

# Equality Impact Assessment [version 2.12]



Title: Tackling Homelessness Programme	
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input checked="" type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input type="checkbox"/> New <input type="checkbox"/> Already exists / review <input checked="" type="checkbox"/> Changing
Directorate: Growth and Regeneration	Lead Officer name: Paul Sylvester
Service Area: Housing and Landlord Services	Lead Officer role: Head of Housing Options

## Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

### 1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

The Tackling Homelessness Programme aims to reduce the significant financial burden of Housing Benefit subsidy loss created by the council's use of Temporary Accommodation (TA) by addressing both the supply of cheaper TA; and stabilising and then reducing the demand for TA placements.

The programme will increase affordable and sustainable TA supply by

- leasing modular homes on small pockets of council owned land
- buying a number of properties for use as TA and General Needs housing
- by exploring, setting up and implementing a council-owned Registered Provider to provide more supported exempt accommodation
- using some existing general needs housing as TA, subject to consultation with tenants

The programme will stabilise and reduce demand for TA placements by re-designing the Housing Options service so that it is focused on homelessness prevention. Significant investment (£962k in 24/25 and £1.3m in 25/26) has been made available to recruit to new positions in the service. This will allow changes to ways of working to better cope with demand and to stabilise and later reduce the number of TA placements. In particular the service re-design will undertake the following

- optimise and improve the triage process so that it is undertaken by Homelessness Prevention Team Housing Advisers
- increase the support available for people to access the private rented sector and to maintain private rented tenancies.
- plan and implement the changes made last year to the Home Choice Allocations Policy

This EQIA should also be viewed alongside the **Supported Housing Delivery plan**. The Supported Housing Delivery Plan will provide information for Registered Providers, and other supported housing providers, about our needs for new supported housing in the city. It is driven by three of our four transformation programmes (Our Families, Adult Social Care, and Temporary Accommodation) to deliver savings and improve services.

This is a high level EQIA at programme level. If a project that sits on this programme has impacts that haven't been covered in this EQIA, a separate EQIA will be completed.

## 1.2 Who will the proposal have the potential to affect?

<input checked="" type="checkbox"/> Bristol City Council workforce	<input checked="" type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community
<input type="checkbox"/> Commissioned services	<input type="checkbox"/> City partners / Stakeholder organisations	
Additional comments:		

## 1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	[please select]
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## Step 2: What information do we have?

### 2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: [How we measure equality and diversity \(bristol.gov.uk\)](http://bristol.gov.uk)

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g. from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here [Data, statistics and intelligence \(sharepoint.com\)](http://sharepoint.com). See also: [Bristol Open Data \(Quality of Life, Census etc.\)](http://bristol.gov.uk); [Joint Strategic Needs Assessment \(JSNA\)](http://bristol.gov.uk); [Ward Statistical Profiles](http://bristol.gov.uk).

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as [HR Analytics: Power BI Reports \(sharepoint.com\)](http://sharepoint.com) which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically active citizens for different characteristics. Additional sources of useful workforce evidence include the [Employee Staff Survey Report](http://bristol.gov.uk) and [Stress Risk Assessment](http://bristol.gov.uk)

Data / Evidence Source [Include a reference where known]	Summary of what this tells us		
<b>Housing Register</b> Data diversity monitoring ( <i>all households who have applied for social housing in Bristol</i> )	Over representation of Black and minoritised ethnic people – 30.57% of households on the Housing register  Over representation of Disabled people – 46.2% of households on the Housing Register identify as having a Disability or long-term health condition  <table border="1"> <tr> <td>Asian or Asian British: Any Other</td> <td>2.1%</td> </tr> </table>	Asian or Asian British: Any Other	2.1%
Asian or Asian British: Any Other	2.1%		

	Asian or Asian British: Bangladeshi	1.0%
	Asian or Asian British: Indian	0.8%
	Asian or Asian British: Pakistani	1.9%
	Black or Black British: African	10.4%
	Black or Black British: Any Other	1.7%
	Black or Black British: Caribbean	4.5%
	Chinese	0.2%
	Gypsy, Romany, Irish Traveller	0.1%
	Mixed: Any Other	1.1%
	Mixed: White and Asian	0.4%
	Mixed: White and Black African	0.6%
	Mixed: White and Black Caribbean	3.5%
	Other Ethnic	2.4%
	White Any Other	7.8%
	White British	58.6%
	White Irish	0.5%
	White Scottish	0.02%
	White Welsh	0.02%
	Female	57.7%
	Male	42.0%
	18-25	10.4%
	26-35	28.4%
	36-45	27.7%
	46-55	16.1%
	56-65	10.6%
	66-75	4.2%
	Over 75	2.3%
	Under 18	0.2%
	Disabled	46.2%
	LGBQ+	4.2%
	Trans	0.4%
	Pregnant	1.45%
	Buddhist	0.6%
	Christian	24.9%
	Hindu	0.2%
	Jewish	0.1%
	Muslim	14.1%
	None	37.8%
	Other	3.9%
	Sikh	0.4%
<b>Housing Support Register</b> - Case specific database for at risk and vulnerable citywide Homelessness prevention placements	<u>Equalities data on all those currently in an HSR-Supported Accommodation service (for families, the data is for the lead household member) – 1374 people</u>	

