Summary Box

The local authority has a statutory obligation under the Homelessness Act 2002 to have an up to date strategy on how it intends to deal with homelessness in its area. The current Homelessness Strategy 2008-13 officially comes to an end at the end of the year so a new one is now needed.

The Homelessness Prevention Strategy 2013-18 will be a proactive document accompanied by an annual action plan designed to enhance current service delivery and improve outcomes for anyone in Tameside who is under the threat of homelessness.

The EIA has not identified any negative impact upon any of the protected characteristic groups through the implementation of the strategy. The EIA has noted that homelessness in itself can have a disproportionate negative impact upon some groups; namely women, pregnancy, young people and members of the LGBT population.

It is anticipated that members of the first 3 of these groups will benefit from the improved outcomes gained through the implementation of the strategy.

Specific data in relating to the LGBT population and older people is not readily available from the official data that is collected. We are proposing to improve our levels of knowledge with regard to these groups.
Equality Impact Assessment Form

Section 1 - Background

BACKGROUND

The local authority is required under the Homelessness Act 2002 to undertake a review of homelessness in its area every 5 years and then develop an effective strategy describing how the issue will be dealt with.

The previous strategy was developed in 2008 and is due to be completed in 2013. We now need another strategy that outlines what our key strategic priorities will be over the next 5 years.

The Homelessness Strategy 2008-13 set out the need to move towards a more preventative approach towards dealing with homelessness. In this period we have achieved the targets set in relation to increasing the number of recorded prevention by at least 10% in every year running up to 2013.

Other notable achievements during the period of the strategy include reducing the use of temporary accommodation, reducing homelessness amongst 16 & 17 year olds and the development of a drop-in facility for people in crisis.

Core homelessness services in the borough are delivered via contracts with New Charter Housing Trust who deliver Tameside Housing Advice (approved via a Key Decision on 15 May 2013) and Supporting People commissioned services (service model approved via Key Decision 14 March 2012).

Section 2 - Issues to consider & evidence base

ISSUES TO CONSIDER

Homelessness legislation

The legislation that governs how local authorities should deal with homelessness is contained within the Housing Act 1996 (as amended by the Homelessness Act 2002). The legislation outlines how homelessness applications should be dealt with and identifies the household circumstances whereby they can be assessed as having priority need status. In some circumstances priority need status is automatically conferred. This includes households with children, pregnant women and applicants who are under 18 years of age. There are also households who can be conferred priority need status as a result of being assessed as vulnerable. The criteria for vulnerability include disability, mental health and fleeing violence.

Prevention

Alongside dealing with homelessness applications there is also an expectation that local authorities promote a preventative approach to homelessness. In Tameside there are a range of homeless prevention initiatives that have contributed to a 50% increase in the number of verified prevention cases since April 2010. Some prevention initiatives have provided proportionally more benefit to certain groups with protected characteristics. An example is the Sanctuary Scheme that installs safety measures in the homes...
of victims of domestic abuse. This has benefited proportionately more females who comprise nearly 80% of domestic abuse victims. National statistics on domestic abuse indicate that 30% of incidents commence when the female partner is pregnant.

**Welfare Reform**
The changes introduced by the Welfare Reform Act 2012 are expected to put more households in Tameside under increased financial pressure and therefore at a greater risk of becoming homeless. This EIA considers the potential impact of welfare reform upon protected characteristic groups.

**How protected groups may be affected:**

a) **Gender**
The figures provided by the Census in 2011 show an approximate 50:50 split in the overall population in Tameside between male and females. The data collected for the government to monitor homelessness trends does not distinguish between male and female in relation to either applications made or prevention activity. We do know that females are more likely to be victims of domestic abuse and this is the biggest single cause of homelessness and has been so for over 5 years in Tameside. The homelessness data records the status of the household and this indicates that females are more likely to be a member of households the Council owe a full housing duty to (i.e. homeless households that are unintentionally homeless and have a priority need). Lone female parents have made up 32% of the total figure over the past 3 years and combined with single females they consist of 53% of households found to be homeless and in priority need.

b) **Pregnancy and Maternity**
Pregnancy is one of the priority need criteria within the homelessness legislation and women who are pregnant are provided with accommodation if they become homeless and make a homelessness application.

c) **Age**
Young people are traditionally seen as one of the at risk groups regarding homelessness due to the difficult transitions many experience between the family home and independence. Parents no longer willing to accommodate a young person is a significant causative factor of homelessness. However the data indicates that this is a downward trend and Tameside figures are lower than the national average. Homeless applicants who are 16/17 and applicants aged between 18-20 who were formerly "in care" are automatically classified as priority need under the legislation. The joint protocol between Housing Strategy and Children's Services has ensured that more young people are dealt with under the Children's legislation (Childrens Act 1989 as amended) with less need to make placements in bed and breakfast accommodation.

d) **Sexual Orientation**
There is no data available to show whether people from the lesbian, gay, bisexual and transgender (LGBT) population are accessing homelessness services in Tameside. This is because there is no requirement from the government for local authorities to collect this data for homeless presentations and for those cases where homelessness is prevented.

