

Appendix 2

St John Mansions Homeless Accommodation Project Equality and Health Analysis

Section 1: Equality analysis details

Proposed policy/decision/business plan to which this equality analysis relates:

Provision of 19 x self-contained studio properties for single homeless people

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Date of review March 2025

Section 2: Brief description of policy/decision/business plan

1.1 Brief description of policy/decision/business plan

This Equalities Impact Assessment (EIA) forms part of the review of the EIA assessment completed on the 3rd of July 2021 for the wider homeless services. The initial assessment examined the impacts (individual and cumulative) of a suite of homeless preventions providing the framework for the use of accommodation at Stacey Street and now St Johns Mansions to help meet the council's duties to homeless households.

These policies included the following:

- The provision of 19 x self-contained studio properties for single homeless people

At the point of the EIA, the assessment was based on the available information prior to implementation. The policies aim to increase access to affordable and suitable accommodation that meets our Good Homes Standards. The new scheme/policies:

- Are designed to reduce rough sleeping and prevent homelessness.

Legal framework

Within this EIA assessment, the legal requirements are set out to confirm the operating parameters applicable when devising the policies. This includes the Housing Act 1996 in which local housing authorities have duties to secure suitable accommodation for homeless people with a local connection and with a priority need, as defined in the statute. Where permanent housing cannot be provided immediately, homeless households are placed in temporary accommodation. The Homelessness Reduction Act 2017 also places Prevention and Relief duties on local authorities which can also include the provision to secure accommodation. The 1996 Act and supporting regulations require local authorities to place homeless households in borough wherever “reasonably practicable”. Location is one of the factors that must be taken into account when considering whether temporary or permanent accommodation provided to meet any of the homelessness duties is suitable. The proposed scheme located at St Johns Mansions will continue to comply with the relevant legislation, government guidelines and case law.

Overall, the new scheme at St Johns Mansions is intended to ensure availability of enough suitable accommodation for single homeless households to allow the council to meet its duties at a cost that it can sustain and which are affordable to homeless households, against the background of an increasingly difficult market, marked by rapid increases in rent costs. Temporary accommodation already costs the council over £13 million per year, at a time when, in common with other local authorities, it faces medium-term financial pressures. This means that it cannot sustain an uncontrolled increase in costs. The policies will have the effect of offsetting the impact of continuing high numbers of homeless households presenting to the council and the loss of social rented supply.

Modelling suggests that without the scheme located at St Johns Mansions the cost of temporary accommodation could increase by a further £45,000 to £100,000 per year. The scheme is also intended to provide more certain and sustainable outcomes for homeless households, enabling them to secure suitable housing more quickly rather than waiting in temporary accommodation for many years (and often subject to multiple moves over this time) until a social home becomes available. For other households, this approach will help free up resources that can be used to help prevent homelessness from arising in the first place – the approach being given increased priority locally, regionally and nationally.

Details of each of the policies is given below:

St Johns Mansions Single Homeless Accommodation Project

The scheme offers to set out clearly and transparently how the council will use its powers under the Housing Act and Localism Act to help eliminate rough sleeping. Another of the scheme's objectives is to help improve outcomes for homeless households. Households often have to move a number of times within temporary accommodation. The nature of temporary accommodation therefore means it can be difficult for households to settle in an area, establish local links and get on with their lives. The scheme (which will be backed by a package of support for the households concerned) is intended to help ensure that the offer of accommodation at St Johns Mansions will mean that households can move into more settled accommodation that is affordable to them more quickly, enabling them to settle in a

neighbourhood, engage with local services and opportunities and plan their futures with more certainty.

The council seeks to maximise provision of new affordable housing in the borough, including through its ambitious new build development programme, but the scarcity and cost of sites in Islington restricts its ability to meet increasing demand in this way.

These supply and demand factors are unlikely to improve as homeless acceptances are forecast to remain high at least in the medium term (primarily as a result of changes to the benefit system, COVID19, Brexit, the cost-of-living crisis, and the rising numbers of people sleeping rough and homeless households).

Social rented supply is also likely to reduce, at least in the short term, due to a number of national policies mainly imposed by the Housing and Planning Act 2016, such as the extension of right to buy to housing association tenants.

St Johns Mansions

This scheme is needed to provide accommodation for single homeless people. A key principle for the scheme is that it is affordable to the council within relevant subsidy levels, in order to help to contain temporary accommodation costs and to prevent them from rising excessively.

