

## EQUALITIES IMPACT ASSESSMENT

### HOMELESSNESS SERVICE

#### Contents

Executive Summary .....	1
<b>1. Introduction</b> .....	<b>2</b>
<b>2. Background</b> .....	<b>4</b>
2.1 Background Information .....	4
2.2 Aims of the Function .....	5
2.3 Perceived Problems with the Function .....	6
2.3.1 Age .....	7
2.3.2 Disability .....	7
2.3.3 Faith, Religion or Belief .....	7
2.3.4 Gender .....	7
2.3.5 Race .....	8
2.3.6 Sexual Orientation .....	8
2.3.7 Trans (/Gender Identity) .....	9
<b>3. Methodology &amp; Sources of Data</b> .....	<b>9</b>
<b>4. Consultation</b> .....	<b>9</b>
4.1. Why Consultation was Carried Out .....	9
4.2 How the Consultation Was Carried Out .....	10
4.3 Responses Received .....	11
<b>5. Assessment of Equality Impacts – Adverse / Differential Impacts Identified and Consideration of Options / Measures to Address</b> .....	<b>15</b>
5.1 Age .....	15
5.2 Disability .....	18
5.3 Faith, Religion or Belief .....	20
5.4 Gender .....	21
5.5 Race .....	23
5.6 Sexual Orientation .....	27
5.7 Trans (/Gender Identity) .....	28
5.8 Identified Differential Impacts and Options to Address .....	29
<b>6. Monitoring Arrangements</b> .....	<b>35</b>
<b>7. Publication of Equality Impact Assessment</b> .....	<b>37</b>
<b>8. Conclusions, Future Actions / Recommendations &amp; Action Plan</b> .....	<b>37</b>
<b>Action Plan</b> .....	<b>40</b>

#### **Executive Summary**

This is the report of the Full Equalities Impact Assessment (EIA) of the Homelessness Service. Its format follows that set out in the Council’s corporate EIA toolkit.

The report begins by explaining why the Homelessness Service was identified as a function requiring an assessment and provides some background information on the delivery of the service, requirements of the Council and Solihull Community Housing (SCH), aims of the function, its perceived problems and a summary of the key issues raised through the initial impact assessment.

The Council has a statutory duty to provide homelessness and housing advice services within the Borough. In Solihull these functions are delivered on the Council’s behalf by SCH. If any household is homeless or threatened with homelessness they have a legal right to approach the Council to be assessed under the relevant legislation (Housing Act 1996 as amended by the Homelessness Act 2002). In addition the Homelessness Act 2002 required all Local authorities to take a more strategic approach to responding to homelessness (reviewing homelessness and producing a local homelessness strategy), focusing more on preventing homelessness and intervening earlier to assist households to either remain in their existing accommodation or to arrange a planned move in to alternative

accommodation. Responding to this agenda SCH have placed an increasing focus on homelessness prevention and housing options activity, receiving 'trailblazer' funding from the Department for Communities & Local Government (CLG) to pilot the delivery of an 'Enhanced Housing Options' service.

Preventative activity is labour intensive and it was necessary for SCH to reconfigure its staffing resources to meet the demands imposed by this new way of working. The fee paid to SCH by the Council to deliver the homelessness service does not meet the full cost of delivering this re-configured service. SCH have put in a bid to the Solihull Partnership for continued investment through LAA reward money (having almost met the stretch target to reduce homelessness acceptances in the Borough) but it should be noted that if this bid is unsuccessful it could result in the service having to be downsized and may impact upon the ability of SCH to deliver some of the recommendations and actions set out in this EIA.

The full EIA was based on comprehensive consultation with a range of partner organisations, statutory returns on homelessness and other information / monitoring data collected as part of the delivery of the homelessness and housing advice service, national research and policy documents and relevant legislation and guidance. Section 4 provides a summary of the consultation responses received (along with a detailed breakdown of responses at Appendix E) and section 5 sets out the results from the full EIA concluding with a summary (table 16) of the possible differential impacts that could result from the delivery of the homelessness and housing advice service, the measures already in place to mitigate these and recommendations to further improve service delivery in terms of equality and diversity outcomes.

Information to come out of the data analysis and consultation led to 10 specific recommendations which are set out in section 8 of the report. These recommendations have then been included in an action plan which provides a detailed breakdown of how each recommendation will be delivered. The action plan combines outstanding actions from the Homelessness Strategy EIA and new actions and recommendations that have come out of the Homelessness Services EIA.

For a summary of the key issues highlighted through the EIA refer to table 16 on page 30 which sets out the possible differential impacts and for information on the recommendations and actions to arise from the full EIA see section 8 on page 37 and the action plan on page 40.

## **1. Introduction**

Solihull MBC has a Statutory Duty<sup>1</sup> to assess the impacts of its functions and to promote equality of opportunity in its communities. Legislation and the Equality Framework for Local Government place obligations upon Local Authorities and public sector organisations to carry out Equality Impact Assessments (EIA).

The homelessness service was identified as requiring an EIA in year 2 (May 2009 – April 2010) of the 2008 – 2011 EIA schedule for the Community and Economic Regeneration Division. This follows on from the completion of a full EIA on the homelessness service in June 2007 and a full EIA on the Homelessness Strategy (2009 – 2011) carried out in March 2009.

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<sup>1</sup> Sex Discrimination Act 1975; Disability Discrimination Act 2005; Race relations Act 1976; Race Relations (Amendment) Act 2000; Equality Act 2006 (Gender Duty). If the Equality Bill (published in April 2009) is passed there will be a single equality duty on all public bodies, embracing grounds such as sexual orientation and religious belief as well as age, race, disability and gender. The bill has completed its passage through the House of Commons and is currently in the House of Lords.

The homelessness service was identified as a medium priority through this process because:

- It has the potential to impact (to a greater or lesser extent) on all of the equality strands. This is because services provided through the homelessness and housing advice function have the potential to impact upon any member of the community.
- The homelessness and housing advice service provided by SCH deals with a large number of enquiries. During 2008/09 4,600 households approached SCH for housing advice / assistance and of these 1,122 attended a housing options interview to discuss their circumstances, aspirations and options in more detail. Of these 405 households made a formal homeless application and 263 were accepted as homeless<sup>2</sup>
- Tackling and preventing homelessness and providing households with suitable housing options to meet their needs makes an important contribution to the key aims of Solihull's Sustainable Communities Strategy and the Council's corporate objectives.
- The causes and consequences of homelessness are diverse, linking to other important issues / agendas in Solihull. These include the well being of children and younger people, domestic violence and financial inclusion.

A full EIA was last carried out on the Homelessness Service in 2006/07. The EIA concluded that based on the available statistical information there was no evidence of adverse impacts by race or age but that insufficient monitoring information was available to make an informed decision in relation to the other 4 strands of equality. Consultation was also carried out to inform the EIA and this covered issues relating to policy, the content and format of the homelessness application form and the policy, the role of homeless officers and other related matters. A number of recommendations were made to address the issues raised through the consultation and data analysis. These included the need to:

- Ensure promotion of homelessness and housing advice services for all communities living in the Borough and ensure that this includes targeting / promoting services accessed by disadvantaged groups.
- Develop and train staff with regards to equalities and diversity and ensure that this is kept under regular review
- Use the findings from the EIA to inform the update the policy and procedures document in relation to housing advice and homelessness services.
- Review SCH's policy on the provision of information in alternative languages and access to translators for customers whose first language is not English.
- Amend the homelessness application form and policy document to take into account points raised through the consultation process

The findings and recommendations from the Homelessness Services EIA were reported to the Cabinet Member for Economic Development and Regeneration in July 2007 and were included within SCH's implementation plans for service improvement.

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<sup>2</sup> The term 'acceptances' means that the Council has accepted a legal duty to secure accommodation for the household.

A full EIA of the Homelessness Strategy was completed in March 2009. Many of the issues covered through the Homelessness Strategy EIA will also need to be analysed as part of this EIA of the Homelessness Service. This is because the majority of data available regarding the level and extent of homelessness in Solihull is from the statutory returns to the government (P1E's) and records of homeless and potentially homeless households interviewed by the homelessness prevention team. The Homelessness Strategy EIA therefore used this data as the basis for analysis for 4 of the 6 equality strands (no local data was available for the other 2). A comprehensive set of recommendations and detailed action plan came out of the Homelessness Strategy EIA (refer to **Appendix A** for a full copy of the action plan with most recent progress updates) and many of the actions related to improvements in the delivery of the homelessness service as linked to the delivery of the homelessness strategy action plan over the period 2009 – 2011. It is therefore assumed that many of the same areas of action will emerge from the Homelessness Services EIA.

Taking the above into account it was proposed, in consultation with the Equalities and Diversity Officer for Places Directorate and the Head of Housing that the relevant data and information from the homelessness strategy EIA be refreshed and updated, that the Homelessness strategy EIA action plan be revisited and up-dated and that further consultation should be carried out with relevant organisations. Based on the data updates and the results from the consultation any additional gaps or issues would then be highlighted and the action plan from the Homelessness Strategy EIA updated and amended to take into account these new findings. As a result there will be one action plan covering the initial actions identified from the Homelessness Strategy EIA (to include a progress update) and any new areas of action that are highlighted through the Homelessness Services EIA.

- **Appendix A** provides a progress update on all actions identified in the Homelessness Strategy EIA carried out in March 2009.
- A new and updated action plan combining outstanding actions for the Homelessness Strategy EIA and new actions identified through the Homelessness Services EIA is set out in section 8 on page 40 of this document.

## **2. Background**

### **2.1 Background Information**

The Council has a statutory duty to provide homelessness and housing advice services within the Borough. In Solihull these functions are delivered on the Council's behalf by SCH. If any household is homeless or threatened with homelessness they have a legal right to approach the Council to be assessed under the relevant legislation (Housing Act 1996 as amended by the Homelessness Act 2002). The homelessness legislation clearly defines the procedures and issues that need to be considered and Communities and Local Government (CLG) produce a statutory code of guidance to assist Local Authorities with their decision making processes.

Following implementation of the Homelessness Act 2002, local authorities were obliged to take a more strategic approach in responding to homelessness. Key requirements included:

- To conduct a review of homelessness in their area
- Based on the findings of the review, produce a homelessness strategy and associated action plan geared to prevention of homelessness

This increased focus on preventative activity and development of housing options is clearly reflected in Solihull's current Homelessness Strategy (2009 – 2011), as well as the Service Level Agreement under which SCH deliver the housing advice and homelessness service on behalf of the Council.

There has been an increase in the amount and the quality of prevention actions including information, advice, family and other intervention. **Appendix B** summarises the main prevention initiatives and the numbers of people assisted by them. Access to these services is available through the housing options / prevention team and signposting through partner organisations. Equality and diversity monitoring varies between these projects and there is not therefore sufficient information to assess access to these services as part of this EIA.

Nationally, the successes achieved by utilising prevention and housing options strategies has led the government to seek to extend this approach to a wider range of people and link-in to other forms of advice, for example, around employment, training and debt. Solihull has been successful in securing CLG 'Trailblazer' funding to develop this type of enhanced housing options service over the next two years, ending in March 2011. The aim of the trailblazer programme is to empower and transform the lives of individuals by offering personalised advice to anyone in housing need, intervening before the point of crisis.

In delivering this service SCH have restructured their services so that homelessness and housing advice, homelessness prevention and money advice now come under the housing options service along with the Solihull Home Options (allocations) service. As a result it is difficult to divide the services in to traditional areas such as the homelessness and allocations service as the aim is to provide a joined up service to customers, offering a range of housing options and meeting their needs not only in relation to housing but also areas such as money and employment advice. It is therefore proposed that in future Council EIA schedules the homelessness and allocations service are no longer looked at as separate areas with the EIA instead being carried out across the whole 'Housing Options Service'. SCH are planning to carry out their own internal EIA on Enhanced Housing Options during 2010/11 and the findings from the homelessness and the allocations EIA will inform this work but the focus will be on the much wider range of services now provided by the housing options team.

The fee paid to SCH by the Council to deliver the homelessness service does not meet the full cost of delivering this re-configured service. Pump Prime funding through the LAA grant and various sources of external funding have enabled the expansion of the service to but this cannot be sustained after March 2011. SCH have put in a bid to the Solihull partnership for continued investment through LAA reward money (having almost met their stretch target on reducing homelessness acceptances) but it should be noted that if this bid is unsuccessful it could result in the service having to be downsized. This is explained in more detail under section 8.