Anecdotal evidence suggests that young lesbian, gay, bisexual and transgender people may be
proportionally more likely to be asked to leave the family home compared to other young people. Research into the issue commissioned by Crisis in 2005 indicated that in urban areas the proportion of young homeless people who are from the LGBT population could be as high as 1 in 3.

e) Disability
The issue of potential adverse outcomes for disabled households has recently been considered in August 2013 in relation to the introduction of a new Allocation Scheme when an Equality Impact Assessment was carried out.

As part of the action plan accompanying this strategy a Nomination Agreement will be developed outlining how Registered Providers will assist the council to fulfil its statutory duties of helping people in housing need access accommodation.

Currently over 70% of the households on the Council’s housing register require an adapted property and these households tend to have much longer waiting times than other households. Safeguards have been included in the Allocation Scheme to ensure that adapted properties or properties suitable for future adaptation are allocated wherever possible to households who require such provision.

f) Gender Reassignment
Consideration has been given to needs of people who have undergone gender reassignment and there are no indications that this strategy would have any adverse impact upon this group.

g) Race
The proportion of Black and Minority Ethnic households accepted as homeless in Tameside over the past 12 months is higher than expected compared to their proportion of the borough’s total population. It is also noted that this replicates the trend both regionally and nationally.

No adverse impact on the grounds of race has been anticipated with the implementation of this strategy.

h) Religion or Belief
Consideration has been given to the issue of religion and/or belief and no potential adverse impacts have been identified when this strategy is implemented.

i) Civil Partnership and Marriage
Consideration has been given to the issue of civil partnership and marriage and no potential adverse impacts have been identified when this strategy is implemented.

Consultation
We have consulted with the general public on the development of the Homelessness Prevention Strategy through the Council’s Big Conversation. People were asked to complete a survey asking their opinion on the key themes and issues seen to be the most relevant in developing a Homelessness Prevention Strategy. The 3 key themes and issues were partnership working, the impact of welfare reform and increasing the use of private rented properties to tackle homelessness.
Equality Impact Assessment Form

Respondents to the survey were positive about the suggestion to strengthen partnerships and some felt that this was needed. In terms of preventing homelessness a majority of respondents felt that priority should be given to identifying those at risk as early as possible and putting measures in place to help the household retain their home.

With regard to the use of the private rented sector a majority of respondents were in favour of increasing access to this sector of the market while 27% of respondents disagreed with this proposal.

A second stage consultation was also carried when a first draft of the strategy was shared with all the key stakeholders who were invited to make comments on the proposals. Responses were received from Tameside Public Health team and from New Charter Housing Trust.

LIST OF EVIDENCE SOURCES

- P1E Quarterly homelessness statistical returns
- Tameside Housing Advice Quarterly monitoring reports
- Domestic Abuse in Tameside – Identifying Opportunities for early intervention and prevention
- Consultation responses from Big Conversation survey
- Responses from Stakeholder consultation

Section 3 – Impact

IMPACT

The main anticipated impact of the Homelessness Prevention Strategy will be an improved profile at a strategic level of the importance of preventing homelessness. At an operational level we are expecting that collaboration between agencies will provide a range of interventions to ensure that a greater number of vulnerable households do not have to experience homelessness or other forms of social exclusion.

The Domestic Abuse strategy advocates that a holistic approach is taken with the issue of domestic abuse with an emphasis on early intervention and strong links established with drug and alcohol treatment and effective programmes aimed at perpetrators. The Bridges services being delivered by New Charter has been commissioned to improve the outcomes for victims of domestic abuse with an eventual goal of drastically reducing the levels of incidences across the borough. In terms of protected characteristic groups the biggest beneficiary of this policy will be females who have comprised 80% of the victims of domestic abuse over the past three years.
Concerns were raised in the stakeholder consultation with regard to the funding the council provides towards tackling domestic abuse. This was in reference to a recent decision taken to no longer directly fund the Sanctuary Scheme. This poses the risk that the scheme will only be able to support New Charter tenants facing domestic abuse.

