

# 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: Sophie Hall**

**Name of ECA and Service: Draft Rough Sleeping Strategy – Housing.**

**Head of Service: Jim Crawshaw**

**Date of completion: 8<sup>th</sup> August 2019**

### ***Background to the planned changes***

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

Coventry City Council has strategic housing duties, and duties towards people who are homeless or threatened with homelessness.

The Ministry of Housing, Communities and Local Government (MHCLG) has made addressing rough sleeping a priority. They have committed to halve rough sleeping in this Parliament and to end it by 2027. MHCLG have produced their own Rough Sleeper Strategy and one of the requirements is for individual Council's to develop their own Rough Sleeper Strategies and Action Plans by December 2019.

Coventry City Council's Rough Sleeping Strategy will set out how we plan to reduce rough sleeping in the City by providing support and developing a planned partnership approach to deliver existing and develop new services specifically for current and future rough sleepers.

Coventry has seen a significant increase in the number of rough sleepers over the last few years, which has been replicated both locally and nationally. Therefore, it welcomes the requirement for a Rough Sleeping Strategy and Action Plan. This will help raise the profile of the issues and challenges around rough sleeping whilst ensuring there is a planned approach to how we can effectively work together to ensure that no Coventry citizen has no other option than to bed-down on the streets.

The Draft Rough Sleeping Strategy focuses on the current position in the City, where we want to be, what tools and services are already in place and how we can maximise their impact and what are the gaps and how we will address these. These elements will be considered for current, future and hidden rough sleepers.

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

- People who are currently rough sleeping
- People who have been rough sleeping
- People who are homeless or at risk of homelessness
- General members of the public
- Homelessness organisations and charities
- Advice agencies
- Registered Providers (housing associations)
- Private Landlords

### *Pre-Consultation Engagement*

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*This section refers to any activities that took place (such as briefings, meetings, workshops, scoping exercises etc) with stakeholders before the formal consultation period.*

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

The initial development of the Draft Rough Sleeping Strategy and Action Plan was carried out in partnership with key external and internal stakeholders, which included ex-service users. The discussion considered the city's current position and considered what the collective vision was and the actions and tools that would be needed to achieve the vision to end rough sleeping in Coventry.

It was recognised to address any equality issues, we need to ensure both past, current and potential new rough sleepers views are considered and included. To do this it was agreed, we will work with current partner organisations to facilitate consultation that is appropriate to rough sleepers that ensures their views are collected in a way that feels safe and meaningful to them.

### *Analysis of Impact*

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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 reassignment  
Marriage/Civil Partnership  
Pregnancy/Maternity  
Race  
Religion/Belief  
Sex  
Sexual Orientation

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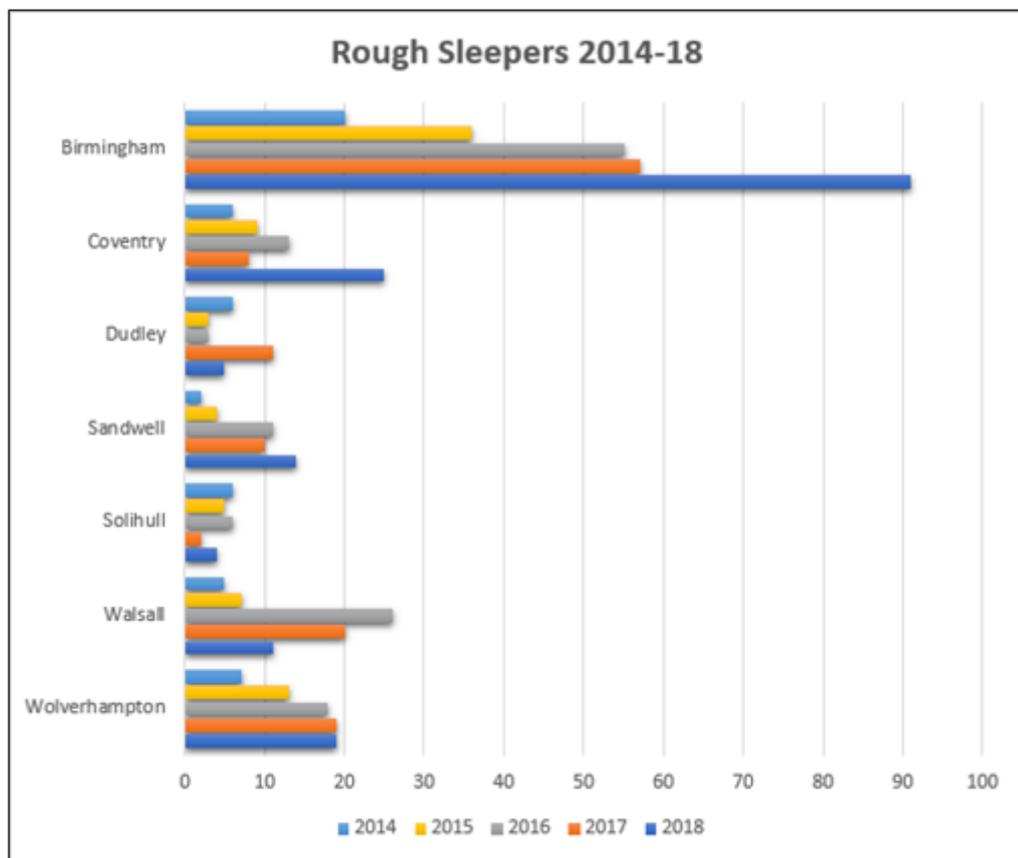
The **three aims of the general duty** require that a public authority, in the exercise of its functions, must have due regard to the need to:

