

Equality Impact Assessment [version 2.12]



Title: Supported accommodation pathways recommissioning	
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input checked="" type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input type="checkbox"/> New <input 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: 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.

• 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 supported accommodation pathways began operating on 28 October 2017. The pathways contracts were initially set up to last for five years, but included provision for two one-year long extensions, the second of which will end on 27th October 2024. We are now considering what the recommissioned pathways will look like and how they will operate from this point onwards, to ensure continued provision of safe, supported accommodation for those who need it.

There are four pathways in total. Each is coordinated by a lead agency, who delivers their own supported housing services as well as sub-contracting a range of providers to deliver additional supported accommodation:

- Pathway 1: Men only (354 units). Led by the Salvation Army;
- Pathway 2: Mixed: men and women (231 units). Led by Second Step;
- Pathway 3: Women only (150 units). Led by St Mungo's;
- Pathway 4: Recovery-oriented (146 units). Led by the Addiction Recovery Agency (Ara).

Pathways 1-3 each have a range of accommodation services grouped under four levels:

- Level 1: High support accommodation (staff on-site 24/7);
- Level 2: Medium support accommodation (staff on-site 9am-5pm Monday-Friday);
- Level 3: Medium/low support accommodation (visiting staff support);
- Level 4: Low support accommodation (visiting staff support).

Pathway 4 is funded and commissioned by Public Health, and has a range of recovery-related accommodation services grouped under three stages:

- Preparation intake: For clients who are motivated to address substance or alcohol use;
- Preparation housing: For clients actively engaging with drug and alcohol treatment services (e.g. scripted);
- In-treatment housing: For clients who are abstinent from non-prescribed drugs and alcohol.

In addition to the four supported pathways, BCC commissions a Resettlement Service, which provides support to clients who have moved on from the pathways into independent accommodation.

Demand for supported accommodation can be inferred from analysing data showing the number of people rough sleeping and in Temporary or Emergency Accommodation, and those approaching the BCC Homeless Prevention Team for advice and assistance, all of which are trending upwards year on year. On 8.11.23, there 408 open referrals for clients waiting to be placed in pathway accommodation.

• **Who will the proposal have the potential to affect?**

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

• **Will the proposal have an equality impact?**

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

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

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

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

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

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

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](#)

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 outlines the current situation regarding the need and demand for affordable housing in Bristol, as well as the need for supported accommodation. It also gives us the demographics and equalities profile of Bristol's current rough sleeping population, many of whom require pathway

	accommodation. It includes data on age, gender, ethnicity, disability, sexual orientation, and religion.
Bristol Quality of Life Survey Quality of Life 2020-21 — Open Data Bristol	The survey shows that 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; full-time carers, or single parents are less likely to be satisfied overall with their current accommodation than average.
Internal Database (HSR) maintained by the Interim Supported Accommodation Team	On 8.11.23, 408 individuals had open referrals to pathways services, according to the HSR. This is the total number of clients who have been referred to at least one pathway accommodation service and were still waiting for an outcome, which could be a refusal.
Consultation with clients and staff	These sessions were an opportunity to gather feedback from current and former pathway clients, pathway staff and additional stakeholders on a range of topics and concerns relating to the current provision. Clients and staff alike noted the challenges of sharing accommodation with diverse groups of clients, some of whose cultural needs clash or are not met at all at present. There are also particular difficulties around accessibility and progression through the pathways towards independent living for Disabled clients and clients with mobility and accessibility needs, including older people, for whom the stock of appropriate units is limited. This means their entry into and movement through the pathways can take significantly longer than for others within the cohort without these support needs.
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 or pregnancy and maternity; no data on these characteristics are collected by the services commissioned to deliver the pathway contracts, as part of their quarterly data reporting and monitoring.

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

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

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

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

We regularly consult with internal and external stakeholders who are delivering services for clients accessing the supported accommodation pathways, to understand the needs of these clients and the capacity of the current provision to meet these needs. We are also part of ongoing conversations with these stakeholders around clients who cannot access the pathways or for whom pathway placements have ended unsuccessfully. This is also helping us to identify gaps in the existing provision, as well as barriers to clients accessing services and support, paying particular attention to equalities-related issues.