Gender identity

Male – 60.3%

Female – 37.2%

Transgender – 0.5%

Non-Binary – 0.2%

Prefer not to say – 0.2%

Don't Know – 1.7%

Age Range

16-17 – 1.1%

18-25 – 23.6%

26-35 – 26.6%

36-40 – 13.5%

41-50 – 24.7%

51-60 – 9.3%

61+ - 1.2%

Ethnicity

White British – 27.3%

White Irish – 0.7%

White European – 0.3%

Eastern European – 0.9%

Any other white background – 4.4%

Black/Black British – African – 9.6%

Black/Black British – Caribbean – 4.5%

Black/Black British – Somali – 1.7%

Black/Black British – Other – 1.6%

Any other Black/African/Caribbean background – 0.6%

Asian/Asian British – Bangladeshi – 0.6%

Asian/Asian British – Chinese – 0.1%

Asian/Asian British - Indian – 0.3%

Asian/Asian British – Pakistani – 2%

Asian/Asian British – Other – 1.1%

Any other Asian background – 0.3%

Arab – 1.7%

Mixed/Dual Heritage – White+Black African – 0.8%

Mixed/Dual Heritage – White+Black Caribbean – 3.9%

Mixed/Dual Heritage – White+Asian – 0.4%

Any other mixed/multiple ethnic background – 0.9%

Gypsy/Irish Traveller – 0.1%

Any other ethnic group – 3%

Prefer not to say – 0.4%

Don't Know – 32.8%

Religion/Beliefs

Christian – 10.8%

Muslim – 14.4%

Buddhist – 0.2%

Hindu – 0.1%

Sikh – 0.1%

Other – 1.9%

No Religion – 40%

Prefer not to say – 3.1%

Don't Know – 28.7%

Sexual orientation

Heterosexual – 74.2%

Gay/Lesbian – 1.4%

Bi-sexual – 2.3%

Other – 1.1%

Prefer not to say – 5.5%

Don't Know – 15.6%

Consider yourself Disabled?

Yes – 11.1%

No – 75.3%

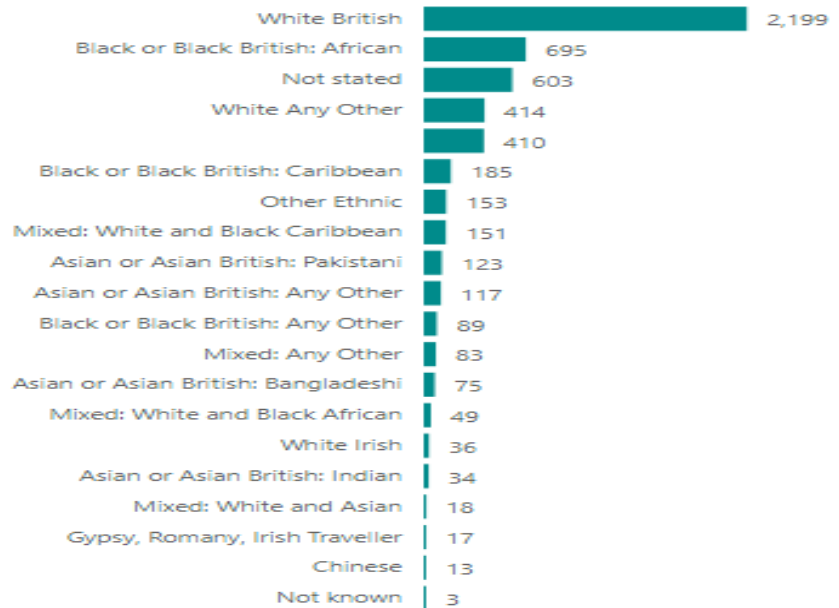
Prefer not to say – 1.2%

Don't Know – 4.7%

Case specific database for citywide Homelessness Prevention Service to capture those assessed under the Homelessness Reduction Act. The data below relates to homelessness applications in the last 12 months. For data on Disability – more than one category may be chosen.

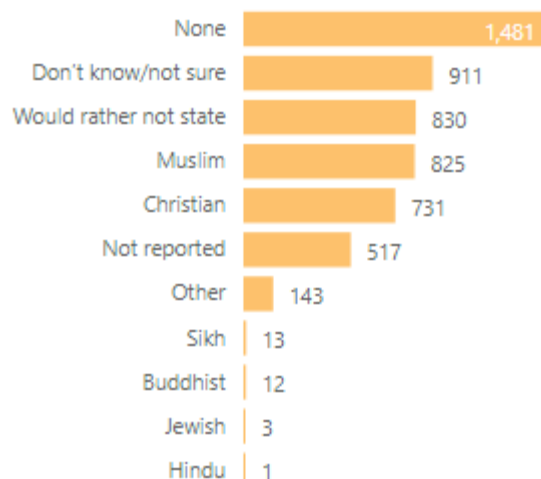
The graph lists the number of clients who have submitted a homelessness application grouped by ethnicity. There are 20 categories including White British (2199), Black or Black British: African (695), White any other (414). There are 603 applications where ethnicity is not stated and 3 applications where ethnicity is not known.

### Ethnicity



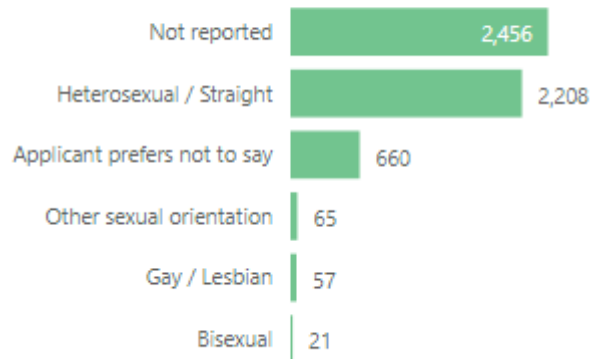
The graph lists the number of clients who have submitted a homelessness application grouped by Religion. There are 11 categories including None (1481), Muslim (825), Christian (731), Other (143), Sikh (13). The data is not complete and there are 911 don't know, 830 would rather not state and 517 not reports.

