

APPENDIX A

**Mayor and Cabinet – 21 November 2018
 Equalities Assurance Assessment (EAA): Budget cut - Intensive Housing Advice and Support Service Contract**

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1. The project or decision that this assessment is being undertaken for

The proposal being assessed is a £300,000 reduction of the current annual budget of £674,320 for the Intensive Housing Advice and Support Service (IHASS) which began operation in April 2017.

IHASS is designed to achieve the following outcomes:

- Preventing homeless for those presenting at the service with a “notice to quit” from their landlord.
- Helping clients remain within the family home, or rented accommodation, through mediation.
- Supporting resettlement from temporary accommodation or support housing to prevent future homelessness.
- Increasing resilience of clients through developing skills and linking with employment services to enable long-term independent living and tenancy sustainment.
- Enhancing service users’ quality of life by working closely with health and wellbeing services.
- Provide specific support in areas not met by other local provision to prevent homelessness, for example services to target hoarding behaviour.

The service also includes a specific element focused on mediation with young people, primarily those aged 16 or 17, who approach the council as homeless. This service provides intensive work with both young people and their family members to support the young person to remain within the home where it is safe and beneficial to do so.

The length of service provision is limited to 6 months to encourage the service to focus on building long-term resilience in clients through developing financial, digital and housing skills.

The proposal is that the cut is made to the main body of the service with the remaining resource reallocated across two areas:

- A reduced contract value to One Housing Group to provide resettlement support to individuals moving on from Lewisham's three supported housing pathways (young people, mental health and vulnerable adults).
- Bringing the young person's mediation element of the service in-house to sit within wither CSC or Housing

2. The protected characteristics or other equalities factors potentially impacted by this decision

<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Ethnicity	<input checked="" type="checkbox"/> Maternity	<input type="checkbox"/> Language spoken	<input type="checkbox"/> Other, please define:
<input checked="" type="checkbox"/> Gender	<input checked="" type="checkbox"/> Gender identity	<input checked="" type="checkbox"/> Disability	<input type="checkbox"/> Household type	
<input checked="" type="checkbox"/> Religion	<input type="checkbox"/> Carer status	<input checked="" type="checkbox"/> Sexual orientation	<input type="checkbox"/> Income	

The list of protected characteristics or other equalities factors potentially impacted by this decision was produced by looking at service-level data on the current reach of services in terms of characteristics of service users (see section 4 of this EAA).

Equalities Context

Public bodies such as local authorities are legally required to consider the three aims of the Public Sector Equality Duty (set out in the Equality Act 2010) and document their thinking as part of any decision-making processes. The Act sets out that public bodies must have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation;
- advance equality of opportunity between people who share a protected characteristic and those who do not share that characteristic; and
- foster good relationships between those who share a protected characteristic and those who do not share that characteristic.

The following equalities characteristics are 'protected' from unlawful discrimination in service provision under the Equality Act 2010: age; disability; gender reassignment; pregnancy and maternity; marriage and civil partnership; race; religion and belief; gender; and sexual orientation.

The duty continues to be a "have regard duty", and the weight to be attached to it is a matter for the Mayor, bearing in mind the issues of relevance and proportionality. It is not an absolute requirement to eliminate unlawful discrimination, advance equality of opportunity or foster good relations.

The Human Rights Act came into effect in the UK in October 2000. It means that people in the UK can take cases about their human rights as defined in the European convention on Human Rights to a UK court. At least 11 Articles of the European Convention on Human Rights have implications for the provision of public services and functions. This EIA assesses whether the proposed recommendations are in line with duties established by this Act.

Against the backdrop of the Equality Act 2010, Lewisham's Comprehensive Equalities Scheme (CES) was developed and agreed by the Mayor in 2012. The CES is the council's overarching equalities vision statement. It specifically describes how the Public Sector Equality Duty will be addressed through five overarching objectives:

- tackling victimisation discrimination and harassment
- closing the gap in outcomes for citizens
- improving access to services
- improving mutual understanding and respect
- improving participation and engagement

3. The evidence to support the analysis

The demographic data from the 2011 census, the ONS and the GLA; and service monitoring to date, have been brought together in this section to inform the impact assessment. For each of the nine protected characteristics, the impact of the proposed changes has been classified as positive, negative or equivocal for each of the nine protected characteristics.

