Action Plan	All	Households at risk of homelessness are encouraged to seek support at any early stage, whilst understanding that there are other housing solutions other than the offer of a social home	Existing	Communications and Engagement Manager Policy, Performance and Communications		
	Investigate recruiting ‘Community Connectors’ (to help homeless households settle in new areas, especially with private rented sector offers), through using social impact bonds	All	Council has funding to employ Community Connectors, who will help households to put down roots outside of Westminster rather than waiting in TA	TBA (subject to funding)	Homeless Contract and Performance Manager Growth, Planning and Housing		

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	See 7.3 of the Homelessness Strategy Action Plan						
	<p>Test out the council's new digital application process for frontline housing services with a service improvement group to ensure it meets everyone's needs</p> <p>See 5.4 of the Homelessness Strategy Action Plan</p>	All	Better understand the needs of applicants and ensure that no residents are disadvantaged by digital solutions	Existing	<p>Homeless Contract and Performance Manager</p> <p>Growth, Planning and Housing</p>		

THIS SECTION TO BE COMPLETED BY THE RELEVANT SERVICE MANAGER



SIGNATURE:

FULL NAME:Neil Wightman – Director of Housing.....

UNIT:Growth, Planning and Housing.....

EMAIL & TELEPHONE EXT:nwightman@westminster.gov.uk 020 7641 3625.....

DATE (DD/MM/YYYY):20th December 2019.....

WHAT NEXT?

It is the responsibility of the service to complete an EIA to the required standard and the quality and completeness of EIAs will be monitored by EMT.

All EIAs for proposed changes to levels of service arising from budget proposals must be completed by (insert date).

All completed EIAs should be sent to Equalities@westminster.gov.uk