## **2.2 Aims of the Function**

The overall aim of the Homelessness Service is to provide a fair and equitable service to all homeless and potentially homeless people seeking assistance in line with the relevant legal framework as set out above. In order to achieve this, the following outcomes are required from the function:

- The Council fulfils its responsibility to provide a homelessness service in accordance with the legislation and statutory guidance
- To help as many people who are homeless / threatened with homelessness by properly discharging the Council's legal duties in a fair and equitable way
- A safety net is available for some of the most vulnerable households in the Borough
- To complement and assist in the sustainable communities agenda
- That wherever possible homelessness is prevented but that any reductions in homeless acceptances are a result of positive intervention and early prevention rather than through any limitation of access to the service (demonstrated through increased number of homeless preventions measured through the quarterly P1E returns to government)
- Reduction in the use of insecure temporary accommodation (National indicator 156) to meet the CLG target of a 50% reduction by 31<sup>st</sup> March (based on a baseline taken at 31<sup>st</sup> December 2004) and better transitions from temporary to permanent accommodation
- Ending the use of unsuitable temporary accommodation for 16 & 17 year olds by 2010, maintaining this reduction and helping to prevent homelessness amongst 16 & 17 year olds wherever possible

In addition to the core aims and objectives of the function the homelessness service has clear links to a number of important local strategies and objectives. These include:

- Working with partner organisations to deliver the 5 key priorities set out in the Homelessness Strategy (2009 – 2011):
  - I. Preventing homelessness through:
    - a) effective housing advice and options
    - b) the provision of timely education and information
    - c) supporting vulnerable people
  - II. Preventing youth homelessness & ensuring that a range of housing options are available to those young people in housing need
  - III. Meeting housing needs through the supply of permanent and temporary accommodation and supported housing
  - IV. Working more effectively with relevant statutory and voluntary organisations to prevent homelessness from occurring and to provide advice and assistance where it does
  - V. Improving services to customers
- Implementation of the Sustainable Communities Strategy and delivery of the LAA (in particular there is a stretch target to reduce homeless acceptances)
- Delivery of the Supporting People agenda – to ensure appropriate provision & services for vulnerable households
- Delivery of recommendations set out within the Housing Strategy – objectives include 'supporting vulnerable people' & 'sustainable communities'

### **2.3 Perceived Problems with the Function**

On the basis of the initial impact assessment and research carried out to inform that assessment several perceived problems / issues associated with the delivery of the homelessness service were identified. These issues were summarised in order to assist with the consultation carried out (further detail is set out in sections 3 and 4). Due to the close links between the homelessness and allocations services (explained under 2.1) and because EIA's for both services were required in the 2009/10 schedule consultation to feed into the EIA for both services was combined. The full summary of potential issues / adverse impacts covering both the homelessness and allocations services for each of the 6 stands can be seen at **Appendix C**. In brief the main issues identified in relation to the homelessness service were:

### **2.3.1 Age**

- Younger and older age groups are more likely to be vulnerable.
- People experiencing homelessness / in housing need are likely to be experiencing different issues according to their age
- A higher proportion of homelessness acceptances are for those in the younger age groups and preventing youth homelessness is therefore a key priority in the homelessness strategy.
- In contrast very few older people make formal homeless applications as their housing careers are generally well established although overall older people are more likely to have accommodation and support needs with increasing age.
- Younger or older people who are vulnerable as a result of their age may find it more difficult to access services.
- The age of all homeless applicants is recorded and monitored regularly through returns to government. However whilst the age of customers is recorded as part of standard equal opportunities monitoring for the delivery of other projects and initiatives delivered as part of the homelessness service there is no active analysis of the data gathered.

### **2.3.2 Disability**

- Physical disability and mental illness or disability are both vulnerability categories included within the homelessness legislation and if an applicant is considered vulnerable as a result of either of these factors they will be assessed as in 'priority need' of accommodation. In relevant cases this requires officers to make a decision as to whether or not a persons disability makes them more vulnerable in housing terms and in making this decision some officers could interpret the legislation and accompanying guidance in a slightly different way than others.
- People with physical and/or sensory disabilities will have specific needs in relation to accommodation both temporary and permanent.
- People with a physical and/or sensory disability may find it more difficult to access homelessness services.
- Whilst data on disability is collected across the homelessness service there is no active analysis of the data or the outcomes for people with an identified physical or sensory disability.

### **2.3.3 Faith, Religion or Belief**

- SCH do not routinely monitor the faith or religious belief of people accessing their services (and this includes the homelessness and housing advice service) although there is currently a pilot in place to monitor this information for all people who attend housing options interviews. Because information has not been collected in this area any impacts (positive or negative) are unknown.
- National research<sup>3</sup> into the causes of homelessness amongst BME communities cited faith and cultural beliefs as possible causes for homelessness and as the reason for differences in the experience of homelessness between different minority ethnic groups.

### **2.3.4 Gender**

- Female households are over-represented in homeless statistics and made up almost three-quarters (72%) of all homelessness acceptances in Solihull in 2008/09 (as either lone parent or single person households)
- The second main cause of homelessness in Solihull is domestic violence. Since women are the victims in the majority of cases they are more likely to receive the

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<sup>3</sup> ODPM (2005) Causes of Homelessness in Ethnic Minority Communities

services in place and indeed some local services are only available for female victims (e.g. the women's refuge). This could lead to access issues for any male victims of domestic violence.

- There may be a lack of understanding of the issues experienced by male victims of domestic violence, by victims from different ethnic groups or by women or men in same sex relationships.
- Whilst the gender of customers accessing services provided through the homelessness and housing advice function is recorded there is no active analysis of the data gathered or the outcomes for customers by gender. In terms of domestic violence it is recorded where this is cited as a main reason for homelessness by customers but it is recognised that many victims of domestic violence will never officially report it to the police or do not feel confident approaching the Local Authority for assistance having been a victim.

### **2.3.5 Race**

- Nationally Black and Minority Ethnic (BME) Households are around three times more likely to become statutorily homeless than are the majority White population. Whilst BME households accounted for 7% of the UK population at 2001 census (although this had increased to 11.8% as at 2007 mid year population estimates<sup>4</sup>) they represented 22% of the households accepted as homeless by Local Authorities in 2007/08<sup>5</sup>.
- National research also suggests that BME groups are less likely to approach Local Authorities for housing and homelessness services and within this that there are often negative perception of social housing amongst some ethnic groups.
- There is a possibility that a lack of knowledge / understanding amongst staff about different ethnic groups and their housing needs may lead to unequal outcomes.
- Services need to be accessible to people whose first language is not English and lack of knowledge about the services available may contribute to low up-take / reluctance to approach for help and assistance amongst certain groups.
- The quarterly P1E returns monitor homelessness presentations and acceptances by ethnic group as well as racially motivated violence and harassment where they are identified as the main reason for homelessness. In line with national trends BME groups are over-represented in terms of both homelessness presentations and acceptances in Solihull.
- As with other strands all homelessness and homeless prevention case files include monitoring information for this strand but the information or outcomes by ethnic group are not routinely monitored.

### **2.3.6 Sexual Orientation**

- SCH do not routinely monitor the sexual orientation of people accessing their services (and this includes the homelessness and housing advice service) although there is currently a pilot in place to monitor this information for all people who attend housing options interviews. Because information has not been collected in this area any impacts (positive or negative) are unknown.

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<sup>4</sup> Mid year Population Estimates by Ethnic Group – Experimental Statistics

<sup>5</sup> CLG Live Tables on Homelessness, <http://www.communities.gov.uk/housing/housingresearch/housingstatistics/housingstatisticsby/homelessnessstatistics/livetables/>, accessed 02/03/10

- Research carried out as part of a joint project between Shelter and Stonewall Housing<sup>6</sup> suggests that lesbian, gay, bisexual and trans (LGBT) people are more likely to be homeless and to feel that they are treated differently to heterosexual people when accessing housing services.

### **2.3.7 Trans (/Gender Identity)**

- The Council's EIA toolkit and associated guidance recognises 6 strands of Equality & Diversity (Race, Gender, Disability, Sexual Orientation, Age & Faith / Religious Belief). It was on this basis that the consultation set out under section 3 was carried out. However one of the responses received was from an organisation called Gender Matters and they highlighted the fact that there are seven rather than six strands of diversity with trans (/gender identity) being the seventh. The Chartered Institute of Housing also recognises trans (/gender identity) as a separate diversity strand. For this reason the assessment of impacts set out under section 5 will consider trans (/gender identity) as a separate strand although it should be noted that currently the Council corporately recognises trans (/gender identity) under the gender strand. This is however being reviewed corporately as part of the review of the EIA toolkit.
- As a result of these findings it was concluded that the Council should do a full EIA to explore the perceived problems / issues further and to build upon the action plan agreed as part of the Homelessness Strategy EIA (**Appendix A**) in order to improve the evidence base and monitor outcomes in relation to equality and diversity.

## **3. Methodology & Sources of Data**

A range of data and other sources of evidence have been used to assist in carrying out this EIA:

- Statutory data returns on homelessness made by SCH and the Council to Central Government (P1E) – these provide data on those people who the Council “accepts” as homeless
- Information / monitoring data collected as part of the delivery of housing options and prevention services
- National research and policy documents relating to the links between the equality strands and housing and homelessness services.
- Relevant legislation and guidance relating to housing and homelessness and Equalities.
- Consultation with a range of partner organisations from the statutory and voluntary sectors (as set out in section 4)
- The Places Directorate Equality and Diversity Officer who has provided advice and assistance throughout the process and particularly following the initial assessment and lead up to the full EIA.

## **4. Consultation**

### **4.1 Why Consultation was Carried Out**

Consultation was carried out in order to test the impact / possible impact of the homelessness and housing advice service amongst those organisations that either represent or work directly with people in the relevant equality and diversity strands. The Council recognises that the views of a wide range of relevant groups are

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<sup>6</sup> Gold, D (2005) Sexual Exclusion: Issues & Best Practice in Lesbian, Gay and Bisexual Housing and Homelessness, Shelter: London

essential in developing and providing services that are effective in their intended purpose and are seen by customers to be fair and equitable.

It is recommended that wherever possible results from consultation exercises undertaken separately from the EIA process should be used and this was the case for the Homelessness Strategy EIA completed in March 2009. However because both the allocations and homelessness services EIA's needed to be carried out and because there was no other relevant and up to date consultation results that could be used it was decided that a separate consultation exercise to inform both EIA's was required.

#### **4.2 How the Consultation Was Carried out**

As mentioned above the decision was taken to combine the consultation carried out to inform both the homelessness services and allocations EIA. There were several reasons for this decision:

- It was recognised that the same organisations were likely to be asked for feedback on each area and in order to reduce time commitments and improve response rates it was felt that combining the consultation would lead to better results and require less work from those being asked to respond.
- As noted in section 2.1 several changes to the structure of the homelessness and allocations services at SCH and the delivery of the Enhanced Housing Options trailblazer programme has meant that the 2 services have become much more aligned and with one overall Head of Housing Options both services are now classed as a Housing Options services. This means that the distinction between homelessness and allocations is no longer as valid and it has been agreed that in future it would make more sense to carry out an EIA of the whole housing options service (which now also includes additional service areas such as money and employment advice).
- Having reviewed the evidence set out in the initial impact assessments it was concluded that many of the issues raised were similar across both areas.

A list of organisations / departments across the statutory and voluntary sector were selected for consultation. This was based on consultation carried out for past EIA's, the partners already working with the Council and SCH in regards to the service areas and organisations identified by the Council's Equality and Diversity team. A full list of those who received the consultation documents can be seen at **Appendix D**.

Consultees received an introduction letter along with a summary of the key issues raised through the initial impact assessment and previous EIA's (**Appendix C**) and a response form which included the following questions:

1. Do you have any evidence to support that these concerns are happening in Solihull?
2. Are you aware of or do you have any additional concerns?
3. Do you have any evidence regarding the experiences or needs of (insert relevant equality strand) in relation to housing and support?
4. Are you aware of any communication issues or barriers to access which may affect customers using the homelessness and allocations services in Solihull?
5. What else could Solihull MBC / SCH be doing to give people (insert relevant equality strand) an equal chance to access the Homelessness Service / Solihull Home Options?
6. Any additional information you would like to provide?

Organisations were sent the summary and questions relating to the equality and diversity strands that were most relevant to their organisation. So for example Age Concern was only asked about age whereas larger organisations such as the Equality and Human Rights Commission were asked about all 6 strands.

### 4.3 Responses Received

A total of 11 organisations responded and there was email correspondence from another organisation (Gender Matters) although this did not address / answer the consultation questions. The full list of organisations that responded and issues raised in relation to both the homelessness and allocations service can be seen at **Appendix E**.

Disability had the highest number of responses (7) with race and faith / religious belief having the least number of responses (at 3 each). Whilst some organisations did provide answers to the specific questions asked others summarised their feedback in a single response rather than answering each of the 6 questions directly. For this reason it was easier to summarise the key issues raised rather than taking the answers to each question in turn. As stated above **Appendix E** sets out the detailed responses received in relation to each of the 6 equality and diversity strands. Table 1 below summarises the main issues raised in relation to the homelessness and housing advice function.

Key issues from the table below will be picked up in section 5 when considering the possible impacts for each of the equality and diversity strands.

