

EQUALITY IMPACT ASSESSMENT TOOL

The council has a statutory duty to consider the impact of its decisions on age, disability, gender reassignment, pregnancy & maternity, race, religion or belief, sex (gender) and sexual orientation.

The Council also has a duty to foster good relations between different groups of people and to promote equality of opportunity.

Completing an Equality Impact Assessment (EIA) is the **simplest way** to demonstrate that the Council has considered the equality impacts of its decisions and it reduces the risk of legal challenge. EIAs should be carried out at the **earliest stages** of policy development or a service review, and then updated as the policy or review develops. EIAs must be undertaken when it is possible for the findings to inform the final decision. Keep all versions of your EIA. An EIA should be finalised once a final decision is taken.

When should you undertake an EIA?

- You are making changes that will affect front-line services
- You are reducing the budget of a service, which will affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making internal reorganisations that will result in staff changes including Transfer of Undertakings (TUPE), redundancies, change in job roles or terms and conditions.
- EIAs also need to be undertaken on how a policy is implemented even if it has been developed by central government (for example cuts to grant funding)
- Section 1 of the EIA Tool: Initial Screening, will help you decide whether a full EIA is necessary

Who should undertake the EIA?

· The person who is making the decision or advising the decision-maker

Further Guidance

- Step-by-Step Guidance to the questions
- An EIA e-learning module is available for all Westminster staff: www.learningpool.com/westminster/course/view.php?id=159

Please contact the Equalities lead to inform them when you begin and then complete an EIA: equalities@westminster.gov.uk

SEB will monitor compliance with the requirement to complete EIAs.

Title of Proposal

The activity covered by this EIA relates to the assessment of the impact of reducing funding for housing related support services for rough sleepers and single homeless people through reviewing service levels and renegotiating contract values of existing supported housing provision to provide services more efficiently.

Lead Officer

- i. Full Name Greg Roberts
- ii. Position Supporting People and Temporary Accommodation Manager
- iii. Department: Housing
- iv. Contact Details grobert2@westminster.gov.uk

Has this project, policy or proposal had an EIA carried out on it previously? If y	yes,
please state date of original and append to this document for information.	

Yes x		No	
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Date of original EIA:

Version number and date of update

You will need to update your EIA as you move through the decision-making process. Record the version number here and the date you updated the EIA. Keep all versions so you have evidence that you have considered equality throughout the process.

SECTION 1: Initial screening: Do you need to complete an Equality Impact Assessment (EIA)?

Not all proposals will require an EIA, this initial screening will help you decide if your project or policy requires a full EIA by looking at the potential impact on any equality groups.

1.1 What are you analysing?

The activity covered by this EIA relates to the commissioning of supported housing services.

Supported housing services commissioned by the Council are generally those that provide 'housing related support' linked to enabling vulnerable people to maintain their independence in the community. This includes:

- 24 hour hostels for rough sleepers.
- women's refuges,
- offender services,
- sheltered housing for older people
- housing services for people with mental health problems and learning disabilities.

Thus there is a direct link between housing related support services and delivery of mainstream Adults, Children's and Housing budgets e.g. delivering targets to reduce the use of residential care placements for people with mental health problems,

learning disabilities and care leavers are dependent upon high quality supported housing services that are the subject of this report

Delivery of outcomes

The level of acute housing related support need presented in particular by rough sleepers is unique in the country. This demand for such supported housing services in an area of acute housing shortage has required a dynamic approach to service commissioning and this is reflected in the achievements since 2003:

- Expanded choice by opening 16 new supported housing services, including two
 extra care housing service and services for people with physical disabilities and
 young people
- Completed 9 tender exercises for services that have expanded capacity, improved service quality and performance and value for money
- Improved move-on performance against national performance Indicators from 60% positive move-on in 2004/05 to over 77.5% in 2014/15 with over 700 people moving on positively from services last year

As part of delivering a balanced housing commissioning budget in 2016/17 c. £750K of savings will be delivered through reduced commissioning of housing related supported services. Contracts for services will be renegotiated following reviews of service provision to provide existing provision more efficiently without impacting upon front-line service delivery in terms of the vulnerability of individuals supported or the level of service provided.

