

**Coventry City Council
Equality and Consultation Analysis (ECA) Form**

In line with the principles of decision making outlined in the City Council Constitution, the Council will ensure that its decision making is open and transparent, and that due regard is given to the Council's obligations and desire to promote equality of opportunity and equal treatment.

Form 1

This part must be completed and before formal consultation is undertaken and must be available during the consultation stage.

Author of this document: Mark Andrews

Name of Service Area/Proposal: Planning and Housing Policy – DRAFT Housing & Homelessness Strategy 2019-24

Head of Service: Tracy Miller, Head of Planning & Regulatory Services

Date of completion:

Background to the planned changes

1. What is the background to the planned changes? Why is this change being considered?

Coventry City Council no longer owns any 'council housing' after the stock was transferred to Whitefriars Housing Group in 2000. However, the Council still has strategic housing duties, and duties towards people who are homeless or threatened with homelessness.

The Homelessness Act 2002 introduced a legislative requirement to carry out a Homelessness Review every five years, and develop a Homelessness Strategy to prevent and tackle homelessness in the city.

Coventry City Council has combined the Housing Strategy and the Homelessness Strategy to produce a coherent and holistic approach to housing and homelessness issues. The current Housing & Homelessness Strategy runs from 2013 to 2018. A Draft Housing & Homelessness Strategy for 2019-24 has been produced to replace it. A public consultation will be carried out on this draft strategy (subject to approval by Cabinet at their meeting on 2nd October 2018) before a final version is produced, with the intention to present the final strategy to Cabinet and Council for approval in early 2019.

The Government has also introduced new legislation (Homelessness Reduction Act 2017) which places additional duties on the Council relating to assistance given to all eligible people who are homeless or threatened with homelessness – not just those with a 'priority need' or who are not intentionally homeless - so more people will now be able to receive assistance.

2. Who do you need to consider as part of this ECA? *stakeholder analysis

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People who are homeless or at risk of homelessness
People who require support and assistance to maintain a tenancy or independent living
People who are living in unsuitable housing or poor housing conditions
Applicants on the Coventry Homefinder choice based lettings register
General members of the public
Homelessness organisations and charities
Advice agencies
Registered Providers (housing associations)
Private Landlords
Housing developers
Planning agents and consultants

Pre-Consultation Engagement

3. What engagement activities took place prior to formal consultation and what feedback (if any) was received in relation to equality issues?

The principles and priorities that should be included in the Housing & Homelessness Strategy have been discussed at several existing groups including the Homelessness Forum, where participants were asked to identify what the priorities for addressing homelessness should be, and what improvements on current services could be made. When carrying out research for the Homelessness Review, a simple survey was sent out to key stakeholders (mostly organisations working with homeless people) asking for feedback on what works well and what needs to be improved in current homelessness services. Meetings have also been held with all relevant Council services that will be involved in delivering the Strategy.

Feedback in relation to equality issues focussed on:

- Ensuring that everyone can access the housing options and homelessness services provided by the Council – with various ways to contact the service etc.
- ensuring that people with lived experience (Experts by Experience) are involved in future service development and improvement
- ensuring that advice and assistance is available to people without a ‘priority need’ (such as single people, especially single men) – this should be addressed with the introduction of new duties under the Homelessness Reduction Act 2017
- The particular needs of children in temporary accommodation that need to be addressed
- Ensuring that people with particular housing needs due to disabilities can access services and also find suitable housing for their needs (either purpose built or through adaptations)
- Improved access to mental health services, especially for those with a dual diagnosis (mental ill health and drug/alcohol misuse)

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- Address the gap in current direct access hostel provision – no specific female only accommodation at present.
- Address the increase in people with multiple complex needs who require services.
- People who have ‘no recourse to public funds’ and are therefore specifically excluded from being able to access housing and homelessness services under the Housing Act 1996 (as amended) and Homelessness Reduction Act 2017.

Analysis of Impact

In this section please ensure that you consider the three aims of the general duty as they affect **protected groups**. These groups are:

Age
Disability
Gender
Gender reassignment
Marriage/Civil Partnership
Pregnancy/Maternity
Race
Religion/Belief
Sexual Orientation

The **three aims of the general duty** require that a public authority, in the exercise of its functions, must have due regard to the need to:

- Eliminate discrimination, harassment and victimisation
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it

4. Outline below how this proposal/review could impact on protected groups positively or negatively, and what steps/mitigations (if any) could be taken to reduce any negative impact that has been identified.

Information that we have relating to homelessness indicates that groups with certain protected characteristics are disproportionately affected by homelessness.

Each quarter, the Council reports data on the people who have been assessed as ‘statutory homeless’ (they are eligible, homeless, in priority need, not intentionally homeless, and have a local connection) and are owed the main housing duty by the council – this report is called P1E and is sent to the Ministry of Housing, Communities and Local Government.

The profile of statutory homeless households in 2017/18 is described below:

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Household composition: the majority of statutory homeless households are either couples with dependent children (21%) or lone female parents with dependent children (50%). The proportions of households in each household type has stayed relatively stable for the last five years.

Household composition	Number	Percentage
Couple with dependent children	118	21%
Lone Parent household with dependent children - Male Applicant	16	3%
Lone Parent household with dependent children - Female Applicant	277	50%
One person household - Male Applicant	69	12%
One person household - Female Applicant	53	10%
All other household groupings	24	4%
Total	557	100%

Age of applicant: The most common age group of statutory homeless applicants is within the 25-44 year age group (56%). This accords with the information that the majority of statutory homeless households are families/parents with dependent children. However, there is also a significant proportion of households (26%) in the younger 16-24 year age group. As with the figures on household composition, the proportions of each age group has stayed relatively stable over the past five years.

