

Equalities Impact Assessment: Full Assessment

Before completing this form you should have completed an Equalities Screening Tool and had sign off from your Head of Service and the Fairness and Equality Team.

This Equality Impact Assessment should be completed where the Screening Tool identifies a potentially negative impact on one or more specific groups but it can also be used to highlight positive impacts.

Summary of proposal

Name of proposal	Nightly Purchased Temporary Accommodation Flexible Framework
Reference number (if applicable)	
Service Area	Housing Needs and Strategy
Date assessment completed	June 2023

Before completing the EQIA please read the guidance and FAQs. For further help and advice please contact equalities@islington.gov.uk.

1. Please provide a summary of the proposal.

Please provide:

- Context on how the service currently operates (if relevant) and the scope of suggested changes
- The intended beneficiaries and outcomes of the proposal
- Reference to any savings or income generation

The Housing Needs and Strategy Service undertook an open procurement last year for providers to join a temporary accommodation framework agreement. Eight providers were appointed to the framework agreement. Unfortunately, there is a continual increasing demand for nightly paid temporary accommodation and these eight providers alone are not able to meet our growing demand. Whilst we will continue to prioritise using the existing eight providers to meet our obligations, we need to take steps to ensure there is increased capacity to meet the need for more temporary accommodation. Outside of the existing framework agreement, nightly paid accommodation is currently secured under 'spot purchasing' arrangements, often out of borough. This flexible framework provides an opportunity to explore a more transparent flexible approach which will increase capacity for the Council.

The establishment of a Flexible Framework ("FF") will assist the Council in securing properly procured and governed nightly paid temporary accommodation. The FF will also assist the Council to respond to increased demands and market forces during the term of the FF, including providing scope to secure bespoke emergency accommodation for rough sleepers in the Borough. This will give the council access to a pool of pre-qualified providers of temporary accommodation and the flexibility to add new providers when the FF is re-opened.

The FF will be procured within the Light Touch regime under the PCR 2015 allowing the Council to adopt a flexible approach to the procurement whilst maintaining fairness and transparency.

The framework enables the council to temporarily house homeless households it has a statutory duty towards under the homelessness legislation as laid down in the 1985 and 1996 Housing Acts and the 2017 Homelessness Reduction Act and the Domestic Abuse Act 2021. Additionally, the council will be able to fulfil its duties under the Care Act and Children's Act, through offering temporary accommodation to clients who have No Recourse to Public Funds (NRPF).

The new flexible framework will cover the provision and management of emergency licensed nightly purchased accommodation; it will assist the council to temporarily house people whilst

Please provide:

- Context on how the service currently operates (if relevant) and the scope of suggested changes
- The intended beneficiaries and outcomes of the proposal
- Reference to any savings or income generation

it conducts its investigations under the Housing Act 1985 and 1996, the 2017 Homelessness Reduction Act, the Care Act and Children's Act.

The purpose of the service is to ensure homeless clients are housed in suitable, good quality, secure and safe accommodation that meets minimum standards. The service has introduced a Quality Standard for homeless households living in temporary accommodation, and all providers joining the framework must commit to this. The council's CARE principles are at the heart of the service offer and we aim to treat all homeless households like we would treat an important member of our family.

The council will make every effort to place clients in accommodation that meets their needs, in terms of size, location and proximity to services and facilities. Priority criteria have been agreed to ensure clients' specific needs, including the need to remain in borough, are accommodated subject to the availability of accommodation.

The flexible framework will be for a period of 4 years, plus the option to extend for a further 2 years. The service will be reviewed annually with a report being produced for the Executive and Housing Scrutiny.

The new flexible framework needs to incorporate the requirements set out in the Good Homes Standard. The Temporary Accommodation Good Homes Standard has been approved by Executive and outlines the requirements of the temporary accommodation offer we make to our clients. This standard includes:

- a licence in applicant's name (with a rent review clause to ensure any future increases are fair and reasonable)
- Is big enough for your household in line with the Housing Act 1985.
- Is self-contained, with your own bathroom and kitchen
- Is clean & free from pests
- Is in a good, safe state of repair and decoration
- Has good condition floor coverings/finishes throughout
- Has safe and working electrics, gas, heating, hot water and plumbing
- Has a working smoke alarm on every floor
- Meets or exceeds current energy performance standards
- If fleeing Domestic Abuse, or Hate Crime, or sleeping rough, applicants will be provided with essential items

The flexible framework will be governed by the charges for nightly paid accommodation as follows:

NIGHTLY RATES FOR UNITS

Please provide:

- Context on how the service currently operates (if relevant) and the scope of suggested changes
- The intended beneficiaries and outcomes of the proposal
- Reference to any savings or income generation

This schedule sets out the maximum nightly rates agreed between the parties for application from the commencement of the Agreement.

The rates below represent the maximum nightly rates for each Broad Rental Market Area (BRMA) in the London Borough of Islington, as laid down in the Pan London (Temporary) Accommodation Agreement (IBAA).

BRMA	Studio	1 bedroom	2 bedrooms	3 bedrooms	4 bedrooms
Inner North	£42	£45	£52	£60	£70
Inner East	£45	£45	£55	£67	£75
Outer North	£36	£42	£45	£53	£60
Central	£45	£45	£55	£67	£75

For properties procured out of borough, the maximum rates paid will be those as set by the host boroughs as specified in the IBAA.

The current framework has a value up to £13m per annum; it is recommended that the new flexible Framework value is £7m, acknowledging that £6m is currently being spent on the existing Framework providers. This would mean that the new flexible framework would hold a value of up to £60m over the next six years.

A prudent approach should be taken given the ever-changing situation in the temporary accommodation sector. It would not be advisable to reduce the budget in the current climate as we need a larger sample of evidence before making this decision, plus the War in the Ukraine and the cost-of-living crisis a reduction in the contracted value may not be advisable at this moment in time.

The beneficiaries will be homeless households who present to our homeless services, and we have a statutory duty to provide temporary accommodation for. These could be any residents or non-residents that are fleeing their home area for reasons such as domestic abuse or gang related violence.

The provision of temporary accommodation is a statutory requirement under the Housing Act and will mean we are providing safe, decent accommodation for eligible homeless households in line with legislation.

Please provide:

- Context on how the service currently operates (if relevant) and the scope of suggested changes
- The intended beneficiaries and outcomes of the proposal
- Reference to any savings or income generation

2. What impact will this change have on different groups of people?

Please consider:

- Whether the impact will predominantly be external or internal, or both?
- Who will be impacted – residents, service users, local communities, staff, or others?
- Broadly what will the impact be – reduced access to facilities or disruptions to journeys for example?

This flexible framework is aimed at providing good quality, local temporary accommodation to people in housing crisis. The accommodation will be for single applicants, families of all sizes and applicants with disabilities.

The accommodation will be used by our residents, service users and the quality of the service and relationship with the providers will be handled by our staff teams.

