

Equality Impact Analysis to enable informed decisions

The purpose of this document is to:-

- I. help decision makers fulfil their duties under the Equality Act 2010 and
- II. for you to evidence the positive and adverse impacts of the proposed change on people with protected characteristics and ways to mitigate or eliminate any adverse impacts.

Using this form

This form must be updated and reviewed as your evidence on a proposal for a project/service change/policy/commissioning of a service or decommissioning of a service evolves taking into account any consultation feedback, significant changes to the proposals and data to support impacts of proposed changes. The key findings of the most up to date version of the Equality Impact Analysis must be explained in the report to the decision maker and the Equality Impact Analysis must be attached to the decision making report.

****Please make sure you read the information below so that you understand what is required under the Equality Act 2010****

Equality Act 2010

The Equality Act 2010 applies to both our workforce and our customers. Under the Equality Act 2010, decision makers are under a personal duty, to have due (that is proportionate) regard to the need to protect and promote the interests of persons with protected characteristics.

Protected characteristics

The protected characteristics under the Act are: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

Section 149 of the Equality Act 2010

Section 149 requires a public authority to have due regard to the need to:

- Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by/or under the Act
- Advance equality of opportunity between persons who share relevant protected characteristics and persons who do not share those characteristics
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The purpose of Section 149 is to get decision makers to consider the impact their decisions may or will have on those with protected characteristics and by evidencing the impacts on people with protected characteristics decision makers should be able to demonstrate 'due regard'.

Decision makers duty under the Act

Having had careful regard to the Equality Impact Analysis, and also the consultation responses, decision makers are under a personal duty to have due regard to the need to protect and promote the interests of persons with protected characteristics (see above) and to:-

- (i) consider and analyse how the decision is likely to affect those with protected characteristics, in practical terms,
- (ii) remove any unlawful discrimination, harassment, victimisation and other prohibited conduct,
- (iii) consider whether practical steps should be taken to mitigate or avoid any adverse consequences that the decision is likely to have, for persons with protected characteristics and, indeed, to consider whether the decision should not be taken at all, in the interests of persons with protected characteristics,
- (iv) consider whether steps should be taken to advance equality, foster good relations and generally promote the interests of persons with protected characteristics, either by varying the recommended decision or by taking some other decision.

Conducting an Impact Analysis

The Equality Impact Analysis is a process to identify the impact or likely impact a project, proposed service change, commissioning, decommissioning or policy will have on people with protected characteristics listed above. It should be considered at the beginning of the decision making process.

The Lead Officer responsibility

This is the person writing the report for the decision maker. It is the responsibility of the Lead Officer to make sure that the Equality Impact Analysis is robust and proportionate to the decision being taken.

Summary of findings

You must provide a clear and concise summary of the key findings of this Equality Impact Analysis in the decision making report and attach this Equality Impact Analysis to the report.

Impact – definition

An impact is an intentional or unintentional lasting consequence or significant change to people's lives brought about by an action or series of actions.

How much detail to include?

The Equality Impact Analysis should be proportionate to the impact of proposed change. In deciding this asking simple questions “Who might be affected by this decision?” “Which protected characteristics might be affected?” and “How might they be affected?” will help you consider the extent to which you already have evidence, information and data, and where there are gaps that you will need to explore. Ensure the source and date of any existing data is referenced.

You must consider both obvious and any less obvious impacts. Engaging with people with the protected characteristics will help you to identify less obvious impacts as these groups share their perspectives with you.

A given proposal may have a positive impact on one or more protected characteristics and have an adverse impact on others. You must capture these differences in this form to help decision makers to arrive at a view as to where the balance of advantage or disadvantage lies. If an adverse impact is unavoidable then it must be clearly justified and recorded as such, with an explanation as to why no steps can be taken to avoid the impact. Consequences must be included.

Proposals for more than one option If more than one option is being proposed you must ensure that the Equality Impact Analysis covers all options. Depending on the circumstances, it may be more appropriate to complete an Equality Impact Analysis for each option.

