

SSA EQUALITY IMPACT AND NEEDS ANALYSIS

Directorate	Housing and Regeneration
Service Area	Housing Services
Service/policy/function being assessed	Changes to removal and storage arrangements and to associated charging procedure in respect of homeless households that the Council has accepted duties under the 1996 Housing Act (as amended)
Which borough (s) does the service/policy apply to	Richmond
Staff involved	Housing advice and information officers and Housing Operations officers

SUMMARY

The EINA has found that BAME, single female headed households, pregnant women and people with disabilities are over-represented amongst statutory homeless households to whom the revised policy would apply. It has also identified that of users of the previous scheme that the majority are female and BAME. The proposed change will result in a positive impact for those unemployed households who are wholly reliant on benefits, as they will be able to have their possessions stored without charge. Given the current profile of service users and of homeless households the policy would have a positive impact on women and BAME service users. No negative impact has been identified on any specific group as result of this proposed amendment to the removal and storage policy. However, the proposals will be subject to consultation and any negative impact identified will be added to the final EINA together with appropriate mitigating actions.

1. Background

Background

Councils have a statutory duty to protect the personal property of homeless applicants when it is at risk of damage or loss and the applicant is unable to protect or deal with it themselves, and there are no other suitable arrangements in place.

This duty applies from the point the council believes an applicant may be eligible for help under the Housing Act 1996 (as amended). The duty applies to the property of the main applicant and the property of anyone else included in the application. Property includes personal belongings and furniture. The council has to a duty to do what is reasonable to prevent loss or damage to an applicant's property and are able to charge for this. This can include advice to them to secure possessions but also can and does involve providing removal into and out of commercially provided storage.

Current process

Under the existing storage procedure, the storage service is limited to homeless applicants who: a) have nowhere to store their belongings, putting them at risk of loss or damage; and b) who are unable to afford the upfront removals and storage of their belongings themselves. Under s211.4 of the Housing Act, Councils have the right to impose conditions prior to taking steps to deal with personal property. These conditions can include levying a reasonable charge and specifying the circumstances the Council may dispose of the property. Once enquiries have established that an applicant is unable to store or protect their belongings themselves, a repayment plan is agreed with them, subject to an affordability assessment. The repayment plan reflects the length of time the property was stored and the full debt incurred by the council would be recharged to the household.

Changes

It is proposed that homeless clients who are unemployed and fully dependent on benefits will not be charged for the storage service to avoid any risk of financial hardship at such a challenging time for some households.

Data

Data is recorded on part VII cases (this is where the case has been accepted for full homeless duty). The data analyzed 208 accepted homeless cases and currently residing in temporary accommodation. The information is drawn from data held within the Saffron homelessness module for LB Richmond-upon-Thames cases. The analysis of these 208 represents a reliable sample of the cohort.

Further analysis was undertaken on the 53 cases have been admitted in TA since November 2017 (when the current procedure was introduced). 26 (49%) of these cases are in receipt of full housing benefit and universal credit. These cases would be then be subject to the proposed change.

Of these 26 cases, the main applicant 18 (69%) are female.

12 of the 26 cases (46%) are from a BAME background.

18 households are using storage facilities and 17 of them are also on full HB/and or on universal credit.

2. Analysis of need and impact

Protected group	Findings
Age	6 people currently in TA were aged 18 or under. This equates to 2.9% of people accepted for the full homeless duty 8 were aged 61 or over. This equates to 3.7% of people accepted for the full duty. This is below the borough profile for Richmond which has 17% of residents as aged 61 or over.
Disability	This data is not currently captured. However, the EINA conducted for the Homeless Strategy found that there were 33 accepted homeless cases in 2015/16 found to be in priority need due to having a physical disability or mental health issue. They account for 17% of homeless acceptances for the year. Of these 11 were due to mental illness or disability and 22 for physical disabilities.
Gender (sex)	154 out the 208 households currently residing in TA and with an accepted full duty were female. This equates to 74.3% of all people accepted. This is above the borough average for Richmond of 51%. This means any changes are likely to impact more on women than men. This data reflects the findings on the EINA on the Homeless Strategy shows that women were more likely than men to be accepted as statutorily homeless. 46% of homeless acceptances in 2016/17 were from households classified as female lone parents with dependent children whilst 7% were from female one person households. In comparison, only 3% of homeless acceptances were from male lone parents with dependent children and 17% from male one person households.