This flexible framework is for the provision of accommodation for anyone that is experiencing homelessness for whatever reason. The accommodation will cater for people with any of the protected characteristics. The accommodation provider is expected to meet people at the properties, identify the gas and electricity meters and offer some support to apply for council tax and other assistance. The residents of the accommodation will be treated with respect and provided good quality accommodation.

The accommodation will be sourced in Islington or as close to it as possible at within 1 hours travelling time.

Islington is committed to working with partners and providers to ensure that the people placed into emergency accommodation are provided with a service that meets their needs and is sensitive to the concerns of the neighbours. This will be done by working in partnership to listen to concerns, address them and enter into continual dialogue.

This project will not breach anyone's human rights. The provider and other stakeholders supporting the residents will advocate on the residents' behalf to ensure that their rights are not being breached and tackle any systems change issues which may create inequalities and fair access to services and treatment.

Regular meetings will be held with community safety and local policing teams to address any safeguarding issues which may be brought about by concerns regarding anti-social behaviour in the local area.

3. What impact will this change have on people with protected characteristics and/or from disadvantaged groups?

This section of the assessment looks in detail at the likely impacts of the proposed changes on different sections of our diverse community.

3A. What data have you used to assess impacts?

Please provide:

- Details of the evidence used to assess impacts on people with protected characteristics and from disadvantaged groups (see guidance for help)
- A breakdown of service user demographics where possible
- Brief interpretation of findings

The council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (section 149 Equality Act 2010). The council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The council must have due regard to the need to tackle prejudice and promote understanding.

For the purposes of this equality impact assessment we have used data on housing allocations between the period April 2020 and March 2021. Unfortunately, there is not sufficient data for people in temporary accommodation, but this data is comparable.

This data includes:

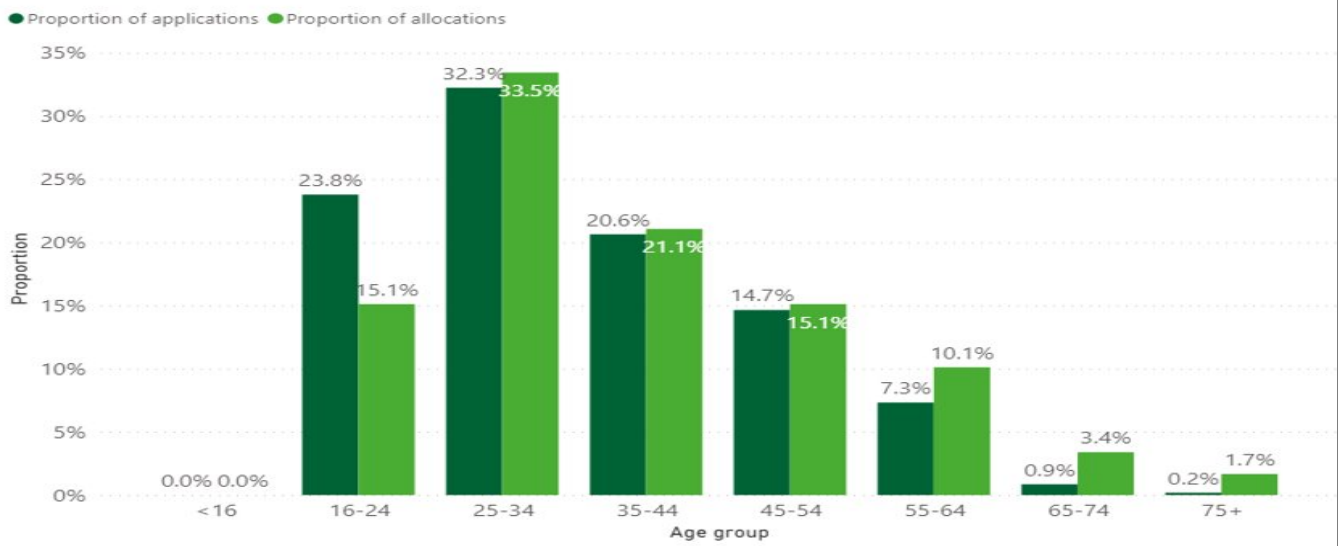
- The population approaching Islington Council to lodge a homelessness application,
- The population who were housed, following a homelessness application
- The population currently on the borough's housing waiting list
- And the borough's overall population.

In the period studied, the council received 1,051 homeless applications and housed 1,680 households in permanent accommodation.

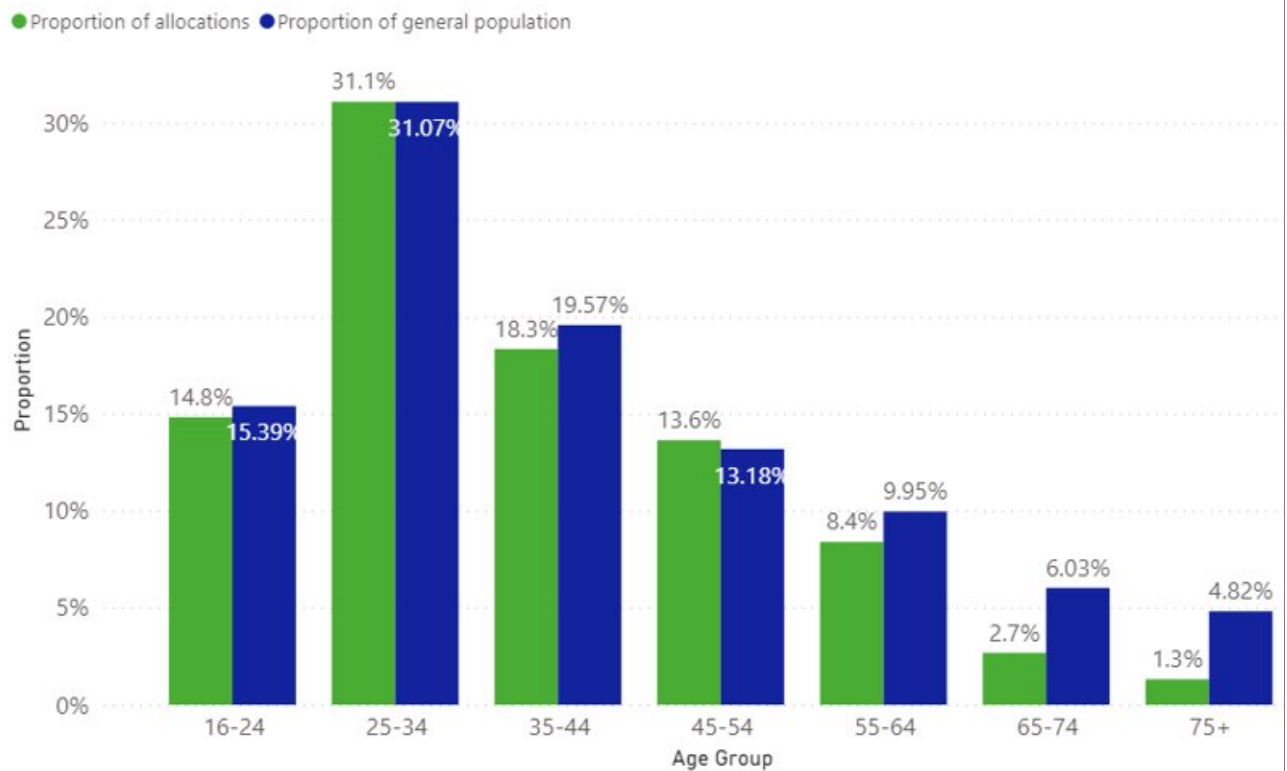
Overall the EIA concludes that not all of the potentially negative impacts on households can be mitigated, but that equality implications have been fully considered and that the policy approaches have been justified. It is required to consider the potentially negative impacts on protected groups and whether these impacts are justified by the council's wider objectives in implementing the policies. The impact of the policies and in particular the equality impact of the policies will in any event be kept under regular review.