### Religion



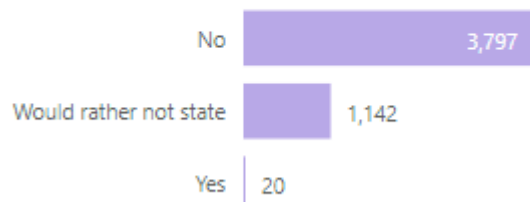
The graph lists the number of clients who have submitted a homelessness application grouped by Sexual orientation. There are 6 categories including Heterosexual (2208), would prefer not to say (660) Gay/Lesbian (57), Bisexual (21), Other (143), Sikh (13). The data is not complete and there are 2,456 applications where sexual orientation is not reported.

### Sexual orientation



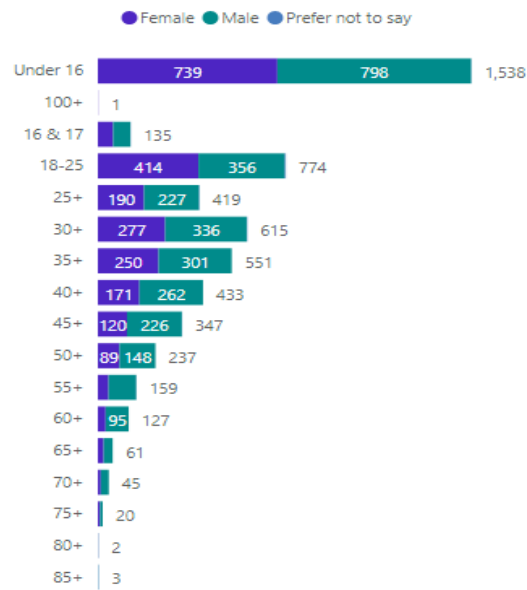
The graph lists the number of clients who have submitted a homelessness application grouped by gender identity. 20 clients have defined themselves as Transgender and 3,797 have defined themselves as not transgender. The data is not complete and there are 1,142 applications where clients would rather not state

### Transgender



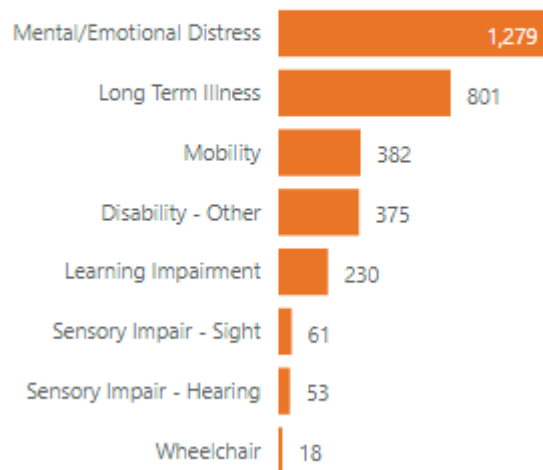
The graph lists the number of household members by age groupings and gender. There are 16 categories, including under 16, 16&17, 18-25 and then categories in 5 year groups e.g 25 – 30, 30 – 35 etc

### Household members distribution by ...



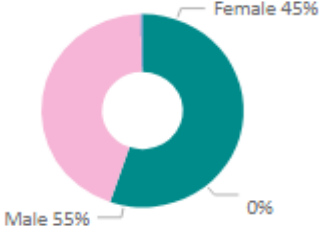
The graph lists the number of clients who have submitted a homelessness application grouped by Disability. There are 8 categories of disability including mental/emotional distress (1279), Long term illness (801) and mobility (382).

### Disability\*



The graph lists the number of clients who have submitted a homelessness application grouped by Gender. 45% female and 55% male