As part of the formal pathways recommissioning process, we have held numerous in-person and online consultation sessions with current and former pathways clients, pathways staff, and external and BCC teams who work with pathway services and clients. Consultation sessions for staff were very well attended, and by a diverse range of professionals. Client sessions attracted a smaller turnout and relied on pathways services inviting and reminding clients to attend. As such, clients with poor relationships with staff or whose engagement is more sporadic are less likely to have received this information or have been willing to attend the sessions. Women's voices were also unfortunately lacking from the client feedback, largely because of a lack of engagement in the consultation process from services in the women's pathway; we attempted to mitigate this by sending reminders and communicating with the pathway lead, but responses were minimal. The pathway lead has offered to take a more active role in any future consultations, which will hopefully increase participation from women living in the pathways during further rounds of consultation.

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.

We will continue to engage with all stakeholders, including clients, as the recommissioning process progresses. This will allow stakeholders to share feedback on our plans at every stage of their development and will ensure that these plans are based on and shaped by the views and experiences of pathways clients and the staff members who support them.

Once the pathways have been commissioned in October 2024, commissioners and managers at accommodation services will continue to liaise regularly with service staff and clients, to make sure that we fully understand the needs of the client group and that access to services is equal for all clients. This will also help us to identify any barriers to access or challenges for individual clients or groups with protected characteristics after placement; we can then effectively support services to address these in a timely manner and apply subsequent learnings and adapt ways of working across the pathways.

There will also be a named commissioning officer or manager that will be responsible for ongoing engagement with providers and contract management. This will include multi-agency meetings to help to ensure a collaborative approach, consistency of quality of service, and collective addressing of any issues that arise, in terms of people accessing services 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 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)

Bristol's housing market is currently highly challenging and the number of buildings we can use to deliver supported pathways accommodation is limited. We are making the best possible use of the options we can access, but the ideal number of buildings and units are simply not available in the city; this has already been extensively explored and the provision is not there. Much of the supported accommodation stock is within larger hostels or shared houses, many of which are located in or near the city centre, so the breadth of available locations is similarly limited.

Clients' protected characteristics and any potential risks relating to these are carefully considered and have a significant bearing on decisions around where clients are placed within the pathways. Supported accommodation providers are required to have established and robust procedures in place around equality, diversity, and inclusion, and as commissioners, we will continue to ensure that these policies are actively considered and play a central role in services' day-to-day operations and staff's ways of working. This will also include promoting ongoing learning and training for accommodation providers around the full range of equality and diversity-related topics. Further, we will ensure that organisations managing accommodation comply with their duty to make reasonable adjustments for Disabled people, in line with the Equality Act 2010 and the Public Sector Equality Duty.

We also know that some groups are the victims of more regular discrimination based on their protected characteristics against more regularly. We also acknowledge that some clients have specific preferences, particularly linked to their cultural backgrounds and religious beliefs, which are often not easily accommodated in the existing pathways provision. However, where possible, we will continue to ensure that clients are placed in services that can accommodate their preferences.

While compiling this document, we collated and analysed data on access to the accommodation pathways and outcomes for clients after placement, for all clients who have been referred to and exited the pathways since they started operating on 28.10.17 up to 27.10.23. We divided these data into demographic categories (gender, ethnic background, disability, age group and religion) to examine whether accessibility or outcomes were better or worse for clients with certain characteristics.

No clients in the sample identify with a gender other than that assigned at birth, so this characteristic was not considered. We recognise, however, that the data on this, and on many of the other protected characteristics that were part of this analysis, are self-reported by clients. As such, our data on this may not be accurate, depending on clients' readiness to share this information and their confidence that doing so will not result in discrimination or increased risk.

It is also important to note that clients were divided into demographic categories based on the categories available on the Housing Support Register. There were some historic issues around these categories and their definitions, which have now been rectified, however these issues continue to affect some of the data available. Consequently, we have had to exclude certain groups from our analysis, such as the significant number of clients whose ethnicity was categorised as 'English/Welsh/Scottish/Northern Irish/British' and 'Irish,' neither of which denote ethnic background. As a result, the data analysed does not pertain to all clients referred, placed and discharged from the pathways during the period in question, and certain categories have been grouped (for

example 'White British,' 'White European,' 'White Other' as one category and 'Gypsy, Roma and Traveller' clients as another), which has produced a data set that is easier to handle and produces more meaningful results, but does not reflect the full diversity of the client group.