Age Data:

Comparison of households applying for homelessness support against those accommodated, 2020/21



Comparison of households accommodated in 2020/21 against the Islington population aged 16+



Age is only recorded for single applicants; age data is therefore not representative of the temporary accommodation population as a whole.

Many households have school age children. Being placed in accommodation outside of the borough could have a potential impact on households in terms of changing schools, and loss of educational support services and networks. The policy and legislation

however requires children taking exams not to be placed where this would affect their ability to attend schools. This also includes those attending specialist schools.

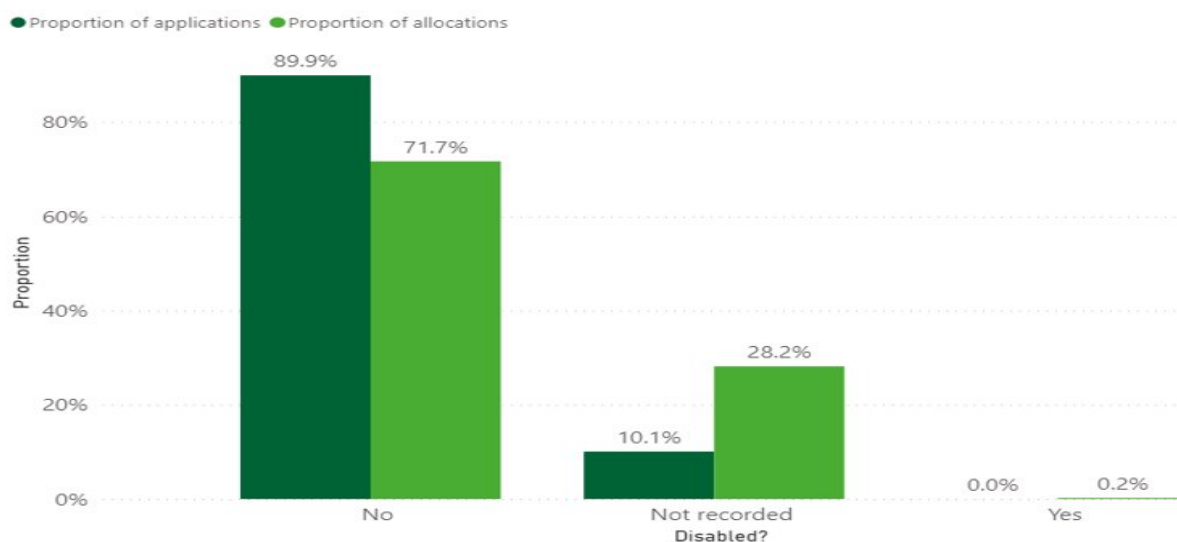
When placing a family out of borough, the council will take children's ages and their educational and support needs into consideration and will make every effort to establish the availability and location of schools and required services in the new area.

Households with children at risk, on the Child Protection Register or significantly disadvantaged, will be prioritised for an offer of accommodation within Islington.

All residents placed in temporary accommodation or placed in private accommodation provided by the council will have a suitability assessment completed which will help to identify any of the above

Disability Data:

Comparison of households applying for homelessness support against those accommodated, 2020/21



Disabled clients may be negatively impacted by being placed out of the borough, by being further away from hospitals, clinics, support centres etc, they may also find it harder to travel. Disabled clients who have regular medical appointments in borough will be prioritised for an offer of accommodation within or as near as possible to Islington.

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.

When placed out of borough, consideration will be given to the ease of transport for disabled clients to and from Islington.

For clients with sensory disabilities, special equipment can be provided or arrangements put in place to adapt the accommodation to the client's specific needs.

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 most of the applicants with mental health or learning disability are single applicants.