	<p>These findings represent a common trend where lone female parents become the primary carers for dependent children after relationship breakdowns.</p> <p>Profile of service users</p> <p>Of the 18 residents who have accessed the service 8 are female.</p>
Gender reassignment	<p>There is little information on gender reassignment amongst those using homelessness services in Richmond. Although the facility is available for the collection of this data the information collected is not statistically significant as a large proportion of applicants did not answer this question. The recent Richmond Housing and Homelessness Strategy 2018-23 seeks to address improving the collection of all protected characteristics groups.</p>
Marriage and civil partnership	<p>This data is not currently captured for part VII acceptances however the EINA on the Homeless Strategy found that 24% of accepted homeless households in 2015/16 were a couple with dependent children which is lower than the borough profile. Therefore, it is likely that the percentage of married and civil partnership homeless households is also lower than the borough profile as the majority of homeless acceptances are single parents with dependent children or vulnerable single person households.</p>
Pregnancy and maternity	<p>This data is not currently captured for part VII acceptances however the EINA on the Homeless Strategy found 10% (23) of acceptances in 2015/16 were found to be in priority need as the household included a pregnant woman where there were no other dependent children in the household.</p>
Race/ethnicity	<p>64 households (out of 208) accepted for the full duty and current living in temporary accommodation were from a BAME background. This equates to 31% of all people accepted who disclosed their ethnicity. This is above the borough average for Richmond of 14%. This means that proposed amendment is likely to impact more on BME residents than non BME residents.</p> <p>The EINA on the Homeless Strategy found that Households from a BAME background were overrepresented in the cases accepted as homeless in LBRuT with 31% of homelessness acceptances being from individuals with a BAME background in 2016/17. This is also the case across London where, in 2016/17, on average 60% of all homeless acceptances were from</p>

	<p>applicants identifying as from a BME background. Black households in particular were significantly overrepresented; 2011 Census data shows that 2% of the Borough's population identifies as Black compared to 8% of homelessness decisions and 8% of acceptances made in 2016/17.</p> <p>Of the 53 households admitted in temporary accommodation since November 2017, 39(74%) are identified as white.</p> <p>The proportion of homelessness decisions and acceptances were in a similar proportion to each other for all ethnic groups.</p> <p><u>White Households</u></p> <p>White households account for 62% of homelessness decisions and 61% of homelessness acceptances in the borough in 2015/16. Those who identified themselves as 'White Other' in 2015/16 were overrepresented amongst homelessness acceptances at 20% compared with 14% of the population. Other white ethnic groups accepted as homeless was lower than the borough demographic.</p> <p><u>Asian Households</u></p> <p>The percentage of households accepted as homeless in 2015/16 that identify as Asian, were slightly overrepresented at 10% compared with the borough profile of 7%.</p> <p>The key reason given for homelessness among all decisions relating to Asian households is the termination of an Assured Shorthold Tenancy (AST).</p> <p><u>Black Households</u></p> <p>Black households were significantly overrepresented in the proportion of acceptances. 2% of the Borough's residents identify themselves as black but formed 8% of acceptances in 2015/16.</p> <p>The main reason given for homelessness by households identifying as Black out of all homelessness decisions between 2013/14 and 2015/16 is the loss of an AST. The next most common reasons included relatives/friends no longer able to accommodate (14%) and relationship violence from a partner (11%).</p> <p><u>Mixed Ethnic Group Households</u></p>
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	<p>Mixed ethnic group households were slightly overrepresented in homelessness acceptances in 2015/16 with 5% of compared with 3% of the population.</p> <p>The most common reason given for homelessness from this group out of all homelessness decisions from 2013/14 to 2015/16 was loss of an AST with 27%, followed by 25% who said that their parents were no longer able to accommodate and 11% who cited relationship violence from a partner.</p> <p><u>Other Ethnic Minority Groups</u></p> <p>Those in other ethnic minority groups were overrepresented in 2015/16 making up 6% of acceptances compared 2% of the population.</p> <p>There is a lot of research already available as to why BAME residents are over-represented in homelessness acceptances. The main issues are socio-economic such as housing affordability, larger families combined with lower homeownership levels in the borough and living in the private rented sector placing BAME families at more risk of homelessness.</p> <p>Profile of service users.</p> <p>Of the 18 residents who have accessed the service</p> <ul style="list-style-type: none"> • 5 are white British/white other • 2 other groups • 6 are from Asian background (including Asian British) • 5 are from Black/Black British Caribbean/Black British African <p>This highlights that the majority are BAME and that as compared to the borough average BAME residents are over-represented in the service user profile.</p>
Religion and belief, including non belief	<p>There is no reliable information for the religion and belief of residents using homelessness services. The recent Richmond Housing and Homelessness Strategy 2018-23 seeks to address improving the collection of all protected characteristics groups.</p>