Age of Applicant	Number	Percentage
16-24	145	26%
25-44	314	56%
45-59	79	14%
60-64	9	2%
65-74	9	2%
75 & over	1	0%
Total	557	100%

Race: In 2013/14, the P1E data requirement for ethnicity of the applicant changed. Rather than recording the detailed groups as found in the census (ie White-British, White-Irish, White-Other etc) the P1E now only records the broad ethnicity groups (White, Black, Asian etc).

Analysis in the previous Homelessness Review (of data from 2008-2013) showed that within each of these broad groups, there was considerable variation. This more nuanced analysis is not possible with the current P1E figures.

The proportion of statutory homeless households recorded as 'White' has varied slightly between 62% and 67% over the past five years. The other groups have fluctuated as well, however the proportion of applicants recorded as Black (15%-23%) is consistently higher than the proportion of the overall Coventry population who are Black (5.5% in the 2011 Census). Conversely, the proportion of Asian applicants (4%-7%) is consistently lower than

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the proportion of the overall population who are Asian (15.1% in the 2011 Census). This is a long term trend.

Ethnic Origin	Number	Percentage
White	351	63.0%
Black	92	16.5%
Asian	41	7.4%
Mixed	29	5.2%
Other	28	5.0%
Ethnicity not stated	16	2.9%
Total	557	100%

Reason for 'priority need': the majority of statutory homeless households in 2017/18 had a priority need because the household contained dependent children (69%) or a pregnant woman (6%). 8% of households had a priority need due to a mental illness or disability, and 9% due to a physical disability.

Positive or negative impact?

The proposals in the Draft Housing & Homelessness Strategy aim to improve services to people who are homeless or vulnerably housed, and will therefore have a positive impact on all (eligible) Coventry citizens who experience homelessness. It will have a greater impact on groups with the protected characteristics that are identified above as being more at risk of homelessness.

The Draft Strategy also includes priorities to provide support and assistance and adaptations for people to live independently in their own homes where this is appropriate, including people with learning disabilities, physical disabilities or frailties due to old age.

5. **Are there any other vulnerable groups that could be affected?** *i.e. deprivation, looked after children, carers.*

Other groups that could be affected are: Care Leavers; prison leavers; those leaving an institution or hospital; victims of domestic abuse; asylum seekers who receive refugee status and have limited time to leave accommodation provided by the Home Office; people in fuel poverty; people in poverty and as a result are unable to cover their basic housing costs.

Each of these groups are subject to specific targeted areas of work that will help deliver elements of the Action Plan that accompanies the Strategy. For example prison leavers will be included within the homelessness services re-commissioning work. There is a separate tendering exercise to provide services to victims of domestic abuse – as well as an accompanying strategy.

There is also a group of people who are not 'eligible' for homelessness services provided by the Council under the Housing Act 1996 (as amended) - usually due to their immigration status, including people with 'No Recourse to Public Funds' (NRPF). There are very few options available to this group if they need housing assistance as they are specifically excluded from public services and are not eligible for certain benefits (such as housing

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benefit). If the household contains dependent children, the Council may have duties under Section 17 of the Children Act 1989 to accommodate the family. 10 applicants who made a full homelessness application in 2017/18 were found to be 'not eligible'.

Housing Services will work closely with Childrens Social Care services and the Migration Team, as well as voluntary organisations (such as the Coventry Refugee & Migrant Centre and the Coventry Winter Night Shelter) to offer appropriate assistance and signposting etc.

6. What are the gaps in evidence? Can this be addressed during the consultation stage?

The current data on homelessness does not record information about religion/belief, sexual orientation, gender reassignment, or marriage/civil partnership (specifically – it does record if the household type is a 'couple').

It is not expected that religion or marriage/civil partnership has a particular impact on housing and homelessness or peoples' ability to access housing. However, research undertaken at a national level shows that people may be more at risk of homelessness and may experience barriers to housing due to sexual orientation or gender reassignment.

This has been acknowledged in the Draft Housing & Homelessness Strategy as a gap in current information and an action has been included to carry out further research on the experience and barriers faced by LGBTQ+ people in Coventry, and identify what services need to be put in place to address these barriers.

The Ministry for Housing, Communities and Local Government has also changed the data collection requirements, and P1E has been replaced with a new report called H-CLIC. This records much more comprehensive information, including information on all the protected characteristics except religion/belief, at case level. This has been introduced from April 2018. The Draft Housing & Homelessness Strategy includes an action to carry out a short update of the Homelessness Review when the first 12 months of H-CLIC data is available, so data will be available from then.

7. What are the likely impacts of this project/review on staff from protected groups? For further support please contact Andy Hyland (andy.hyland@coventry.gov.uk tel: 7683 3426)

No specific impacts on staff are expected.

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Form 2

This section should be completed AFTER any consultation has been concluded.

Author of this document:

Date of completion:

Potential Impacts – further information

8. Referring to the information detailed in question 4 of ECA Form 1, state if the potential impacts have been confirmed. Also detail below any additional information about potential impacts that has been highlighted during any consultation.

Outcome of equality impact

9. Indicate which of the following best describes the equality impact of this project/review:

There will be **no** equality impact if the proposed option is implemented

There will be **positive** equality impact if the proposed option is implemented

There will be **negative** equality impact if the proposed option is implemented but this can be objectively justified

There will be both **positive and negative** impacts if the proposed option is implemented

Summary of ECA

Write a paragraph below which summarises the key aspects of this ECA.

This paragraph should be included in the Equalities/EIA section of any Cabinet/Cabinet Member Report.

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Approvals from Director and Cabinet Member

Name of ECA Author

Date

Director:

Cabinet Member:

Please detail below any committees, boards or panels that have considered this analysis.

Name

Date

Chair

Decision taken

Next steps

Please send this completed ECA to the Insight Team as follows:

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