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

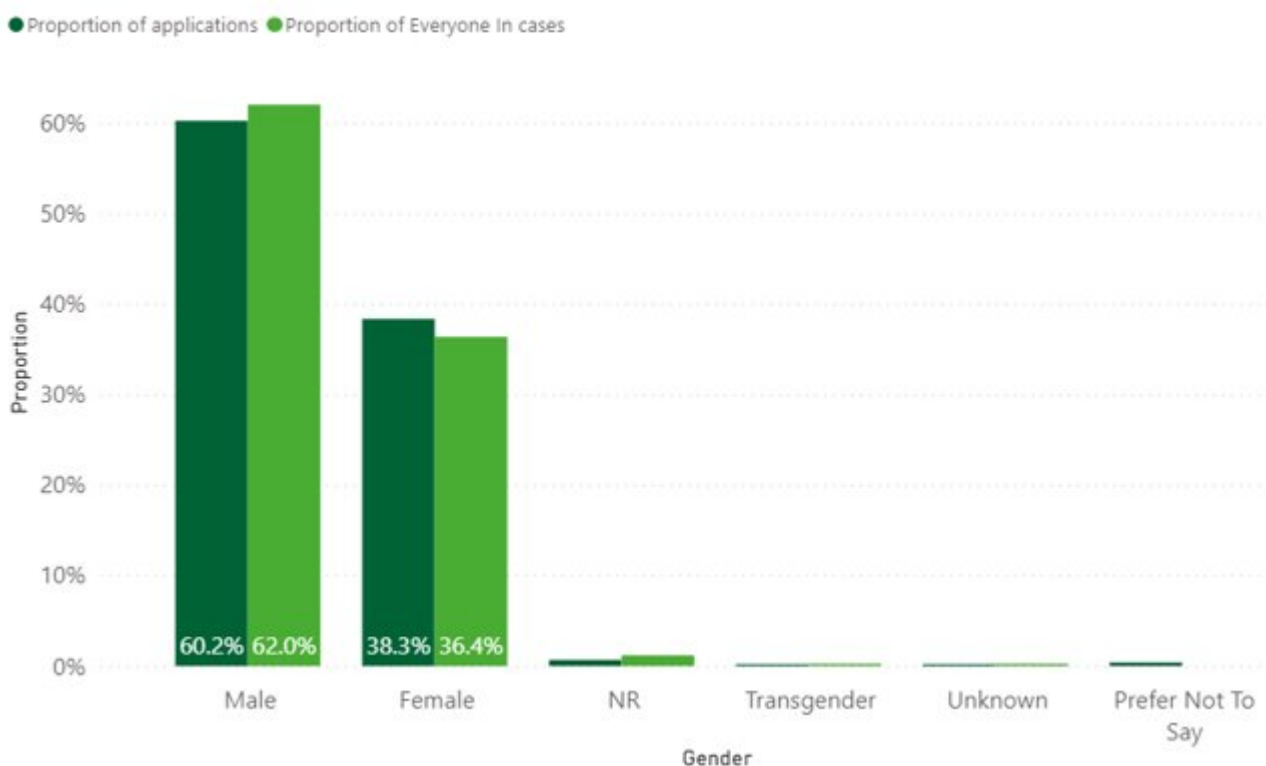
Gender re-assignment

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 whom have undergone gender reassignment.

The council will endeavour to place clients close to locations with appropriate community support services.

Comparison of those supported through Everyone In with those households applying as homeless in 2020/21



Marriage / Civil Partnership

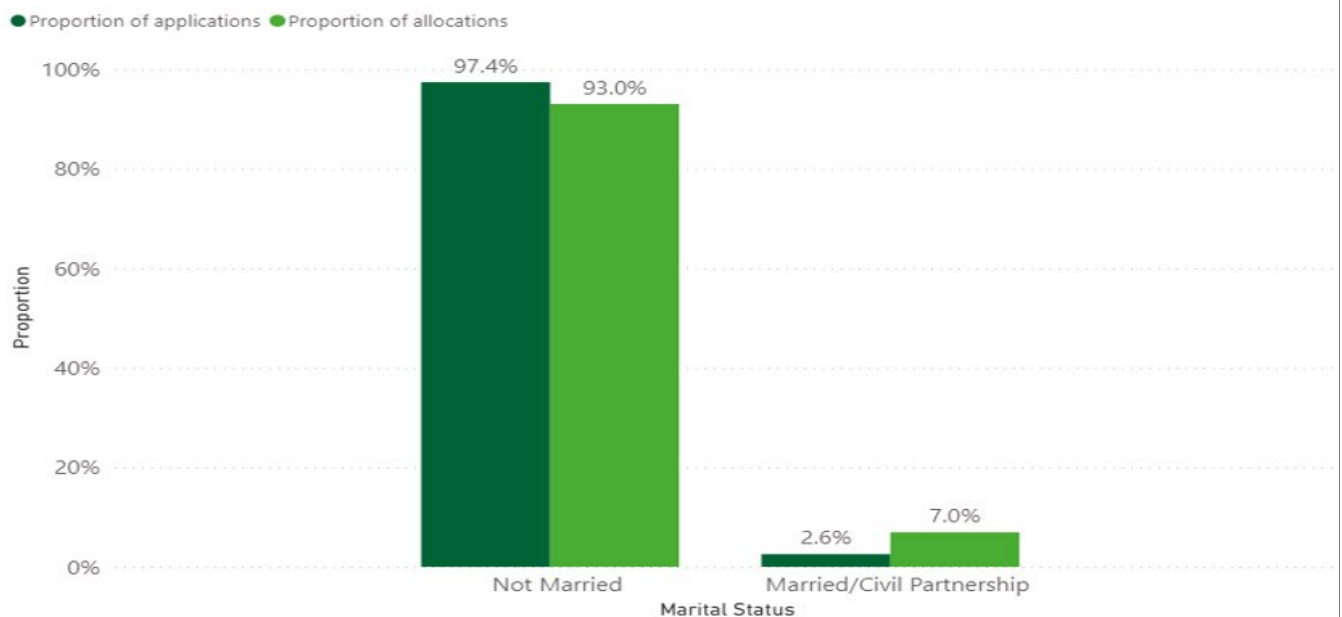
We do not have data available on marriage or civil partnership status of clients in temporary accommodation. The data we have for housing allocations is comparable.

A joint income household will likely be able to have more disposable income. Income assessments will take this into consideration when determining if a property is suitable.

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

It is not envisaged that the flexible framework will have a specific impact on this protected characteristic.

Comparison of households applying for homelessness support against those accommodated, 2020/21



Pregnancy + Maternity

Pregnant women are included in 'Households with children', for temporary accommodation data recording purposes. Separate figures for pregnant women are not available.

Households with children make up the majority of all homeless households (80%), with each household having 1.7 children on average.

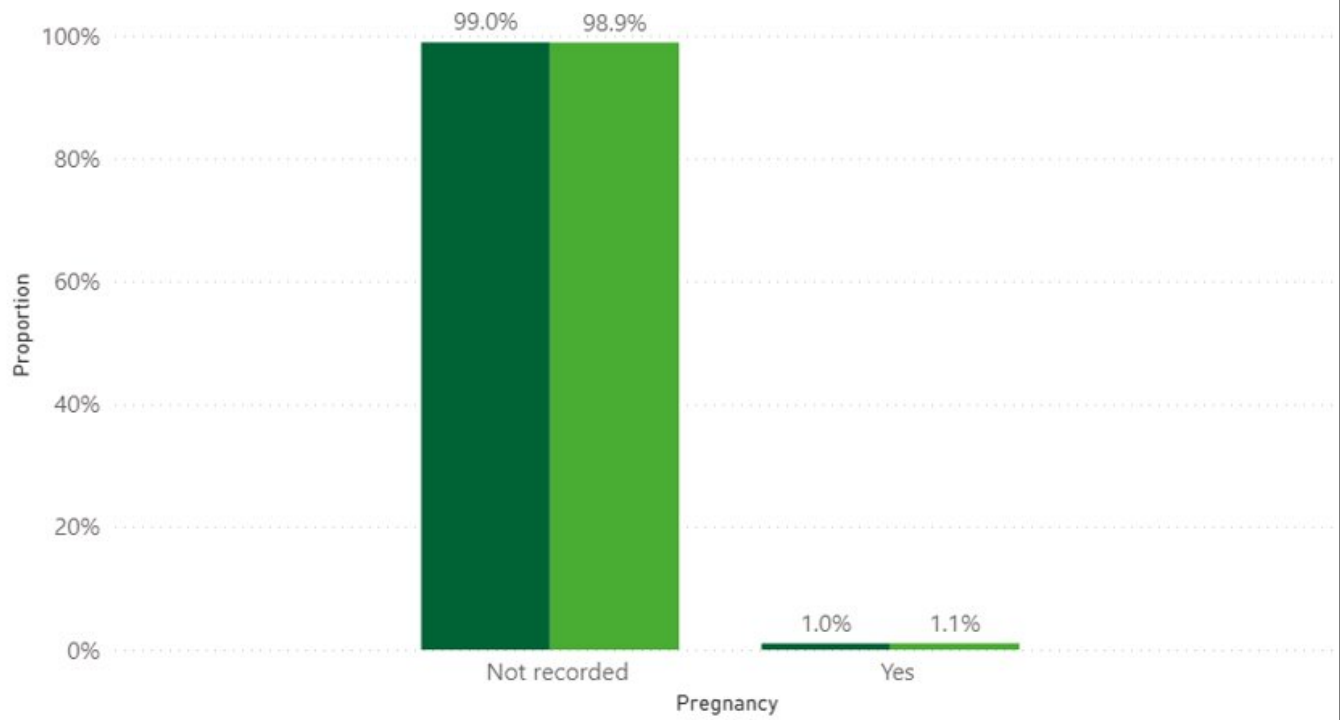
A transition of services during pregnancy could have a potential negative impact, as could a potential loss of support networks.