- 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.**

Coventry has seen a significant increase in the number of rough sleepers over the last few years. Official figures demonstrate a 316 per cent increase in rough sleeping in Coventry over the last 5 years. This is a greater proportional increase than that of the greater WMCA which has seen an increase of 128 per cent over the same period, alongside the increase seen in neighbouring Nuneaton and Bedworth (267 per cent), and Nottingham (comparable size city) (278 per cent).

**Table1 – The increase in the number of rough sleepers on a yearly basis since 2014 across the West Midlands Combined Authorities**



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**Table 1 – A table showing the increase in the number of rough sleepers on a yearly basis since 2014 in across the West Midlands Combined Authorities**

	Coventry	Birmingham	Dudley	Sandwell	Solihull	Walsall	Wolverhampton
2014	6	20	6	2	6	5	7
2015	9	36	3	4	5	7	13
2016	13	55	3	11	6	26	18
2017	8	57	11	10	2	20	19
2018	<b>25</b>	<b>91</b>	<b>5</b>	<b>14</b>	<b>4</b>	<b>11</b>	<b>19</b>

The last official count for Coventry was in November 2018 and there were 25 rough sleepers as illustrated in the table above, however latest intelligence suggests that the number of rough sleepers in Coventry is 58.

By nature of the complexities of the cohort demographic information is very limited. The team who work with Rough Sleepers indicate that they have information for 43 current rough sleepers. The City has secured external funding to appoint 3 posts whose role is to specifically work with our rough sleepers to overcome barriers in securing a tenancy and supporting the client to access medical support, training and or employment opportunities. As part of the interim Rough Sleeping Action plan; one of the priority areas is to identify and engage with all 58 rough sleepers from the July 2019 unofficial count.

<b>*Gender:</b>	
Male	32
Female	10
Unknown	1

\*The draft Rough Sleeping Strategy aims to work in partnership with local organisations to provide services which will have a positive impact on both male and female, which will support them to overcome any barriers to secure a tenancy.

<b>*Age:</b>	
16-24yrs	3
25-44yrs	9
45-59yrs	5
60-64yrs	0
65-74yrs	0
75yrs & over	0
Unknown	26

\*Demographics of the current cohort of rough sleepers is limited. Rough sleepers generally do not wish to engage in conversation with our Rough Sleeper Workers and so establishing their ages can prove problematic.

<b>*Ethnicity:</b>	
White British	15
Black British	2
White European	5

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South American/British	1
Unknown	20

\*The City has a cohort of rough sleepers who are from the EU or outside EU and Refugees. There is limited information and the data is not thorough in part due to language barriers. However, this is a priority for the service area to identify and engage with this cohort and there is a Rough Sleeper Worker whose role is to specifically engage and work with this cohort in the action plan going forward

Disability	
Yes	0
No	12
Unknown	31

\*Demographics of the current cohort of rough sleepers is limited. Rough sleepers generally do not wish to engage in conversation with our Rough Sleeper Workers and so establishing if the person has any disabilities can prove problematic. However, research indicates that rough sleepers have complex needs which can include mental health issues which may be significant enough to fall under the protective characteristics.

### 5. Are there any other vulnerable groups that could be affected?

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 of the Housing and Homelessness Strategy, which the Rough Sleeper Strategy complements. 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 lack of 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 benefit). We know that a large proportion of our rough sleepers fall into this group.