	<p style="text-align: center;">Gender distribution</p>  <p>A donut chart illustrating the gender distribution of the population. The chart is divided into three segments: a large teal segment representing 55% for 'Male', a smaller pink segment representing 45% for 'Female', and a very thin segment representing 0% for an unspecified category. Labels with leader lines point to each segment.</p>
<p><b>Population - Bristol Key Facts 2023 (November 2023 Update)</b></p> <p>Updated annually. The report brings together statistics on the current estimated population of Bristol, recent trends in population, future projections and looks at the key characteristics of the people living in Bristol.</p>	<p>The population of Bristol is estimated to be 479,200. Future population projections are uncertain and if pre-pandemic trends were to continue, the total population of Bristol would be projected to increase by 13% to reach 532,700 by 2043.</p> <p>28.4% of people in Bristol belong to a minority ethnic group (ie not 'White British'), up from 22.1% a decade ago.</p> <p>As nationally, there has been a marked change in immigration from mainly EU to non-EU. This follows EU free movement ending in Jan 2021, the easing of COVID-19 travel restrictions, and external issues such as the war in Ukraine. Increases in non-EU migration include both international students and workers.</p> <p>The population of Bristol has become increasingly diverse and some local communities have changed significantly.</p> <p>There are now at least 45 religions, at least 185 countries of birth and at least 90 main languages spoken.</p> <p>Bristol has a relatively young age profile. The median age of people living in Bristol is 33.9 years compared to 40.6 years in England and Wales. Bristol has 41 areas in the most deprived 10% in England, including 3 in the most deprived 1% (Hartcliffe, Withywood and Lawrence Hill).</p>
<p><b>Housing - Bristol Key Facts 2023 (November 2023 Update)</b></p>	<p>There are 205,270 homes in Bristol, and the average house price £330,000 against an England average of £268,000. Bristol earnings are similar to the national average resulting in affordability issues. The high cost of housing drives higher rents, meaning that housing outside of the social rented sector is becoming increasingly unaffordable.</p> <p>Bristol's tenure mix is 55% Owner Occupied, 26% Private Rented and 19% Social Rented.</p>
<p><u><a href="#">Bristol One City: Cost of Living Crisis – Bristol's One City approach to supporting citizens and communities (Oct 2022)</a></u></p> <p><u><a href="#">Cost of Living Risk Index (arcgis.com)</a></u></p>	<p>The rising cost of living is not impacting on everyone equally. People who are already experiencing inequity and poverty will be disproportionately impacted:</p> <p>People on the lowest incomes will have less available income but also pay more for the same services. For example, people unable to pay their bills by Direct Debit and those borrowing money are subject to higher costs and interest rates. This is what anti-poverty campaign group Fair by Design has referred to as a Poverty Premium</p> <ul style="list-style-type: none"> <li>• <b>Households with pre-payment energy meters</b> - households with pre-payment meters often pay above-average costs for their fuel. They will face a significant rise in their monthly bills in autumn and winter with</li> </ul>

	<p>increased energy usage as they do not benefit from the “smoothing” effect of Direct Debits, which spread usage costs evenly across the year</p> <ul style="list-style-type: none"> <li>• <b>Parents and young families</b> – parents of young children are more likely to seek credit and alternative support as they are less able, on average, to afford an unexpected expense. Single parents will be disproportionately affected; and one in four single parents find it difficult to manage financially (30%).</li> <li>• <b>Disabled people</b> – just under half of all people in poverty in the UK are Disabled people or someone living with a Disabled person. Disabled people have higher living costs, and tend to pay more for their heating, travel, food/diet, prescription payments, and specialist equipment. It is estimated that UK households that include Disabled children pay on average £600 more for their energy bills than an average household</li> <li>• <b>Black and Minoritised people</b> – A higher proportion of Black and minoritised ethnic groups reported finding it difficult to manage financially (14.9%) in 2021. In 2020 the Social Metrics Commission found that almost half of people living in a family in the UK where the head of the household is Black are in poverty. Age UK report that poverty among older Black and minoritised ethnic groups is twice as high as for white pensioners.</li> <li>• <b>People in rented accommodation</b> – it is estimated that 69% of low-income private renters in England will be forced to go without food and heating at least one day per week to meet rising housing and living cost. Almost three in ten homes in Bristol are privately rented</li> <li>• <b>Underserved populations</b> - It is likely that populations that are not typically well represented in data and research are likely to also face increased risk from rising cost of living. For example, refugees and asylum seekers, people experiencing homelessness, and Gypsy/Roma/Traveller groups.</li> </ul> <p><b>Cost of Living Risk Index</b> (October 2022) identified Lawrence Hill, Hartcliffe &amp; Withywood, Filwood, Lockleaze, Ashley, Southmead, Easton, Avonmouth &amp; Lawrence Weston, Hillfields and Eastville as neighbourhoods in Bristol more at risk of the impact of the cost of living crisis.</p>
<p>Evidence base for the 2024 – 2029 BCC Homelessness and Rough Sleeping Strategy</p>	<p>The 2024 – 2029 BCC Homelessness and Rough Sleeping Strategy is currently in development, and an evidence base has been prepared to assist with this. It sets out a review of the current situation with homelessness in Bristol, providing a statistical review of trends in homelessness presentations and underlying causes, activity in preventing and relieving homelessness, cohorts that may be more likely to become homeless and the profile of households experiencing homelessness. The information and data analysis we have reviewed covers both the period before and after the Covid-19 pandemic.</p> <ul style="list-style-type: none"> <li>• There is an over-representation of households from Black Asian and Minority Ethnic groups facing homelessness with these groups representing 18.9% of the population, but 31.1% of relief duty acceptances in 2022.</li> <li>• Poverty is a key risk factor for homelessness: by equality groups, in 2022-23, the highest levels of people struggling financially were reported amongst people of Black ethnicity (27.0%), single parents (23.0%) and Disabled people (25.7%).</li> <li>• Family homelessness (couples or single parents with an expectant mother in the household or with dependent children, to whom we owe a homelessness duty to) has been increasing due to a combination of the economic environment, welfare benefit reform and affordability of</li> </ul>

