

Equality Impact Assessment [version 2.9]



Title: Rough Sleeping Initiative (RSI) Services 2022-2025	
<input type="checkbox"/> Policy <input checked="" type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input type="checkbox"/> New <input checked="" type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Growth and Regeneration	Lead Officer name: Hywel Caddy
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.

The objective of this RSI proposal is to reduce rough sleeping in the city for 2022/25. The RSI 5 services will deliver direct service provision to assist people off the streets or to prevent people from rough sleeping in the first place. This proposal includes extensions for some existing RSI services and review of other current services, as well as introducing some new interventions. This EQIA is an update of the EQIA that was produced for the Reducing Rough Sleeping Commissioning Plan that can be found on the BCC website here . Much of the data is derived from the Needs Analysis for the Commissioning Plan.
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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 checked="" 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: <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 <i>[Include a reference where known]</i>	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: The numbers of people rough sleeping in Bristol has increased markedly since 2013 as a result of austerity (reducing service provision), Welfare Benefit reform and lack of affordable housing. Since the Pandemic, and additional funding from DLUHC there has been a reduction in the number of people on the streets on any one particular night as we have accommodated over 1,600 people during everyone in. The most recent annual count in November 2021 was 68, higher than in 2020 (50) but lower than before Covid. The RSI 2022-25 funding bid will aim to reduce rough sleeping by 2024-25 to as close to zero as possible. 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.

We are meeting with service providers to consider services that they feel are gaps in the current system and the inclusion of new interventions in the T+RSI 2022-25 bid. Representatives from Independent Futures (IF) with lived experience of homelessness are also giving feedback on proposals and will be involved in the commissioning process. The original commissioning plan for rough sleeping services published in December 2019 contains extensive consultation with people using services about the proposals that we are implementing.

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.

Engagement with Independent Futures representatives (an organisation of people with lived experience of rough sleeping) will be a thread that runs through the commissioning process. Representatives from this group will also assist in peer interviews of people who use services to inform service development, reduce gaps and improve access to services.

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 (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)

The wide range of services included in the RSI 5 proposal have been designed to provide high quality homeless prevention and reduction services suitable and inclusive for all service users considering their protected characteristics or other relevant characteristics. Specialist services for young people and vulnerable women are included in the proposal to mitigate the barriers that these groups may face accessing homelessness and rough sleeping services.

Public Health and Safeguarding are undertaking a thematic review of deaths in homelessness services to see how services can better support people who are at risk, particularly people who have substance misuse issues. Public Health are introducing a new system that provides real time information on deaths of people who are rough sleeping or in homelessness services. We will continue to review the circumstances of deaths of people who are homeless and look at how we can improve services to try to reduce deaths in the future.

PROTECTED CHARACTERISTICS

Age: Young People Does your analysis indicate a disproportionate impact? Yes No

Potential impacts: Info from the Needs Analysis shows that the majority of people (over 75%) who have accessed the current Rough Sleeper Service last year are aged between 26 and 50 years old. The number of **young people (18 to 25)** is 10% of the client group. Young people (up to the age of 25) are offered accommodation in the young people's pathway as this is often more appropriate for their needs and prevents them being exposed to older people with more complex needs who may take advantage of their vulnerability. There are rarely any people who are under 18 who access the service as they are immediately referred into social services and accommodated immediately through the Emergency Duty Team.

Mitigations: Specialist support will be provided for young people (Young Persons navigator) to access services and accommodation that is safe and suitable for their needs. The YP navigator is and will continue to be linked in with Youth MAPS and works to prevent rough sleeping amongst young people and to link them in with young people's accommodation when appropriate.

Age: Older People Does your analysis indicate a disproportionate impact? Yes No

Potential impacts:	Only 1% of clients who have contact with the service are 61 years or older . This partly reflects the vulnerability of people who end up sleeping on the streets and the complexity of their issues. The mean age at death was 45 years for men and 43 for women, far lower than for the general population, which is 76 years and 81 years for men and women respectively. This often reflects the impact of living on the streets, and the trauma that many people experience in early life.
Mitigations:	n.a.
Disability	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	The majority of people on entry to the Outreach service responded to say that they did not have a disability; indeed only 9% in 2017-2020 and 7% in 2019-20 stated that they did have a disability. The first two quarters of 2020-21 there was an increase in those where their disability status was unknown, again possibly reflecting people who moved from rough sleeping before fuller details were collected. However, as noted in the Needs Analysis, this contrasts with a 2010 Health Needs Audit of 152 people in homelessness services or supported housing, whereby 59% said they experienced a long term physical health need or problem. We also know that in the adult supported accommodation pathways in 2018-19, 73% of people have mental health needs and 43% of people have physical health needs. Accommodation needs to be accessible for those with physical disabilities (e.g., mobility difficulties, wheelchair users).
Mitigations:	Accommodation based services or Assessment centre's needs to have level access and wheelchair accessible rooms. For the accommodation-based services included in this proposal we will ensure property details are accurate to ensure placements are suitable. People with other disability such as sight loss are likely to be accommodated via other mechanisms. The bid is seeking to gain funding for 2 social workers to provide Care Act assessments where clients feel comfortable. There is also a bid for Hight Stability Housing that dovetails care provision into the supported housing pathways.
Sex	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Mixed gender accommodation may not be suitable for some placements, and we need to ensure we are providing safe and appropriate accommodation for women. Around 16% of outreach clients are female.
Mitigations:	There will be a proportion of the HMO cluster accommodation provision will be women only. We will be seeking to maintain specialist services and staffing levels for women accessing services who often find it difficult to access services (dependent on the RSI government funding bid). There will also be a specific One25 navigator working with women involved in sex work.
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Accommodation based services only: Lack of diversity in the locality, or within shared properties may mean increased likelihood of discrimination and hate incidents.
Mitigations:	We will build a collaborative relationship with accommodation providers and relevant support services to select and place people in appropriate accommodation across the city. Service providers are required to have robust policies to tackle discrimination, harassment, victimisations and hate incidents. All services are required to work within the public sector equality duty framework.
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Services are largely provided for single people.
Mitigations:	Any pregnant women will be referred to suitable services commissioned through different funding.
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Accommodation based services only: Lack of diversity in the locality, or within shared properties may mean increased likelihood of discrimination and hate incidents.
Mitigations:	We will build a collaborative relationship with accommodation providers and relevant support services to select and place people in appropriate accommodation across the city. Service providers are required to have robust policies to tackle discrimination, harassment, victimisations and hate incidents. All services are required to work within the public sector