The council will actively seek to link clients into maternity and support services in the new area.

All staff have been trained in safeguarding matters and procedures to ensure potential issues are identified and dealt with appropriately.

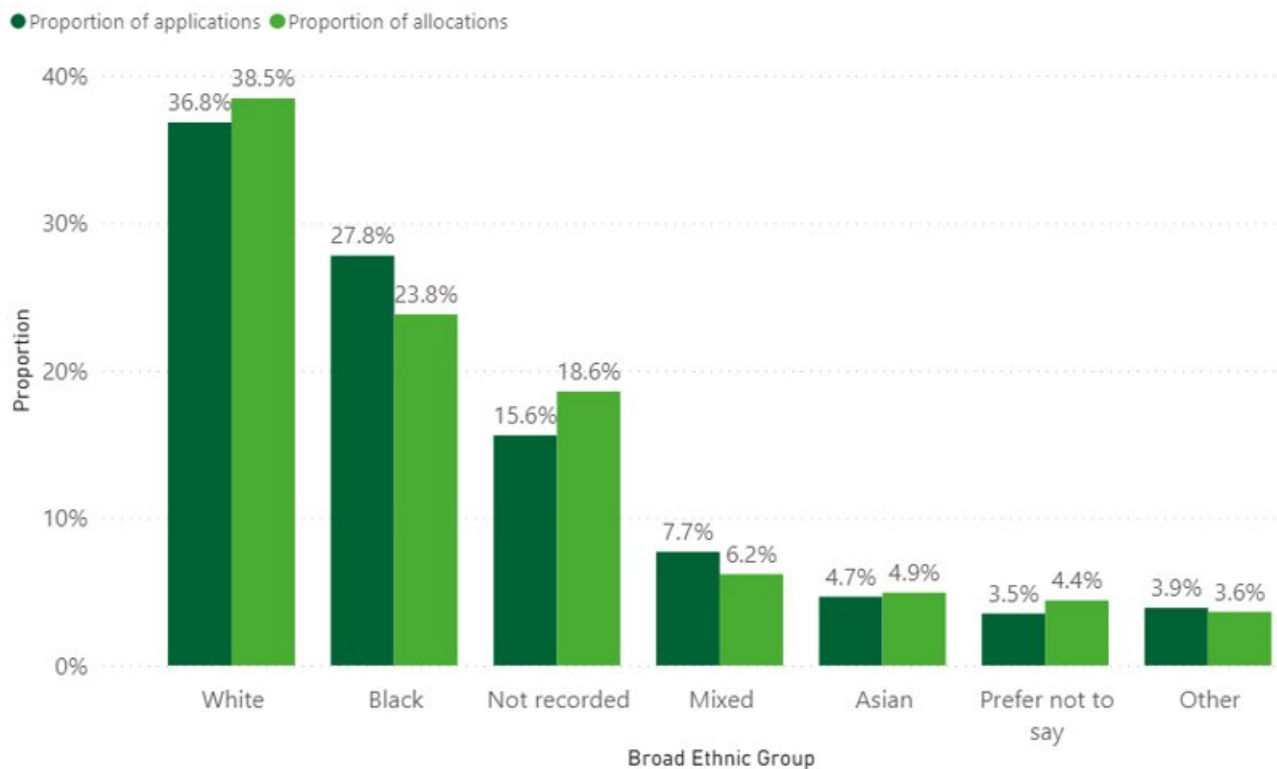
Comparison of households applying for homelessness support against those accommodated, 2020/21

● Proportion of applications ● Proportion of allocations



Ethnicity

Comparison of households applying for homelessness support against those accommodated, 2020/21



Clients from black and minority ethnic groups are slightly over-represented amongst homeless clients compared with the general population (55% against 52%).

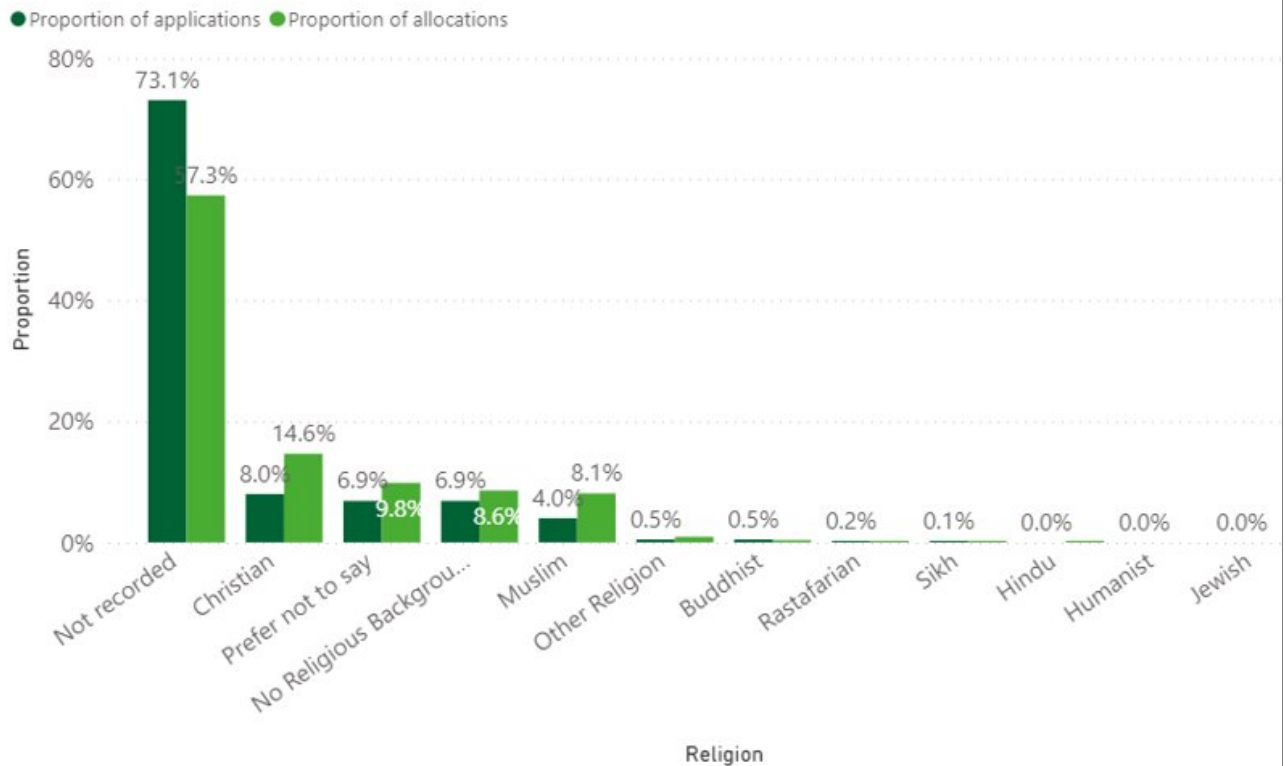
There is a significant potential negative impact on black and minority ethnic groups if they were to be placed in areas which are less diverse, possibly causing isolation and potential discrimination. Every effort will be made to place families in areas that will welcome and meet the needs of BME groups, and with appropriate existing community groups in place.