Another key principle is that rents need to be affordable to low-income people within benefit levels as otherwise it will not be sustainable to them in the long term. Both of these considerations are likely to become increasingly pressing if private sector rents continue to rise and the tendency for landlords to let to more affluent tenants continues. They are likely to be further exacerbated by the introduction of Universal Credit which has now been fully rolled out across Islington.

Temporary Accommodation Lettings Framework

This scheme is designed to complement the Accommodation Procurement and PRSO policies and is needed as the amount of housing available for temporary accommodation (and for private rented sector offers) in Islington and Greater London is likely to continue to decline while costs are likely to continue to increase. Although, as set out above, the council aims to place households in or as close to Islington as possible, where sufficient affordable accommodation is not available, it will have to seek alternative accommodation further afield.

Proposed changes

The general trend of increasing number of homeless approaches to the council has been further exacerbated as a result of the cost-of-living crisis. The proposed scheme has been suggested in order to meet the needs of our residents while also reducing financial expenditure.

Age - Where this is referred to, it refers to a person belonging to a particular age (e.g., 32-year-olds) or range of ages (e.g., 18 - 30-year-olds).

Potential impacts (positive and negative) of proposed scheme/decision/business plan

Potential health impacts (positive and negative)

There are some age ranges of the lead household member makes up the majority of homeless approaches and would therefore be subject to the be affected by changes to the policy.

Previously we had reported the age range of applicants making an approach consisted of households aged between 25-44. There is no significant change in this proportion of approaches.

Conversely, those aged over 65 are under-represented and so less likely to be directly affected.

The proposed changes will positively benefit single residents aged between 18-35, as they will have greater access to a supply of accommodation that the council can offer.

Age – Children

No impact as children will not be accommodated in this scheme.

Age – Older people

The scheme will be open to anyone between the ages of 18 to no age restriction.

It is anticipated the scheme will have a positive impact upon households across all age groups as they will be able to benefit from a better standard of property.

Mitigating actions to be taken

Age – Children

- **Disability** - A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Only a small proportion of accepted homeless households have members needing a wheelchair adapted property or a level access property.

Overall, less than 1% of homeless households have members with a physical disability which impacts on the type of properties needed.

During the same period, the total applicants approaching with mental health, or a learning disability is similar with 1%. This data relates to the main applicant and therefore it is likely that household members could be under reported. This is also reflected in the data as the majority of the applicants with mental health or learning disability are single applicants.

It is anticipated the scheme will have a positive impact upon households who have a disability as they will be able to benefit from a better standard of property.

Mitigating actions to be taken

We have reviewed the suitability assessment process to ensure all placements have a robust assessment completed when placed in the new scheme provided by the council.

This will help to ensure any of the policy has been fully implemented and reduce unintended consequences of unsuitable placements. This must be audited at regular intervals.

Some people with particular health problems or disabilities will be prioritised for the scheme, these include:

- Households where the resident has a severe health condition or disability (including a severe mental health condition that requires intensive and specialised medical/mental health
- treatment/ aftercare that is either (a) only available in Islington or (b) where a transfer of care would create a serious risk to their safety or the sustainability of the treatment or care.
- Households where the resident is receiving support through a significant commissioned care package or package of health care options provided in Islington, where a transfer of care would create a serious risk to their safety or the sustainability of the care.
- Some carers, and people being cared for, will be prioritised for the accommodation.

Resettlement support is offered to households being made offers of accommodation at this scheme.

The Housing allocations scheme priorities households with physical disabilities to obtain accessible social housing. This is restricted to eligible households and therefore this will aim to meet the required need, limiting the need for a household with physical disabilities to move into private accommodation or temporary accommodation.

Gender reassignment - The process of transitioning from one gender to another.

The council has begun including equalities questions about the sexual orientation and gender reassignment of the lead applicant for homeless households in the homelessness application. However, applicants can decline answering these and as this was only implemented in April 2021, it is too early to analyse any data collected.

There are no specific issues from the proposed changes which are felt could discriminate or disadvantage residents who have undergone gender reassignment other than general matters detailed elsewhere in this report, and the significant reduction in the availability of affordable in Islington.

However, that being said, transgender customers may be particularly at risk of housing crisis and homelessness arising from transphobic reaction by family, neighbours and members of the local community.

It is anticipated the scheme will have a positive impact upon households who have undergone gender re assignment as they will be able to benefit from a better standard of property.