The following data sources were identified:

- 1) **Demographic data from 2011 Census, Office for National Statistics, Greater London Authority** – used to determine the prevalence of having a protected characteristic in the Lewisham population.
- 2) **Service monitoring data** for the IHASS, including age, gender, ethnicity and other groups (where available) to determine the current reach of service to different population groups.

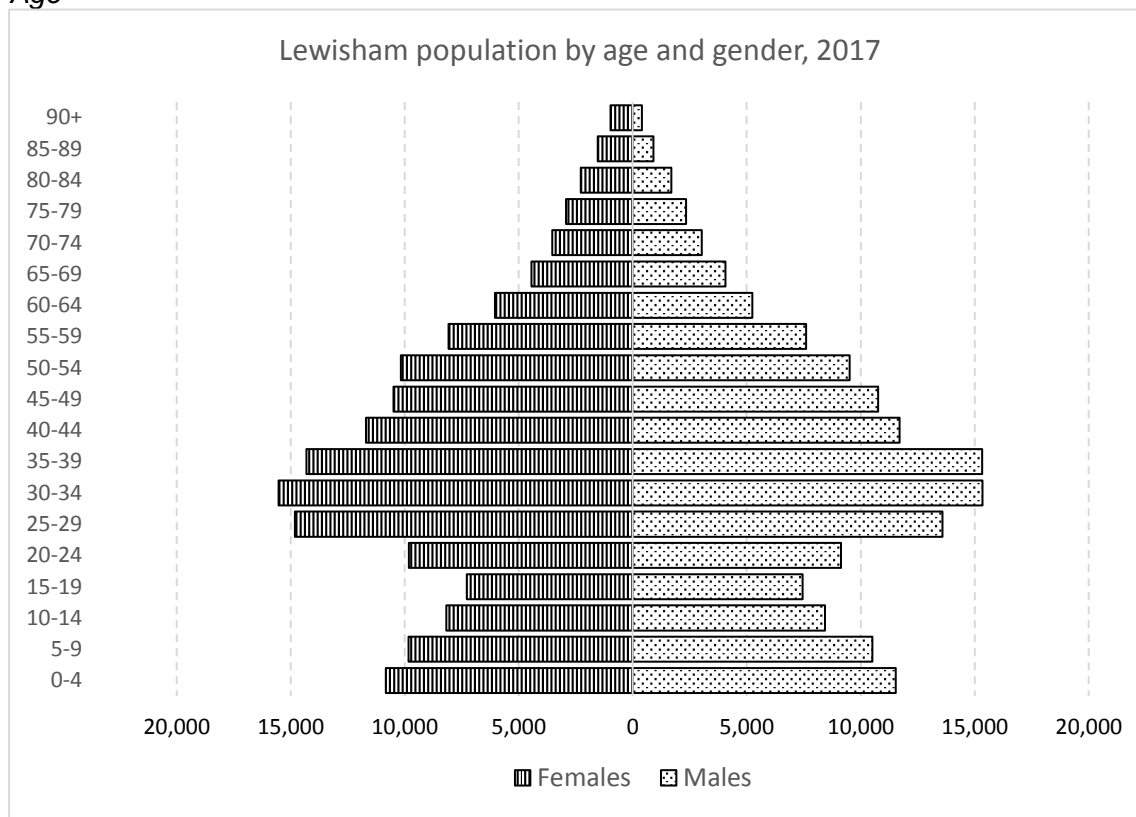
Changes to the IHASS service may impact the protected characteristics in different ways. The current uptake of services by protected characteristics is described below.

Contextual data: The Lewisham population

Gender

In 2017, it is estimated that just over half (50.7%) of Lewisham's population of 301,300 are female.¹

Age



Source: Office for National Statistics (ONS) 2017 mid-year population estimate.

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesandnorthernireland>

Ethnicity

The below table sets out the ethnic profile of Lewisham from the 2011 census.