	<p>accommodation, particularly in the private rented sector. Families are staying longer in supported accommodation, leading to pent up demand for families in unsupported emergency and temporary accommodation who are waiting to move into supported accommodation.</p> <ul style="list-style-type: none"> <li>The priority need with the largest in numbers reported since 2018 has been those reporting ‘vulnerable as result of mental health problems’, where numbers increased from 36 to 245 in 2022-23. Those reporting ‘Vulnerable as result of physical Disability / ill health’ saw an increase from 33 (2019) to 170 (2022-23).</li> </ul>																																
<p>Temporary Accommodation 2022 Needs Analysis – <b>Single Framework service spec not published</b></p>	<p>Temporary Accommodation clients present with at least low support needs, so there is a place for new accommodation to address this gap in the supported housing market. As of November 2022, approximately 390 childless singles and couples reside in non-supported Temporary Accommodation, who would be eligible for low-medium supported housing. This shows the need for supported accommodation for those who are currently in unsupported temporary accommodation.</p>																																
<p><u>Bristol Quality of Life Survey 2023-24</u></p>	<p>The Quality of Life (QoL) survey is an annual randomised sample survey of the Bristol population, mailed to 33,000 households (with online &amp; paper options), and some additional targeting to boost numbers from low responding groups. In brief, the most recent QoL survey showed a mixed picture. In the 10% most deprived areas all but 6 results for our most deprived communities are worse than the Bristol average, same as last year (and statistically significantly worse in 31 of the 50).</p> <p>The <u>Quality of Life 2023/24 data dashboard</u> highlights those indicators, wards and equality and demographic groups which are better or worse than the Bristol average.</p> <p>For example, there are significant disparities based on people’s characteristics and circumstances in the extent to which they find it difficult to manage financially:</p> <table border="1" data-bbox="560 1317 1401 2107"> <thead> <tr> <th>Quality of Life Indicator</th> <th>% who find it difficult to manage financially</th> </tr> </thead> <tbody> <tr> <td>16 to 24 years</td> <td>17</td> </tr> <tr> <td>50 years and older</td> <td>6.5</td> </tr> <tr> <td>65 years and older</td> <td>4.1</td> </tr> <tr> <td>Female</td> <td>10.9</td> </tr> <tr> <td>Male</td> <td>9.9</td> </tr> <tr> <td>Disabled</td> <td>21.5</td> </tr> <tr> <td>Asian /Asian British</td> <td>20.2</td> </tr> <tr> <td>Black/Black British</td> <td>24</td> </tr> <tr> <td>Mixed/Multiple Ethnicity</td> <td>20.9</td> </tr> <tr> <td>White British</td> <td>8.7</td> </tr> <tr> <td>White Minority Ethnic</td> <td>10.4</td> </tr> <tr> <td>Lesbian Gay or Bisexual</td> <td>14.8</td> </tr> <tr> <td>No Religion or Faith</td> <td>9.9</td> </tr> <tr> <td>Christian Religion</td> <td>8.2</td> </tr> <tr> <td>Other Religions</td> <td>24.7</td> </tr> </tbody> </table>	Quality of Life Indicator	% who find it difficult to manage financially	16 to 24 years	17	50 years and older	6.5	65 years and older	4.1	Female	10.9	Male	9.9	Disabled	21.5	Asian /Asian British	20.2	Black/Black British	24	Mixed/Multiple Ethnicity	20.9	White British	8.7	White Minority Ethnic	10.4	Lesbian Gay or Bisexual	14.8	No Religion or Faith	9.9	Christian Religion	8.2	Other Religions	24.7
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Carer	13.2
Full Time Carer	21.4
Part Time Carer	10.5
Single Parent	30
Two Parent	10.4
Parent (all)	13.1
No Qualifications	13.7
Non-Degree Qualified	14.7
Degree Qualified	8.3
Rented (Council)	29.2
Rented (HA)	26
Rented (Private)	18.2
Owner Occupier	5.7
Most Deprived 10%	20.9
<b>Bristol Average</b>	<b>10.4</b>

**Additional comments:**

The latest national statistics (2020-21) indicate that homelessness has disproportionately affected certain communities, with single households, young people, and people of colour (especially Black/Black British people) who have seen the greatest increases.

National statistics show 84.9% of the overall population is White British, compared to 69.6% of people experiencing or at risk of homelessness. Black/Black British is the most overrepresented ethnic group comprising 9.7% of those owed a homelessness duty. In Bristol these national figures are broadly replicated with 16% of the population who are Black, Asian and minority ethnicity, compared to 30-40% of homeless acceptances between 2012 and 2018.

Comparing application data from Abrisas over the last 12 months to the Bristol Census 2021 data shows that 'Asian/Asian British' are both 6.6% of homeless applicants and 6.6% of the total Bristol population. In contrast Black/Black British make up 5.9% of the Bristol population and 18% of homeless applicants and are therefore overrepresented. Mixed or 'multiple ethnic groups' are 5.5% of homeless applicants compared to 9% of the population, and White Other are 8.5% of homeless applicants compared to 9.5% of the Bristol population. Both of these broad ethnic groups are therefore underrepresented amongst homeless applicants, in particular people listing a mixed ethnic group. White British applicants are also underrepresented, with 40% of homeless applicants compared to 71.6% of the Bristol population.

It should be noted that for 11% of applicants an ethnicity was not stated or not known, therefore there are limitations in comparing this data to the Census 2021 data. However, it is certainly evident that as with the national data, that Black/Black British is the most overrepresented broad ethnic group, and White British households are underrepresented.

For data recorded on Abrisas for homeless applications, there is inadequate data to compare these applicants to the Bristol data based on Religion or Sexual Orientation. 41% of applications have either don't know/not reported/rather not state as the answer for Religion, meaning it cannot reasonably be measured against Bristol population level data to analyse if certain groups are under or overrepresented. For the sexual orientation category this is even higher, as 57% of homeless applicants on Abrisas have unreported or not stated in the data. For answering whether they were transgender, 23% of applications did not state an answer. Both these categories have substantially higher levels of not known/not reported/did not state than the Census 2021 data, where 8.48% did not answer a category for sexual orientation, and 6.73% for the gender identity question.