The officer post has been integrated into the new Bridges service with a view to providing a more holistic approach to dealing with domestic abuse and the Council have offered their support in identifying new sources of funding.

The new Bridges service will also work with male victims of domestic abuse and will provide refuge accommodation for households with male children over the age of 14 years. Neither of these services have been available previously in Tameside.

Young people are also likely to be beneficiaries of the improved outcomes achieved in relation to domestic abuse. Whilst the strategy records improved outcomes for young people over the past 2 years we are aware that family breakdown remains a key causative factor in them becoming homeless and domestic abuse is frequently a feature in such scenarios. The adoption of the Troubled Families model in Tameside is an initiative that reduces family breakdown and provide more young people with a stable background in which to make their transition into adulthood.

Young people will also benefit from the initiatives being pursued through the strategy to increase access to suitable accommodation and developing positive move-on and sustainability. Young people have been identified as a group who are adversely impacted upon by the welfare reform changes. The changes to the housing benefits rates mean that anyone under the age of 35 will only qualify for a shared room rate if renting private accommodation. The strategy has highlighted the need to prepare young people to make the step into independence and increase their levels of self resilience to minimise the likelihood of them becoming homeless again.

Both national research and our own local anecdotal evidence indicate that being excluded from school is a frequent precursor to future homelessness amongst young people. The strategy proposes to strengthen the links between schools and the homelessness sector and to raise the need to pursue preventative work once this risk has been identified.

The Homelessness Prevention Strategy makes no direct reference to the needs of older people and their potential need of intervention to help avoid becoming homeless. Our local data collected to report to the government indicate low numbers of homelessness applications made by people over the age of 65. Over the past 3 years a total of 5 households over the age of 65 have been given a housing duty. In the last quarter Tameside scored 0% on this indicator compared to 2.3% for the North West and 1.5% nationally.

**Section 4 – Proposals & Mitigation**
**PROPOSALS & MITIGATION**

To achieve the outcomes identified in the Homelessness Prevention Strategy strong working partnerships will be needed across a broad range of agencies. The Preventing Homelessness Forum will be key to ensuring that we effectively engage with all relevant stakeholders and that the strategy is implemented through an annual action plan developed and overseen by a multi-agency group.

Through the implementation of the strategy we are expecting benefits to accrue to women, women who are pregnant and young people.

We are proposing that we improve our level of understanding in relation to the housing needs and the risk of homelessness in relation to older people and LGBT people. Through discussions with Age Concern and the Albert Kennedy Trust and other agencies we will scope out the housing issues facing older people and LGBT people respectively, including the identification of any perceived barriers to key services that could help in broadening access to suitable accommodation.

We are proposing to improve our collection, monitoring and analysis of data relevant to how homelessness impacts upon people within the protected characteristic groups. This proposal will be built into the forthcoming action plan that will be developed to accompany the strategy.

---

**Section 5 – Monitoring**

**MONITORING PROGRESS**

Colm O’Brien
Senior Housing Strategy Officer

<table>
<thead>
<tr>
<th>Issue / Action</th>
<th>Lead officer</th>
<th>Timescale</th>
</tr>
</thead>
<tbody>
<tr>
<td>Older people experiencing homelessness</td>
<td>Colm O’Brien</td>
<td>April 2014</td>
</tr>
<tr>
<td>Action – Scoping exercise to assess the level of housing need amongst older people</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Closer partnership working with Age Concern to ensure older people can access appropriate advice and information about their housing options.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reduction of funding to Sanctuary</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
**Equality Impact Assessment Form**

| Action – |  |  |
|----------|  |  |
| Liaise with Family Support Charity regarding the identification of future funding to ensure the long term sustainability of the prevention work to be carried out by the Sanctuary Project | Colm O’Brien | April 2014 |

**LGBT**

| Action – |  |  |
|----------|  |  |
| Work with the Albert Kennedy Trust to identify ways to improve the identification of need and the provision of support to LGBT young homeless people | Colm O’Brien | April 2014 |

**Data Collection**

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Collect and analyse data to assess the level of impact homelessness has had upon people within the protected characteristic groups</td>
<td>Colm O’Brien</td>
</tr>
</tbody>
</table>

**Sign off**

<table>
<thead>
<tr>
<th>Signature of Service Unit Manager</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Signature of Assistant Executive Director / Assistant Chief Executive</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>