When considering access, we divided the total population of clients referred to pathways accommodation during the above-mentioned timeframe into the demographic categories listed above. We then compared this to the total population of clients who were actually placed in pathways, again divided into the same categories. If placements for certain groups were lower than referrals, we would assume this indicates a challenge for certain groups to access pathways. The data show a high level of consistency between the makeup of the referred and placed populations, save for minor discrepancies of +/-1 or 2%, except in the cases of disability and ethnicity. 16% of clients referred to pathways consider themselves to have a disability, whereas 10% of pathway placements consider themselves to have a disability. This discrepancy may reflect the limited supply of rooms available in the pathways that are suitable for clients who use wheelchairs, require ground floor rooms and facilities, or have other accessibility and mobility needs; this may also indicate that the demand for these room outstrips the available supply, with pathways currently ill-equipped to accommodate all referred clients with disabilities and mobility needs. As such, accessibility to the pathways for Disabled clients in particular appears to be limited. Similarly, 60% of referrals are for White clients and 4% for those with dual heritage, whereas 53% of placed clients are White and 12% have dual heritage.

To examine outcomes, we similarly divided clients leaving the pathways by their demographic characteristics. We then divided this data into planned departures (i.e., successful moves out of the pathways, into independent or more appropriate supported accommodation, moving in with family or friends etc) and unplanned departures (i.e., unsuccessful moves out of the pathways in cases of eviction, abandonment, long-term hospital admission, custodial sentences etc). We cross-referenced this with the proportion of planned and unplanned departures for the total client population over the same period; this showed that 60% of all departures during the period were unplanned against 40% planned. As above, the data indicated that no particular demographic groups are leaving the pathways unsuccessfully at a rate higher than 60%, apart from male clients (63% unplanned), Jewish clients (100% unplanned) and those who identified as lesbians (67%). In the latter cases, only one client described themselves as Jewish and three clients described themselves as lesbian over the whole period, so these data sets may be too small to lead us to any definitive conclusions or generalisations on outcomes for Jewish and lesbian clients.

What is striking, however, is the discrepancy between unplanned departure rates for men (63%) and women (51%). Similarly, there is significant gulf between the lowest unplanned departure rate by ethnicity (29% for Arab clients) and the highest (59% for White clients), and between the same rates for clients by age (19% unplanned departures for clients aged 65 and over, and 61% for clients younger than 65). The higher rate of planned departures for clients aged over 65 may be linked to the availability of specific, planned move-on options for people of 55 and up.

Regarding gender, it's important to note that while our data does not suggest any barriers to accessibility for the women who are identified as homeless and referred to pathways, women are more likely than men to be 'hidden homeless' or alternating between 'hidden homelessness' and rough sleeping.¹ As such, it's likely that many women are not visible or known to services and are therefore less likely to be placed in supported accommodation than men, who are more likely to sleep rough and are thus relatively more visible.

Graphs showing this data have been provided on a separate sheet at the end of this document.

PROTECTED CHARACTERISTICS

Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	The supported accommodation pathways accommodate adults aged 22 and over. There is a separate, bespoke accommodation pathway for young people.
Mitigations:	
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

¹ <https://www.mungos.org/wp-content/uploads/2018/10/Women-and-Rough-Sleeping-Report-2018-Summary.pdf>