Looking at the data recorded for applications by Disabled people there were 3199 people who identified as being Disabled people but as noted at the top of the Abrisas data set for homeless applications, more than one type of

Disability could be recorded per application. For example, a household may record mental/emotional distress and mobility issues. However, even with households recording in multiple categories, the data would suggest that Disabled households are overrepresented amongst homeless applicants. From the Census 2021, 19.4% of the Bristol population were Disabled people under the Equalities Act.

## 2.2 Do you currently monitor relevant activity by the following protected characteristics?

<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Disability	<input checked="" type="checkbox"/> Gender Reassignment
<input checked="" type="checkbox"/> Marriage and Civil Partnership	<input checked="" type="checkbox"/> Pregnancy/Maternity	<input checked="" type="checkbox"/> Race
<input checked="" type="checkbox"/> Religion or Belief	<input checked="" type="checkbox"/> Sex	<input checked="" type="checkbox"/> Sexual Orientation

## 2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

Although our corporate approach is to collect diversity monitoring for all relevant characteristics, there are gaps in the available local diversity data for some characteristics, especially where this has not always historically been included in census and statutory reporting e.g. for sexual orientation. We also know there are some under-reporting gaps in our workforce diversity information - where personal and confidential information is voluntarily requested from staff.

## 2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol's diverse communities.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to [Managing a change process or restructure \(sharepoint.com\)](#) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups and trades unions as well as affected staff.

### [Consultation and engagement – Bristol's budget 2023 -24](#)

The council launched a public consultation on its 2023-24 budget proposals, which included the TA project and the reallocation of GN to TA (Consultation proposal GR7), between Friday 11 November and Friday 23 December 2022. Proposal GR7 set out all the savings proposals we had identified to produce a balanced budget in the context of reduced available funding and increasing financial pressures.

Analysis of consultation responses showed that proposal GR7 received the highest support out of proposals included in section 1 of the consultation, with 77% who agree or strongly agree and 10% who disagree or strongly disagree.

GR7: Temporary accommodation need - 13 (1%) respondents commented on proposal of whom:

- 9 (0.5%) supported the proposal
- 1 (0.1%) favoured reducing the Housing Support budget significantly
- 1 (0.1%) was opposed to cuts to the temporary housing budget proposal
- 7 (0.4%) made other comments about the proposal including who should have priority for housing (ex-forces personnel) and who should not, the need to reduce the use of expensive private rented property, and surprise that this proposal isn't already happening.

## 2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

Consultation will continue to be done as necessary for specific projects or work streams on the programme. There is a need to consult on the work stream to allocate existing homes in the HRA (as properties are vacated) not via Home Choice, but directly to those in TA. Plans for this consultation are underway for it to take place in August/September 2024. Easy read versions, as well as versions in other languages will be available.

## Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#)

### 3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

#### GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)

A main impact of this programme is on households with a HomeChoice application who are bidding for social housing properties. The initiative which looks to convert some general needs council housing into Temporary Accommodation will reduce the availability of properties for households to bid on, leading to longer average waiting times to be rehoused. Whilst overall there will be fewer properties available for long term housing, Black / Black British people and Disabled people who are overrepresented in HomeChoice diversity data are also overrepresented in homelessness prevention, TA and waiting lists, so we do not anticipate a disproportionately negative impact from the reallocation of general needs housing into Temporary Accommodation on this basis.

For any conversion of properties from the council disposal list, and refurbishment of hospital trust properties we will ensure there is a wide range of property/locations (and property details are accurately recorded) with a suitable proportion of accessible and adaptable properties, and sufficient properties for larger families. Individual conversion schemes will be subject to separate equality analysis and will be centred around the specific needs of the homelessness client cohort.

For new units of modular homes on council land we are aware that in some instances accommodation may not always have ground floor access or be fully accessible for Disabled people with mobility impairments. However, whilst not suitable for all we will ensure as above there is a sufficient range of more accessible accommodation and always use client needs as a basis to determine placement.

We anticipate a positive impact from increasing the supply of supported exempt accommodation delivered by Registered Providers, because most temporary accommodation is currently unsupported, and this will promote a higher standard of overall support for service users.

We are also aware of existing structural inequalities and particular considerations, issues, and disparities for people in Bristol based on their characteristics, which we will take into account.

#### PROTECTED CHARACTERISTICS

##### Age: Young People

Does your analysis indicate a disproportionate impact? Yes  No

##### Potential impacts:

- As of 25th March 2024, there were 1587 households in temporary accommodation (TA), having increased from 1282 on 31st March 2023. 48% of these households include dependent children.