<b>Table 1 - Key Issues from the Consultation: Homelessness Services EIA</b>		
<b>Diversity Strand</b>	<b>Organisations that Responded</b>	<b>Summary of key Issues Raised</b>
Age	<ul style="list-style-type: none"> <li>• Solihull Churches Action on Homelessness (SCAH)</li> <li>• Stonham</li> <li>• Age Concern, Solihull</li> <li>• Solihull Care Housing Association</li> <li>• SMBC Equality &amp; Diversity Officer (Places Directorate)</li> <li>• SMBC Adult Services (People Directorate)</li> </ul>	<ul style="list-style-type: none"> <li>• Young people will be particularly vulnerable when homeless and moving into their own accommodation for the first time and they need to be supported through this process and beyond in order to help them settle in and maintain their tenancy (i.e. basic budgeting, accessing grants, furnishing the property etc)</li> <li>• Access issues – some people cannot cope with complicated instructions &amp; find the process of looking for accommodation very confusing and intimidating and need support with the process. For some people also they cannot afford to make phone calls to different agencies.</li> <li>• Outreach – this has proved successful in the past and provides an excellent service whereby clients can be provided with the information and support they need in an environment that is familiar to them (e.g. in supported housing projects).</li> <li>• Outreach &amp; Access – People often do not know where to go to access housing &amp; homelessness services in the South of the Borough.</li> <li>• Vulnerable People – Support should be provided for more vulnerable people to walk them through some of the processes which can be complicated and difficult to understand.</li> <li>• Questions re: the over-representation of younger people and the under-representation of older people in formal homelessness acceptances.</li> <li>• Monitoring – there is no active analysis around successful outcomes or whether schemes are reaching their target audience – it would be useful to introduce standard monitoring processes.</li> <li>• Training – Need to provide training to frontline staff to help them to engage with both younger and older people to support them through the process.</li> </ul>

Diversity Strand	Organisations that Responded	Summary of key Issues Raised
Disability	<ul style="list-style-type: none"> <li>• Autism West Midlands</li> <li>• Solihull Society for the Physically Handicapped</li> <li>• Making Space</li> <li>• Solihull Care Housing Association</li> <li>• SMBC Equality &amp; Diversity Officer (Places Directorate)</li> <li>• SMBC Adult Services (People Directorate)</li> <li>• Solihull Mind</li> </ul>	<ul style="list-style-type: none"> <li>➤ There needs to be appropriate accommodation and support to assist people wanting to move into independent living</li> <li>➤ There needs to be an up to date needs assessment and comprehensive analysis of provision / gaps in provision</li> <li>➤ Communication / understanding – there needs to be a better understanding of the impact of housing choices for people with mental health problems</li> <li>➤ Partnership working – need for partners to understand the processes and procedures to follow when they are working with clients who may be homeless / in housing need (e.g. hospital ward staff) and to look at a more ‘one-stop’ shop style approach in partnership with support and care providers</li> <li>➤ Definitions &amp; Decision Making - are there a set list of criteria for staff to follow to ensure that decisions are made in a fair and equitable manner and what is being done to minimise the risk of an individual making a discriminatory decision? There is a need for regular staff training to address this issue and to ensure that officers are fully informed.</li> <li>➤ There is a need for support for homeless people who are ineligible for assistance through the homelessness legislation but who are still nevertheless in housing need.</li> <li>➤ Access &amp; Information - Support should be provided for more vulnerable people to walk them through some of the processes which can be complicated and difficult to understand. Alternative methods of communication should be available to meet the needs of vulnerable groups e.g. makaton for people who have communication, language or learning difficulties.</li> <li>➤ Existing policies and procedures need to be correctly and consistently implemented.</li> <li>➤ Timescales – the length of time taken to get through the relevant processes can cause additional stress on service users with mental health issues and it would help if housing officers were able to be honest and realistic about the likely timescales at the beginning of the process.</li> <li>➤ Training - In some cases officers can pre-decide what is needed for someone with a mental health issue based on previous experience and it would be helpful if officers were given general mental health awareness training but also guidance that they need to treat each person as an individual and listen to any specific needs they may have.</li> <li>➤ Housing officers need to have a better understanding of the impact of housing policies and procedures on people with mental health problem – what may be seen as a ‘preference’ for some people may actually be a ‘need’ for a person with mental health problems. E.g. the need for a private entrance or a specific type of accommodation.</li> <li>➤ There is a need to think about and monitor outcomes for customers.</li> </ul>
Faith	<ul style="list-style-type: none"> <li>• SCAH</li> <li>• SMBC Equality &amp; Diversity Officer (Places Directorate)</li> <li>• SMBC Adult Services (People Directorate)</li> </ul>	<ul style="list-style-type: none"> <li>➤ SCAH responded to say that they didn’t feel able to comment on the questions re: faith</li> <li>➤ Consideration should be given to a persons faith / religious needs when providing temporary and permanent accommodation e.g. housing people as close as possible to places of worship &amp; social / support connections</li> <li>➤ Access – information should be provided or available in alternative formats / languages.</li> <li>➤ Because the impact is currently unknown it is important to monitor the delivery of services by faith in order to ensure that effective systems are in place to minimise the possible adverse impacts.</li> </ul>

Diversity Strand	Organisations that Responded	Summary of key Issues Raised
Gender	<ul style="list-style-type: none"> <li>• Solihull Care Housing Association</li> <li>• SMBC Equality &amp; Diversity Officer (Places Directorate)</li> <li>• SMBC Adult Services (People Directorate)</li> <li>• Solihull Mind</li> <li>• The Mankind Initiative</li> <li>• Gender Matters</li> </ul>	<ul style="list-style-type: none"> <li>➤ Where hate crimes are a factor in homelessness there may be an issue where victims do not feel able or want to go to the police and how do support these people (e.g. would a statement from the police be required to support an application made on these grounds?)</li> <li>➤ There is a need to look into the profile of male and female homeless applicants in order to ensure that provision meets needs and that suitable interventions / prevention initiatives are in place</li> <li>➤ Access – Literature and websites needs to use supportive language and included targeted information (e.g. for male victims of domestic violence) and need to look at raising awareness of the service available amongst potential service users (e.g. in G.P's, bus shelters, amongst partner organisations etc)</li> <li>➤ There is a need to do more in terms of service provision for male victims of domestic violence – there is a lack of appropriate accommodation for male victims and for adolescent male children and of information regarding the help and advice that is available to men (as male victims often believe domestic abuse services are for females only). There is a need to ensure that a male victim's first point of contact is positive, that they are treated with respect and understanding and that they are signposted to appropriate support services.</li> <li>➤ Training – there needs to be training and awareness raising for staff around domestic abuse issues (for both female and male abuse including same-sex domestic abuse).</li> <li>➤ The system where homelessness decisions are made by one member of staff could be subjective – would suggest a system for reviewing decisions.</li> <li>➤ Staff should be sensitive to any language or cultural issues experienced by victims of domestic abuse.</li> <li>➤ There is a need to implement existing policies and procedures appropriately and with equality. In relation to victims of domestic abuse there is a need to ensure that those with additional needs (e.g. drug or alcohol abuse) linked with their abusive lifestyles are treated as equally as those who conform to the more traditional 'victim' role. There needs also to be practical support in terms of maintaining tenancies that is linked in with mental health, drug and alcohol services.</li> <li>➤ Mind do offer services to male victims of domestic abuse but as yet these services have not been directly requested (although it is recognised that it may have been a contributing factor in some of the more general mental health applications Mind have dealt with but that the man may have been too embarrassed to say)</li> <li>➤ As raised under disability there is a need for all customers to be treated as individuals rather than being labelled according to their issue or vulnerability and for officers to be clear about possible timescales for carrying out relevant procedures.</li> <li>➤ Gender Matters responded to suggest that the Council should look at seven and not six strands of diversity as included in the consultation – the seventh strand is trans.</li> <li>➤ Monitoring – there needs to be active analysis of the data that is collected looking at both access and outcomes for customers (a specific comment was made about needing to understand the reasons for the under-reporting of male domestic abuse)</li> </ul>

Diversity Strand	Organisations that Responded	Summary of key Issues Raised
Race	<ul style="list-style-type: none"> <li>• Solihull Care Housing Association</li> <li>• SMBC Equality &amp; Diversity Officer (Places Directorate)</li> <li>• SMBC Adult Services (People Directorate)</li> </ul>	<ul style="list-style-type: none"> <li>➤ Training – There is a need for regular training for frontline staff to improve their knowledge and understanding of BME groups.</li> <li>➤ P1E data compared to census data shows an over-representation of BME groups in homelessness presentations and acceptances and an increase in racially motivated violence as a reason for homelessness – there is a need to understand the reasons behind this information.</li> <li>➤ Need for targeted engagement / awareness raising to encourage social housing as a positive choice amongst BME communities</li> <li>➤ Access – as well as raising awareness of services available information should be available in alternative languages and translation services offered where the need is identified.</li> <li>➤ Monitoring – there needs to be active analysis of the data that is collected looking at both access and customer outcomes</li> </ul>
Sexual Orientation	<ul style="list-style-type: none"> <li>• Solihull Care Housing Association</li> <li>• SMBC Equality &amp; Diversity Officer (Places Directorate)</li> <li>• SMBC Adult Services (People Directorate)</li> <li>• Solihull Mind</li> </ul>	<ul style="list-style-type: none"> <li>➤ Same comments re: hate crime as made in relation to gender - where hate crimes are a factor in homelessness there may be an issue where victims do not feel able or want to go to the police and how do support these people (e.g. would a statement from the police be required to support an application made on these grounds?)</li> <li>➤ Nationally homelessness has been identified as a key issue for lesbian, gay &amp; bisexual young people. There needs to be understanding of whether this is an issue in Solihull and if so appropriate support should be in place for young people where homophobic bullying / other related issues may be a reason for them facing homelessness / having to leave home</li> <li>➤ The specific nature of domestic violence in same-sex relationships should be fully understood by frontline officers and an appropriate response provided whereby someone approaches for this reason.</li> <li>➤ Understanding is required around fear of victimisation and any penalties that may occur if a person didn't want to accept a property for this reason.</li> <li>➤ There is currently no mention of same sex violence in the literature around homelessness services and this may lead to an expectation that services aren't in place / aren't suitable to meet need.</li> <li>➤ Solihull Mind may have supported gay, lesbian and bi-sexual people within the general advocacy service but unless they mentioned that their sexuality was an issue they wouldn't be aware of it – as with other strands it was felt that if existing policies and procedures were followed correctly and consistently then the needs of this group should be addressed</li> <li>➤ When a person approaches for help with issues around their sexuality the issues should be treated seriously and the person treated respectfully with a sympathetic, understanding and non-judgemental attitude – this was seen as one of the main issues for 2 of the respondents.</li> <li>➤ Solihull Mind cited 1 example where they have supported a client who was the victim of bullying / aggressive behaviour from their neighbours and working with the housing department, the police and the anti-social behaviour team this situation was resolved “successfully and speedily”.</li> </ul>

## **5. Assessment of Equality Impacts – Adverse / Differential Impacts Identified and Consideration of Options / Measures to Address**

This section summarises the key findings of the EIA taking into account the literature review, analysis of relevant data and results from the consultation and sets out the differential impacts that the delivery of the homelessness and housing advice service may have. The differential impacts are summarised in table 16 at the end of the section following a discussion of the evidence available in relation to each of the strands.

This EIA has not investigated any specific issues that may face gypsies and travellers or refugees and asylum seekers in terms of accessing homelessness services. However it is felt that some further investigation into the barriers faced by these groups would be beneficial to the delivery of homelessness services in Solihull. As a result a specific recommendation (recommendation 11 on page 38) and action (page 47) have been included as part of section 8 and depending on the results of this investigation further activity may be required.

As part of the implementation of Enhanced Housing Options a 'Triage' assessment model started as a pilot in December 2009 / January 2010. The triage approach aims to ensure consistency in the advice, support and decision-making processes for all customers who are homeless, potentially homeless or in housing need. The 'Triage' model involves all customers receiving advice services to undertake an initial assessment completed by an officer who will follow and ask questions through scripts developed to establish the level of housing need.

The implementation of a traffic light system will then lead the approach delivered:

- Red: Customer has imminent threat of homelessness meeting the client on the day to provide advice and support and comprehensive needs assessment.
- Amber: Moderate housing need established and in depth housing options interview to be co-ordinated within 5-10 days of initial enquiry with the aim to provide support, advice and comprehensive options appraisal with the customer through a planned system and action plan approach.
- Green: Low priority housing need established for the customer but sign-posting and advice on housing options through information, websites and self-help systems (self-help systems currently under development).

As part of recommendations that came out of the Homelessness Strategy EIA SCH agreed to pilot the monitoring of all 6 equality and diversity strands through this pilot triage interview process and officers have been asking every customer the 6 equal opportunities monitoring questions at the end of the housing options interview. Early indications from this information will be discussed in relation to each of the 6 strands below but at the time of writing there is insufficient information to draw any conclusions for the purposes of the EIA.

### **5.1 Age**

As table 2 shows the majority of those accepted as homeless are aged between 16 – 24 and 25 – 44. Across all years over 80% of those accepted as homeless were aged either 16 – 24 or 25 – 44. As at 2001 census only 9% of the population were aged 16 – 24 and 27% of the population were aged 25 – 44. This shows that younger households (and particularly those aged 16 – 24) are over-represented in homelessness acceptances. In response to this a key priority for Solihull's Homelessness Strategy (2009 – 2011) is tackling and preventing youth homelessness.

People aged 60 – 64, 65 – 74 and 75+ make up a small proportion of those accepted as homeless. Combined totals have remained relatively constant over the last 4 years at between 3% and 4%. This age group are likely to have differing housing needs and whilst they may not be facing homelessness may need to talk to the housing options team to explore their options (e.g. downsizing to a smaller property or having aids & adaptations fitted to help them live independently). These are issues that will be picked up and explored in more detail in the allocations EIA.

Several respondents to the EIA consultation did question the over-representation of younger people and under-representation of older people. Whilst this is reflected in national and regional statistics and is not just a local trend there may be a need for further investigation and monitoring of this issue.

**Table 2: Age of those accepted as eligible, unintentionally homeless and in priority need (not measured in 2003/04 or 2004/05)**

Age Category	2005/06		2006/07		2007/08		2008/09	
	No	%	No	%	No	%	No	%
16-24	270	46	142	45	120	42	110	42
25-44	246	42	126	40	129	46	111	42
45-59	47	8	33	11	26	9	33	13
60-64	7	1	3	1	4	1	5	2
65-74	8	>1	4	1	3	1	2	<1
75 & Over	5	<1	6	2	1	<1	2	<1
<b>TOTAL</b>	<b>583</b>	<b>100</b>	<b>314</b>	<b>100</b>	<b>283</b>	<b>100</b>	<b>263</b>	<b>100</b>

Information from the housing options interviews collected through the pilot triage process is broadly in line with trends set out above in relation to homelessness acceptances. Those aged between 16 – 25 made up just over a quarter (27%) of those interviewed and those aged 25/26 – 34 made up 13% whilst those over 50 made up only 7%. The key issue to note is that various age categories are being used and these overlap and are not in line with the P1E age categorisation. This makes it difficult to draw any overall conclusions / comparisons with other data.