The commissioning strategy is designed to continue the approach of investing in services whilst increasing the efficiency and performance of the sector whilst meeting Council's strategic goals. For example Westminster's commitment to ending rough sleeping remains and is key to delivering the government and Mayor's target to end rough sleeping through initiatives such as 'no second night out'. Westminster continues to support delivery of these targets and initiatives.

The approach taken in reaching decisions to decommission services and renegotiate contract values includes the following activities:

- Value for money. Westminster's approach has developed over time and has focused on reducing higher cost services, assessing levels of support provided and the strategic relevance of services.
- Information about presenting needs on each service area is gathered from a
 variety of primary and secondary, local and national sources, children and
 adult services and other official statistics. Based on this data any gaps or
 changes in presenting needs can be identified and these findings are used to
 inform future service development work in order to ensure that housing related
 support needs are met effectively across all the service areas.
- Quality Assessment Framework (QAF). Self assessments are completed by all service providers across five objectives which covers, assessment and support planning, health & safety, Equality & fair access, Safeguarding and protection from abuse and client involvement and empowerment. QAF scores are validated and these should be at least level 'B' with action plans for each service to attain 'A'.

1.2 From a service user and staff perspective, does the project, policy or proposal have the potential to <u>disproportionately</u> impact on any of the following

	Men or women (include				X
	impacts due to pregnancy/				
	maternity)				
	People or particular sexual				x
	orientation/s				
	People who are proposing to				х
	undergo, are undergoing or				
	have undergone a process or				
	part of a process of gender				
	reassignment				
	People on low incomes				Х
	People in particular age				х
	groups				
	Groups with particular faiths				x
	and beliefs				
	Are there any other groups	X			
	that you think may be				
	affected negatively or				
	positively by this project,				
	policy or proposal?				
	If the answer is "negative"	or "unclear"	consider doi:	ng a full EIA	
1.3	-				Significant
1.3	What do you think that th	e overall	None / N	Ainimal S	Significant
1.3	What do you think that the NEGATIVE impact on grou	e overall		Ainimal S	Significant
1.3	What do you think that th	e overall	None / N	Ainimal S	Significant
1.3	What do you think that the NEGATIVE impact on group communities will be?	e overall ps and	None / N	Ainimal S	Significant
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	What do you think that the NEGATIVE impact on group communities will be? None or minimal impact would no negative impact identified, owill be no change to the service. Wherever a negative impact has you should consider undertaking completing the rest of the form. Using the screening and in	e overall ps and be where there or where there es for any group is been identifie ing a full EIA by i. of or mation in ton the proje	None / No	Ainimal S	
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1.4	What do you think that the NEGATIVE impact on group communities will be? None or minimal impact would no negative impact identified, owill be no change to the service. Wherever a negative impact ha you should consider undertaking completing the rest of the form. Using the screening and in assessment be carried out. Yes - the changes proposed.	e overall ps and be where there or where there es for any groups as been identifie ag a full EIA by a. on the proje affect the grou is decision? service reviews	None / No	2 and 1.3, show	uld a full

groups? If so, is the impact positive or negative?

Disabled people

Particular ethnic groups

None

Positive

Negative

Not sure

X

X

SECTION 2: EQUALITY IMPACT ASSESSMENT

Building an Evidence Base: What do you know?

This section will help you build your evidence base and interpret what the likely impact will be of your service. Complete this section if your proposal is service user related. If your proposal only affects staff, go to section 2.2

2.1	 are likely to be impacted by the If you do not formally collect date 	a about a particular group then use the results of local surveys tional trends or anecdotal evidence (indicate where this is the
	How many people use the service currently? What is this as a % of Westminster's population?	
	Disabled people	
	Particular ethnic groups	
	Men or women (include impacts due to pregnancy/maternity)	
	People of particular sexual orientations	
	People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	
	People on low incomes	
	People in particular age groups	
	Groups with particular faiths and beliefs	
	Any other groups who may be affected by the proposal?	