Affordability assessments will be carried out for all clients, not only black and minority ethnic groups, to try and ensure that people are being placed in accommodation that is affordable to them.

Religion and belief

There is a potential negative impact on clients being placed in areas where they may be unable or meet hostility to practice their religions. The council will ensure that clients are placed in locations with reasonable access to appropriate institutions of worship.

Comparison of households applying for homelessness support against those accommodated, 2020/21

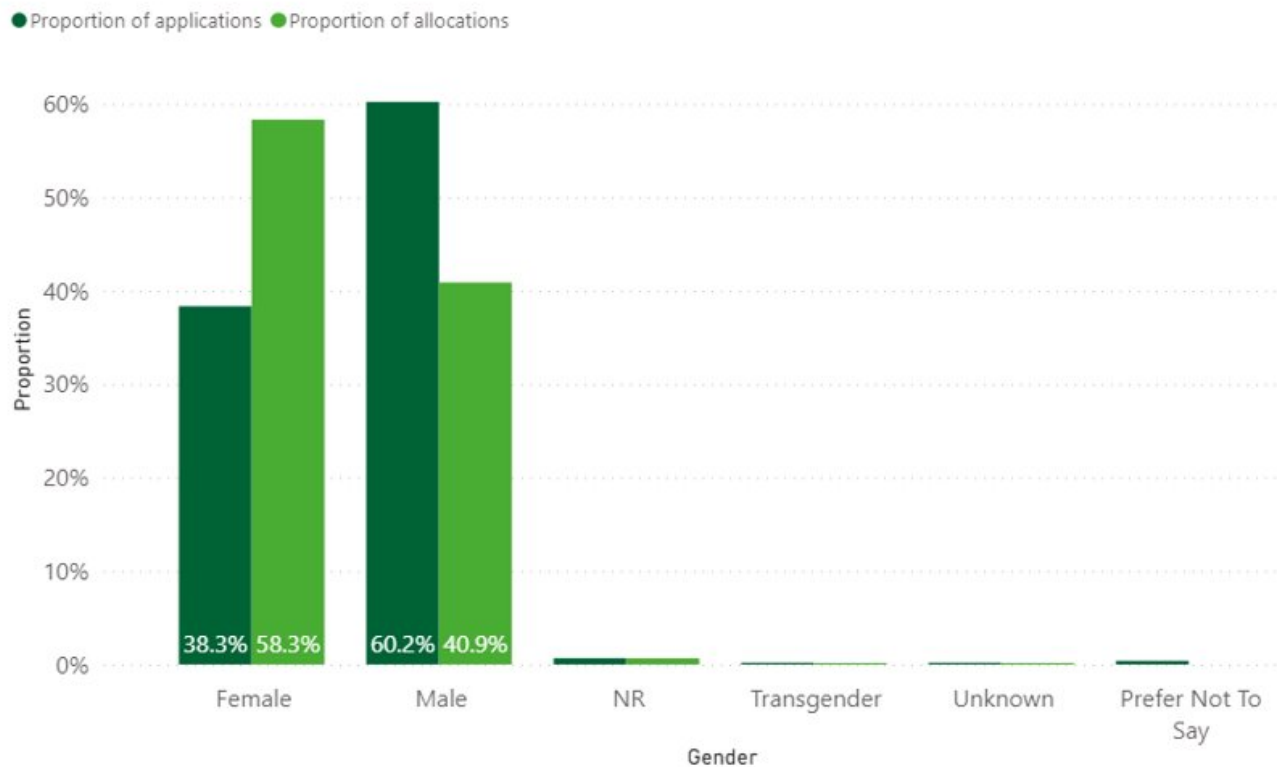


Sex

There is a higher ratio of women in temporary accommodation mainly due to the number of lone parent households headed by women.

The new flexible framework therefore unavoidably has a greater impact on women than men. Efforts will be made to place women clients in safe and secure accommodation, in areas with good transport links, and with support and community facilities in place.

Comparison of households applying for homelessness support against those accommodated, 2020/21