The other issue noted with relation to this data is that 35% of all those interviewed either did not give their age category or the age category was not recorded on the electronic interview spreadsheet.

**Table 3 - Age of those interviewed by the housing options team in January 2010**

Age Category	Numbers Interviewed	%
16 – 25	22	18
Under 24	2	2
Under 25	9	7
25 – 34	4	3
26 – 34	13	10
35 – 49	22	18
Over 50	9	7
Not Stated / Blank	44	35
<b>TOTAL</b>	<b>125</b>	<b>100</b>

One of the Council's key objectives is to ensure a "brighter future for our children and young people". This is particularly relevant to homelessness given that 16 – 24 year olds have made up almost half of all homelessness acceptances in Solihull over the last 3 years.

Young people experience a multitude of problems including truancy, exclusion, not being in education, employment or training, disputes with their families, violence and lack of confidence. In their consultation responses several organisations mentioned the fact that young people are particularly vulnerable when homeless and moving into their own accommodation for the first time. As a result there is a need to provide

support for young people throughout the process from making a homelessness application right through to settling in to and maintaining their own tenancies.

As a result of the diverse range of issues there is a need for a joined up approach to the provision of services and support for young people. The Council and SCH have therefore been working with a range of partners to meet the housing needs of young people and prevent their homelessness wherever possible. Key activities include:

- The appointment of a youth homelessness prevention officer on a 3 year contract to work with 16 and 17 year olds to prevent homelessness and assist in planned and supported moves
- 3 SCH prevention officers have been trained to provide mediation so that they are able to reduce homelessness arising from parent, relative or friend eviction (one of the main reasons for homelessness amongst young people in Solihull)
- The development of a joint protocol between SCH and Education and Children’s Services for the assessment of the housing and support needs of homeless 16/17 year olds
- Working with Education and Children’s services around issues such as corporate parenting and the implementation of the Common Assessment Framework for young people
- Vulnerable young people have a high priority in the Solihull Home Options Scheme so that they are able to access permanent accommodation when they are ready for independent living
- A new supported housing scheme for young people (Venture House) opened in September 2009 (Stonham Housing Association) and there are plans to redevelop and expand an existing supported housing scheme for young people in 2010/11 (St Basils)
- The Housing Strategy Officer is part of the accommodation sub-group for Unaccompanied Asylum Seeking Children (UASC). The group aims to develop a range of accommodation options for UASC which includes in-borough provision and feed into the UASC strategy group which provides a strategic overview for the provision of services to UASC. As part of this work 2 units in the new supported scheme for young people (at Venture House) are funded by the UASC team.

Table 4 provides details on the range of supporting people funded services in place to assist both younger and older people in the Borough. Current supporting people funded contracts run until March 2011. Solihull’s Supporting People budget is managed by the Care Trust. From 2009/10 the central government Supporting People programme grant has been paid as a non ring fenced grant. This represents both a risk and an opportunity. The risk is that the removal of the ring fence may lead to a threat to providers because Solihull may face pressures to re-prioritise within the Supporting People budget and/or spend money on other non Supporting People priorities and that over time funding for housing related support will reduce. The opportunity will be that the removal of the ring fence may provide more flexible and innovative ways to support vulnerable people in a range of different situations.

<b>Table 4– Supporting People Funded Services for Younger &amp; Older People in Solihull</b>	
<b>Client Group</b>	<b>Current Provision</b>
Older people with support needs inc frail elderly	<ul style="list-style-type: none"> <li>• Reflecting the traditional role of providers 83% of all housing related support in Solihull is for older people.</li> <li>• There are 626 units of accommodation for older people in the Borough (this includes fixed location alarm services)</li> <li>• A further 1438 units of floating support are provided through SCH’s Safe &amp; Sound project. This includes regular personal contact, an emergency on call service, an annual home safety check and the ability to provide different levels of support based on need.</li> </ul>

Teenage parents	<ul style="list-style-type: none"> <li>• 16 units of accommodation based support are provided for young families and young single mothers (aged 16 – 25) across 2 young parents' schemes run by Bromford.</li> <li>• Bromford also provide 6 units of floating support to assist young families to live independently (including helping those moving on from the young parents schemes)</li> </ul>
Young people at risk inc those leaving care	<ul style="list-style-type: none"> <li>• 5 units of supported accommodation for young people are provided by St Basils at Mildenhall House. A further 6 units of accommodation are provided through Bromford's Pathways Scheme (4 places are for people leaving care and 2 for referrals from the housing options team).</li> <li>• St Basil' also provided 12 units of floating support for this client group.</li> <li>• In addition Stonham provide 24 units of accommodation based support for young people aged 16 – 25.</li> <li>• There are plans to re-develop Mildenhall House to increase provision for young people.</li> </ul>

Other issues in relation to age raised through the consultation process included:

- The need to support vulnerable younger and older people through the application process
- The need to expand outreach services so that housing options services are taken into the community (to assist those people that have difficulties accessing central offices etc) and are more accessible to residents living in the South of the Borough
- Training to be provided to improve engagement with younger and older people through the housing options service
- The need to monitor outcomes on a regular basis

## 5.2 Disability

As part of the homelessness legislation a person is assessed according to whether or not they are in 'priority need' of accommodation. Part of this test relates to whether they are vulnerable in terms of their ability to access housing because of physical or mental disability and the test relies on the interpretation of each case worker based on all of the supporting evidence available (e.g. medical notes, reports from an occupational therapist etc). The table below shows the proportion of people accepted as homeless over the last 6 years as a result of either mental or physical illness / disability.

Priority Category	2003/04 (%)	2004/05 (%)	2005/06 (%)	2006/07 (%)	2007/08 (%)	2008/09 (%)
Vulnerable – mental illness or disability	6	4	10	5	10	8
Vulnerable – physical disability	4	1	6	4	6	7

More people have been accepted as homeless as a result of mental illness or disability over the last 5 years than physical disability with the former fluctuating between 4% and 10% and the later between 1% and 7%. For the last financial year (2008/09) the percentages were closer for both with the number of people accepted as homeless as a result of physical disability at 7% being slightly higher than previous years.

Information being collected as part of the triage interview process shows that for January 2010 of the 125 people interviewed 7 (6%) stated that they did have a disability and 85 (68%) stated that they did not. According to the 2001 Census, 16.3% of all people in Solihull were suffering from a limiting long-term illness and of all people in the Borough aged between 16 and 74, 4.4% were classed as

permanently sick or disabled. The disability question very much depends on a person's interpretation of their illness and disability and whether they feel it meets the definition but taking the later information on the number of people permanently sick or disabled figures on the number of people attending housing options interviews in the month of January is in line with the census data.

In just over a quarter of cases (33 cases or 26%) the question on disability was left blank this could either be because the person did not answer the question or because the information wasn't transferred onto the electronic spreadsheet.

There are a range of services available for people with disabilities (both physical and mental illness) in Solihull and these are set out in table 6 below. Again there are the same issues in terms of supporting people funded contracts as raised in discussion of age.

<b>Table 6 – Supporting People Funded Services for People with a Disability in Solihull</b>	
<b>Client Group</b>	<b>Current Provision</b>
People with a physical or sensory disability	<ul style="list-style-type: none"> <li>• 11 units of floating support provided by Bromford. 6 units provide support to people with physical disabilities and 5 for people with sensory impairment and additional needs.</li> <li>• Whilst there are no specialist supported accommodation schemes in the Borough, need is met through aids and adaptations and floating support (where necessary), assisting people to live independently.</li> <li>• Development of purpose built properties as opportunities allow (for example at Monkspath 2009)</li> <li>• 1 unit at Venture House (the new supported housing scheme for young people which opened in September 2009) is DDA compliant</li> </ul>
People with mental health problems	<ul style="list-style-type: none"> <li>• 28 units of supported accommodation across 3 schemes (20 units provided by Solihull Care and 8 by Solihull Mind)</li> <li>• 48 units of floating support provided by Accord (10 units) and Family Care Trust (38 units) for people with enduring mental ill health and the majority are referred by statutory mental health teams.</li> </ul>
Older people with support needs inc frail elderly	<ul style="list-style-type: none"> <li>• There is a link between physical disability and age and older people are therefore more likely to require services to help them live independently or in a supported environment in order to avoid homelessness.</li> <li>• Reflecting the traditional role of providers 83% of all housing related support in Solihull is for older people.</li> <li>• There are 626 units of accommodation for older people in the Borough (this includes fixed location alarm services)</li> <li>• A further 1438 units of floating support are provided through SCH's Safe &amp; Sound project. This includes regular personal contact, an emergency on call service, an annual home safety check and the ability to provide different levels of support based on need.</li> </ul>
Mentally disordered offenders	<ul style="list-style-type: none"> <li>• 15 units of floating support provided by Fry Housing for offenders with mental health support needs.</li> </ul>

There were numerous detailed responses to the consultation on the issue of disability. These are set out in full at Appendix E and summarised in table 1 on page 11. In terms of action points there are several issues that need to be addressed in the recommendations from this EIA:

- There is a need for continual training for staff on a range of disability related issues (mental health was an issue raised a number of times by different organisations) but at the same time for staff to ensure that they treat each case individually and do not pre-decide what is needed for someone based on previous experience / general issues raised through training. Building on this there is a need to understand the impact that policies and procedures can have

on people with a disability and how what may be considered a ‘preference’ in the policy could actually be a need in some cases.

- Policies and procedures should be correctly and consistently implemented and there is a need for processes to ensure that decisions are made in a fair and equitable manner. In addition there is a need for partnership working to ensure that partners are also aware of the policies and procedures in place so that they can assist their customers.
- Customers with a disability may need additional help to navigate through some of the processes which can be complicated / difficult to understand. In addition the timescales for various processes to be carried out can cause additional stress for customers and communication / updates throughout the process would help to allay any fears they may have.
- Alternative methods of communication should be available to meet the needs of vulnerable groups.
- Intelligence could be improved in order to highlight gaps in provision and there needs to be more work to monitor outcomes for customers.

### 5.3 Faith, Religion or Belief

As highlighted in the initial impact assessment there is no local monitoring data relating to the faith, religion or beliefs of people accessing the housing options or homelessness service.

Early indications from the pilot being carried out as part of the triage process are set out in table 7 below. There is insufficient data to draw any overall conclusions but information from the first month shows that the highest proportion of those who answered the question stated that they would prefer not to disclose this information (27%). On the database a further 36 cases were left blank in relation to this area and in 12 cases a response of not applicable had been recorded. If this pilot were to be rolled out to cover all SCH services there would be a need to be a lot clearer on the categories that should be used and how the information should be recorded.

<b>Table 7 - Faith, religion or belief of those interviewed by the housing options team in January 2010</b>		
<b>Faith, Religion or Belief</b>	<b>Numbers Interviewed</b>	<b>%</b>
Catholic	1	<1
Christian	8	6
Muslim	1	<1
N/a	12	10
No religion / belief	22	18
Not disclosed / stated	34	27
Sikh	1	<1
Unknown	1	<1
Blank	45	36
<b>TOTAL</b>	<b>125</b>	<b>100</b>

National research carried out into the causes of homelessness amongst BME communities (footnote 3) cited faith and cultural beliefs as possible causes of homelessness and as the reason for differences in the experience of homelessness between different minority ethnic groups. For example the research found that domestic violence was the most common cause of homelessness amongst single female-headed South Asian households. Because traditional values around family and community honour encourage the down-playing / hiding of serious domestic problems they make it more difficult for women to seek help outside the home.

Only 3 of the consultation responses related to faith, religion or belief and of these 1 response was to state that the organisation did not feel able to comment on these issues. The responses that were received highlighted the need to consider a persons faith / religious needs when providing temporary or permanent accommodation, the need to ensure information is available in alternative formats / languages where required and because there is a lack of local information the need to start to monitor the delivery of services by these categories and to regularly analyse the information collected.

#### 5.4 Gender

Table 8 below sets out the household type of those accepted as homeless over the last 2 years (prior to 2006/07 this information was not measured).

<b>Table 8: Household Type of those accepted as eligible, unintentionally homeless &amp; in priority need</b>						
<b>Household Type</b>	<b>2006/07</b>		<b>2007/08</b>		<b>2008/09</b>	
	<b>No.</b>	<b>%</b>	<b>No.</b>	<b>%</b>	<b>No</b>	<b>%</b>
Couple with or expecting dependent children	<b>40</b>	13	<b>36</b>	13	<b>38</b>	14
Lone parent household with or expecting dependent children – Male Applicant	<b>10</b>	3	<b>10</b>	4	<b>10</b>	4
Lone parent household with or expecting dependent children – Female Applicant	<b>170</b>	54	<b>157</b>	55	<b>161</b>	61
One person household – Male Applicant	<b>35</b>	11	<b>32</b>	11	<b>17</b>	6
One person household – Female Applicant	<b>37</b>	12	<b>39</b>	14	<b>30</b>	11
All other household groups	<b>22</b>	7	<b>9</b>	3	<b>7</b>	3
<b>TOTAL</b>	<b>314</b>	100	<b>283</b>	<b>100</b>	<b>263</b>	100

Source: Solihull MBC P1E statistics

The homelessness legislation sets out certain categories of applicants who are in 'priority need' of accommodation and one of these categories is households with dependent children. Reflecting this households with dependent children account for a large majority of all homeless acceptances (70% in 2006/07, 72% in 2007/08 and 79% in 2008/09). The proportion of households with dependent children accepted as homeless in Solihull is higher than the national average which was 65% in 2006/07 and 68% in 2007/08 and 2008/09 and as the table shows the trend has been increasing over the last 3 years. Of those households with dependent children almost two thirds are lone parents and within this the majority were female lone parents. Single person households made up 17% of acceptances in 2008/09 and this represents a slight fall compared to previous years. There were more female single person households in 2008/09 than males and the gap had increased slightly compared to previous years.