Ethnic Group	2011	
	number	%
All usual residents	275,885	100.0
White	147,686	53.5
Mixed/multiple ethnic groups	20,472	7.4
Asian/Asian British	25,534	9.3
Black/African/Caribbean/Black British	74,942	27.2
Other ethnic group	7,251	2.6
BAME	128,199	46.5

Disability status

The 2011 Census asked about long-term health problems and disabilities. It found that in Lewisham, 14.4% of the population reported that were living with a long-term health condition that limited their day-to-day activities: 7.1% reported that they were limited a lot and 7.3% reported that they were limited a little.²

¹ Office for National Statistics (ONS) 2017 mid-year population estimates.

² Table KS301UK. 2011 Census: Health and provision of unpaid care, local authorities in the United Kingdom.

Sexual orientation

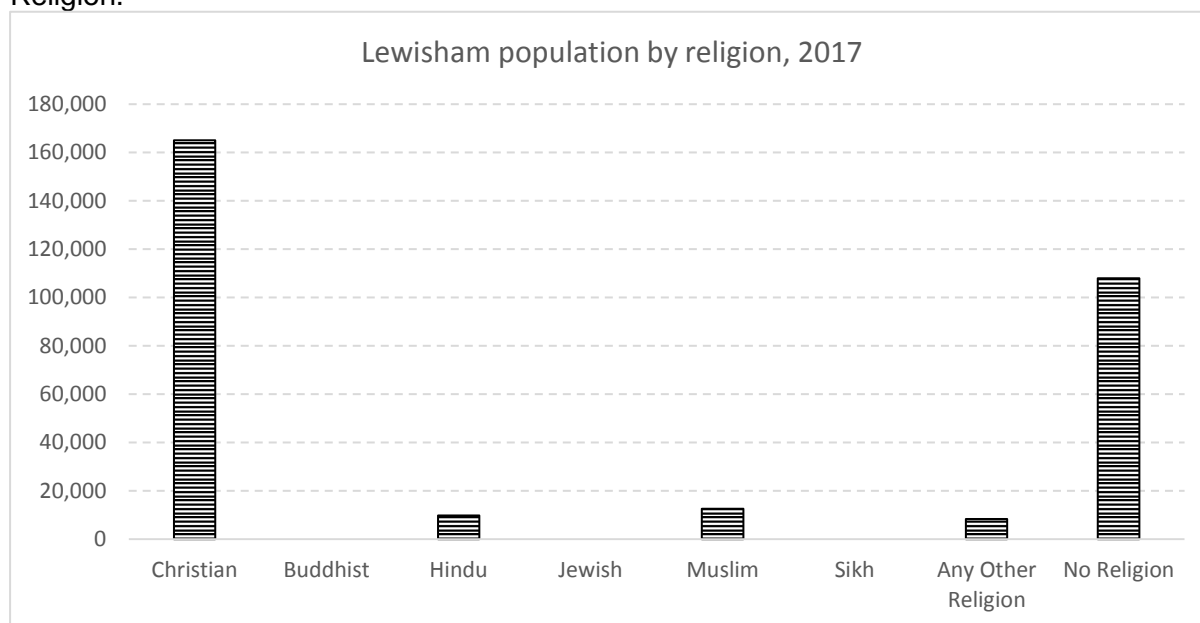
The Annual Population Survey has released experimental statistics on sexual identity at a local authority level, using estimates based on a survey.³ In Lewisham, it is estimated that 89.0% of the adult population identify themselves as heterosexual or straight; 2.5% identify themselves as lesbian, gay or bisexual; and 8.5% don't know, refuse to answer or identify themselves as other (i.e. neither heterosexual/straight, lesbian, gay or bisexual).

Gender identity

The ONS 2021 Census topic consultation identified a need amongst a number of data users for information about gender identity for policy development and service planning; especially in relation to the provision of health services. These requirements are strengthened by the need for information on those with the protected characteristic of gender reassignment as set out in the Equality Act 2010.