Westminster saw a total of 2570 rough sleepers in 2014/15. The number reflects a large range of demographics and ethnicities, with a large proportion being from specific countries in Central and Eastern Europe. The figures below reflect demographic data from 2014/15 and are derived from GLA commissioned figure from the CHAIN database (rough sleeper database).

Ethnicity	% of WCC's rough sleeping population
White Other	38
White Irish	3
White British	29
Gypsy/Romany/Irish Traveller	14
Mixed: White & Black Caribbean	0
Mixed: White & Black African	0
Mixed: Other	2

Black or Black British - other	2
Black or Black British - Caribbean	1
Black or Black British - African	5
Asian or Asian British - Pakistani	0
Asian or Asian British - other	1
Asian or Asian British - Indian	1
Asian or Asian British – Bangladeshi	0
Chinese	0
Other	2
Refused	1

Of the total people contacted on the streets, their support needs are categorised into three of the most prominent sets: drugs, alcohol and mental health.

^{*}please note people may identify with more than support need

Support Need	% of people who identify area as their need
Alcohol	34
Drugs	27
Mental health	44
No alcohol, drugs or mental health support need identified	32

Over 60% of this population is transient and will move on or away from the streets after being contacted by a street outreach service. In 14/15, Westminster housed just over 450 individuals in our commissioned supported accommodation, supported 399 to access No Second Night Out hubs and confirmed reconnections for 183 people to their home area.

1074 people moved into supported housing services between January 2014 and January 2015. The table below provides a breakdown of the primary client groups of new referrals into services.

Primary Client Group	%
Older people with support needs	5%
Older people mental health	2%
Mental health problems	21%
Learning disabilities	1%
Physical or sensory disability	1%
Single homeless with support needs	20%
Alcohol misuse problems	2%
Drug misuse problems	3%
Offenders/at risk of offending	3%
Young people at risk	7%
Young people leaving care	2%
Teenage parents	1%
Rough Sleeper	13%
People at risk of domestic violence	7%
Generic/Complex needs	12%
Total	100%

Age

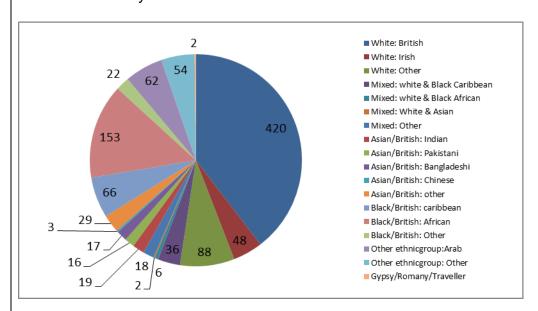
63% of residents were male, 19% were aged 16 to 24 years, 44% aged 25 to 45 years, and 31% aged 46 to 64 and 6% over aged 70.

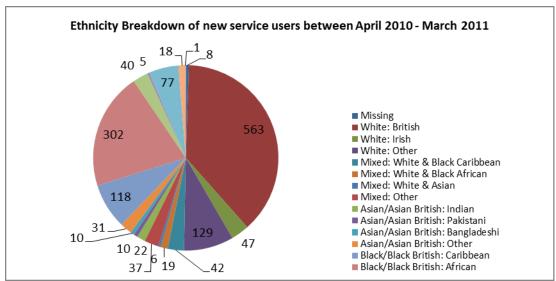
Disability

30 % of residents moving into services recorded having a disability.

Ethnicity

The proportion of residents from a white ethnic background is just over 50% which is comparable to Westminster's proportion of residents. The table below provides the ethnicity breakdown of new services users moving into supported housing schemes between January 2014 and January 2015.





Income

Of the 1074 clients, 487 are actively seeking employment.

This section should be completed for all proposals that will impact on staff.

2.2 Build up a picture of the makeup of the workforce profile in the service affected.

What is the workforce profile of the service? As a percentage, how does this compare to the profile of Westminster City Council workforce?