In total (and excluding couples and other household groups) females (single and lone parents) made up 72% of all acceptances in 2008/09 as compared to 10% of men. This reflects the priority need accorded to households with children and the fact that a much higher proportion of lone parents are female. The trend is however becoming more marked in the case of single person households with female single person households making up 5% more cases than men in 2008/09 as compared to 3% more in 2007/08 and 1% more in 2006/07.

Data recorded for the housing options interviews carried out in January also shows a higher proportion of females interviewed compared to men (35% female as

compared to 22% male). In 9 cases (7%) interviews were carried out with a couple and in 45 cases the gender of the customer wasn't recorded.

Another key issue relating to gender is domestic violence. In Solihull domestic violence is the second main reason for homelessness and as the table below shows the proportion of homeless acceptances resulting from domestic violence has increased over the last few years (despite a fall in real numbers).

Year	Number of homeless acceptances	DV is main Cause of Homelessness	% of Homeless Acceptances due to DV
2008/09	263	67	25%
2007/08	283	61	21%
2006/07	314	57	18%
2005/06	583	91	16%
2004/05	774	125	16%
2003/04	820	143	17%

In the majority of these cases women are the victims and as a result are more likely to be the recipients of the services in place. There are a range of services in place for female victims of domestic violence in Solihull. These include an 11 bed refuge for women at risk of domestic violence and 30 units of intensive floating support (to help support victims living in the Community) provided by Birmingham & Solihull Women's Aid. In their response to the consultation Mind stated that they do offer services for male victims of domestic abuse but that as yet these services had not been directly requested.

There is also a sanctuary scheme available which provides victims with the opportunity to remain in their current home where they chose to do so by guaranteeing their security through assessing the property and fitting a range of safety measures depending on the level of risk posed to the client and their individual preferences. The scheme is a partnership between the Council, SCH, the Police, the Fire Service, Women's Aid and a range of other local stakeholders. 64 sanctuary schemes have been completed since the scheme was launched in June 2006 and all have been for female victims. The scheme would be available to male victims if they approached the prevention team for help and assistance but there have so far been no applications from men. A questionnaire is sent to the recipient of the service immediately after they have had the security measures fitted in order to monitor service user satisfaction with the scheme. So far 73% of customers have returned the survey with 68% rating the service as excellent, 9% as very good and a further 17% as good.

At a national, regional and local level the vast majority of services, support and funding for services are aimed at female victims of domestic violence. Research does however suggest that men do suffer from domestic violence and in fact Home Office figures for 2007/08 show that 6.4% of men in England and Wales between the ages of 20 and 24 say they were victims of domestic violence over the last year compared to 5.4% of women. National research states that one in six men will be victims of domestic violence during their lifetime<sup>7</sup> and that at least 40% of victims of domestic violence are men with one in four incidents of domestic violence being

<sup>7</sup> Walby, S. and Allen, J. (2004) Domestic Violence, sexual assault and stalking : Findings from the British Crime Survey. Home Office Research Study No. 276. London : Home Office

perpetrated against a man<sup>8</sup>. In addition practically the same number of men (1.7%) and women (1.8%) were victims of severe force in 2007/08. Key issues identified for male victims include their concern with leaving their children with a violent partner and a sense of shame and embarrassment about their situation<sup>9</sup>. There is currently little support offered to male victims with the Government concentrating the majority of resources on female victims through publicity, the Supporting People Grants system and national performance indicators.

As well as a lack of services and support for male victims of domestic violence several organisations raised the issue of same-sex domestic abuse and the different experiences / issues that this may raise. One example highlighted to demonstrate this was victims of same-sex domestic abuse and how they would be supported / their application for assistance handled (especially where they didn't want to report the incident to the police). This was therefore identified as an additional area that staff may need to receive training in. Other areas for action highlighted through the consultation exercise were:

- In terms of access literature and websites need to use supportive language and include targeted information (e.g. for male victims of domestic abuse or victims of hate crime) and staff need to be sensitive to any language or cultural issues experienced by victims of domestic abuse. At the same time however customers need to be treated as individuals with respect and understanding and no assumptions should be made based on previous cases.
- One respondent picked up on the fact that decisions on homelessness cases are made by one member of staff and suggested that this could be subjective. Linked to this one organisation commented that existing policies and procedures did address equality and diversity issues but that they needed to be implemented consistently across the organisation.
- There needs to be additional support / signposting for victims of domestic abuse who have additional needs and this should be supported through work with partner organisations such as mental health and drug and alcohol services
- In terms of monitoring there is a need to analyse in more depth the profile of male and female applicants and to monitor outcomes for customers.

## 5.5 Race

Tables 10 and 11 over the page set out both homeless presentations<sup>10</sup> and acceptances<sup>11</sup> by ethnic group. When taking out cases where ethnicity was not stated it shows that the percentage of people from a non-white British background both presenting and being accepted as homeless has remained relatively constant between 2004/05 and 2008/09. Presentations from BME groups have fluctuated between 6% and 13% and acceptances of people from BME groups between 7% and 13%.

When compared to the overall BME population, which for Solihull at the 2001 census was 5.4%, it can be seen that people from a non-white background are slightly over-

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<sup>8</sup> Crime in England and Wales, 2006/07, Nicholas, at al. Home Office Statistical Bulletin 11/07, July 2007

<sup>9</sup> 'Male Abuse is being ignored' (10/02/09), [http://news.bbc.co.uk/newsbeat/hi/health/newsid\\_7878000/7878698.stm](http://news.bbc.co.uk/newsbeat/hi/health/newsid_7878000/7878698.stm)

<sup>10</sup> Those people who make a formal homeless application following all other prevention & housing options having been explored

<sup>11</sup> Those people who the Council accepts a statutory duty to secure accommodation for (following a full investigation of their homeless application)

represented in terms of both presentations and acceptances. This is in line with national trends set out in section 2.3.5 which show that BME households are around 3 times more likely to become statutorily homeless than the Majority White population. Whilst this trend is mirrored in Solihull it is to a lesser extent than the West Midlands region and UK as a whole. Data from the 2007 mid year population estimates would also suggest that Solihull's BME population has increased from 5.4% to 9.4%<sup>12</sup> and if this was the case the number of presentations and acceptances would be more in line with the local population.

Again reflecting national trends there are differences in rates of statutorily homelessness between the different minority ethnic groups in Solihull. Taking homeless acceptances (table 2) people from a Black or Black British background made up 4% of all acceptances in 2007/08 but as at the 2001 census made up only 0.97% of the total population (or 1.7% of the population using mid year population estimates). People from mixed race groups are also slightly over-represented making up 3% of acceptances but only 1.27% of the population. In contrast the Asian population which is the largest ethnic group in Solihull (making up 2.54% of the population at 2001 census and 4.9% of the population according to the 2007 mid year population estimates) has been slightly under-represented making up 2% of acceptances in 2007/08 and in the previous 3 years just 1% of acceptances. In 2008/09 this trend has reversed slightly with Asian or Asian British households making up 5% of homeless acceptances

**Table 10: Homeless Presentations By Ethnic Group**

Ethnic Group	2004/05		2005/06		2006/07		2007/08		2008/09	
	No.	%	No.	%	No.	%	No.	%	No.	%
<b>White</b>	1002	92	1164	93	551	92	372	86	352	87
<b>Black or Black British</b>	56	5	39	3	13	2	9	2	19	5
<b>Asian or Asian British</b>	11	1	10	<1	6	1	7	2	16	4
<b>Mixed</b>	9	<1	21	2	10	2	9	2	12	3
<b>Other Ethnic Group</b>	14	1	9	<1	5	<1	4	1	3	<1
<b>Not Stated</b>	2	<1	4	<1	12	2	30	7	3	<1
<b>TOTAL</b>	<b>1094</b>	<b>100</b>	<b>1247</b>	<b>100</b>	<b>597</b>	<b>100</b>	<b>431</b>	<b>100</b>	<b>405</b>	<b>100</b>

**Table 11: Homeless Acceptances By Ethnic Group**

Ethnic Group	2004/05		2005/06		2006/07		2007/08		2008/09	
	No.	%	No.	%	No.	%	No.	%	No.	%
<b>White</b>	701	91	540	93	283	90	235	83	228	87
<b>Black or Black British</b>	46	6	18	3	9	3	8	3	11	4
<b>Asian or Asian British</b>	9	1	8	1	4	1	5	2	12	5
<b>Mixed</b>	9	1	9	2	7	2	6	2	7	3
<b>Other Ethnic Group</b>	8	1	6	1	4	1	3	1	3	1
<b>Not Stated</b>	1	<1	2	<1	7	2	26	9	2	<1
<b>TOTAL</b>	<b>774</b>	<b>100</b>	<b>583</b>	<b>100</b>	<b>314</b>	<b>100</b>	<b>283</b>	<b>100</b>	<b>263</b>	<b>100</b>

Source: Solihull MBC P1E statistics

The ethnic origin of those households attending housing options interviews has been monitored on a regular basis since prior to the introduction of the triage process and the pilot for collecting equal opportunities monitoring information. The table below sets out the ethnic origin of all applicants interviewed per month since April 2009.

<sup>12</sup> Mid year Population Estimates by Ethnic Group – Experimental Statistics

**Table 12: Housing Options Interviews by Ethnic Group**

Month	Ethnic Group							Total Interviewed Cases
	White	Black or Black British	Asian or Asian British	Mixed	Other Ethnic Group	Not Stated / Blank	Unknown / Invalid Entry	
Apr 09	64 (62%)	3 (3%)	0	1 (<1%)	0	31 (30%)	5 (5%)	104
May 09	56 (77%)	3 (4%)	3 (4%)	1 (1%)	0	8 (11%)	2 (3%)	73
Jun 09	82 (77%)	4 (4%)	2 (2%)	1 (<1%)	0	18 (17%)	0	107
Jul 09	75 (89%)	2 (2%)	3 (4%)	1 (1%)	2 (2%)	1 (1%)	0	84
Aug 09	76 (80%)	3 (3%)	1 (1%)	3 (3%)	0	10 (11%)	2 (2%)	95
Sept 09	84 (78%)	2 (2%)	1 (<1%)	4 (4%)	2 (2%)	13 (12%)	2 (2%)	108
Oct 09	73 (78%)	1 (1%)	5 (5%)	2 (2%)	1 (1%)	12 (13%)	0	94
Nov 09	67 (71%)	0	2 (2%)	4 (4%)	0	22 (23%)	0	95
Dec 09	92 (83%)	4 (4%)	4 (4%)	7 (6%)	0	2 (2%)	1 (<1%)	111
Jan 10	90 (72%)	5 (4%)	4 (3%)	0	0	25 (20%)	1 (<1%)	125
Mean	76 (77%)	3 (3%)	3 (3%)	2 (2%)	0.5 (0.5%)	14 (14%)	1 (1%)	100

Reflecting the homeless presentation and acceptance figures the majority of interviews are carried out with white households with interviews across the other ethnic groups fluctuating between 1% to 5% depending on the month. When looking at the average across the 10 months, figures are very similar to those set out in tables 1 and 2 for BME groups. For example on average 3% of all options interviews were carried out with people from Black or Black British households between April 2009 and January 2010. This corresponds to the 5% presentations and 4% of acceptances for this ethnic group in 2008/09. The figures are similar for Asian or Asian British households which make up 3% of all housing options interviews carried out as compared to 4% presentations and 5% acceptances. Trends are similar for mixed race and other ethnic groups. This would suggest that there is no discrimination occurring by officers between the options interview stage, the presentation stage and being accepted as homeless. This is because in all cases the proportion of homeless presentations and acceptances for BME groups is higher than the average proportion of housing options interviews carried out.

15 units of floating support provided by a specialist BME Housing Association (Ashram Housing) are available to provide support and advice to help people from BME communities in Solihull to maintain their tenancies and live independently.

All those accepted as homeless need to give a reason for their homelessness and this is then recorded and submitted to Government as part of the quarterly P1E returns. 2 of the potential reasons for homelessness are violence including racially motivated violence as a sub-category and harassment or threats of intimidation including racially motivated violence as a sub-category. Tables 13 and 14 below show the number of incidents recorded in each of these categories over the last 5 years.

<b>Table 13 - Homelessness acceptances in Solihull due to violence</b>				
<b>Year</b>	<b>Total Homeless Acceptances</b>	<b>Violence from any person (includes domestic violence)</b>	<b>Of which racially motivated violence</b>	<b>% of homeless acceptances due to racially motivated violence</b>
2008/09	263	80	3	1.1
2007/08	283	75	1	0.4
2006/07	314	88	1	0.3
2005/06	583	141	0	0
2004/05	774	194	2	0.3

  

<b>Table 14 - Homelessness acceptances in Solihull due to harassment, threats or intimidation</b>				
<b>Year</b>	<b>Total Homeless Acceptances</b>	<b>Harassment, threats or intimidation</b>	<b>Of which racially motivated harassment</b>	<b>% of homeless acceptances due to racially motivated harassment</b>
2008/09	263	10	0	0
2007/08	283	10	2	0.7
2006/07	314	31	0	0
2005/06	583	37	2	0.3
2004/05	774	52	8	1.0

In 2008/09 3 out of 263 homeless acceptances were a result of racially motivated violence. At 1.1% of all acceptances this is the highest level recorded over the last 5 years. At the same time however acceptances due to racially motivated harassment have fallen from 1% (8 out of 774 acceptances) in 2004/05 to 0% in 2008/09 (the figure was also 0% in 2006/07). It is difficult to draw any conclusions from these figures due to the low numbers involved but these trends should be noted and further monitored throughout 2010/11.