Religious belief

The Annual Population Survey estimates the population by religion in Lewisham. It estimates that 54.3% are Christian, 35.6% are No Religion, 4.1% are Muslim, 3.2% are Hindu; and 2.7% are Any Other Religion.



Source: Greater London Authority (GLA) Population by Religion, Borough <https://data.london.gov.uk/dataset/percentage-population-religion-borough>. Data from ONS Annual Population Survey.

Maternity/pregnancy

Of live births in Lewisham in 2017, 2.0% of mothers were aged under 20 and 9.4% of mothers were aged 20-24

Number and percentage of live births in Lewisham, by age of mother, 2015-2017

Age of mother	2015		2016		2017	
	Number	Percentage	Number	Percentage	Number	Percentage
Mother aged under 20	116	2.4%	114	2.4%	97	2.0%
Mother aged 20-24	499	10.4%	466	9.9%	445	9.4%
Mother aged 25-29	1,032	21.4%	958	20.3%	951	20.0%
Mother aged 30-34	1,612	33.5%	1,628	34.5%	1,617	34.0%
Mother aged 35-39	1,228	25.5%	1,219	25.8%	1,303	27.4%
Mother aged 40-44	292	6.1%	308	6.5%	313	6.6%

³ This means they are subject to sampling variability. This is because the sample selected is only one of a large number of possible samples that could have been drawn from the population.

Mother aged 45 and over	35	0.7%	28	0.6%	25	0.5%
Total	4,814		4,721		4,751	

Source: Office for National Statistics. Live births in England and Wales down to local authority local area. Downloaded from Nomis.

4. The analysis

In order to complete this section we compare the demographic characteristics of IHASS clients with that of Lewisham as a whole.

Age

Age breakdown of IHASS clients and 2017 Lewisham population

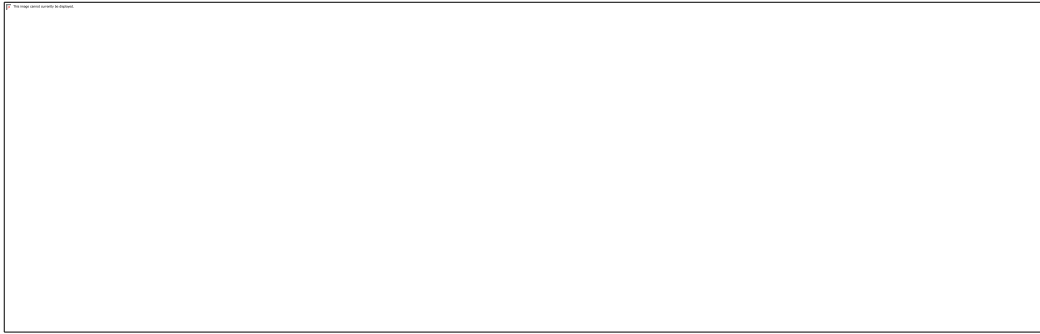
Age	Percentage IHASS clients	Percentage of Lewisham population ⁴
Under 18	0.5%	22.7%
18-24	16%	8.2%
25-29	6%	9.4%
30-34	7%	10.2%
35-39	11%	9.8%
40-44	7%	7.8%
45-49	8%	7.1%
50-54	15%	6.5%
55-59	12%	5.2%
60-64	7%	3.7%
65-69	6%	2.8%
70-74	2%	2.2%
75-79	2%	1.7%
80-84	0.3%	1.3%
85+	0.2%	1.3%

If we discount the under 18s as this service does not work with anyone under 16 it is clear that those aged between 18 and 24 are over represented in the service. This is not surprising as there is a specific element of the service designed to work with this group. Other than this, the other groups are broadly in line with other age groups although there is a clear over representation of the age groups between 50 and 65. In order to provide further context to understand this data we have also sought figures on the age of presentations of single homeless people to the council which is set out in the tables below.

	14/15	15/16	16/17	17/18	18/19 to date
<18	172	165	127	103	19
18-25	773	660	627	652	181
26-35	1150	751	769	773	146
36-40	472	358	355	381	81
41-50	724	554	493	602	114
51-60	395	352	350	383	129
61+	199	159	154	188	71

As a set of percentages of the total this is the below.