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 Children's Social Care services and the Migration Team, as well as voluntary organisations (such as the Coventry Refugee &

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Migrant Centre and the Coventry Winter Night Shelter) to offer appropriate assistance and signposting etc.

Rough sleepers have complex needs and often there are presenting with mental health issues which are being self-medicated and therefore, not being effectively supported. Through the commissioning of the Council's homelessness services as well as linked services associated with drug and alcohol support for example the council and its partners work with health care providers to support the health and wellbeing of homeless households and rough sleepers.

There is a cohort of hidden rough sleepers such as sex workers whereby these people are not present at the time of any counts as they are working, and potentially they bed-down on the street during the day. The Rough Sleeper team will work in partnership with specific teams who offer support to sex workers so that their housing needs will be considered.

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

The current cohort of rough sleeper's demographic information is very limited. The team who work with Rough Sleepers indicate that they have information for 43 current rough sleepers. However, at the last unofficial count this number has increased to 58 rough sleepers. This gap in information can be addressed by the newly appointed Rough Sleeper Outreach Workers whose role is to work with our rough sleepers and specifically our rough sleepers who are refugees with status and EU immigrants, to engage and support them.

With the introduction of a new outreach team we expect over the next 6 months that further information to be collected, including the protective characteristic data and therefore be able to be analysed and included in management information process and/or service specifications.

The current data on rough sleepers 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 an 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.

### **7. What are the likely impacts of this project/review on staff from protected groups?**

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: Sophie Hall**

**Date of completion: 31<sup>st</sup> October 2019**

### *Potential Impacts – further information*

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- 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.**

It was not known as to whether the current cohort of rough sleepers have a mental impairment, research suggested that this could well be a feature, but this detail of information had not been previously collected. Following face to face feedback with people who are currently rough sleeping or have recently experienced rough sleeping all shared that they have required support with their mental well-being, citing substance misuse or depression due to a relationship breakdown as the cause. We know that the majority of those sleeping rough have a substance misuse issue and or a mental health need however, mental health needs are often not formally diagnosed due to their manifestation being related to a lifestyle choice and not a formal mental health diagnosis.

Therefore, in order to ensure that the Rough Sleeping Strategy and Action Plan meets all groups with a protective characteristic consideration will be given to improve links with secondary health services who provide support to individuals experiencing mental well-being difficulties due to substance misuse or depression.

During our consultation and research process we have established a cohort of hidden rough sleepers who are sex workers. Whilst they are not protected in terms of the Equality Act in terms of having a protected characteristic, they are a minority group whose needs are not currently being met. There we will be undertaking more engagement with this group and current service providers to understand how best to meet their needs.

We were also able to update our latest demographic information of our cohort of rough sleepers. Coventry City Council, Rough Sleeping Outreach Team report on the 29<sup>th</sup> October 2019, they have identified 62 who are presenting as rough sleeping. This is an increase from previous figures, but rough sleeping figures can only be a snap-shot at a period in time and can fluctuate. The majority were males; 92% were males and 8% were females. Of which, 56% were White British, 39% were White European, 3% Black British and 2% were Black African. Ages of our rough sleepers are 16-24yrs 5%, 25-44yrs 65%, 45-49 yrs 11%, 60-64yrs 0%, 65-74yrs 1% and there were 18% where we did not know their ages.

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### Outcome of equality impact

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**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

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**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.*

By having a shared partnership approach to strive to eradicate rough sleeping in Coventry by 2022, will improve the wellbeing and life chances of people with protected characteristics, who are homeless or at risk of being homeless, and it will, therefore, have a positive impact.

Mental well-being impairment is a feature within the cohort of rough sleepers and those who have experienced rough sleeping, therefore is important that strong effective links are made with appropriate agencies who support people to overcome.

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## Approvals from Director and Cabinet Member

**Name of ECA Author - Sophie Hall**

**Date - 31/10/19**

**Director:** David Ashmore

Date – 19/11/19

**Cabinet Member:** Councillor T Khan

Date – 4/11/19

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

<b>Name</b>	<b>Date</b>	<b>Chair</b>	<b>Decision taken</b>
Scrutiny Board 4	14/11/19	Councillor N Akhtar	N/A

## *Next steps*

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

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Jaspal Mann ([jaspal.mann@coventry.gov.uk](mailto:jaspal.mann@coventry.gov.uk) tel. 7683 3112)