Mitigating actions to be taken

Resettlement services provided to all residents placed into the scheme to help link up with the relevant support. The Housing Needs and Strategy service has entered into a partnership with Stonewall Housing dedicated to providing support and advice to residents from the LGBTQ

community. This will aim to promote the services and ensure any resident who has gone through gender reassignment do not face any barriers to access social housing through the allocations scheme.

Marriage and civil partnership – In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couples. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples and must be treated the same as married couples on a wide range of legal matters. (Only to be considered in respect to the need to eliminate discrimination).

Our data shows that there are very little residents who approach our service who are married or have a civil partnership. Our current snapshot of data shows there are only 3% of households.

A joint income household will likely be able to have more disposable income. Therefore, income assessments will take this into consideration when determining where an affordable property would be available in the private sector.

Lone parents are disproportionately affected by homelessness compared to their share of the population so are more likely to be affected by the policies.

The proposed scheme is not likely to have an impact upon this specific group, as the accommodation is aimed at single homeless people.

Pregnancy and maternity - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

A significant number of lead applicants from accepted households are pregnant women.

In assessing the scheme, the changes have not identified any additional direct or indirect discrimination on the basis of pregnancy or maternity.

It is anticipated the scheme will have a positive impact upon households with a pregnant woman or a woman on maternity leave as they will be able to benefit from a better standard of property.

Mitigating actions to be taken

Every offer of accommodation will take into account the household's individual circumstances and suitability of the accommodation offered to meet their needs. Any special circumstances will be taken into account when making offers to households – taking into account if there is a compelling need for the accommodation to be in a particular location. Resettlement support will be offered to households being made offers of accommodation at the scheme.

Support will also be offered to households moving into the scheme 24 hours a day 365 days a year. The completion of a suitability form will be completed for all households who move into the scheme.

Race - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others.

A greater proportion of homeless decisions are made for ethnic minorities and therefore the scheme will have a disproportionate effect on ethnic minority households.

Islington is ethnically diverse, and this is reflective in the snapshot of residents in temporary accommodation with similarity to the population of Islington.

There may also be fewer cultural facilities for some ethnic groups in locations outside London, although this would very much depend on the area where the offer was made.

Poor quality information or language problems could impact negatively. English not first language – if households are allocated accommodation, they will need to receive adequate guidance to explain the rent charged and the ability to pay.

Members of gypsy and travelling communities may be reluctant to approach the Council for help due to suspicion of official organisations.

In addition to this, a lack of understanding of homelessness in gypsy and traveller communities means that this group may not be adequately planned for.

In assessing the scheme, the proposed scheme has not identified any additional direct or indirect discrimination on the basis of race.

It is anticipated the scheme will have a positive impact upon households across all races as they will be able to benefit from a better standard of home.

Mitigating actions to be taken

Rehousing into the scheme will be monitored by ethnicity. As applicants move on in the process, progress is monitored through the iWorld Northgate housing system which enables a series of reports that monitor by relevant equality characteristics.

All literature, forms and other information is readily available in the languages most commonly used. The Service ensures that people from whatever ethnicity can compete on an equal basis; this includes Gypsy and traveller communities. Translation services are made widely available. Islington has committed in the Homelessness Prevention and Rough sleeping strategy Action Plan to exploring factors behind BME households being over-represented as accepted homeless cases. With a better understanding it could be possible to improve prevention of homelessness in the first place.

The overall aim of this scheme is to prevent homelessness and reduce the necessity for people to remain in inappropriate temporary accommodation. The delivery of the actions identified will have positive impact for BME, disabled and vulnerable, young people and women, all of whom are overrepresented amongst those who are at risk of homelessness.

Religion and belief - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g., Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

Homeless applicants may, for example, regularly attend a place of worship. If they are allocated accommodation at the St Johns Mansions, this will ensure attendance can be maintained.

Whilst the detailed recording of homeless applications and housing allocations by people of different faith groups can pinpoint adverse trends in relation to individual faith groups, the information should be treated only as an issue for further investigation since much will depend on the respective priorities of applicants and the particular areas they are aspiring to. Therefore, close monitoring in this area is essential to identify any patterns that may arise.

Please note that religion or belief alone would not have any bearing on the ability to access services. However, this could impact on a household decision to move away for the existing community.

There is no evidence of inequality taking place as a result of the council homelessness work in this area.