- Age
- Disability
- Gender
- Gender Reassignment
- Ethnicity
- Pregnancy and Maternity
- Religion/Belief
- Sex
- Sexual Orientation

Group	up Service		Council	
-	No	%	No	%
Age				
16-24			35	2%
25-29			148	7%
30-44			893	43%
45-59			854	41%
60-64			115	5%
65 +			33	2%
Disability				
Yes			66	3%
No			897	43%
Not Known			1115	54%
Ethnicity				
Asian/Asian			145	7%
British				
Black/Black			416	20%
British				
Mixed			62	3%
White			1371	66%
Other			42	2%
Unknown			83	4%
Gender				
Female			1192	57%
Male			886	43%

Pregnancy and Maternity

- Are any staff pregnant or on maternity
- How are they affected by this change

Religion & Belief

There is insufficient data to make an assessment on this characteristic. Any issues identified as part of the consultation process will be included

Sexual Orientation

There is insufficient data to make an assessment on this characteristic. Any issues identified as part of the consultation process will be included

Gender Reassignment

Data on Gender Reassignment is currently not available but it is unlikely that this proposal will impact either positively or negatively on the

		protected characteristic of gender reassignment. The consultation process should identify any issues that need to be considered with regards to this
		protected characteristic.
any gro	the information above, are oups of staff portionately represented ared to the Council price?	n/a does not impact on Council employed staff
Does T	TUPE apply to this proposal?	N/A
result	e reorganisation/restructure in an increase or decrease in umbers? If so, approximately any?	N/A
result i	e reorganisation/restructure in changes in job roles or and conditions for staff? If at changes are proposed?	N/A

2.3	Summary (to be completed follo	owing analysi	s of the evider	nce above)	
	Does the project, policy or proposal have the potential to have a disproportionate impact on any of the following groups? If so, is the impact positive or negative?	None	Positive	Negative	Not sure
	Disabled people				Х
	Particular ethnic groups				X
	Men or women (include impacts due to pregnancy/maternity)				X
	People of particular sexual orientations				Х
	People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment				X
	People on low incomes				Х
	People in particular age groups				X
	Groups with particular faiths and beliefs				Х
	Are there any other groups that you think this proposal may affect negatively or positively?	Х			

In order to be able to identify ways to mitigate any potential impact it is essential that we know what those potential impacts might be.

3.1 Consultation Information

This section should record the consultation activity undertaken in relation to this project, policy or proposal

There is a wide range of service user engagement processes and quality assurance systems in place that drive the commissioning of services. For example the use of the Quality Assurance Framework (QAF.) As highlighted above QAF Self assessments are completed by all service providers across five objectives which covers, assessment and support planning, health & safety, Equality & fair access, Safeguarding and protection from abuse and client involvement and empowerment.

Part of the validation of QAF assessments involves commissioners visiting services to assess the quality of front-line service delivery. This includes speaking directly with service users and their experience of support planning, knowledge of safeguarding practice, review of complaints etc.

In particular recent reviews of young persons and mental health services have involved panels of current and former service users visiting services and talking directly to users to obtain feedback. The outcome of these visits is available on request but generally this practice has seen the average QAF score increase over the past 8 years and has informed commissioning decisions.

3.2 What might the potential impact on individuals, groups or staff be? Consider disability, race, gender, sexual orientation, transgender, age, faith or belief and those on low incomes and other excluded individuals or groups Generic impact (across all groups) Men or women (include impacts due to pregnancy/maternity) People of particular sexual orientation People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment Disabled people Particular ethnic groups People on low incomes People in particular age groups Groups with particular faiths and beliefs Other excluded individuals and groups

There will be no unlawful discrimination arising from the changes as it relates to proposals to reduce the total amount of spending on housing related support services in a planned way and the City Council remains committed to commissioning housing related support services for the vulnerable and

as set out above has a strong track record in developing new more efficient services (and is planning to open a new supported housing services in the next year and with partners has completed the refurbishment of 2 services for people with mental health problems and learning disabilities).