	<ul style="list-style-type: none"> <li>• Young people are often under-represented in engagement and consultation in Bristol and are less satisfied than average with the way the council runs things.</li> <li>• Children and young people from the most deprived areas of Bristol have the poorest outcomes in health and education in terms of health, education and future employment etc.</li> <li>• Young people in Bristol are more likely to: <ul style="list-style-type: none"> <li>○ have poor emotional health and wellbeing</li> <li>○ find inaccessible public transport prevents them from leaving their home when they want to</li> <li>○ 5% of 16-17 year olds (end of 2022) were “not in education, employment or training” (NEET), similar to the national average (5.2%)</li> </ul> </li> <li>• Young adults are most likely to have lost work or seen their income drop because of COVID-19 and the cost of living crisis</li> </ul>
Mitigations:	Provision of additional supported accommodation and general need affordable housing. Bristol City Council’s ‘Supported Housing Delivery Plan 2024 – 2029’ and ‘Young People’s Housing & Independence Pathway Commissioning Plan 2023’ set out the planned provision for additional supported housing for different cohorts in more detail, including the following for homeless families <ul style="list-style-type: none"> <li>• 200 units of Temporary Move-on accommodation (Self-contained accommodation with up to five rooms suitable for sleeping)</li> <li>• 1 family hostel (short-term supported accommodation for up to 15 families)</li> </ul>
<b>Age: Older People</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Bristol Ageing Better estimated at least 11,000 older people are experiencing isolation in the city. We must factor aging and the needs of older people into long term budgeting and service design.
Mitigations:	<ul style="list-style-type: none"> <li>• The Supported Housing Delivery Plan identifies that we need to build more supported accommodation which meets Building Regulation Wheelchair M4(3)(2)(b) standards.</li> </ul>
<b>Disability</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	44.2% of applicants on the Housing Register are from a household with a Disabled person or someone with a long term health condition. The impact will depend on the scale of the temporary reduction in supply of affordable housing  The priority need with the largest in numbers reported since 2018 has been those reporting ‘vulnerable as result of mental health problems’, where numbers increased from 36 to 245 in 2022-23. Those reporting ‘Vulnerable as result of physical Disability / ill health’ saw an increase from 33 (2019) to 170 (2022-23).
Mitigations:	<ul style="list-style-type: none"> <li>• We have ensured that properties with Disabled adaptations and wheelchair accessible properties are not included in the allocations to TA.</li> <li>• The Supported Housing Delivery Plan identifies that we need to Build more supported accommodation which meets Building Regulation Wheelchair M4(3)(2)(b) standards.</li> <li>• Consider mental health support services for future supported accommodation.</li> </ul>
<b>Sex</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> <li>• 57.7% of all applicants for social housing in Bristol are female</li> <li>• In recent years there has been higher levels of women in local homelessness presentation (18-20%)</li> <li>• Nationally 1 in 4 women experience domestic abuse in their lifetimes. The rate of recorded domestic abuse incidents in Bristol has shown a significant rise over recent years. In the year ending March 2022, the victim was female in 74.1% of domestic abuse related crime.</li> <li>• A higher proportion of boys have physical impairments and more boys than girls have diagnosed mental health disorders and learning difficulties.</li> </ul>
Mitigations:	The Supported Housing Delivery Plan will consider gender specific accommodation
<b>Sexual orientation</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

Potential impacts:	<ul style="list-style-type: none"> <li>Lesbian, gay and bisexual people are statistically more vulnerable to verbal and physical abuse</li> <li>1 in 5 Lesbian, Gay, Bisexual and Trans (LGBT+) staff have been the target of negative comments or conduct from work colleagues in the last year because they're LGBT+.</li> <li>One in four lesbian and bisexual women have experienced domestic abuse in a relationship, one third of them were abused by a man. Almost half of all gay and bisexual men have experienced at least one incident of domestic abuse from either a family member or a partner since the age of 16.</li> </ul>
Mitigations:	<ul style="list-style-type: none"> <li>The Supported Housing Delivery Plan identifies that we need to consider LGBT+ friendly accommodation</li> </ul>
<b>Pregnancy / Maternity</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> <li>The Equality Act 2010 applies to those who are pregnant or have given birth in the past 26 weeks, as well as making provisions to protect rights for breastfeeding.</li> <li>Ensure there is equality of opportunity for services in relation to pregnancy and maternity. This includes e.g. providing physical access when using prams and pushchairs, and availability of toilets and baby-changing facilities etc. , and flexible working patterns and service times for childcare arrangements</li> <li>Women from minoritised ethnic backgrounds are more likely to experience complications at birth</li> </ul>
Mitigations:	
<b>Gender reassignment</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> <li>As sexual orientation above trans people are statistically more vulnerable to verbal and physical abuse. Trans people regularly face prejudice and discrimination because of the way in which they transgress many of the norms of our culture and society.</li> <li>1 in 8 trans people (12%) in the workplace have been physically attacked by customers or colleagues in the last year because they were trans <ul style="list-style-type: none"> <li>We are aware that there is an issue more generally regarding the city centre location for young people, in particular for those who are transgender.</li> </ul> </li> </ul>
Mitigations:	The Supported Housing Delivery Plan identifies the need for supported accommodation for young people out of the city centre.
<b>Race</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	30.57% of households on the HomeChoice are from Black and minoritised ethnic backgrounds
Mitigations:	Build new supported and general needs accommodation.
<b>Religion or Belief</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> <li>There are at least 45 religions represented in Bristol. Approximately 1 in 20 people in Bristol are Muslim, and Islam is the second religion in Bristol after Christianity</li> <li>Budget proposals should take into account differing needs because of people's religion and belief (for example different requirements around diet, life events, and holidays)</li> </ul>
Mitigations:	We will take into account religious holidays and festivals that may fall during consultation periods, and adjust timings accordingly.
<b>Marriage &amp; civil partnership</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>OTHER RELEVANT CHARACTERISTICS</b>	
<b>Socio-Economic (deprivation)</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>