Potential impacts:	There is currently a limited supply of accessible and ground floor accommodation, and in some cases, shared facilities may not be located on the same floor as clients' rooms, which may impact older clients with limited mobility or specific accessibility needs.
Mitigations:	<p>We will support services to ensure that older clients with limited mobility are prioritised, among the wider pool of clients with accessibility requirements, for the limited supply of accessible and ground floor rooms across the pathways.</p> <p>We are exploring options to try and bring new accommodation online as part of the pathways, with a particular focus on increasing the stock of accessible units, however Bristol's current housing market is extremely challenging and the options available are very limited in number and suitability. Simultaneously, we are speaking to providers about possible adaptation of existing units to increase accessibility for any Disabled clients or clients with limited mobility. Teams responsible for placing clients prioritise accommodating clients with mobility and accessibility needs in adapted and accessible rooms.</p>
Disability	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	There is likely to be a limited supply of accessible accommodation or units that can be adapted to suit the needs and requirements of Disabled people, including those with mobility needs. As detailed above, the discrepancy between the proportion of Disabled people referred between 28.10.17 and 27.10.23 and those placed during the same period may also be attributable to this limited supply, which does not match the total number of clients who require accessible rooms and facilities or rooms that can accommodate a wheelchair.
Mitigations:	<p>We will engage with referring agencies to understand the numbers of require specific units to accommodate their mobility and accessibility needs and to obtain information about what those needs are.</p> <p>We will use this information to inform the sourcing and conversion works required of the accommodation, in order to increase the number of units available that actually meet clients' needs and requirements. As above, we will ensure that organisations managing accommodation comply with their duty to make reasonable adjustments for Disabled people and those with mobility needs, in line with the Equality Act 2010 and the Public Sector Equality Duty. Disabled clients and clients with mobility needs will be prioritised for accessible accommodation units.</p>
Sex	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Women have historically made up a minority of the client group and may experience additional barriers to accessing services, particularly as the identification of potential pathway clients relies on visible rough sleeping or the willingness and ability to present in person to the Homeless Prevention Team.
Mitigations:	The sourcing and allocation of accommodation will consider the distinct needs of women, including safety and facilities. Barriers to accessibility for women specifically will also be considered and addressed on an ongoing basis. We're aware that mixed gender services can bring challenges for some women, particularly those who have experienced domestic and sexual violence and/or abuse. For this reason, we commission a pathway with accommodation for women only, staffed entirely by women, to ensure accessibility for women who cannot live in services with men, or who feel unsafe doing so.
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	A lack of diversity in some localities may mean increased likelihood of discrimination, although data on access and outcomes do not suggest any disproportionate, negative impacts on LGBTQIA+ clients.
Mitigations:	We will ensure that all available accommodation options are considered, to ensure that placements are safe and represent the best fit for clients' needs. Resources and training are available to providers on meeting the specific support needs of LGBTQIA+ clients, and these can be updated regularly, to ensure they contain the most current information and recommendations for best practice.

Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	The supported pathway accommodation services for specifically for single adults, not parents. Bristol City Council commissions separate supported accommodation services designed for parents and families. In cases where pregnant women require supported accommodation, care is always taken to ensure they are placed in alternative services, not in the pathways. As such, pregnant clients are not generally part of the cohort, except in cases where clients become pregnant while living in pathways accommodation, which is why there is limited data on pathway clients with this particular protected characteristic.
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 type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
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 type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Carers	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Other groups [Please add additional rows below to detail the impact for any other relevant groups as appropriate e.g., asylum seekers and refugees; care experienced; homelessness; armed forces personnel and veterans]	
Speakers of languages other than English	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	All supported accommodation pathway services operate in English, except in some cases where individual staff members are able to communicate with clients in other languages.
Mitigations:	Providers will be able to access external translation and interpreting services to ensure that support and related literature is accessible and meaningful for clients whose English is their second or additional language. Our expectation is that providers will use translation and interpreting services in all such cases, and this will be clearly communicated in the accommodation service specification, which will be devised later in the recommissioning process.

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 will be open access referral criteria for the accommodation which will ensure there is no unlawful discrimination for a protected group.

This proposal aims to secure continued provision of secure and supported accommodation to some of the most vulnerable citizens of Bristol. The security of this accommodation and the comprehensive support provided to each client will advance the equality of opportunity for occupants to engage with work, volunteering and training opportunities as well as integrating into local communities and developing skills to live independently.

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 the risk of clients being accommodated in areas which do not meet their cultural or other needs, can be mitigated by ensuring that allocations to accommodation placements are informed, as much as practically possible, by the unique needs and requirements of individual clients, to ensure clients are well matched.

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

Meaningful consultation with the services referring into and delivering this accommodation, as well as with clients themselves, has enabled us to fully understand the demographic and the range of needs of specific clients who are likely to be referred to this accommodation. This can be used to ensure that placements and referrals are carefully considered in accordance with clients' needs, particularly those with protected characteristics. Robust, ongoing data reporting processes 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	Monitoring will be in place.
Seek specific demographic and equalities data for 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	Monitoring will be in place.

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

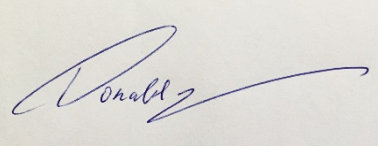
How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

The services and organisations responsible for delivering this accommodation will be submitting regular reporting that will monitor who is accessing the service and their progress after placement. We will also regular run reports from the Housing Support Register that will be able to tell us the full demographics data of those being nominated for and accepting or declining the accommodation, and the outcomes for client groups with protected characteristics.