⁴ Office for National Statistics (ONS) 2017 mid-year population estimate.



While there is a high presentation rate to the council amongst the 41-50 age group and a spike of presentations amongst 51-60 years olds in 18/19 to date this group is still over-represented in the IHASS users.

Gender

Just over 41% of the IHASS service users are female. In 2017, it is estimated that just over half (50.7%) of Lewisham's population of 301,300 are female⁵ so males (59% of service users) are over-represented in the service.

Disability

Of the IHASS service user data about disability, 14% considered themselves to be a disabled person. The service users are therefore broadly representative of the Lewisham population in terms of disability: the 2011 Census asked about long-term health problems and disabilities and found that in Lewisham, 14.4% of the population reported that were living with a long-term health condition that limited their day-to-day activities: 7.1% reported that they were limited a lot and 7.3% reported that they were limited a little.⁶

Ethnicity

The available data on IHASS clients shows that 49% are black (see combined categories in table below) 39% were White with 3% Asian, 5% mixed and 4% other. The below comparison with the 2011 census shows that the Black population are significantly over-represented in the IHASS service and all other ethnic groups are under-represented.

Ethnic group breakdown of IHASS Clients

Broad ethnic group	Percentage of IHASS Clients	2011 Census
White	39%	53.5%
Black African, Black Caribbean, Black British or any other Black background	49%	27.2%
Asian or Asian British	3%	9.3%
Mixed or multiple ethnic groups	5%	7.4%
Other	4%	2.6%

Pregnancy and maternity

We do not have data for this characteristic at a service level as the service is for single people.

Religion/belief

Of the IHASS clients that stated their religion/belief, 34% stated that they had no religious belief and 56% were Christian and 9% stated they were Muslim. Responses for each of the other religions stated (Buddhism, Hinduism, Judaism, Islam or Sikhism) were under 1%. The Annual Population Survey estimates that in 2017, 54.3% are Christian, 35.6% are no religion, 4.1% are Muslim, 3.2% are Hindu;

⁵ Office for National Statistics (ONS) 2017 mid-year population estimates.

⁶ Table KS301UK. 2011 Census: Health and provision of unpaid care, local authorities in the United Kingdom.

and 2.7% are any other religion.⁷ This means that Muslims are significantly over represented in the service but other than that, the client group is broadly in line with the religious make-up of the borough.

Sexual orientation

In Lewisham, it is estimated that 89.0% of the adult population identify themselves as heterosexual or straight; 2.5% identify themselves as lesbian, gay or bisexual; and 8.5% don't know, refuse to answer or identify themselves as other (i.e. neither heterosexual/straight, lesbian, gay or bisexual). According to IHASS service data just over 4% of the clients identify themselves as lesbian, gay or bisexual which suggests that they are over represented in the service.

However, it is generally considered that the official statistics underrepresent the number of lesbian, gay or bisexual people in the population with The Greater London Authority estimating that the lesbian and gay population comprises up to 10% of the total population of London.

Gender reassignment

We do not have a reliable comparator data source for this protected characteristic at local authority level.

Marriage and civil partnership

The IHASS service is for single homeless people so there is no comparator data for this characteristic from the service.

5. Mitigation

As the referral route for the IHASS service is directly through the SHIP function for those approaching the council the service changes will mean that the impacts will be felt by those who approach as homeless in the future.

However, there have been a number of changes since the service has been commissioned which means that there has been a significant increase in overall capacity to meet this need. To an extent this means that the future service offer will be broadly in line to that which previously existing with the inclusion of IHASS.

This would mean there is very little impact of this change overall and as such these 'macro' mitigations are considered first followed by specific reference to the protected characteristics – particularly where there are areas of over representation in the current service.

Firstly, Lewisham Citizens Advice Bureau have developed a partnership with Southwark Law Centre to create the Lewisham Law Service in order to improve access to legal services in Lewisham.