Gender:

- Alongside the rough sleeping pathway, there is a single homeless pathway model in place for vulnerable clients to access further supported accommodation within borough.
- There is adequate supported provision enabling access for both genders
- Appropriate advice and assistance can also being offered by the Housing Options Service regarding entitlement to housing and the options available

Ethnicity:

- The City Council closely monitors access to supported housing services to ensure that systems do not discriminate on the groups of ethnicity.
- The analysis of the CHAIN database and contract monitoring of each service shows that people from a range of different ethnic groups are accessing supported housing and this will continued to be monitored to ensure this continues

Disability:

Generally the support needs of the residents accessing services is high but through on-going scheme monitoring we have determined that there are other schemes which are fully able to meet the needs of those who have disabilities

SECTION 4: Reducing & Mitigating Impact

As a result of what you have learned, what can you do to minimise the impact of the proposed changes on equality groups and other excluded / vulnerable groups, as outlined above?

4.1	the impact? (Remember to think ab	mpact, what can be done to reduce or mitigate out the Council as a whole, another service area may an help to deal with any negative impact).
	Changes to housing related support services for the vulnerable do impact on a wide range of different vulnerable people across all protected groups. Changes to services will impact on the wider housing pathway for each group.	On-going assessment of the impact of changes to the vulnerable housing pathways is required through the existing commissioning and user involvement structures across each area.
	Ensure that the equalities data used is the most up to date available.	Ensure the 2014/15 full year client record data is used to inform commissioning decisions (and to compare to previous year's take-up of services.

Now that you have considered the potential or actual effect on equality, what action are you taking?			
No major change (no impacts identified)			

	Adjust the policy/proposal	
	Continue the policy/proposal (impacts identified)	X
	Stop and remove the policy/proposal	
4.3	Please document the reasons for your decision	
	There is no unlawful discrimination, there is a commitment of service provision and the impact will be in relation to import The City Council has a strong track record in reducing level maintain and improving service outcomes and delivering home.	roving the efficiency of services. s of resources in this area whilst
4.4	How will the impact of the project, policy or prop	osal and any changes made
	to reduce the impact be monitored?	
	On-going assessment and monitoring of services and needs and user involvement structures across each area. Equalit reviewed to inform commissioning decisions.	
4.5	Conclusion	
	This section should record the overall impact, who will be intaken to reduce/mitigate impact	npacted upon and the steps being
	As above there will be no unlawful discrimination arising fro and the City Council will continue to maintain and improve shomeless clients.	

SECTION 5: Next Steps

5.1	Action Plan Complete the action plan if you need to reduce or remove the negative impacts you have identified, take steps to foster good relations or fill data							
	gaps.							
	NB. Add any additional rows, if required.							
	Action Required	Equality Groups Targeted	Intended Outcome	Resources Needed	Name of Lead, Unit & Contact Details	Completion Date (DD/MM/YY)	RAG	
	Ensure website information on availability of and access to supported housing service provision is up to date	All	Services are accessible	No additional resources	Gregory Roberts; 0207 641 2834 Grobert2@westm inster.gov.uk	30/03/2016	A	
	Housing Commissioning/S P Team will take into account and mitigate the possible negative impacts listed in 4.1 through the management of the different vulnerable housing pathways to ensure the needs of the vulnerable	All	Has no negative impacts on equality groups Has no negative impact on the numbers of rough sleepers presenting in Westminster Has no impact on the number of homeless vulnerable people	No additional resources	Gregory Roberts; 0207 641 2834 Grobert2@westm inster.gov.uk	30/03/2016	A	

are effectively met			

5.2 Ri	5.2 Risk Table				
Ref	Risk	Impact	Actions in place to mitigate the risk	Current risk score	Further actions to be developed
R1.1	[Enter risk here]	[Enter here the likely impact if the risk came to pass]	[Record here any actions already in place to reduce the risk]	[Using the key below, enter the current risk score]	[Enter here any actions that can be developed in future to reduce the risk identified]



THIS SECTION TO BE COMPLETED BY THE RELEVENT SERVICE MANAGER
Signature:
Full Name:
Unit:
Email 9 Talanhana Eut
Email & Telephone Ext:
Date of Completion (DD/MM/YY):
Bute of Completion (BB) will, 11/1

WHAT NEXT?

Please email your completed EIA to the Equalities Lead: equalities@westminster.gov.uk