There will be robust contract management and review mechanisms in place throughout the delivery of the pathways contracts. This will include close monitoring of clients who are accessing the service, and prompt investigation and addressing of any issues and barriers preventing anyone from accessing the accommodation. There will be a named commissioning officer or commissioning manager who will ensure regular review meetings with all providers; these currently happen on a monthly basis. This person will be responsible for quality assurance of the contracts and obtaining direct service user engagement and feedback, as appropriate. This will also 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, possibly due to equalities related risks or issues. They will also collect and interrogate regular service delivery reports, and raise any issues or anomalies promptly with the relevant service provider.

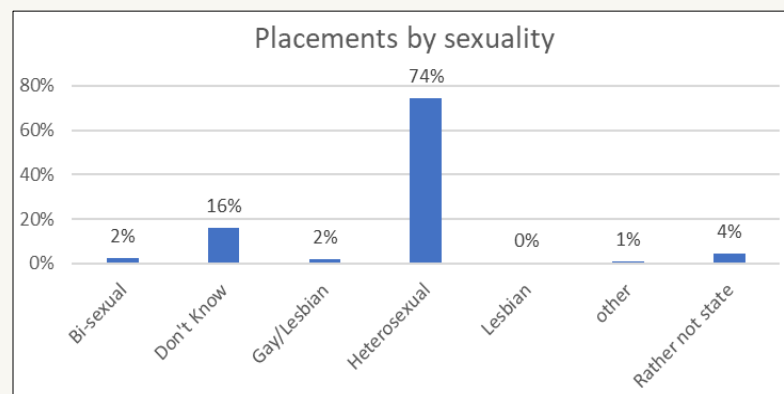
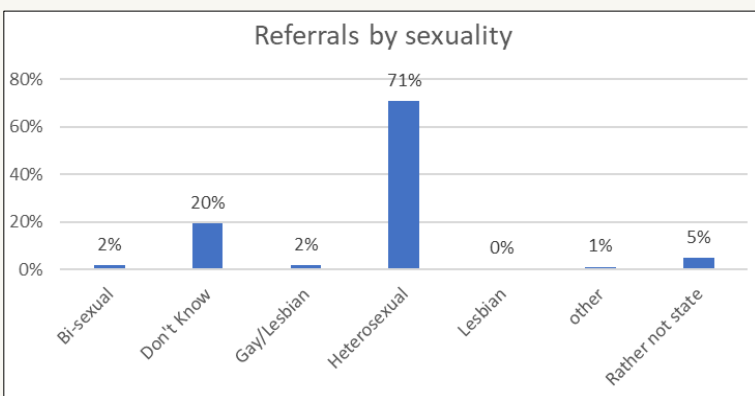
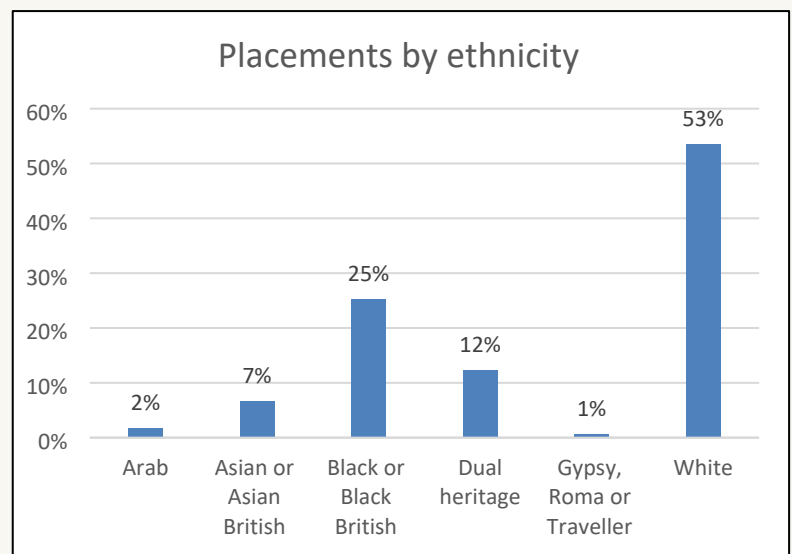
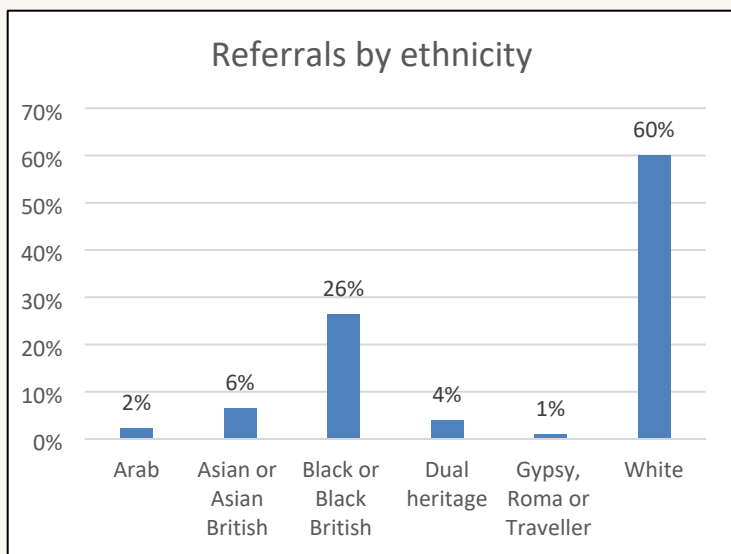
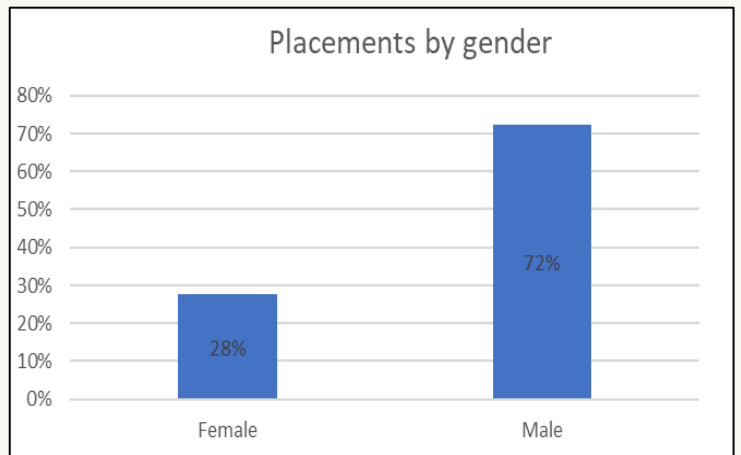
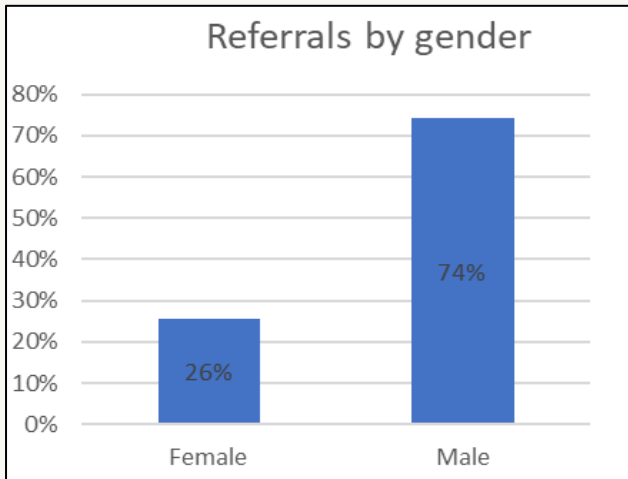
Step 5: Review