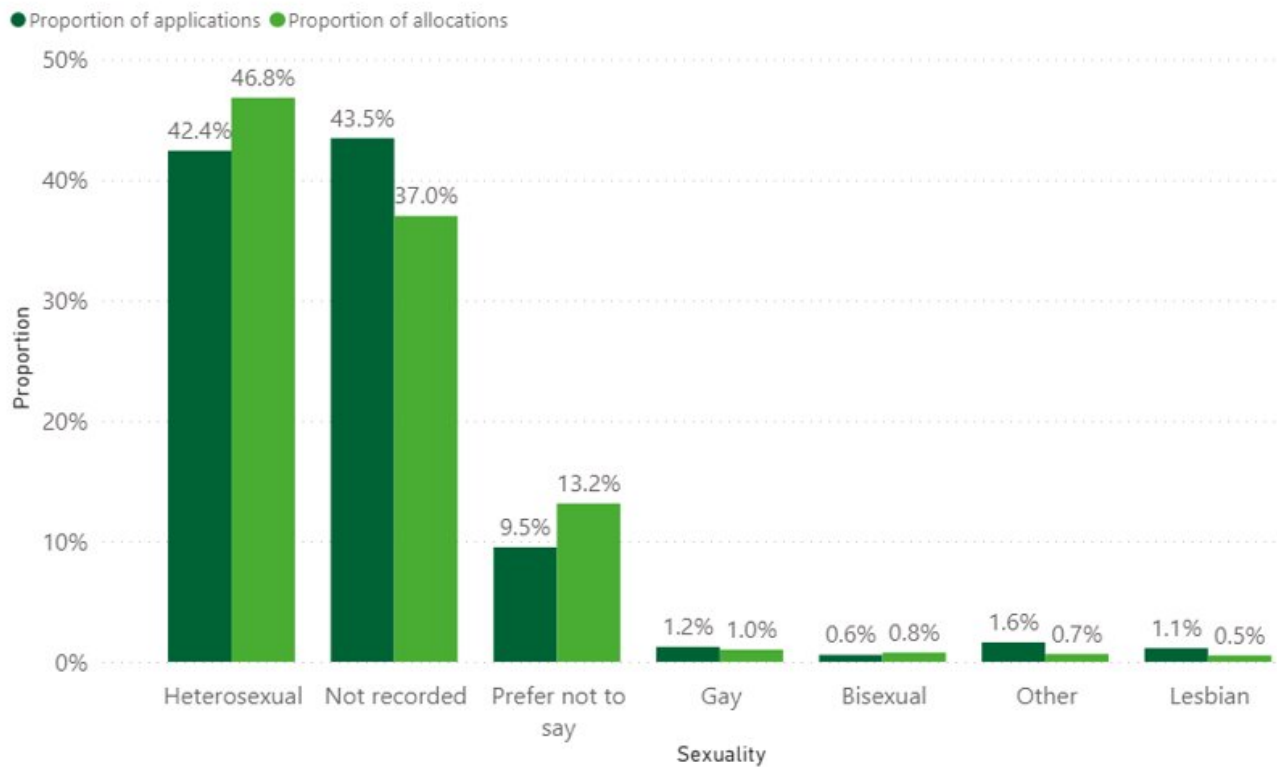


Sexual orientation

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 (LGBTQ) groups, although there is no actual evidence of this, and it would very much depend on the location of any properties offered.

Comparison of households applying for homelessness support against those accommodated, 2020/21



ONS data (2015) indicates that areas outside London have a smaller LGBTQ population. The proportion of the LGBTQ population in London is estimated to be 2.6% compared to 1.8% in the South East 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 LGBTQ people in some places outside London, but again this would very much depend on the area where the offer was made

Due to under-reporting, no comprehensive data are available of sexual orientation of temporary accommodation clients.

Where specific needs are identified, the council will take these into consideration when allocating temporary accommodation.

3B: Assess the impacts on people with protected characteristics and from disadvantaged groups in the table below.

Please first select whether the potential impact is positive, neutral, or negative and then provide details of the impacts and any mitigations or positive actions you will put in place.

Please use the following definitions as a guide:

Neutral – The proposal has no impact on people with the identified protected characteristics

Positive – The proposal has a beneficial and desirable impact on people with the identified protected characteristics

Negative – The proposal has a negative and undesirable impact on people with the identified protected characteristics

Characteristic or group	Positive/Neutral/Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
-------------------------	---------------------------	--	---

Characteristic or group	Positive/Neutral/Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
Age	Positive and Negative	<p>Negative: Placing Families Out of Borough away from support networks</p> <p>Positive: Flexible Framework affords the council flexibility to on board new temporary accommodation providers to increase the pool of providers and therefore properties</p>	<p>Thorough assessment of the family's needs including information on schools attended</p> <p>Information about any gang involvement for young people fleeing gang violence</p> <p>Collaborative working with other agencies and across departments</p> <p>Allocation of homeless support officer</p> <p>Search for properties as close to Islington as possible that meets the needs of the family</p> <p>Prioritise households for in-borough/adjacent borough accommodation if: one of the children has a Statement of Special Educational Needs or an Education, Health and Care Plan, if the family are receiving support from the Family Islington Service and there is significant concerns about the child, if in-borough placement is recommended after a</p>

Characteristic or group	Positive/Neutral/Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
			<p>joint assessment with Children's and Adult's Services</p> <p>Any special circumstances demonstrating a compelling need for accommodation in a certain area will be considered and this might particularly benefit children</p> <p>Support will also be offered to households moving into temporary accommodation outside London and as above this could include help to enrol children in local schools and to find nursery places</p> <p>Support will also be offered to older people moving into temporary accommodation outside Islington/London and this could involve help to transfer any care and support packages</p>

Characteristic or group	Positive/Neutral/Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
Disability (include carers)	Positive and Negative	<p>Negative: potential lack of support and social care networks of the person or family being placed e.g. attendance at hospital appointments, care packages.</p> <p>Positive: Flexible Framework affords the council flexibility to on board new temporary accommodation providers to increase the pool of providers and therefore properties</p>	<p>Suitability assessment completed with all people being placed in temporary accommodation</p> <p>Allocation of Homeless Support Officer</p> <p>Disabled clients who have regular medical appointment in borough will be prioritised for an offer of accommodation within or as near as possible to Islington.</p> <p>When placed out of borough, consideration will be given to the ease of transport to and from Islington.</p> <p>For clients with sensory disabilities, special equipment can be provided or arrangements put in place to adapt the accommodation to the client's specific needs.</p> <p>Some people with particular health problems or disabilities will be prioritised for in borough/adjacent borough accommodation, these include:</p>

Characteristic or group	Positive/Neutral/Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
			<ul style="list-style-type: none"> • Households where at least one member 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 at least one member 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

Characteristic or group	Positive/Neutral/Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
Race or ethnicity	Positive and Negative	<p>Negative: There is a significant potential negative impact on black, minority, ethnic groups if they were to be placed in areas which are less diverse, possibly causing isolation and potential discrimination.</p> <p>Negative: lack of larger family sized units</p> <p>Positive: Flexible Framework affords the council flexibility to on board new temporary accommodation providers to increase the pool of providers and therefore properties</p>	<p>Every effort will be made to place families in areas that will welcome and meet their needs and with appropriate existing community groups in place.</p> <p>Every effort will be made to accommodate families in the right size accommodation</p> <p>Procurement team will actively search for new temporary accommodation providers across London and further afield to ensure a supply of properties</p> <p>If English is not the first language of households placed in temporary accommodation the Council will ensure that essential information is translated, and translators used for all verbal communication</p>

Characteristic or group	Positive/Neutral/Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?

