

Equality Impact Assessment [version 2.9]



Title: Protect and Vaccinate DLUHC Grant	
<input type="checkbox"/> Policy <input checked="" type="checkbox"/> Strategy <input type="checkbox"/> Function <input checked="" type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input checked="" type="checkbox"/> New <input type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Growth and Regeneration	Lead Officer name: Paul Sylvester
Service Area: Housing Options	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.

<p>In response to the spread of the Omicron variant, we are using a grant from the Department for Levelling Up, Homes and Communities (DLUHC) with the aims of:</p> <ul style="list-style-type: none"> Accommodating people sleeping rough; and Increasing vaccination uptake amongst the single homeless cohort, including through the use of appropriate incentives such as travel costs, meal vouchers and/or funding for staff to take people to vaccination appointments. <p>Funding is in place until the end of March 2022. BCC is aiming to block block 50 rooms in Arnos Manor Hotel to accommodate people sleeping rough. On-site support will be provided by Golden Key. Providing self-contained accommodation is one of the most immediate ways to prevent transmission of Covid-19, as well as providing a stable base from which to support and encourage individuals to get vaccinated.</p>

1.2 Who will the proposal have the potential to affect?

<input type="checkbox"/> Bristol City Council workforce	<input checked="" type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community
<input checked="" 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.

Yes **No** [please select]

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: <https://www.bristol.gov.uk/people-communities/measuring-equalities-success>.

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 \(sharepoint.com\)](#). See also: [Bristol Open Data \(Quality of Life, Census etc.\)](#); [Joint Strategic Needs Assessment \(JSNA\)](#); [Ward Statistical Profiles](#).

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 \(sharepoint.com\)](#) 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](#) and [Stress Risk Assessment Form](#)

Data / Evidence Source <small>[Include a reference where known]</small>	Summary of what this tells us
Housing Support Register	Database for at risk and vulnerable citywide homelessness prevention placements
Abritas	Database for citywide Homelessness Prevention Service to capture those assessed under the Homelessness Reduction Act - linked to gov.uk H-CLIC
Joint Strategic Needs Assessment	Citywide quarterly data, population, housing, health
National Statutory Homelessness Statistics (Department of Levelling up Housing & Communities)	National Homelessness Data from quarterly returns by local government through H-CLIC returns
Homelessness Trends	Quarterly report on citywide homeless trends
Rough Sleeping snapshot	Citywide monthly and annual street count reported to gov.uk

Additional comments:
 Statutory homeless statistics capture data on everyone who has been assessed under the Homelessness Reduction Act. 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.

We know that there are higher than average numbers of women and non-EU nationals represented in the Bristol rough sleeping population, but we do not currently know enough about the reasons why.

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.

Data collected for the homelessness review indicates that there are gaps in existing ethnicity data and sexual orientation data; characteristics are not always stated or recorded. We will be looking to improve the range of equalities data we gather, both as a local authority and through the homelessness services we commission.

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. See <https://www.bristol.gov.uk/people-communities/equalities-groups>.

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 change 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.

The [Homelessness & Rough Sleeping Strategy 2019-24](#), which was informed by a full public consultation with external stakeholders and service users underwrites the provision of statutory homelessness services in the city, including services that aim to tackle rough sleeping and improve health and wellbeing. This strategy applies multi-agency governance that includes stakeholders and those with lived experience of homelessness.

Consultation on Protect and Vaccinate has taken place with local Counsellors, commissioned services, Public Health, internal teams and accommodation providers.

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.

Information will be provided to the local community about the programme and what measures are being taken to mitigate any impacts on the local area.

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 \(EqIA\) \(sharepoint.com\)](https://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 (different kinds of disability, ethnic background etc.) 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)	
There is the potential for people to refuse an offer to go into Arnos Manor Hotel if they don't know or like the area, or feel they would be isolated from their support network or key services. As a mitigation to this, cases can be reviewed on a case-by-case basis with alternative offers of accommodation offered where necessary (e.g. other temporary accommodation).	
Individuals may not be able to access Arnos Manor Hotel if their risks are considered too high to manage safely (e.g. arson risk). As a mitigation, an alternative offer will be provided at the Compass Centre for this cohort.	
PROTECTED CHARACTERISTICS	
Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Disability	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Accommodation needs to be accessible for those with physical disabilities (e.g. mobility difficulties, wheelchair users).
Mitigations:	Arnos Manor Hotel has level access and wheelchair accessible rooms.
Sex	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Mixed sex accommodation may not be suitable for some placements, and we need to ensure we are providing safe and appropriate accommodation for women.
Mitigations:	To consider whether we could keep a floor/area of the hotel for women only. Ideally with restricted access or an area which is within sight of onsite staff/ security.
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Race	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	The Office of National Statistics shows that vaccine hesitancy is five times higher among Black or Black British adults compared with White adults, and those who don't speak English at all or well have lower vaccination rates among those aged 50 years and over.
Mitigations:	Accommodation stays will not be conditional upon individuals agreeing to have a vaccine. Support around having the vaccination will be tailored to each individual and

	focused on empowering individuals to make an informed decision based on all the available evidence, and on-site vaccination clinics will be run.
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Accommodation includes a hot meal each day which may not meet the dietary requirements of guests.
Mitigations:	Dietary requirements will be checked as part of booking in process. Arnos Manor Hotel have confirmed that they can cater for multiple needs (e.g. Halal, vegan, vegetarian).
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
OTHER RELEVANT CHARACTERISTICS	
Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Adults living in the most deprived areas are more likely to report vaccine hesitancy.
Mitigations:	Accommodation stays will not be conditional upon individuals agreeing to have a vaccine. Support around having the vaccination will be tailored to each individual and focused on empowering individuals to make an informed decision based on all the available evidence.
Carers	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Other groups: People who do not have recourse to public funds (e.g. asylums seekers and Refugees)	
Potential impacts:	Accommodation will be paid for by a combination of Housing Benefit and personal service charges. This could exclude individuals who do not have recourse to public funds.
Mitigations:	Funding available to accommodate those outside of Housing Benefits/ personal service charge if individuals are not entitled to welfare benefits.

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 proposal will advance equality of opportunity for those who are currently street homeless by providing accommodation and support around vaccinations for all, regardless of need.

The proposal also have potential to benefit groups who are at increased risk of COVID-19 including people who are homeless and/or those with clinical vulnerabilities.

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:

There is a risk that the accommodation and/or services could exclude certain groups, leaving them without a reasonable offer off the streets. However, each of these risks has been mitigated, ensuring that nobody is excluded due to a protected characteristic.

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

The proposal will advance equality of opportunity for those who are currently street homeless by providing accommodation and support to access vaccinations.

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
Work with support providers to ensure better data collection to reduce gaps and increase or understanding of this client group.	Commissioning Managers	6 months
Write to local residents and businesses to update about the use of Arnos Manor Hotel and measures to mitigate any negative impact on the community.	Andy Corp	2 weeks

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

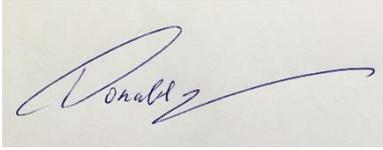
How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

Successful will be measured by:

- High rates of occupancy
- Low rates of refusals/ abandonments/ evictions
- Successful move-ons
- Increased vaccination rates

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 Director¹.

Equality and Inclusion Team Review: Reviewed by Equality officer	Director Sign-Off: Donald Graham, Director Housing and Landlord Services 
Date: 17/02/2022	Date: 28/01/2022

¹ 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.