It is anticipated the scheme will have a positive impact upon households across all faiths as they will be able to benefit from a better standard of property.

Mitigating actions to be taken

Sex - A man or a woman.

Women are disproportionately represented among lead applicants from accepted households.

Women are also more likely to be lone parents, who are disproportionately affected by homelessness in Islington.

Women of a working age are less likely than men of a working age to be in employment.

Women are 8 times more likely to be a victim of domestic abuse. Therefore, obtaining accommodation greater choice to women who require permanent and temporary accommodation.

In assessing the scheme, the scheme has not identified any additional direct or indirect discrimination on the basis of sex.

Women are 8 times more likely to be victims of domestic abuse. Therefore, they may require specific suitable supported accommodation, and this is provided at St Johns Mansions.

Mitigating actions to be taken

Resettlement support will be offered. Support will also be offered to households moving into permanent accommodation from this scheme. s.

Provision of supported accommodation for victims of domestic abuse. Suitability assessments are completed to ensure victims of domestic abuse are removed from the areas of risk.

Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

It is acknowledged that data on resident's sexual orientation has the potential to be inaccurate and on-going efforts should be made to encourage such information being given at the point of application.

While many people identify as heterosexual, many people also do not in the wider community. The Government estimates that approximately 6% of the population are gay men, lesbians or bisexuals.

Members of the LBGTQ community may face specific barriers not currently considered, and it may be that more information about this client group is needed.

Insufficient monitoring customer engagement and feedback means that it is not possible at this time to properly evaluate with any certainty what impact the service has and whether some customers may be disadvantaged through their sexual orientation. There is a risk albeit small, that anyone in this position could be discriminated against and this could lead to an inequality in treatment.

A survey published in 2000, National Survey of Sexual Attitudes and Lifestyles, concluded that 5-7% of the UK population were likely to be lesbian, gay and bisexual. There is no evidence to suggest that people in these categories are likely to be disproportionately represented among those presenting themselves as homeless.

Homeless household sexual orientation information is inadequate but moves outside London may impact on the support networks and services available to Lesbian, Bisexual, Gay and Transgender (LBGTQ) groups, although there is no actual evidence of this, and it would very much depend on the location of any properties offered.

ONS data (2015) indicates that areas outside London have a smaller LBGTQ population. The proportion of the LBGTQ population in London is estimated to be 2.6% compared to 1.8% in the Southeast and 1.2% in the East of England. There may be impacts arising from the relative lack of support and other services designed specifically for LBGTQ people in some places outside London, but again this would very much depend on the area where the offer was made.

In assessing the scheme, the proposed new scheme has not identified any additional direct or indirect discrimination on the basis of sexual orientation.

It is anticipated the scheme will have a positive impact upon households across all groups as they will be able to benefit from a better standard of property.

Mitigating actions to be taken

The Housing Operations service responsible for the administration of the policies, have partnered with Stonewall Housing. This will help to continually examine the practices of the policy ensuring residents from the LBGTQ community are represented. Ensuring there is access to households from this group to access the service Stonewall Housing will focus on advice and advocacy including viewings, applying for benefits, referring to other agencies for assistance. In addition to the above, Stonewall Housing will focus upon wider community and outreach work.

It is acknowledged there is not an over representation of homeless approaches from the LBGTQ community and greater work must be completed to prevent homelessness. The

Housing Operations services will employ resettlement officers to provide a customer care to all households placed out of the borough to ensure households have someone to contact regarding any issues.

Monitoring of this sector will enable specific issues for different segments of the population to be identified and addressed.

Human Rights

There are 16 rights in the Human Rights Act. Each one is called an article. They are all taken from the European Convention on Human Rights. The Articles are the right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour, Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol.

There are no anticipated negative impacts on Human Rights as a result of these policies.

Mitigating actions to be taken

None at this point. Will be reviewed as appropriate.

Further actions and objectives

- Ensure regular scheduled reviews and analysis of data is recorded.
- Improve our customer insight through focus group involvement and improved data collection.
- Develop appropriate early intervention and prevention measures to address any over representation.
- Develop improved understanding of why some BAME communities are disproportionately represented within homelessness services together with the development of appropriate early intervention and prevention measures to address this over representation.
- Effects of the cost-of-living crisis on BAME, needs research and action in Islington, through close monitoring and work with public health.
- Ensuring households with mental health issues can successfully sustain a tenancy. Resettlement service to ensure 12-month tenancy review are completed.