Research carried out for the Office of the Deputy Prime Minister (Now Department for Communities & Local Government – CLG) by ETHNOS in 2003 and published in 2005<sup>13</sup> aimed to gain a better understanding of the causes of homelessness amongst BME communities. The research found that BME communities have specific support needs and report poor experience of homelessness services with people not accessing services because of:

- lack of knowledge of the “system”
- fear that services may not be sensitive to their specific cultural needs
- fear of discrimination
- fear or inability to communicate; and
- a preference for voluntary, community or other informal support networks

In order to address these issues several respondents to the consultation highlighted the need for targeted engagement / awareness raising to encourage social housing as a positive choice amongst BME communities and to increase the proportion of customers from BME communities who approach the homelessness and housing advice service for advice and assistance. Part of this would be ensuring that services are accessible to people from BME communities with information being available in alternative languages and translations services available where required.

Other issues to come out of the consultation included the need to provide regular training for frontline staff to improve the knowledge and understanding of BME groups, the need to understand the reasons behind the data on homeless acceptances relating to racially motivated violence and harassment and as with other

<sup>13</sup> ODPM (2005) Causes of Homelessness in Ethnic Minority Communities

strands the need to monitor and actively analyse service provision and outcomes for BME customers.

## 5.6 Sexual Orientation

As highlighted in the initial impact assessment information is not currently collected on the sexual orientation of applicants / customers accessing the housing options and homelessness service and the possible impacts are therefore unknown.

The table below sets out the results for January 2010 from the pilot being carried out as part of the triage process. The initial results show that just under half of all those interviewed (46%) stated they were heterosexual or straight (both answers were included on the spreadsheet) whilst a further 18% preferred not to answer the question and in 2 cases it was recorded as not applicable (although it is not clear why this was). As set out in relation to the other strands the pilot has not been running long enough to make any overall conclusions. There are also issues with the categories used for recording the data and the number of cases where the database was left blank (34% of all entries for January were blank). In terms of the latter point this makes it difficult to understand whether an entry was left blank because the customer did not want to answer the question or because the officer had forgotten to input the data and this would need to be rectified in order to carry out any meaningful analysis of the data.

This would suggest that more would need to be done to ensure clear, consistent information if the pilot were to be rolled out. Nevertheless the first months results do show that customers are willing to answer the question on sexual orientation and once consistent information on this area is more readily available it will enable SCH to track outcomes for customers.

**Table 15 – Sexual orientation of those interviewed by the housing options team in January 2010**

Sexual Orientation	Numbers Interviewed	%
Heterosexual / Straight	57	46
Not stated / disclosed	23	18
N/a	2	2
Blank	43	34
<b>TOTAL</b>	<b>125</b>	<b>100</b>

National research carried out by Shelter and Stonewall (see footnote 6) suggests that lesbian, gay and bisexual (LGB) people are more likely to be homeless and to feel that they are treated differently to heterosexual people when accessing housing services. Specific issues identified include:

- Sexuality can be a direct cause of homelessness for young LGB people – they could be thrown out of their home or decide to leave home to escape homophobia and this can have a significant impact on their emotional and mental health.
- Sexuality can be an isolating factor for older LGB people and this is especially so within sheltered or extra care accommodation
- LGB people can face domestic abuse from partners, parents, siblings and other family members and one of the biggest obstacles for LGB people wanting to flee domestic abuse is the lack of emergency accommodation (especially for men)
- LGB people can face marginalisation on multiple levels when trying to find accommodation e.g. if they are disabled or from a BME group
- Lack of awareness amongst service providers about the sexuality of their clients can mean that they are not always aware of the needs of LGB people and may

not appreciate that they are in priority need for housing. This can make it difficult for LGB people to get the right help and support and in some cases can therefore lead to increased vulnerability.

A recent report by the Equality and Human Rights Commission<sup>14</sup> states that it is vital to start collecting more robust data in order to ensure that services reflect the experiences of and meet the needs of LGB people. The report provides evidence to show that despite the introduction of progressive legislation and a positive change in attitudes research still indicates that homophobia continues to impact on the lives of LGB men and women and remains entrenched within institutions and communities. The report identifies that a major obstacle in measuring progress on tackling discrimination and inequality in relation to sexual orientation is the lack of any reliable statistical data. The decision to exclude a question on sexual orientation in the 2011 census represents a further barrier to the development of services to meet the needs of LGB people and the report concludes that “the collection of sexual orientation data should become part of the process of all data collectors and public bodies alongside other equality monitoring data”.

The organisations who responded to the consultation picked upon similar issues to those raised at the national level with key points being:

- There is a need for frontline staff to be sensitive to the experiences of and support needs of LGB people and to treat people respectfully with a sympathetic, understanding and non-judgemental attitude
- There is a need to be sensitive and aware of potential issues in relation to LGB customers (e.g. where they are victims of hate crime or domestic abuse they may not feel able to go to the police and if this is required as evidence in support of an application may be disadvantaged)
- National information suggests that homelessness is a particular issue for LGB young people and there needs to be an understanding of whether this is the case in Solihull
- Existing literature and information should be reviewed to ensure that services are advertised as inclusive and able to meet the needs of LGB people (e.g. support for victims fleeing same sex domestic violence)
- Existing policies and procedures should be implemented correctly and consistently and implementation should be monitored so that data is available to analyse the impact on LGB people.

## **5.7 Trans (/Gender Identity)**

Trans (/Gender Identity) was not included as a separate strand of equality and diversity in the consultation questions or the original analysis carried out as part of the initial impact assessment. This was because the Council's toolkit and guidance is set out around the 6 strands of equality and diversity (race, gender, disability, sexual orientation, age and faith, religion or belief).

One regional advocacy group did however respond to the consultation in order to inform the Council that there are seven diversity strands (and not 6 as included in the consultation). The additional strand is trans. Public bodies are currently required by law to assess their functions for impact on the grounds of race (from Race Relations (Amendment) Act 2000), disability (Disability Discrimination Act 2005) and gender (Equality Act 2006). Solihull MBC extended the grounds for assessment some years

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<sup>14</sup> Equality and Human Rights Commission (2009) Beyond Tolerance: making Sexual Orientation a Public Matter

ago to include sexual orientation, age, religion and/or belief. The Council and the Equalities and Diversity Team suggest that the needs of trans people are considered as part of gender issues. To strengthen this commitment the Equalities and Diversity Team are currently in the process of reviewing the EIA Toolkit, to reflect forthcoming legislative requirements and emerging good practice. In the meantime it is recommended that SCH continue consultation with those groups that offer support to trans people in Solihull.

There is no local data relating to the gender identity of customers accessing the housing options and homelessness service. Also because trans (/gender identity) is not included as a separate strand within the Council / SCH's guidance monitoring on this area has not been included in the housing options interviews / triage pilot.

The Equality and Human Rights Commission recently published guidance on the provision of goods, facilities and services to trans people<sup>15</sup> and within this set out the following key issues in relation to housing and homelessness services

- Housing is a particular issue for trans people because some experience family breakdown and / or victimisation by neighbours when they undergo gender reassignment – equalities research carried out to inform the report found that 46% of trans people had experienced family breakdown due to their gender identity and 28% had moved to a different area because of their gender reassignment.
- As a result of the above housing service should regard trans people as vulnerable for the purpose of homelessness applications or for relocation if they are experiencing abuse or harassment where they live.
- Young trans people in particular may experience homelessness after rejection from the family home due to their gender identity or fleeing from domestic abuse as a result of their gender identity
- In order to access specific support trans people of all ages may need to move to larger cities / areas where there is provision and access to support should be taken into account when considering whether a trans person has sufficient local connection to have their homelessness application accepted.
- There needs to be a set procedure for making changes to existing records where a customer has been through the gender reassignment process (this applies to records across all Council services)

## **5.8 Identified Differential Impacts and Options to Address**

Based on the evidence set out under section 5.1 to 5.7 table 16 brings together the main issues identified with relation to the delivery of homelessness and housing options services and the possibility of differential impacts according to each of the equality strands. It sets out what measures are already in place to mitigate these possible impacts and recommends further options to address the issues identified.

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<sup>15</sup> Equality and Human Rights Commission (2010) Provision of goods, facilities and services to trans people: Guidance for public authorities in meeting your equality duties and human rights obligations

**Table 16 – Differential Impacts & Options to Address**

Equality Strand	Identified Impact	Options to Address Identified Impacts	
		Already in Place	Recommendations
All Strands / Overarching Issues	<ul style="list-style-type: none"> <li>The decision to accept a household as homeless lies with individual case officers. This may lead to adverse decisions being made on the grounds of age, disability, faith, religion or belief, gender, race or sexual orientation. More subtle discrimination may also occur in decision making where officers are not aware of the impact that either one of the 6 strands may have on a persons experience of homelessness (e.g. hate crime).</li> <li>In areas where monitoring information is available for age, disability, race and gender it is not routinely analysed and used to inform service and policy development.</li> <li>Monitoring information is not formally collected on faith, religion or belief or sexual orientation (although as documented throughout section 5 a new monitoring process for all 6 strands is being piloted through the new triage assessment / interview process)</li> <li>Where existing procedures are not implemented consistently this can lead to differential outcomes for customers.</li> <li>Equality &amp; Diversity categories being used as part of the pilot exercise are inconsistent and a large majority of cases are still being left blank so it is not known whether the customer did not answer the question or the officer did not record the answer.</li> <li>Possible impacts on gypsies and travellers and refugees and asylum seekers have not been investigated as part of this EIA.</li> </ul>	<ul style="list-style-type: none"> <li>There are internal management procedures in place to ensure that officers are interpreting legislation correctly and making sound decisions and managers carry out random spot checks of case officer's files.</li> <li>The Housing Strategy team carry out quarterly spot checks of a sample of 10% of the files in the homelessness prevention and homelessness assessment teams on a quarterly basis in order to ensure that a fair and equitable service is being delivered.</li> <li>There is a formal review process in place which allows individuals and external agencies representing individuals (e.g. law firms and advice centres) to challenge all homeless decisions. The review process has recently been contracted out to an independent body (Housing Reviews Ltd) to carry out all homeless reviews on behalf of the Council. This process is being piloted for 6 months and is due to be evaluated in June 2010. Housing Reviews have an Equality and Diversity Statement and this was part of the scoring criteria used to choose the successful tender.</li> <li>All SCH and Council staff receive equalities and diversity training as part of the induction process.</li> <li>Some monitoring to capture gypsies and travellers accessing SCH services is already in place. This does not however currently extend to the homelessness service.</li> </ul>	<ul style="list-style-type: none"> <li>More in depth equality and diversity training should be provided to housing options officers so that they are aware of the specific issues that may arise for certain groups and how this may impact upon their experience of homelessness.</li> <li>Ensure that all officers receive regular updates to equalities and diversity training.</li> <li>Take into account equalities and diversity information when analysing the 6 month pilot for carrying out homelessness reviews</li> <li>There is a need for data that is already collected to be routinely analysed, reported to service managers and to inform potential changes and improvements to services in order to address any issues identified.</li> <li>In cases where monitoring information is not collected SCH need to make a corporate decision (based on the outcome of the pilot) on whether to change existing monitoring processes to include all relevant strands. If it is decided to expand current monitoring there will be a need to ensure consistent categories are being used to record the data and that information is correctly recorded.</li> <li>Monitoring and reporting mechanisms need to be built into the IT system used for the homelessness and housing advice service.</li> <li>Ensure that all officers are aware of policies and procedures and that training is regularly updated to take into account any amendments or updates.</li> <li>Carry out research re: any barriers to accessing the service for gypsies and travellers and refugees and asylum seekers.</li> </ul>