The information you provide in this form must be sufficient to allow the decision maker to fulfil their role as above. You must include the latest version of the Equality Impact Analysis with the report to the decision maker. Please be aware that the information in this form must be able to stand up to legal challenge.

Background Information

Title of the policy / project / service being considered	Re-commissioning of Lincolnshire's Housing Related Support Service (HRS)	Person / people completing analysis	David Clark, Amy Smithson
Service Area	Public Health	Lead Officer	Semantha Neal
Who is the decision maker?	Derek Ward, Director of Public Health	How was the Equality Impact Analysis undertaken?	<ul style="list-style-type: none"> • Service user, provider and professional stakeholder feedback, • Desk top exercise • Ongoing
Date of meeting when decision will be made	Click here to enter a date.	Version control	0.03
Is this proposed change to an existing policy/service/project or is it new?	Existing policy/service/project	LCC directly delivered, commissioned, re-commissioned or de-commissioned?	Re-commissioned
Describe the proposed change	<p>Proposed Adults Housing Related Support Service Model</p> <p>The proposed Housing Related Support model will replace the existing service provision, reflecting new duties and an increase in funding for homelessness services being directed to the district councils.</p> <p>Due to the increase in responsibility brought in by the Homelessness Reduction Act 2017, district councils will now become the first port of call for everyone who is homeless or at risk of homelessness. LCC's Housing Related Support will complement but not duplicate district council statutory duties to prevent and relieve homelessness (part of the Homelessness Reduction Act).</p> <p>The proposed model for Adults Housing Related Support is to commission a tenure blind floating support service and that accommodation for those that require it will be facilitated by the District Councils (regardless of whether they are legally required to provide it). It is not proposed to re-commission emergency or non-emergency-based accommodation services or street outreach. However, if it would assist District Councils in fulfilling their responsibilities accommodation could be added to the model to support those immediately at risk of becoming street homeless and not eligible for district accommodation</p>		

provision. This will not be an additional cost to LCC. As support will be tenure-blind it will be open to those who meet the eligibility criteria regardless of how they are accommodated.

The proposed eligibility criteria for the new service will be:

- Have a local area connection to Lincolnshire (as determined by the District Housing authority making the referral)

AND

- *Require support to enable them to maintain their accommodation and avoid eviction*

AND have one (or both) of the following:

- *Have an identified or suspected mental health need which impacts on their ability to secure or maintain a tenancy,*
- *Have an identified or suspected substance misuse issue which impacts on their ability to secure and maintain a tenancy.*

The service will aim to improve the health and wellbeing of the most vulnerable people by ensuring access to early support to prevent their needs escalating to more costly statutory service thresholds such as Adult Safeguarding and Adult Care Services, and to help them access and maintain stable, settled and appropriate accommodation.

Under the proposals:

- current accommodation based support and services will end on 30 June 2020
- Street Outreach will end on 31 March 2021.

Domestic Abuse Refuge with Support

The contract for Domestic Abuse Refuges with Support is not proposed to change at the moment and we will be commissioning a like for like service to commence when the existing service ends on 1st July 2020.

Mental Health Crisis Houses

LCC commissions two units of accommodation (10 beds in two locations) funded by the Clinical Commissioning Groups (CCGs). The service provided is unrelated to Housing Related Support and sits outside the current and proposed service pathways.

Summary

New legislation, greater clarity of statutory duties, increasing numbers of homeless people and especially those with complex needs and pressure on public services requires a new model of service delivery to support the most vulnerable people in

Lincolnshire. The proposals outlined above seek to address ongoing needs whilst also reducing duplication and re-focussing activity to support those most in need to prevent their needs escalating and increasing demand on LCC and other services. The new approach ensures that the council continues to support this non-statutory service, during a time of unprecedented budget pressure, whilst continuing to work with local district councils to ensure there are efficiencies within both the Housing Related Support and district provision, and reducing service cross over.

Evidencing the impacts

In this section you will explain the difference that proposed changes are likely to make on people with protected characteristics. To help you do this first consider the impacts the proposed changes may have on people without protected characteristics before then considering the impacts the proposed changes may have on people with protected characteristics.