The service, while relatively small, provides expert housing advice for clients referred through the Advice Lewisham partnership. It is hoped to widen the areas of advice provided over time but the initial focus on housing has reduced some of the demand for IHASS. Overall, this is a very positive development for the borough which has long lacked an effective Law Centre.

Secondly, the council's own approach to homelessness prevention has been transformed by the introduction of the Homelessness Reduction Act in April 2018.

The Act is one of the biggest changes to the rights of homeless people in England for 15 years and it effectively bolts two new duties to the original statutory rehousing duty: the duties to both prevent and relieve homelessness.

It places renewed emphasis on prevention of homelessness requiring detailed assessments and a personalised response to an individual's circumstances. In summary the Act:

- Places new duties on local authorities to properly assess the cause of homelessness, circumstances and needs of all household members, including children.

⁷ Greater London Authority (GLA) Population by Religion, Borough <https://data.london.gov.uk/dataset/percentage-population-religion-borough>. Data from ONS Annual Population Survey.

- Places new duties on local authorities to develop and agree with applicants a personalised plan of the steps that will be taken to prevent or relieve homelessness
- Extends from 28 to 56 days the period in which a household is defined as 'threatened with homelessness'.
- Places a new 'prevention' duty on local authorities to 'take reasonable steps' to prevent the threatened homelessness of anyone who is eligible

Whilst in theory the introduction of the Act should increase the demand for the IHASS it has also brought with it a degree of 'new burdens' funding which has allowed the employment of an increased number of Housing Options advisors within the authority which has increased the in-house capacity to meet the demand from those threatened with homeless.

The introduction of the Act has also increased the requirements on the authority to record and track all activity and outcomes so handoffs and referrals to other agency for this work is no longer as efficient or effective as it would previously have been.

In recognition of the new requirements under the Act, the council has received funding for 8 additional prevention and support officers to work with all clients presenting as being at risk of homelessness within 56 days. This coupled with the new Duty to Refer placed upon public bodies will alert the council earlier to households facing housing difficulty and give an opportunity for earlier intervention designed to help people stay in their tenancies or find their own alternative home before the crisis of homelessness sets in.

In addition to this the council is also undertaking a 'trailblazer project with the aim is to identify households potentially at risk of homelessness much further in advance to avert the crisis before it develops reducing the number of people who need to present to the authority and consequently the level of service required to meet their needs.

Consultation across the council has identified that while the in-house offer regarding homelessness prevention has improved considerably there remains a need for increased access to supported housing for the most vulnerable for whom prevention is not possible. It is therefore recommended that, should the budget reduction be accepted, the remaining element of the service is refocused on resettling individuals from Lewisham's three supported housing pathways (young people, mental health and vulnerable adults).

Linked to this the council has also secured '*Rough Sleeper Initiative*' funding from Central Government to work with the local voluntary sector to both enhance the Housing First model and provide a permanent night shelter for rough sleepers meaning that the overall offer for those needing supported accommodation has improved reducing the burden on the council's homelessness service. Furthermore additional financial support has been made available to single person households to help them to find their own accommodation to prevent homelessness and a further cross borough scheme to find private rented accommodation has been commissioned with, again, funding from central government made available to support this.

Finally, the review the service offer to young people approaching the council for support offers the opportunity to make more efficient and effective use of the mediation element of the current service. This review, led by the Children's Social Care (CSC) Improvement Group, will include the current service offer from Children's Social Care and Housing and offers the opportunity to bring the mediation resource from the contract in-house to ensure a seamless and comprehensive service offer. This will require the TUPE transfer of the existing staff into either CSC or Housing which will be decided as part of the review should the recommendation be accepted.

Overall, these mitigations mean that the impact of the budget cut will be significantly reduced but overall it will have a negative impact where all things remain equal as there is a loss of overall resource to the system.

For some groups this is straightforward as they are evenly represented in the service but for other groups the impact will be more equivocal for a number of reasons:

Age – impact equivocal

The analysis shows that those aged between 18 and 24 and between 50 and 65 are over represented in the service.

As set out above it is anticipated that the proposed changes will have a positive impact on the younger client group as the in-sourcing of this element of the service will increase efficiency by reducing the number of service handoffs and decision points for this group.