Equality Strand	Identified Impact	Options to Address Identified Impacts	
		Already in Place	Recommendations
Age	<ul style="list-style-type: none"> <li>• Young people are over-represented in terms of homeless acceptances and the need to prevent and tackle youth homelessness is a key priority of the Homelessness Strategy.</li> <li>• Older people (60+) make up a small proportion of those accessing homeless prevention and advice services but may have differing needs to the younger population.</li> <li>• There is a possibility that customers may be treated differently / certain assumptions made about their needs because of their age. At the same time it is likely that needs will differ depending on the age of the customers and services will need to be responsive to these differing needs.</li> <li>• Vulnerable younger and older people may be disadvantaged by complicated processes and procedures and may experience difficulties accessing services.</li> <li>• Uncertainly around future supporting people contracts (post March 2011) may impact upon existing service provision for vulnerable young and older people.</li> </ul>	<ul style="list-style-type: none"> <li>• A range of prevention initiatives and support services are available for young people threatened with homelessness (as listed on page 16)</li> <li>• All customers facing homelessness / in housing need are offered a housing options interview where their individual circumstances are discussed and a range of housing options offered – this ensures that each customer receives a personalised approach to their problem / issue.</li> <li>• The homeless prevention team offer home visits and advice over the telephone and can signpost people needing support to appropriate organisations.</li> </ul>	<ul style="list-style-type: none"> <li>• Delivery of actions in the homelessness strategy contributing to priority 2 (preventing youth homelessness and ensuring that a range of options are available to young people in housing need)</li> <li>• Analyse the age profile of those accessing the homelessness and housing advice service and from this to identify any specific needs or areas for further service development. Whilst this data is collected it is not analysed on a regular basis.</li> <li>• From this information identify the needs of different age groups and ensure that services meet these needs.</li> <li>• Further develop outreach services so that housing options services can be delivered in community locations / other areas of the Borough.</li> <li>• Further develop &amp; monitor support provided for vulnerable groups to ensure that they are supported through the relevant processes and to achieve independent living.</li> <li>• Work with the Care Trust to ensure that priority continues to be given to the delivery of housing related support to vulnerable groups</li> </ul>
Disability	<ul style="list-style-type: none"> <li>• People with a disability may have difficulty accessing the services available (this could be physical in terms of actually going into offices or for people with mental health problems in terms of having awareness of help available and having the confidence to access services)</li> <li>• Customers with a disability may be disadvantaged by complicated processes and procedures and require additional help</li> </ul>	<ul style="list-style-type: none"> <li>• The homeless prevention team offer home visits and advice over the telephone and can signpost people needing support to appropriate organisations.</li> <li>• There is a hospital discharge protocol in place with the mental health team at Solihull Hospital.</li> <li>• As part of the council's response to the economic downturn homelessness prevention training was provided to:</li> </ul>	<ul style="list-style-type: none"> <li>• Further develop outreach services so that housing options services can be delivered in community locations / other areas of the Borough.</li> <li>• Further develop &amp; monitor support provided for vulnerable groups to ensure that they are supported through the relevant processes.</li> <li>• Review the hospital discharge protocol and work with other partner organisations to ensure that frontline staff are aware of the</li> </ul>

Equality Strand	Identified Impact	Options to Address Identified Impacts	
		Already in Place	Recommendations
	<p>and support.</p> <ul style="list-style-type: none"> <li>Customers with a disability may be disadvantaged where partner organisations (e.g. hospitals) are unaware of policies and procedures in place for people who are homeless / in housing need.</li> <li>Customers with a disability may be disadvantaged by the implementation of some policies and procedures.</li> </ul>	<ul style="list-style-type: none"> <li>Solihull Connect walk-in staff</li> <li>SMBC income &amp; awards team</li> <li>SCH contact centre staff</li> <li>Briefings at Chelmsley Wood &amp; Solihull JCP and at JCP management cluster meeting</li> <li>A process was also agreed for ensuring that VCS organisations receive up to date information on housing advice and homelessness prevention.</li> </ul>	<p>help and advice that is available from the housing options team and that where applicable there is an awareness of the policies and procedures in place.</p>
Faith, Religion or Belief	<ul style="list-style-type: none"> <li>There is no local data available to monitor issues relating to faith, religion or belief and as such there could be adverse impact on this group.</li> <li>National research suggests that a lack of understanding of religious and cultural beliefs may mean that circumstances of individual cases / causes of homelessness are not fully understood.</li> </ul>	N/a – adverse impacts are not currently known.	<ul style="list-style-type: none"> <li>Evaluate the results of the pilot for collecting data on faith, religion or belief and make a decision as to whether monitoring for all SCH services should include faith, religion or belief.</li> </ul>
Gender	<ul style="list-style-type: none"> <li>Female applicants make up the majority of homeless acceptances (and in relation to single person households the trend has increased slightly over recent years). Although this reflects the priority need categories in the legislation there is a need to ensure that male applicants are offered advice and support to meet their needs to ensure they are not adversely affected.</li> <li>Services for victims of domestic violence in Solihull are almost exclusively for female victims. This could have an adverse impact on any male victims or victims of same-sex domestic abuse who would find it difficult to access services or support and may be put off if they think there is no provision.</li> </ul>	<ul style="list-style-type: none"> <li>All customers facing homelessness / in housing need are offered a housing options interview where their individual circumstances are discussed and a range of housing options offered – this ensures that each customer receives a personalised approach to their problem.</li> </ul>	<ul style="list-style-type: none"> <li>Through the launch of 'Enhanced Housing Options' ensure that a range of options are offered to meet the needs of all households (including single people not in priority need).</li> <li>Research best practice around the provision of services for male victims of domestic violence and ensure that support services / agencies are advertised locally (to be raised through Solihull's Domestic Abuse Forum)</li> <li>In light of the high level of female customers compared to male analyse the gender profile of those accessing the homelessness and housing advice service and from this identify any specific needs or areas for further service development.</li> </ul>

Equality Strand	Identified Impact	Options to Address Identified Impacts	
		Already in Place	Recommendations
Race	<ul style="list-style-type: none"> <li>• People from BME communities may not be aware of the services offered by SCH and other partner organisations to tackle and prevent homelessness – this is especially so in relation to new arrivals or people who do not speak English as a first language.</li> <li>• As compared to the 2001 census BME groups are slightly over-represented in terms of both homelessness presentations and acceptances (although figures are more in line with the 2007 mid year population estimates). Within this people from a Black or Black British and mixed race backgrounds are slightly overrepresented in the figures.</li> <li>• In 2008/09 there was a slight increase in the number of homeless acceptances whereby racially motivated violence was cited as the main reason for homelessness (although the numbers are small and it is therefore difficult to draw any overall conclusions)</li> <li>• National research into the causes of homelessness amongst BME communities found that BME communities have specific support needs and report a poor experience of homelessness services with many choosing not to access the services available.</li> </ul>	<ul style="list-style-type: none"> <li>• The Council &amp; SCH are in the process of raising awareness of the homelessness and housing advice service. A leaflet setting out the range of services provided by SCH and a poster providing contact information are currently being produced for display at a range of community locations and circulated to VCS organisations.</li> <li>• SCH subscribe to translation services (language line and type talk) so that anyone who cannot speak / read English can access literature and communicate with the team. In addition the website has a translation service which will translate all the information in to alternative languages.</li> <li>• 15 units of floating support are provided by a specialist BME Housing Association (Ashram Housing) to provide advice and support to help people from BME communities in Solihull to maintain their tenancies and live independently.</li> </ul>	<ul style="list-style-type: none"> <li>• There is a need for targeted engagement / awareness raising to encourage social housing as a positive choice amongst BME communities and to increase the proportion of customers from BME communities who approach the homelessness and housing advice service for advice and assistance (meaning that the team may be able to work with them to prevent homelessness thereby reducing their over-representation in the homelessness presentation and acceptance figures)</li> <li>• Information in alternative languages and translation services are available on request – there is a need to ensure that people are aware of these services and encouraged to ask for them where required.</li> <li>• Continue to monitor homelessness acceptance data where racially motivated violence or harassment are cited as the main reason for homelessness and ensure appropriate support is available to meet need.</li> </ul>
Sexual Orientation	<ul style="list-style-type: none"> <li>• There is no local data available to monitor the impact on lesbian, gay or bisexual (LGB) people and as such there could be adverse impact on this group.</li> <li>• National research would suggest that LGB people are more likely to be homeless and to feel that they are treated differently to</li> </ul>	N/a – adverse impacts are not currently known.	<ul style="list-style-type: none"> <li>• Evaluate the results of the pilot for collecting data on sexual orientation and make a decision as to whether monitoring for all SCH services should include sexual orientation.</li> </ul>

Equality Strand	Identified Impact	Options to Address Identified Impacts	
		Already in Place	Recommendations
	<p>heterosexual people when accessing housing services. Nationally a range of issues experienced by LGB people in terms of accessing housing and homelessness services have been identified and in order to look at this locally there is a need to establish baseline information.</p> <ul style="list-style-type: none"> <li>LGB people may be disadvantaged by existing policies and procedures e.g. the need to have police evidence to support reports of hate crime or harassment.</li> </ul>		
Trans (/Gender Identity)	<ul style="list-style-type: none"> <li>There is no local data available to monitor the impact on trans people.</li> <li>Housing has been identified as a key issue for trans people by the Equality and Human Rights Commission and in order to look at this locally there is a need to establish baseline information.</li> </ul>	N/a – adverse impacts are not currently known.	<ul style="list-style-type: none"> <li>Consider the need to include trans as a separate strand of equality and diversity and to monitor accordingly (based on the outcome of the Equality Bill currently in the House of Lords).</li> <li>Implement local guidelines so that staff are able to properly record information in cases where customers have been through the gender reassignment process.</li> </ul>

## 6. Monitoring Arrangements

The need for effective monitoring is crucial to ensure that organisations are aware of any adverse impacts and are able to respond to needs identified and in turn that the effects of any actions put in place to mitigate identified impacts can be measured.

This EIA has identified three key areas for future development in terms of monitoring:

1. For race, gender, disability and age where information is collected this needs to be analysed on a more regular basis so that trends can be identified and any necessary changes implemented in response
2. For sexual orientation, faith, religion or belief and trans (/gender identity) where data is not routinely collected measures need to be put in place to look at the possibility of collecting information as part of the standard equal opportunities monitoring forms used by the homelessness and housing advice service (building on the results from the pilot exercise set out in section 5).
3. Based on the results of the current pilot being carried out to monitor all 6 strands there needs to be consistency in terms of the categories used to record equality and diversity information and training for all staff so that they are aware what they mean (particularly if the decision is made to expand current monitoring activity and monitor all strands across all of SCH services)

In terms of the former a full analysis of the data collected on race, gender, disability and age was carried out under section 5 to inform this EIA. For homeless acceptances quarterly returns to government (P1E's) do record the ethnicity, age, gender and whether the household was accepted due to vulnerability resulting from physical or mental illness / disability. However there are no formal arrangements to monitor or report on these indicators for other service areas e.g. all those who have a housing options interview or those who utilise one of the prevention tools such as the sanctuary scheme. To achieve this it is recommended that a template is produced which sets out all those areas where data is collected and recommends a format for reporting on equalities information on a quarterly basis.

Taking the 3 equality strands where data is not currently collected it is recommended that the Council explore with SCH (taking into account the outcomes of the passage of the Equality Bill through parliament) the possibility of recording sexual orientation, faith, religion or belief and trans (/gender identity). In the EIA of the homelessness service carried out in 2007 it was concluded that sexual orientation and faith, religion or belief (trans at the time was not recognised as a separate strand) should not be monitored due to the fact that it would be impractical, unlikely to yield a high response rate and difficult to monitor accurately. Subsequently SCH have added questions on sexual orientation and faith, religion or belief on to some of their monitoring forms but the HR and Equalities sub-committee asked for them to be taken back off again.

Following advice taken from the Places Directorate's Equality and Diversity Officer it was felt that the decision should be reviewed since it would be better to include all categories and give customers the option as to whether or not to complete them. As a result the housing options team are piloting asking questions on all 6 strands as part of the triage housing option interview process but as stated in section 5 there are issues with recording answers having looked at the first months results from the pilot exercise. The viability of introducing the 3 additional categories across SCH's services will need to be explored by SCH, its tenants and board members and the full

evaluation of the delivery and outcomes of the pilot (expected in July 10) will be able to inform this process.

In the past the homelessness team have recorded most of their customer information on paper files and excel spreadsheets. This made it more difficult to monitor delivery of the service and potential impacts in general as well as in relation to equal opportunities and lead to officers spending a lot of time inputting information on to relevant databases and extracting it to analyse when required. Recognising this SCH are in the process of implementing an IT system for the homeless prevention and homeless assessment teams so that they are able to record and monitor information on one central system. The system was installed in September 2009 and is currently being piloted while the paper based and excel spreadsheet systems continue alongside it in order to ensure that it is extracting relevant information for reporting. Once the new system is fully implemented and reporting is set up this should make it easier to monitor service delivery and customer information which will help in the implementation of some of the recommendations made as part of this EIA.

Finally there is a comprehensive monitoring framework to ensure the delivery of the Homelessness Strategy 2009 – 2011. Table 11 sets out the range of monitoring mechanisms in place for the homelessness strategy. The action plan accompanying this EIA (included in section 8 below) has been linked into the Homelessness Strategy Action plan and will therefore be included in this overall monitoring framework.

<b>Table 17 - Homelessness Strategy Monitoring Mechanisms</b>	
Strategic Multi-Agency Homelessness Forum	Meets quarterly. The action plan is updated and progress reviewed at each meeting, taking into account any developments at local, regional or national level.
National Performance Indicators	<p>Within the new performance framework the only national indicator relating directly to homelessness is the temporary accommodation target.</p> <p>Performance will however continue to be monitored through the quarterly P1E returns and snapshot surveys sent out on an ad-hoc basis to capture information on particular service areas. The P1E data will continue to be monitored and reviewed regularly by the Council.</p>
Local Performance Indicators	<p>The 2007 – 2010 LAA Homelessness Stretch target will continue to be monitored on a monthly basis to ensure that progress is on target.</p> <p>SCH and SMBC will continue to monitor performance against certain Best Value Performance Indicators relating to housing and homelessness and whilst the figures will no longer be reported to central government they will continue to give a detailed picture and allow comparison with previous years. In addition local performance indicators agreed between SMBC and SCH will be monitored.</p>
Action Plan Update	The action plan will be formally updated on a 6-monthly basis and will be made available on the Council's website as well as being circulated to key partners and members of the homelessness forums.
Reporting to Cabinet Member & Scrutiny Board	Regular reports will be taken to the relevant cabinet member and scrutiny board to highlight progress made against the action plan, to outline key trends and to identify any risks to / resources required for the future delivery of the strategy and action plan.