Characteristic or group	Positive/Neutral/Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
Religion or belief (include no faith)	Positive and Negative	<p>Negative: There may be potential negative impact on clients being placed in areas where they may be unable or meet hostility to practice their religions</p> <p>Positive: Flexible Framework affords the council flexibility to on board new temporary accommodation providers to increase the pool of providers and therefore properties</p>	<p>Suitability Assessment completed</p> <p>Allocation of Homeless Support Officer</p> <p>The council will ensure that clients are placed in locations with reasonable access to appropriate institutions of worship.</p>

Characteristic or group	Positive/Neutral/Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
Gender and gender reassignment (male, female, or non-binary)	Positive and Negative	<p>Negative: placing clients in locations away from existing community and support services</p> <p>Potential impact for victims of abuse and hate crimes</p> <p>Positive: Flexible Framework affords the council flexibility to on board new temporary accommodation providers to increase the pool of providers and therefore properties</p>	<p>Suitability Assessment completed</p> <p>Allocation of Homeless Support Officer</p> <p>Consideration given to local services</p> <p>For women with children please see age related category above</p> <p>Some people may be prioritised for in-borough/adjacent borough placements as per age related category above</p> <p>For victims of abuse and hate crimes, suitability assessments are completed to ensure victims are moved away from the areas of risk and given support to engage in local communities</p>

Characteristic or group	Positive/Neutral/Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
Maternity or pregnancy	Positive and Negative	<p>Negative: A transition of services during pregnancy could have a potential negative impact, as could a potential loss of support networks</p> <p>Positive: Flexible Framework affords the council flexibility to on board new temporary accommodation providers to increase the pool of providers and therefore properties</p>	<p>Suitability Assessment completed</p> <p>Allocation of Homeless Support Officer</p> <p>The council will actively seek to link clients into maternity and support services in the new area</p> <p>All staff have been trained in safeguarding matters and procedures to ensure potential issues are identified and responded to appropriately.</p>

Characteristic or group	Positive/Neutral/Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
Sex and sexual orientation	Positive and Negative	<p>Negative: potential negative impact of placing people who do not identify as heterosexual (LGBTQ) into smaller, rural communities</p> <p>Positive: Flexible Framework affords the council flexibility to on board new temporary accommodation providers to increase the pool of providers and therefore properties</p>	<p>Suitability Assessment conducted</p> <p>Allocation of Homeless Support Officer</p> <p>Where specific needs are identified, the council will take these into consideration when allocating temporary accommodation</p> <p>Procure properties in diverse urban communities which reflects the diversity in Islington</p>

Characteristic or group	Positive/Neutral/Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
Marriage or civil partnership	Neutral	Neutral: It is not envisaged that the new flexible framework will have a specific impact on this protected characteristic	

Characteristic or group	Positive/Neutral/Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced or negative impacts be eliminated or reduced?
<p>Other Age (e.g. elderly)</p> <p>(e.g. people living in poverty, looked after children, people who are homeless or refugees)</p>	<p>Positive and Negative</p>	<p>Negative: Possible impact on older people who may be receiving packages of care</p> <p>Positive: Flexible Framework affords the council flexibility to on board new temporary accommodation providers to increase the pool of providers and therefore properties</p>	<p>Suitability assessment completed</p> <p>Allocation of Homeless Support Officer</p> <p>Procure properties in urban areas close to shops for ease of access</p> <p>Consider carers when making placements and the need for them to be within close proximity of the person being placed in temporary accommodation</p>

4. How do you plan to mitigate negative impacts?

Please provide:

- An outline of actions and the expected outcomes
- Any governance and funding which will support these actions if relevant

Negative impacts and the steps to mitigate these have been addressed above.

In summary, every effort will be made to ensure that the accommodation is reasonable for the applicant to occupy. The applicant will be made aware of their rights in respect of asking for a suitability review. All temporary accommodation placements will be made after an assessment and everyone placed in temporary accommodation will be allocated a Homeless Support Officer.

Our work providing temporary accommodation is governed by legislation and case law.

- Councils must ensure all accommodation provided to homeless applicants is suitable for the needs of the applicant and members of their household. (Housing Act 1996, section 206 and Homelessness Code of Guidance 17.2)
- Councils must assess whether accommodation is suitable for each household individually. Whether accommodation is suitable will depend on the relevant needs, requirements and circumstances of the homeless person and their household. (Homelessness Code of Guidance 17.4 & 17.9)
- The duty to provide suitable accommodation is immediate, non-deferrable, and unqualified. *Elkundi, R (On the Application Of) v Birmingham City Council* [2022] EWCA Civ 601

Homeless applicants have a right to ask for a review of the suitability of temporary accommodation provided under the main housing duty. (s202 review Housing Act 1996).

Our Homeless Support Team keeps in contact with each household placed in temporary accommodation and will be able to undertake suitability assessments and request further information from applicants if there has been a change of circumstances.

5. Please provide details of your consultation and/or engagement plans.

Please provide:

- Details of what steps you have taken or plan to take to consult or engage the whole community or specific groups affected by the proposal
- Who has been or will be consulted or engaged with
- Methods used or that will be used to engage or consult
- Key findings or feedback (if completed)

The council commissioned Homeless Link to hold bi-annual focus groups with people experiencing homelessness, with and without dependants, who have accessed their housing services. The key objectives were:

- To gather feedback about people's experience of using the service;
- Identify ways for the service and customer experience to be improved;
- Identify how we can improve and enhance the service we provide.

The first round of focus groups was held on the 25th January and on 1st February 2023.

- The first focus group, targeting people experiencing homelessness without dependents and was attended by 8 individuals, all currently accommodated in temporary accommodation.
- The second focus group, targeting people with dependents and was attended by 6 individuals, all currently accommodated, with their family, in temporary accommodation.

The following recommendations have been incorporated into the Housing Needs Service Improvement Plan as a direct result:

- Improving our file recording systems.
- Audits of case files, key themes are being summarised and will be used to further improve services.
- Restructure of service includes new and amended job descriptions and person specifications to reflect a more person-centred service provision, to effectively drive a cultural change in the way we engage with our customers.
- Trauma informed practice training to be rolled out to all front-line officers and managers to improve the way in which we communicate with our customers

We have committed to reviewing the temporary accommodation service annually with a report being produced for the Executive and Housing Scrutiny.

We will ensure (via training and check-ins) that all officers are familiar with the Ombudsman guidance on suitability assessments and reviews: [Ombudsman issues guide on temporary accommodation for homeless people - Local Government and Social Care Ombudsman](#).

Please provide:

- Details of what steps you have taken or plan to take to consult or engage the whole community or specific groups affected by the proposal
- Who has been or will be consulted or engaged with
- Methods used or that will be used to engage or consult
- Key findings or feedback (if completed)

We will continue to improve and develop our services, via regular service user feedback, responding and learning from complaints and advice from the Ombudsman and mystery shopping exercises.

We will ensure that we regularly spot check temporary accommodation units to ensure that the quality and standard is as of the quality we expect.

6. Once the proposal has been implemented, how will impacts be monitored and reviewed?

Please provide details in the table below.

Action	Responsible team or officer	Deadline
Annual Review of Service with report for Corporate Director and Executive	Head of Private Housing Partnerships and Director of Housing	Annually by June of each year

Action	Responsible team or officer	Deadline

Please send the completed EQIA to equalities@islington.gov.uk for quality checking by the Fairness and Equality Team. All Equality Impact Assessments must be attached with any report to a decision-making board and should be made publicly available on request.

This Equality Impact Assessment has been completed in accordance with the guidance and using appropriate evidence.

Member	Name	Signed	Date
Staff member completing this form	Ian Tagg		10/05/2024
Fairness and Equality Team	Max Edgington		08/10/2024
Director or Head of Service	Ramesh Logeswaran	<i>RameshL</i>	10/05/2024