It is unclear why the older group are over-represented in the service but it has been suggested that this is a time when men often become homeless as a result of drug or alcohol problems. These individuals are likely to benefit from the increased access to supported accommodation through the use of the remaining resource on move-on from these services but commissioners will work with colleagues in the SHIP service to monitor this situation and reconfigure the approach for this group if required.

Gender - impact equivocal

It is clear from the data that males are over-represented within the IHASS service. However, this is reflective of the overall single homeless population so it is likely that the overall mitigation outlined above will respond to this over-representation simply through the universal offer provided by SHIP and the Lewisham Law Service.

However, men are even more heavily over-represented in the supported housing services in the borough so, again, it may be that the refocusing on creating capacity in these services may have a positive impact on gender by ensuring that more men are able to access the supported accommodation that they need in a timely fashion.

Disability – impact negative

The service users are therefore broadly representative of the Lewisham population in terms of disability so there should be no disproportionate impact on this group. The overall impact will therefore be negative due to the loss of resource but overall it is anticipated that the impact will be relatively small given the other changes in the system for single homeless people.

Ethnicity – impact equivocal

The Black population are significantly over-represented in the IHASS service and all other ethnic groups are under-represented.

To an extent this over-representation is due to the significant number of young people accessing the service with the ethnicity profile of this group in Lewisham more closely reflects the percentage makeup of the service users. As outlined above the service offer for this group is anticipated to improve so this will also apply here.

However, for the older population the benefits that may be realised through greater access to supported housing is unlikely to have such a significant impact for black service users as they are generally under-represented in supported housing services for vulnerable adults. Therefore, the overall impact is difficult to assess but is overall equivocal with officers again required to work collectively to ensure on-going service offers are designed to ensure equality of access for all ethnic groups.

Pregnancy and maternity – no impact/not applicable.

We do not have data for this characteristic at a service level as it is for single people.

Religion/belief – Impact negative.

This means that Muslims are significantly over-represented (9% rather than 4.1% in the general population) in the service but other than that, the client group is broadly in line with the religious make-up of the borough. However, while this is significant in percentage terms the overall numbers are small so it is assessed that overall there should be no disproportionate impact due to religion and belief. The overall impact will therefore be negative due to the loss of resource but overall it is anticipated that the impact will be relatively small given the other changes in the system for single homeless people.

Sexual orientation

Overall, it is difficult to truly assess whether different sexual orientations are over or under-represented in the service. As such, the differential impact is assessed as neutral. The overall impact will therefore be negative due to the loss of resource but overall it is anticipated that the impact will be relatively small given the other changes in the system for single homeless people.

Gender reassignment

We do not have a reliable data to assess the impact.

Marriage and civil partnership – no impact/not applicable.

The IHASS service is for single homeless people so there is no comparator data for this characteristic from the service.

Overall it is assessed that this change will have a negative impact across a number of protected characteristics due to the loss of capacity to support in support to those threatened with homelessness. However, overall it is assessed that these negative impacts can be kept to a minimum due to:

- The new Lewisham Law Service delivered by the CAB
- The extra in-house homelessness prevention resource facilitated by the introduction of the homelessness Reduction Act
- The work being undertaken by the council to identify those at risk of homelessness at an earlier stage thus reducing the need for crisis services
- The securing of extra resources from central government to support rough sleepers that will reduce the pressure on the council's front line housing options service
- Increased efficiency in the service offer to young people under 18 through the integration of the current service with the Council's in-house services
- The refocusing of the remaining support on creating capacity within supported housing for those that most need it to free up preventative support to focus on individuals more likely to benefit from it.

6. Service user journey that this decision or project impacts

As outlined above the service journey for all IHASS clients is via the SHIP service for single individuals who present as homeless so the service user journey is not directly impacted apart for young people whose journey should be improved through the integration of the provision with the current in-house offer. This will improve the service user journey by reducing referral points and ensuring that vulnerable young people are not required to tell their story to multiple agencies.

**Signature of
Head of Service**

For further information, please see the full [Corporate Equality Policy](#).