You must evidence here who will benefit and how they will benefit. If there are no benefits that you can identify please state 'No perceived benefit' under the relevant protected characteristic. You can add sub categories under the protected characteristics to make clear the impacts. For example under Age you may have considered the impact on 0-5 year olds or people aged 65 and over, under Race you may have considered Eastern European migrants, under Sex you may have considered specific impacts on men.

Data to support impacts of proposed changes

When considering the equality impact of a decision it is important to know who the people are that will be affected by any change.

Population data and the Joint Strategic Needs Assessment

The Lincolnshire Research Observatory (LRO) holds a range of population data by the protected characteristics. This can help put a decision into context. Visit the LRO website and its population theme page by following this link: <http://www.research-lincs.org.uk> If you cannot find what you are looking for, or need more information, please contact the LRO team. You will also find information about the Joint Strategic Needs Assessment on the LRO website.

Workforce profiles

You can obtain information by many of the protected characteristics for the Council's workforce and comparisons with the labour market on the [Council's website](#). As of 1st April 2015, managers can obtain workforce profile data by the protected characteristics for their specific areas using Agresso.

Positive impacts

The proposed change may have the following positive impacts on persons with protected characteristics – If no positive impact, please state 'no positive impact'.

Age	<i>No positive impact</i>
Disability	<i>The continued provision of mental health crisis houses will ensure the continued support of people suffering a mental health crisis</i>
Gender reassignment	<i>No positive impact</i>
Marriage and civil partnership	<i>No positive impact</i>
Pregnancy and maternity	<i>No positive impact</i>
Race	<i>No positive impact</i>

Religion or belief	<i>No positive impact</i>
Sex	<i>The continued commissioning of domestic abuse refuges ensure continued support for victims of domestic abuse which impacts disproportionately on women.</i>
Sexual orientation	<i>No positive impact</i>

If you have identified positive impacts for other groups not specifically covered by the protected characteristics in the Equality Act 2010 you can include them here if it will help the decision maker to make an informed decision.

Adverse/negative impacts

You must evidence how people with protected characteristics will be adversely impacted and any proposed mitigation to reduce or eliminate adverse impacts. An adverse impact causes disadvantage or exclusion. If such an impact is identified please state how, as far as possible, it is justified; eliminated; minimised or counter balanced by other measures.

If there are no adverse impacts that you can identify please state 'No perceived adverse impact' under the relevant protected characteristic.

Negative impacts of the proposed change and practical steps to mitigate or avoid any adverse consequences on people with protected characteristics are detailed below. If you have not identified any mitigating action to reduce an adverse impact please state 'No mitigating action identified'.

Age

The removal of street outreach and the emergency and non-emergency accommodation may have an impact on those people that district councils have no statutory duty to house. Currently this mainly affects single men (without dependents) and this is likely to remain the largest affected group. Data collected from current services from 2015/16 to October 2018/19 shows us:

The majority of 1,694 clients supported by the Street Outreach Team were aged 25-29, followed by 14% aged 60+ and 13% aged 0 to 24 in the period 2015/16 to October 2018/19. The biggest increase in the number of clients supported are seen in those aged 18-21 years, they are 7 times higher in 2017/18 (42) compared to the period 2015/16 (6), the age groups 25-59 and 60+ also more than doubled in the same time period.

Of the 1,753 clients receiving Housing Related Support services during the time period 2015/16 to October 2018/19, aged 18 and over: 46% were aged 25-59, 15% were aged 18-24, and only 3% were aged 60+. The biggest increase was seen in the age group 18-21 with three and half times as many clients using the service in 2017/18 compared to 2015/16.

Therefore any reduction in these services will have an adverse impact on younger men specifically.

Mitigation

District councils will have a responsibility supported by new funding towards all homeless people although they may refer individuals to another area where there is a local connection to that area.

District councils will have a responsibility to help individuals to secure that accommodation becomes available for their occupation. If this is not possible for lack of suitable accommodation the Council could consider procuring accommodation for the most vulnerable individuals by adding in some capacity for accommodation via an addition to the Housing Related Support model at district council cost.

