

# Equality Impact Assessment [version 2.9]



Title: Singles and Couples Flexible Supported Accommodation	
<input type="checkbox"/> Policy <input 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: Joe Wheeler
Service Area: Housing Options	Lead Officer role: Project Manager

## 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.

This proposal focuses on the development and procurement of a new flexible-level supported housing service for homeless single people and couples.

The proposal is aimed at citizens who become homeless, or are threatened with homelessness, and the council has a duty to provide housing and assistance under homelessness legislation.

This framework is being developed as a much-improved alternative to the current expensive private sector led Temporary Accommodation framework. The Council has a legal duty to provide housing in certain prescribed circumstances, and these emergency housing solutions are procured almost exclusively from the private sector. Government disincentivise this approach via a subsidy scheme, and the delivery of approximately 800 units of accommodation only costs BCC circa £9.2 per annum. By recommissioning these services to an alternative model, we can reduce this expenditure to nil, instead spending Council funds on a valuable support service costing approx. £2.8 million.

Registered Providers (RPs) will tender for a support contract and deliver support with an accommodation service. We expect that most of the properties will be leased by the RPs from private landlords, and then let to tenants on a licence agreement after meeting the requirements of BCC's private rented housing team.

### 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.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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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 [Include a reference where known]	Summary of what this tells us
Housing Support Register	Case specific database for at risk and vulnerable citywide Homelessness prevention placements
Abritas	Case specific database for citywide Homelessness Prevention Service to capture those assessed under the Homelessness Reduction Act - linked to gov.uk HCLIC
Joint Strategic Needs Assessment	Citywide quarterly data, population, housing, health
National Statistics (Department of Levelling up Housing and 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
Population -Bristol Key Facts 2021 (March 2021 Update)	The population of Bristol is estimated to be 465,900 and is expected to increase over the 25-year period (2018-43) to 532,700. This is a 15% increase and is

	<p>higher than the 10% increase forecast for England. The proportion of the population who are not 'White British' has increased from 12% to 22% of the total population.</p> <p>The population of Bristol has become increasingly diverse and some local communities have changed significantly. There are now at least 45 religions, at least 187 countries of birth and at least 91 main languages spoken.</p> <p>Bristol has a relatively young age profile with more children aged 0-15 than people aged 65 and over. Bristol has 41 areas in the most deprived 10% in England, including 3 in the most deprived 1% (Hartcliffe, Withywood and Lawrence Hill)</p>
Housing -Bristol Key Facts 2021 (March 2021 Update)	<p>There are 203,490 homes in Bristol, and the average house price £309,800 against an England average of £261,900. 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 53% Owner Occupied, 29% Private Rented and 18% Social Rented</p>
Equalities Data (July 2022 Briefing Note)	Comprehensive data on equalities in Bristol (except Gender and Sexual Orientation, which are due to be published for the first time in October 2022)
Deprivation in Bristol 2019 (Report)	Bristol's position within English deprivation indices as at 2019.
<p><b>Additional comments:</b></p> <p>Statutory homeless statistics capture data on everyone who has been assessed under the Homelessness Reduction Act. This is easily one of the best sources of homelessness statistics in the world.</p> <p>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.</p> <p>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</p>	

## 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, with ethnicity not always stated or recorded. From what data there is, indicates that Black, Asian and minority ethnic homelessness applicants are over-represented compared to their relative proportion in the Bristol Community as a whole.

We also know that there are gaps in our data relating to sexual orientation. 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.

In general, we acknowledge that there are gaps in our knowledge about the future demands on homelessness services as it affects a range of equalities groups and 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 etc., underwrites the provision of statutory homelessness prevention services in the city. Services that include the supply of temporary accommodation. This strategy applies multiagency governance that includes stakeholders and those with lived experience of homelessness

## 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.

The framework will require supplier monitoring, quality assurance, property inspections and contract management as part of the contract specification. We will seek regular feedback from placements, conduct regular meetings with suppliers, and compliance inspections with all units provided to the framework.

