

Equality Impact Assessment [version 2.9]



Title: Rough Sleeping Accommodation Revenue Funding Extension	
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input checked="" type="checkbox"/> Other [please state] Funding for Accommodation	<input type="checkbox"/> New <input checked="" 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: Paul Sylvester

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 purpose of this proposal is to seek approval to accept and spend additional grant funding awarded by the Department of Levelling Up Housing and Communities under the Rough Sleeping Accommodation Program (RSAP). If approval is obtained, this will allow the continuation of support services for the 143 units of supported move on accommodation under RSAP schemes. These units are used to accommodate and support single people who are rough sleeping or who have recently rough slept and expands our existing Supported Move on services in Bristol.

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 type="checkbox"/> The wider community
<input checked="" type="checkbox"/> Commissioned services	<input checked="" type="checkbox"/> City partners / Stakeholder organisations	
Additional comments: The Proposal affects partners, stakeholder organisations and internal council employees who would be delivering the support service. It also affects service users who would be accessing the accommodation and support services.		

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 [Include a reference where known]	Summary of what this tells us
Reducing Rough Sleeping Needs Analysis December 2020 (Appended to this EQIA)	The Needs Analysis tells shows us the current situation in relation to affordable housing need and demand in Bristol and thus the need for this accommodation. It also gives us the demographics and equalities profile of Bristol's current Rough sleeping population who will be the beneficiaries of this accommodation. It included data on age, gender, ethnicity, disability, sexual orientation, and religion.
Bristol Quality of Life Survey Quality of Life 2020-21 — Open Data Bristol	Bristol citizens who are: living in council rented accommodation; living in the 10% most deprived areas of the city; aged under 25; Black, Asian and minority ethnicity; have a non-Christian faith/religion; a full-time carer; or a single parent – are less likely to be satisfied overall with their current accommodation than average.
Additional comments:	

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

<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Disability	<input type="checkbox"/> Gender Reassignment
<input type="checkbox"/> Marriage and Civil Partnership	<input 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.

There is no reliable data on marriage and civil partnership, pregnancy and maternity (the majority of Bristol's rough sleeping population are single male), or Gender Reassignment.

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.

We regularly consult with internal and external stakeholders who are delivering services for single people that are rough sleeping or have recently rough slept, in order to understand the needs of clients. Specifically in relation to RSAP Supported Move-on, we have units of accommodation in delivery already from funding awarded to Bristol in 2020 and subsequent awards in 2021. There has been consultation with partners in the processes of setting up referral criteria and procedures for accessing this accommodation. As part of this consultation, we have listened to what specific needs the client group have and what the main challenges and barriers are in terms of accessing move-on accommodation, paying particular attention to equalities related issues. We also have regularly quarterly monitoring meetings with providers who are delivering these schemes where any particular issues or concerns are raised, including consideration of any equalities issues or equalities action plans that might be needed.

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.

Commissioners and service managers of the accommodation will continue to liaise regularly with service staff and clients to ensure we fully understand the needs of the client group and ensure that there is as equal access as possible for this accommodation.

There is a named commissioning officer and manager who are responsible for ongoing engagement with and contract management of the providers of the accommodation and aligning support service. This will include multi agency meetings to help ensure a collaborative approach, consistency of quality of service, and collective addressing of any issues that arise in terms of people accessing the service and best practice sharing.

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)	
<p>This proposal is an extension of an existing proposal which highlighted concerns.</p> <p>There is a risk that if there is not enough suitable accommodation in a range of localities, some people may not have their needs met, be cut off from their existing cultural / support networks or be insecure or unsafe because of their protected characteristics.</p> <p>Because a portion of the housing are units within planned BCC new build developments, they have been sourced 'as is' and this could mean there are limitations in respect of making some of the accommodation accessible. There will be specific areas of the city that these new build developments are located in which could have an impact on people with particular cultural or religious needs who would benefit from living in certain areas of the city.</p> <p>There has been work to mitigate these risks, including allocating a small number of units within each development with as much spread across the city as possible. Plus, where we aim to convert either existing council property stock into Supported Move-on Accommodation we have endeavoured to make these flats as accessible as possible for people with disabilities and mobility needs.</p> <p>Wherever possible we will further mitigate these risks by engaging with referring services to understand the diversity and needs of people who are suitable for this accommodation, subject to having a suitable property for their needs.</p> <p>We will also ensure that organisations managing accommodation comply with their duty to make reasonable adjustments for people with disabilities, wherever this is viable.</p>	
PROTECTED CHARACTERISTICS	
Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Most of the accommodation acquired will be self-contained accommodation which may limit access for people who are aged under 35 who are not eligible for the single room rate of housing benefit.
Mitigations:	There are existing shared properties within the Supported Move-on services that can be offered to young people. However, services will also work with clients to ensure anyone who is entitled to an exemption from shared housing rate can evidence this and therefore be able to access self-contained accommodation. Part of the proposal for RSAP round 5 includes 11 units for young people. While all of these flats must be allocated to people who are eligible for the shared housing rate, the wraparound support dedicated to these units will be tailored to meet the needs of young people.
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	N/A
Disability	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	There is a limited supply of accommodation that is accessible or able to be adapted to be suitable for disabled people, including those with mobility impairments.
Mitigations:	We will engage with referring services to understand the numbers of people who may be suitable for this accommodation subject to having a suitable property for their needs, and also to obtain information about what those needs are. Although the sourcing and conversion works will already be complete, we will still use this information to inform whether any further adaptation works may be possible to help ensure there is sufficient accommodation that will meet the needs of disabled people, including those with mobility impairments.