Disability	<p>The removal of street outreach and the emergency and non-emergency accommodation may have an impact on those people that District Councils have no statutory duty to house. This is likely to have a disproportionate impact on people with a disability as homeless people and particularly street homeless people are disproportionately likely to suffer with their mental health.</p> <p>People with mental health difficulties can also be expected to be more difficult to find accommodation for.</p> <p>Mitigation</p> <p>District Councils will have a responsibility supported by new funding towards all homeless people although they may refer individuals to another area where there is a local connection to that area.</p> <p>District Councils will have a responsibility to help individuals to secure that accommodation becomes available for their occupation. If this is not possible for lack of suitable accommodation the Council could consider procuring accommodation for the most vulnerable individuals by adding in some capacity for accommodation via an addition to the Housing Related Support model at district council cost.</p>
Gender reassignment	No perceived adverse impacts
Marriage and civil partnership	No perceived adverse impacts
Pregnancy and maternity	No perceived adverse impacts
Race	No perceived adverse impacts
Religion or belief	No perceived adverse impacts

<p>Sex</p>	<p>The removal of the emergency and non-emergency accommodation is likely to have an impact on those who the Districts have no statutory duty to house. Currently, these are predominantly males without dependants. Emergency and non-emergency accommodation currently accommodates these men. These men would be difficult to find accommodation for. This is due to their needs making them 'unattractive tenants' as they may have rent arrears, exclusions from social landlords due to anti-social behaviour, criminal records, mental health and/or substance misuse issues.</p> <p>Mitigation</p> <p>District councils will have a responsibility supported by new funding towards all homeless people although they may refer individuals to another area where there is a local connection to that area.</p> <p>District councils will have a responsibility to help individuals to secure that accommodation becomes available for their occupation. If this is not possible for lack of suitable accommodation the Council could consider procuring accommodation for the most vulnerable individuals by adding in some capacity for accommodation via an addition to the Housing Related Support model at District Council cost.</p>
<p>Sexual orientation</p>	<p>No perceived adverse impacts</p>

If you have identified negative impacts for other groups not specifically covered by the protected characteristics under the Equality Act 2010 you can include them here if it will help the decision maker to make an informed decision.

Stakeholders

Stake holders are people or groups who may be directly affected (primary stakeholders) and indirectly affected (secondary stakeholders)

**Objective(s) of the EIA consultation/engagement activity
Who was involved in the EIA consultation/engagement activity?**

Engagement activity has been undertaken with a wide range of key stakeholders, including existing and potential service providers, users of the existing commissioned services, district councils, the Police and health partners. The objective of the engagement activity has been to find out what stakeholders value about the existing service, what barriers to accessing the service may be experienced, and what changes they would recommend. This is intended to support the development of the new service model.

Detail any findings identified by the protected characteristic

Age	No specific feedback identified
Disability	No specific feedback identified
Gender reassignment	No specific feedback identified
Marriage and civil partnership	No specific feedback identified
Pregnancy and maternity	No specific feedback identified

Race	No specific feedback identified
Religion or belief	No specific feedback identified
Sex	No specific feedback identified
Sexual orientation	No specific feedback identified
Are you confident that everyone who should have been involved in producing this version of the Equality Impact Analysis has been involved in a meaningful way? The purpose is to make sure you have got the perspective of all the protected characteristics.	To be updated upon further development
Once the changes have been implemented how will you undertake evaluation of the benefits and how effective the actions to reduce adverse impacts have been?	<p>The Equality Impact Analysis will be a live document, regularly reviewed by commissioning leads and commercial colleagues.</p> <p>There will be regular implementation meetings with the successful providers as part of awarding the contracts. These meetings will review whether there are any impacts against individual service users, particularly those who are protected under the Equality Act 2010. A review of any adverse impacts will be carried out six months after the new service has been implemented.</p> <p>Following implementation there will be quarterly contract management meetings, again these will review the service delivery and will identify any protected groups or individuals who may be impacted either in a positive or negative way.</p>

Further Details

Are you handling personal data?

Yes

Actions required

Include any actions identified in this analysis for on-going monitoring of impacts.

Action

Lead officer

Timescale

Signed off by

Date

[Click here to enter a date.](#)