## 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.

<b>GENERAL COMMENTS</b> (highlight any potential issues that might impact all or many groups)	
<b>PROTECTED CHARACTERISTICS</b>	
<b>Age: Young People</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	The experience of the shared accommodation environment might negatively impact on some placements. Some young people may feel isolated or cut off from networks and/or insecure or unsafe or be more likely to be victims of abuse or crime. Younger people may be vulnerable to becoming engaged with criminal or antisocial activity (either voluntarily or by coercion/intimidation) if this occurs.
Mitigations:	We include suitability for shared accommodation in triage and risk assessment. Where possible young people will be accommodated in specialist YP accommodation. We will liaise with providers to allocate YP only shared accommodation as appropriate.
<b>Age: Older People</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Disability</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	The range of accommodation may not be sufficiently accessible for e.g. wheelchair users or have limited access for people with mobility issues.
Mitigations:	We will aim to ensure that a suitable proportion of properties brought to the framework meet accessibility requirements e.g. level access. We will ensure property details are accurate and work with RPs on detail to ensure placements are suitable. People with other disability such as sight loss are likely to be accommodated via other mechanisms.
<b>Sex</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Mixed gender households may not be suitable for some placements, and we need to ensure we are providing safe and appropriate accommodation for women.
Mitigations:	We plan to offer an apportioned number of single gender shared households
<b>Sexual orientation</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Lack of diversity in the locality, or within shared properties may mean increased likelihood of discrimination and hate incidents.
Mitigations:	We have a collaborative relationship with providers to select and place people in appropriate accommodation across the city. Providers are required to have robust policies to tackle discrimination, harassment, victimisations and hate incidents.
<b>Pregnancy / Maternity</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Gender reassignment</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Lack of diversity in the locality, or within shared properties may mean increased likelihood of discrimination and hate incidents.
Mitigations:	We have a collaborative relationship with providers to select and place people in appropriate accommodation across the city. Providers are required to have robust policies to tackle discrimination, harassment, victimisations and hate incidents.
<b>Race</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	We have a collaborative relationship with providers to select and place people in appropriate accommodation across the city. Providers are required to have robust policies to tackle discrimination, harassment, victimisations and hate incidents.
Mitigations:	We have a collaborative relationship with providers to select and place people in

	appropriate accommodation across the city. Providers are required to have robust policies to tackle discrimination, harassment, victimisations and hate incidents.
<b>Religion or Belief</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Lack of diversity in the locality, or within shared properties may mean increased likelihood of discrimination and hate incidents, or do not have their cultural needs met
Mitigations:	We have a collaborative relationship with providers to select and place people in appropriate accommodation across the city – e.g. nearer to places of workshop. Providers are required to have robust policies to tackle discrimination, harassment, victimisations and hate incidents
<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:	Isolation, if placement is not near to work, schools, support networks and transport
Mitigations:	Careful consideration at placement
<b>Carers</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Placement away from carer
Mitigations:	Careful consideration of location and access to carer network for placement
<b>Other groups</b> [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:	Location of asylum seekers and refugee placements away from support networks
Mitigations:	Careful consideration and discussion with relevant support providers about support networks ahead of placement.

### 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 to deliver homeless accommodation with housing related support is expected to engender improved client outcomes than the currently utilised non-supported Temporary Accommodation. Needs analysis has evidenced that 100% of clients assessed in Temporary Accommodation present with support needs which are not being met while housed in non-supported accommodation. This is likely to lead to quicker re-housing, and mitigates the risk of street homelessness for these groups.

## 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.

<b>Summary of significant negative impacts and how they can be mitigated or justified:</b>
Poor placement creating local community imbalance
<b>Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:</b>
Supply of good quality RP provided supported accommodation to support the prevention of homelessness in the city.

## 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
Through a close and collaborative relationship - ensure all suppliers offering accommodation to these blocks provide quality accommodation in the right place to meet the needs of the service and the placements made	Joe Wheeler	Ongoing

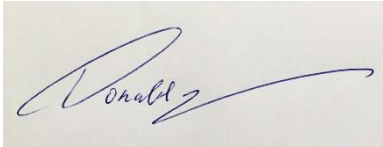
## 4.3 How will the impact of your proposal and actions be measured?

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.

High rates of occupancy, low rates of void empties and successful move on to more sustainable accommodation for those placed.
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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>.

<b>Equality and Inclusion Team Review:</b> <i>Reviewed by Equality and Inclusion Team</i>	<b>Director Sign-Off: Donald Graham, Director Housing and Landlord Services</b> 
Date: 22/8/2022	Date: 09/09/2022

<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.