	We will ensure through contracting arrangements that providers comply with their duty to make reasonable adjustments where viable.
Sex	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Women have historically made up around 15-20% of the client group and may experience additional barriers to accessing services. Accommodation may not be suitable in terms of safety or facilities.
Mitigations:	The allocation of accommodation will consider the needs of women, including safety and facilities.
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	A lack of diversity in some localities may mean increased likelihood of discrimination and hate incidents.
Mitigations:	As above we will seek to ensure there is a range of suitable properties in different localities.
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	N/A
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	A lack of diversity in some localities may mean increased likelihood of discrimination and hate incidents.
Mitigations:	As above we will seek to ensure there is a range of suitable properties in different localities.
Race	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	A limitation in terms of the areas in which successful purchases can take place may have an impact on Black, Asian and minority ethnic people, as some areas of the city have higher levels of racially motivated hate crime, and particular cultural needs may not be so easily met in these areas.
Mitigations:	We have sourced this accommodation across a wide a range of areas across the city, with attention to sourcing accommodation that will meet the needs of people from different ethnic backgrounds. Accommodation allocations will be managed in a “best fit” way meaning that properties can be prioritised for client groups that will meet their cultural needs as far as possible.
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Some areas may lack places of appropriate places of worship, food etc. and a lack of diversity in some localities may mean increased likelihood of discrimination and hate incidents.
Mitigations:	As above we have sought to ensure there is a range of suitable properties in different localities and this will be taken into account when considering allocations and through contractual management.
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	N/A
OTHER RELEVANT CHARACTERISTICS	
Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Whilst there will clearly be an over-representation of service users living in deprivation, we have not identified any additional negative impact from this proposal
Mitigations:	N/A
Carers	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	There are no known potential impacts on this equalities group.
Mitigations:	N/A
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:	

Mitigations:	
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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

There is an open access referral criteria in place for the accommodation which will ensure there is no unlawful discrimination for a protected group. This criteria will remain in place through this extension period.

This proposal aims to provide additional secure and long-term accommodation to some of the most vulnerable citizens of Bristol. The security of this accommodation and the wraparound support provided with each placement will advance the equality of opportunity for occupants to engage with work or volunteering and training opportunities as well as integrating into local communities and developing skills to live independently.

Most of the accommodation is dispersed in existing communities. Therefore, in each of these settings there is likely to be a mixed and diverse community (as is characteristic to many areas of Bristol). This may serve to support the fostering of good relations between people who share a protected characteristic and those who don't.

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 possible lack of accessible accommodation for disabled people and there is a risk of people being accommodated in areas which do not meet their cultural or other needs. This can be mitigated by the fact that accommodation has been sourced across different areas in the city. Allocations into this new accommodation will be informed by the needs of the clients to ensure people are best matched to the properties available.

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

Ongoing meaningful consultation with the services referring into this accommodation will enable us to fully understand the demographic and needs of specific clients who are likely to be referred to this accommodation and this can be used to ensure the accommodation that is sourced is as best fit as possible and meets the needs of a range of equalities groups. Robust monitoring with a range of tracking methods will enable us to closely monitor that this accommodation is not directly or indirectly excluding certain protected groups.

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
Range of relevant monitoring mechanisms to be put in place	Paul Sylvester	These are in place for RSAP schemes already delivered and will continue

Improvement / action required	Responsible Officer	Timescale
		until March 2025 (the end of this extension period).
Seek specific demographic and equalities data of those who could be referred to this accommodation and pass this information to those who are sourcing the accommodation or planning any conversions of existing BCC property stock.	Paul Sylvester	This monitoring is already in place for RSAP schemes with partner organisations and internal BCC support services.
EqlA to be revisited / updated at key points ongoing e.g. after the proposal is approved, at the point funded is awarded if it is, as any new information emerges and at regular points in ongoing services delivery	Paul Sylvester	Various dates.

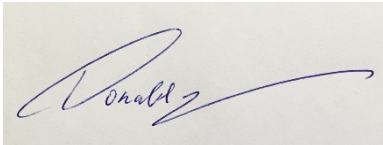
4.3 How will the impact of your proposal and actions be measured?

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.

The services and organisation responsible for delivering this accommodation submit regular reporting which monitor who is accessing the service and this will continue through this extension period. This information will prompt investigation and addressing of any issues and barriers that are preventing any person from accessing the accommodation. There will continue to be a named commissioning officer or commissioning manager that will ensure regular review meetings with all providers of Supported Move On Accommodation. This person is responsible for ensuring the monitoring of quality assurance, will collect and interrogate regular service delivery reports and will ensure there is a suitable wide range of monitoring mechanisms in place which shall include obtaining direct service user engagement and feedback. This will include feedback from people who have been nominated for and offered the accommodation, but who are unable or unwilling to proceed with the offer on the grounds the accommodation not meeting their needs on the basis of equalities related risks or issues.

Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqlA. EqlAs 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: <i>Reviewed by Equality and Inclusion Team</i>	Director Sign-Off: Donald Graham, Director Housing and Landlord Services 
Date: 8/9/2023	Date: 15/09/2023

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.