Sexual orientation	<p>Data on sexual orientation is not reported in the P1E Returns but is collected. Of the cases between 2010/11 and 2015/16 where the lead applicant disclosed their sexual orientation, 94% of cases were listed as heterosexual, 3% as “other”, 1% as bisexual and 2% as gay or lesbian. These figures were broadly in line with national statistics, such as the Integrated Household Survey which found that in 2014 93% of the British population identified as heterosexual, 1% as gay or lesbian, 1% as bisexual and 0.3% as “other”¹. However, the data on homelessness cases in the Borough is not comprehensive, for 69% of homelessness decisions between 2010/11 and 2015/16, sexual orientation was not recorded. In addition, as there were so few cases, it is difficult to identify trends in the homelessness cases where a decision has been made.</p> <p>National research indicates that younger LGBT people were at greater risk of homelessness whilst living in the family home as a result of their sexuality. This is because research suggests that individuals ‘coming out’ to family members can cause tension in the family and some evidence suggests this leads to this group being overrepresented amongst homelessness cases².</p>
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3. Impact

Protected group	Positive	Negative
Race/ethnicity	<p>BAME residents are over-represented in the data collected for Part VII acceptances and for current service users. The proposed will impact positively more on BAME residents.</p> <p>The policy will only apply to new users of the service but if existing storage users (who are unemployed)</p>	<p>There is no evidence to support that the proposed change will impact negatively on race/ethnicity grounds.</p> <p>Those are in employment will continue to have a repayment plan subject to an affordability assessment.</p>

¹ ONS (2015) *Sexual Identity by Region, UK*. Available from:

<http://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/referencetable04sexualidentitybyregionuk>

² NIESR (2016) *Inequality among lesbian, gay bisexual and transgender groups in the UK: a review of evidence*. Available from:

http://www.niesr.ac.uk/sites/default/files/publications/160719_REPORT_LGBT_evidence_review_NIESR_FINALPDF.pdf

	<p>contact to advise of financial difficulties, their financial plans will be reviewed.</p> <p>Similarly, should an unemployed homeless applicant using the storage service subsequently find employment, a repayment plan will be arranged subject to a financial assessment.</p>	
Gender	Female residents are over-represented in the data collected for Part VII acceptances and in the current service user profile. This means that the changes proposed will impact more on female residents. The impact set out above therefore also apply to female residents	There is no evidence that the proposed change will have any negative impact on female residents
Age	.46% of homeless acceptances in 2016/17 were from households classified as female lone parents with dependent children whilst 7% were from female one person households. In comparison, only 3% of homeless acceptances were from male lone parents with dependent children and 17% from male one person households. These findings represent a common trend where lone female parents become the primary carers for dependent children after relationship breakdowns. The impact set out above therefore also apply to households with children	There is no evidence that the proposed change will have any negative impact on any specific age group
Disability	The profile of homeless acceptances exceed the borough profile. The proposed change will therefore impact more on disabled residents.	The proposed amendment will not negatively impact on disabled residents.

Gender reassignment	Data not available. Positive impacts are as outlined above.	Data not available. Negative impacts and mitigating actions are as outlined above.
Marriage and civil partnership	24% of accepted homeless households in 2015/16 were a couple with dependent children which is lower than the borough profile.	24% of accepted homeless households in 2015/16 were a couple with dependent children which is lower than the borough profile. The proposed changes do not impact negatively on those who are married or in a civil partnership
Pregnancy and maternity	Comparative data not available. Positive impacts are as outlined above.	The EINA on the Homeless Strategy found 10% (23) of acceptances in 2015/16 were found to be in priority need as the household included a pregnant woman where there were no other dependent children in the household. The proposed changes could be a positive impact on pregnant women
Religion and belief, including non belief	Data not available. Positive impacts are as outlined above.	Data not available. No specific negative impacts on such groups
Sexual orientation	Data not available. Positive impacts are as outlined above.	Data not available. No specific negative impacts on such groups

4. Actions

Action	Lead Officer	Deadline
Consult on the proposed policy change and update EINAS with any further equality impacts identified.	Head of Housing Services (Allocations and Provision	September 2018

<p>Unemployed homeless applicants who are identified as exclusively dependent on welfare benefits will be exempt from removal and storage charges.</p> <p>Affordability assessment will continue to be undertaken to ensure that other applicant can meet the costs</p>	<p>Head of Housing Services (Allocations and Provision)</p>	<p>Immediately upon policy becoming effective. Data will be collected on those accepted homeless applicants with protected characteristics who pay removal and storage charges in order to monitor impact.</p>
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