Potential impacts:	<ul style="list-style-type: none"> <li>• Bristol has 41 areas in the most deprived 10% in England, including 3 in the most deprived 1%. The greatest levels of deprivation are in Hartcliffe &amp; Withywood, Filwood and Lawrence Hill.</li> <li>• In Bristol 15% of residents (72,300 people) live in the 10% most deprived areas in England, including 17,900 children and 7,600 older people</li> <li>• There are an estimated 29,045 households living in fuel poverty in Bristol, 14.4% of all households (BEIS, 2022)</li> <li>• 8.3% of households have experienced moderate to severe food insecurity, rising to 18.9% in the most deprived areas of the city (QoL 2023-24)</li> <li>• 40.7% of people in Bristol are dissatisfied with the way the Council runs things, but this is 54.5% for people living in the most deprived areas of the city (QoL 2023-24).</li> <li>• The inequalities gap in life expectancy between the most and least deprived areas in Bristol is 9.9 years for men and 6.9 years for women.</li> </ul>
Mitigations:	Deliver new supported accommodation.
<b>Carers</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> <li>• Being a carer can be a huge barrier to accessing services and maintaining employment</li> <li>• Almost 34,000 people provide unpaid care in Bristol (7.6% of all people aged 5 &amp; over; England and Wales average is 8.9%).</li> <li>• Women have a 50% likelihood of being an unpaid carer by the age of 46 (by age 57 for men)</li> <li>• Young carers are often hidden and may not recognise themselves as carers_</li> </ul>
Mitigations:	
<b>Other groups</b> [Please add additional rows below to detail the impact for any other relevant groups as appropriate e.g. asylum seekers and refugees; care experienced; homelessness; armed forces personnel and veterans]	
Potential impacts:	It is anticipated that 100% of asylum seeker families who receive a positive immigration decision will require temporary accommodation through the local authority, whether TA through the priority Homeless Duty or, if refused status, will require emergency accommodation and subsistence support under Section 17 Children Assessment. Over 200 families previously housed by the home office, will need emergency and temporary accommodation from the Local authority if the government speeds up its decision making.
Mitigations:	

### 3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our [Public Sector Equality Duty](#) to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

The programme is looking to increase the amount of temporary accommodation available, meaning we will be able to move people out of hotels into more suitable accommodation. There is an over-representation of Black and Minoritised Ethnic Groups, and people living in poverty, on both the Housing Register and in TA. Being in an unsuitable housing situation, be that alternative accommodation while waiting for general needs housing, or inappropriate temporary accommodation such as a hotel, can be traumatic, and can negatively impact these groups. This can only be mitigated by an increase in affordable housing, and supported move on accommodation, as well as suitable TA.

The element of the programme which redesigns the Housing Options Service (currently 180+ staff across 12 teams) will improve the speed of effective engagement with households which present with a housing need. Issues of equality, equity and diversity will be given importance. It is not possible that all households will obtain the housing solution they wish for but they will receive high quality advice and assistance, wherever possible, to access affordable, suitable and sustainable accommodation.

## Step 4: Impact

### 4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

#### Summary of significant negative impacts and how they can be mitigated or justified:

- The significant negative impact is on households on the Housing Register who are not homeless. There will be a temporary reduction in supply of affordable housing for non-homeless clients as we create an in-house portfolio of Temporary Accommodation. The scale of the impact will be mitigated by limiting the number of properties that are converted into Temporary Accommodation, whilst achieving the necessary reduction in expenditure.
- Properties that are accessible for those who are Disabled with physical impairments will generally not be converted into Temporary Accommodation.

#### Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:

- Changing some of the Temporary Accommodation provision from private organisations to in-house or delivered by Registered providers will improve standards.
- Bringing on-line additional Temporary Accommodation with support will have a positive impact on clients with support needs.

### 4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

Improvement / action required	Responsible Officer	Timescale
We won't use general needs properties that have been adapted for those with disabilities for temporary accommodation.	Paul Sylvester	General needs properties will only be reallocated for temporary accommodation for a period of two years – from January 2025 to January 2027.
We will always use client needs as a basis to determine housing placements	Paul Sylvester	Ongoing
We are working with HR colleagues to consider the impact on BCC staff when re-designing the Housing Options service in relation to the following <ul style="list-style-type: none"> <li>• Staff with caring and childcare commitments</li> </ul>	Paul Sylvester	During the period of the service redesign June – December 2024

Improvement / action required	Responsible Officer	Timescale
<ul style="list-style-type: none"> <li>The requirement for staff to travel into the office more (cost and time)</li> <li>Communications about the changes being made to staff who are on long term sick leave, maternity leave or other types of long term leave</li> <li>Staff who have reasonable adjustments for the work place</li> </ul>		


### 4.3 How will the impact of your proposal and actions be measured?

How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

<ul style="list-style-type: none"> <li>The tackling homelessness programme will measure the financial savings being made and <i>the</i> impact on the significant financial burden created by Housing Benefit subsidy loss created by the council's use of Temporary Accommodation.</li> <li>The programme is also looking at how to measure the number of homelessness prevention duties that are being awarded by the council (a prevention duty requires the council to take reasonable steps to prevent homelessness for those who are threatened with losing their home within 56 days.)</li> <li>The consultation on allocate existing homes in the HRA (as properties are vacated) not via Home Choice, but directly to those in TA will inform the programme of any impact on the citizens of Bristol that have not yet been identified.</li> <li>Each project on the programme will work out its own measures for impact and will have its own EQIA where necessary.</li> </ul>
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## Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the [Equality and Inclusion Team](#) before requesting sign off from your Director<sup>1</sup>.

<p><b>Equality and Inclusion Team Review:</b> <i>Reviewed by Equality and Inclusion Team</i></p>	<p><b>Director Sign-Off: Fiona Lester, Interim Director Housing and Landlord Services</b></p> 
<p>Date: 24/7/2024</p>	<p>Date: 06/08/2024</p>

<sup>1</sup> Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.