	equality duty framework. This will be a focus of the provider equality impact assessments and we will discuss this with the supported housing Pathways to consider specific provision.
Race	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<p>Information from the Needs Analysis tells us that there are higher levels of Black/African/Caribbean/Black British people, white other and lower levels of Asian/Asian British people engaging with the service compared to the Bristol population in 2011. However, this census data is now out of date and is no longer thought to correspond with averages in Bristol.</p> <p>Information for the first two quarters of 2020-21 during the COVID19 period show a reduction in those identifying as White British, from 62% in both previous time periods to 52%. This drop is explained by slight increases in most other ethnicities - in particular double the number of individuals identifying as Black or Black British: African or where the ethnicity is unknown. This suggests that the COVID pandemic has had more of an impact on non-White British people who are disproportionately likely to enter the rough sleeping service. During 'Everyone in' the government suspended legislation around people who had no recourse to public funding which is likely to have had an impact in the reduction of white British clients in comparison to previous years.</p> <p>Services will need to ensure that their services are accessible for Black or Black British and African clients and EEA nationals.</p> <p>Accommodation based services only: Lack of diversity in the locality, or within shared properties may mean increased likelihood of discrimination and hate incidents.</p>
Mitigations:	We will build a collaborative relationship with accommodation providers and relevant support services to select and place people in appropriate accommodation across the city. Service providers are required to have robust policies to tackle discrimination, harassment, victimisations and hate incidents. All services are required to work within the public sector equality duty framework.
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	A significant proportion say they have no religion. More recently 12% said they were Christian and 4% said they were Muslim. Engagement and Accommodation based services: Lack of diversity in the locality, or within shared properties may mean increased likelihood of discrimination and hate incidents. Also, some accommodation could be in areas with a lack or low number of places of worship.
Mitigations:	We will build a collaborative relationship with accommodation providers and relevant support services to select and place people in appropriate accommodation across the city. Service providers are required to have robust policies to tackle discrimination, harassment, victimisations and hate incidents. All services are required to work within the public sector equality duty framework.
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:	Isolation, if accommodation placement is not near to work, schools, support networks and transport. We are limited by what we can offer people with no recourse to public funding.
Mitigations:	Careful consideration at placement according to the individual's needs. Plus, accommodation will be sought in locations across the city that are close to support services and agencies. We are bidding for additional funding to help people with no recourse to public funding to have a realistic option to move off the streets, including short term accommodation and access to legal advice.
Carers	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Placement away from the person that the carer is caring for.
Mitigations:	Careful consideration of location and access to carer network for placement

Other groups [Please add additional rows below to detail the impact for other relevant groups as appropriate e.g. Asylums and Refugees; Looked after Children / Care Leavers; Homelessness]	
Potential impacts:	Accommodation based services 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. We are bidding for additional funding to help people with no recourse to public funding to have a realistic option to move off the streets, including short term accommodation and access to legal advice.

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 people who are homeless, and improved access to homeless services through support workers and navigators.

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 or other relevant characteristic.

Information collected on sexual orientation is poor in the current service (although the current provider, St Mungo's is very proactive in supporting LGBTQ+ service users). We will ensure that commissioned providers assimilate recommendations from Stonewall's 'Finding Safe Spaces' so that people feel safer in services in the city and confident to be open about their sexuality.

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 or are at risk of homelessness by providing accommodation and support to access homelessness prevention services.

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 Manager	6 months

Improvement / action required	Responsible Officer	Timescale
We will continue to monitor data and ensure that all commissioned services produce an EQIA with and action plan each year to improve access to services for all protected characteristic groups. The EQIAs and action plans will be an integral part of the annual reviews of services.	Commissioning Manager	Annually

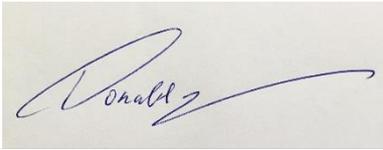
4.3 How will the impact of your proposal and actions be measured?

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.

- Marked reduction in the monthly rough sleeping counts.
- Successful move-ons into suitable settled tenancies, e.g., private renting or social housing, for all service users regardless of protected or other relevant characteristics.
- Low rates of disengagement with services and/or abandonments/refusals/evictions in accommodation-based services.
- Length's of stay within each service to match appropriate timeframe applicable to the type of service provided.

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: Duncan Fleming	Director Sign-Off: Donald Graham, Director Housing and Landlord Services 
Date: 26-01-22	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.