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 Director².

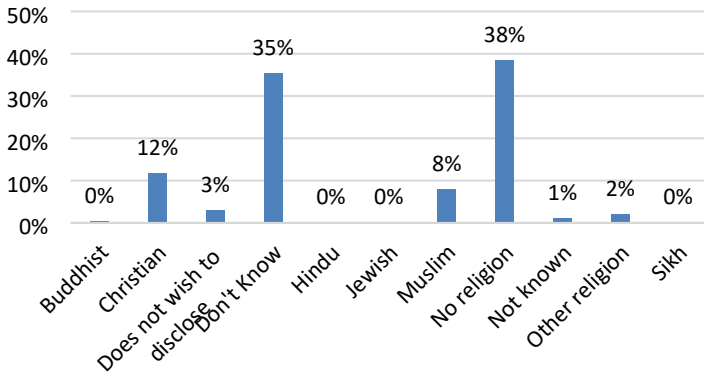
<p>Equality and Inclusion Team Review: <i>Reviewed by Equality and Inclusion Team</i></p>	<p>Director Sign-Off: Donald Graham, Director Housing and Landlord Services</p> 
<p>Date: 8/1/2024</p>	<p>Date: 11/01/2024</p>

² 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.

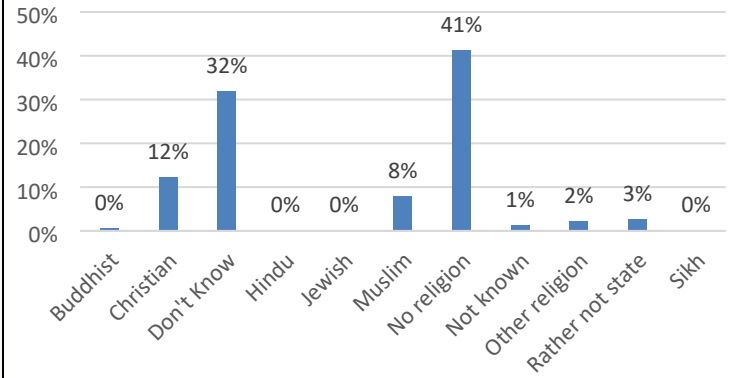
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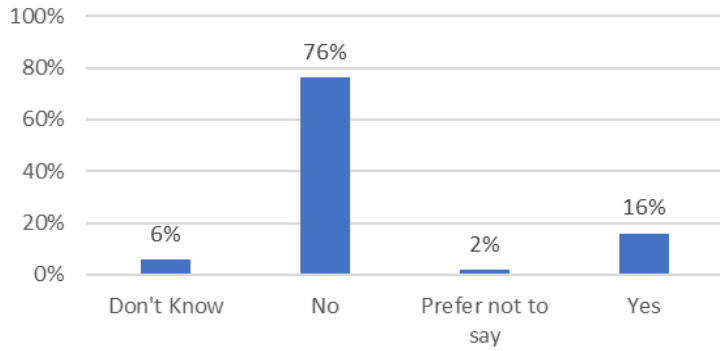
Referrals by religion/belief



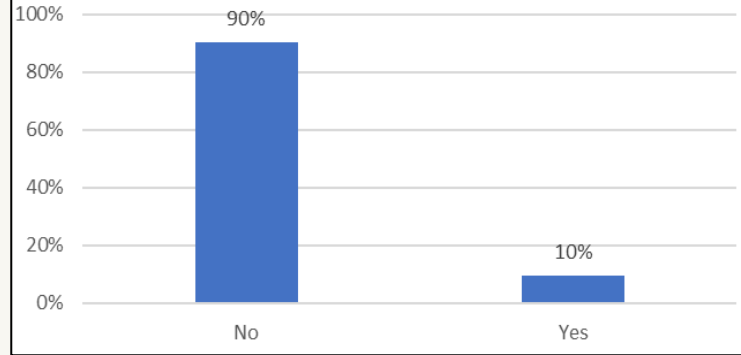
Placements by religion/belief



Referrals by disability

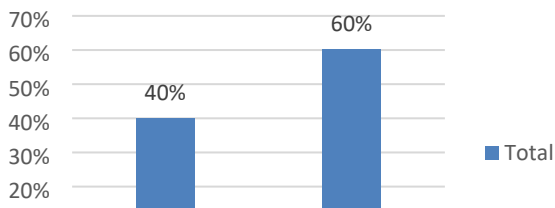


Placements by disability

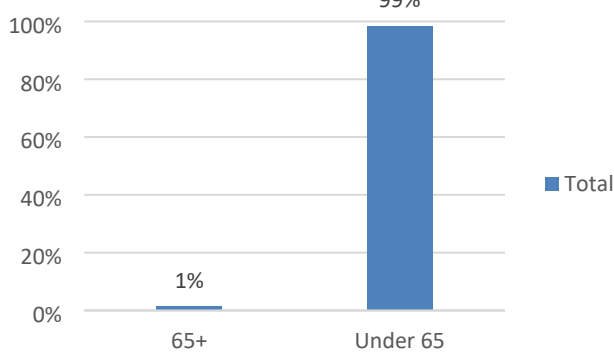


Outcomes data:

All departures



Referrals by age group



Placements by age group