## **7. Publication of Equality Impact Assessment**

This EIA will be reported to and approved by the Places Directorate Equality and Diversity Champions Group. In addition SCH have been involved / consulted throughout the planning, consultation and drafting stages for this EIA and joint work will continue to ensure that the recommendations and actions set out in section 8 are considered and implemented as appropriate by SCH.

Following this the full report will be published on Solihull MBC's website. Copies will also be made available to partner organisations upon request.

## **8. Conclusions, Future Actions / Recommendations & Action Plan**

As set out in section 1 because the EIA of the Homelessness Strategy carried out in March 2009 covered many of the same issues that have been discussed as part of this EIA it was proposed that consultation and updated information from this EIA would highlight any additional issues of gaps and then update the recommendations and action plan from the Homelessness Strategy EIA.

The action plan from the Homelessness Strategy has been updated and can be seen at **Appendix A**. Many of the original targets and milestones have been actioned but in general the issues to come out of this EIA remain in line with the overall recommendations identified as part of the homelessness strategy EIA. A few minor changes have been made to the original recommendations to take into account issues raised through this EIA but in general the overall areas for further action remained the same:

1. Ensure that services are accessible to all residents of Solihull and raise awareness / carry out more pro-active work within the community and with partner organisations in both the statutory and voluntary sector to facilitate this process
2. Agree formal arrangements with SCH for monitoring equalities and diversity information that is already collected (i.e. race, gender, age and disability) on a regular basis and ensure that relevant support / services are available to address any needs identified  
  
Identify any services where information is not already collected and introduce monitoring arrangements  
  
Ensure that the homelessness legislation and associated processes are explained to customers in plain English so that they know what to expect
3. For sexual orientation, faith, religion or belief and trans (/gender identity) the Council should work with SCH to look at the viability of including this information on the standard equal opportunities monitoring form (based on the outcomes from the pilot carried out for housing options interviews and the passage of the Equalities Bill through parliament) and agree a timetable to implement any agreed changes
4. Build equal opportunities monitoring and reporting mechanisms into the new IT system for homelessness and housing advice
5. Provide a range of housing options to meet the needs of all potentially homeless households in the Borough

6. Look at Best Practice around the provision of support and services for male and same-sex victims of domestic violence and ensure that support services are advertised locally
7. Prevent youth homelessness and ensure that a range of options are available to help young people in housing need
8. Recognising the fact that not all homeless / potentially homeless households approach the Council for advice and assistance work with partners in the statutory and voluntary & Community sector to capture data across the Borough and present a more detailed picture of homelessness
9. Look at the provision of additional support and accommodation for vulnerable groups

There were two issues raised through this EIA that were not included in the Homelessness Strategy EIA. The first of these related to the need for on-going staff training and the second to the need for further investigation into specific issues that may impact upon gypsies and travellers or refugees and asylum seekers in accessing homelessness services. Two additional recommendations are therefore proposed:

10. Provide up to date and regular training for all frontline officers working in the homelessness and housing advice service – this should cover updates on all strands of equality and diversity, more in depth training on any specific issues and regular updates on departmental policies and procedures and how to ensure that these are implemented consistently across the team.
11. Investigate the barriers faced by both gypsies and travellers and asylum seekers and refugees in terms of accessing homelessness services. Depending on the results of this exercise further activity may be required.

The Homelessness strategy EIA action plan has been updated to take into account actions completed during the first year and to include new actions and recommendations highlighted through this EIA. The updated action plan (set out over the page) will take forward outstanding recommendations from the Homelessness Strategy EIA and new actions identified through the Homelessness Services EIA.

Whilst this EIA has shown no evidence of discrimination in respect of the homelessness service it has highlighted several areas where there is the possibility for adverse impacts and in certain cases that the lack of any local information means that there is insufficient information to clearly demonstrate that discrimination is not occurring. Implementation of these recommendations will ensure that equality of opportunity is promoted, that possible adverse impacts are mitigated and that a decision will be made on the monitoring that will be carried out by SCH in relation to the homelessness and housing options service.

It should be noted that the current structure of the housing options and homelessness prevention team in place at SCH has been significantly expanded since 2005/06 from 9 FTE officers to 17 FTE officers in 2009/10. This expansion has been funded through various sources:

- LAA pump prime grant invested to assist SCH in meeting the LAA homelessness stretch target (to reduce homelessness acceptances to not more than 802 over the three-year period 2007-2010 )

- Additional SCH spend beyond the management fee paid by the Council
- External funding from the CLG through:
  - Homelessness Grant of £66,050 per annum in 2009/10 and 2010/11
  - Enhanced Housing Options Trailblazer Funding of £218,000 over 2 years (2009/10 & 2010/11) as part of a competitive bidding process
- Supporting People Grant (administered by the Care Trust)

This additional investment has enabled SCH to increase in the amount and the quality of prevention actions including information, advice, family and other intervention and to provide a wider range of housing options linked to other forms of advice, for example, around employment, training and debt (as set out in section 2).

The fee paid to SCH by the Council does not meet the full cost of this re-configured service. In addition the homelessness grant, supporting people grant and enhanced housing options funding are not guaranteed / will not be renewed after 2011. SCH are currently on track to meet the LAA homelessness stretch target and have put a bid into the Solihull Partnership for investment through the LAA reward money to increase the housing advice team (including money and employment advice) within SCH. This would allow SCH to both sustain and build on existing levels of service. If this bid were to be unsuccessful however it could, in the absence of a sufficient increase in SLA income from the Council to close the funding gap (which is currently being met by tenants out of HRA funds), mean that the service may have to be downsized and this would adversely affect the ability of SCH to fully deliver some of the actions set out in the action plan (e.g. further developing the housing options service and increasing outreach work in the community).

**This EIA has been completed by**

Name and Job Title: Gemma Jones, Housing Strategy Officer

Signature: G. Jones

**This EIA has been approved by**

Name and Job Title: George Daley, Head of Housing

Signature: G. Daley

<b>Partners Key (Lead Role in Bold Text in the Action Plan)</b>		
AC – Age Concern	HA's – Housing Associations	SCH – Solihull Community Housing
B&SMHT – Birmingham & Solihull Mental Health Team	HBT - Housing Benefit Team (SMBC)	SCT – Solihull Care Trust
BSWA – Birmingham and Solihull Women's Aid	HCA – Homes & Communities Agency	SHA – Stonham Housing Association
CAB – Citizens Advice Bureaux	HST – Housing Strategy Team (SMBC)	SMBC – Solihull Metropolitan Borough Council
CA&RA - Chelmsley Advice & Resources Agency	JCP – Job Centre Plus	UASC – Unaccompanied Asylum Seeking Children Team
CST – Customer Services Team (SMBC)	LSC – Learning & Skills Council	VCS – Voluntary and Community Sector Organisations
E&CS – Education & Children's Services (SMBC)	MAHF – Multi-Agency Homeless Forum	WMFS – West Midlands Fire Service
EDT – Economic Development team (SMBC)	RHSIG – Regional Homelessness Strategy	WMP – West Midlands Police
GOWM – Government Office West Midlands	Implementation Group	WMPS – West Midlands Probation Service

**Homelessness Strategy & Homelessness Services EIA Action Plan**  
**(Homelessness Strategy EIA Action Plan updated from original version agreed in March 2009 as part of the Homelessness Strategy EIA)**

No.	Recommendations to Address Adverse / Differential Impacts Identified	Actions to Overcome Problem / Barrier & Related Action in the Homelessness Strategy (where applicable)	Resource*	Lead Role & Key Partners	Milestones & Target Date
1.	Ensure that services are accessible to all residents of Solihull and raise awareness / carry out more pro-active work within the community and with partner organisations in both the statutory and voluntary sector to facilitate this process	<p>Advertise &amp; raise awareness of prevention services, offering earlier advice &amp; assistance to all potentially homeless h/holds</p> <p>Improve the quality of housing options information available to all customers and ensure Solihull Home Options (SHO) continues to be clear and transparent</p> <p>Ensure that all literature is accessible, tailored to meet local need and widely communicated via numerous channels (e.g. websites, leaflets &amp; posters etc)  <b>(Ref action 1.13)</b></p> <p>Assess the needs of people from BME communities and ensure that the range of homelessness and housing related support services respond appropriately to their needs <b>(Ref action 2.23)</b></p>	Officer Time & Existing Budgets	<b>SCH &amp; HST</b>	<p>Review &amp; update customer leaflet on homelessness prevention &amp; housing options &amp; poster advertising SCH housing advice services following publication in Mar 09  <b>(On-Going – Annual Review)</b></p> <p>Raise awareness of the availability of literature in other languages / formats and the translation services that are available e.g. language line and type talk <b>(On-Going)</b></p> <p>Look at developing alternative methods of communication to meet the needs of vulnerable groups e.g. Makaton for people having language, communication or learning difficulties <b>(Mar 11)</b></p> <p>Further develop out reach services to ensure that housing options and homelessness prevention advice can be delivered to vulnerable people in their own homes and communities  <b>(Dec 10 &amp; On-going)</b></p>

No.	Recommendations to Address Adverse / Differential Impacts Identified	Actions to Overcome Problem / Barrier & Related Action in the Homelessness Strategy (where applicable)	Resource*	Lead Role & Key Partners	Milestones & Target Date
2.	<p>Agree formal arrangements with SCH for monitoring equalities and diversity information that is already collected (i.e. race, gender, age and disability) on a regular basis and ensure that relevant support / services are available to address any needs identified</p> <p>Identify any services where information is not already collected and introduce monitoring arrangements</p> <p>Ensure that the homelessness legislation and associated processes are explained to customers in plain English so that they know what to expect</p> <p>Introduce guidelines for making changes to records following gender reassignment (across both the Council &amp; SCH)</p>	<p>Monitor the quality of homelessness, housing advice and prevention services <b>(Ref action 1.8)</b></p> <p>Monitor &amp; review existing prevention initiatives:</p> <ul style="list-style-type: none"> <li>- Sanctuary Scheme</li> <li>- RDGS</li> <li>- Money Advice</li> <li>- Tenancy Support</li> <li>- Mortgage Rescue</li> <li>- Mediation</li> <li>- Prevention fund &amp; DHP</li> </ul> <p><b>(Ref action 1.10)</b></p> <p>Improve communication with customers &amp; monitor customer satisfaction with the homelessness service:</p> <ul style="list-style-type: none"> <li>- Produce, update &amp; advertise service standards</li> <li>- Monitor delivery of service standards and feedback to customers</li> <li>- Introduce regular customer satisfaction surveys</li> </ul> <p><b>(Ref action 2.13)</b></p> <p>Seek guidance on correct procedures (nationally) and put in place local guidelines to ensure that where a customer has been through the gender reassignment process the Council and SCH are able to record this correctly and respond sensitively to any future needs.</p>	Officer Time & Existing Budgets	<b>SCH &amp; HST, BSWA, WMP, WMFS, SCT, Private Landlords, Support Providers, CAB, VSC &amp; HA's</b>	<p>Complete quarterly spot-checks of the homeless teams <b>(on-going)</b></p> <p>Review monitoring data, service standards &amp; customer satisfaction surveys already in place and monitor in line with equalities information <b>(Sept 10 &amp; On-going)</b></p> <p>Further develop customer information, service standards and satisfaction surveys where the need is identified through the above review process <b>(By Mar 11)</b></p> <p>Carry out an evaluation of the 6 month pilot re: homelessness reviews and agree on-going process (to include any equality &amp; diversity information / implications) <b>(June 10)</b></p> <p>Framework for monitoring &amp; reporting on homelessness, housing advice &amp; homeless prevention initiatives to be agreed as part of the roll out of the Abritas IT system <b>(July 10)</b></p> <p>Regular monthly &amp; quarterly monitoring in place <b>(From Q3 10/11) &amp; annual review (Apr 11)</b></p> <p>Recommendations from homelessness EIA implemented &amp; satisfaction monitored <b>(Apr 10 &amp; on-going)</b></p> <p>Guidelines in place so that staff are able to properly record when customers have been through the gender reassignment process <b>(Oct 10)</b></p>

No.	Recommendations to Address Adverse / Differential Impacts Identified	Actions to Overcome Problem / Barrier & Related Action in the Homelessness Strategy (where applicable)	Resource*	Lead Role & Key Partners	Milestones & Target Date
3.	For sexual orientation, faith, religion or belief and trans (/gender identity) the Council should work with SCH to look at the viability of including this information on the standard equal opportunities monitoring form (based on the outcomes from the pilot carried out for housing options interviews & the passage of the Equalities Bill through parliament) and agree a timetable to implement any agreed changes.	Explore the feasibility of monitoring sexual orientation, faith, religion or belief and if appropriate trans (/gender identity) as part of the standard equal opportunities monitoring of homelessness and housing advice services and agree a timetable to implement any agreed changes.	Officer Time & Existing Budgets	<b>SCH, HST &amp; SMBC Equality &amp; Diversity Officer</b>	<p>Identify services where equal opportunities data is currently monitored and any services where information is not collected (as per action 2) <b>(Sept 10)</b></p> <p>Evaluate the pilot equality &amp; diversity monitoring exercise carried out for all housing options triage interviews <b>(July 10)</b></p> <p>Based on the results of the pilot exercise and feedback from SCH board members and tenants agree approach for future monitoring of sexual orientation &amp; faith, religion or belief <b>(Dec10)</b></p> <p>Consider the need to include trans as a separate strand of equality and diversity and monitor accordingly (based on the outcome of the Equality Bill – currently in the House of Lords @ the final stage) <b>(Outcome Expected – June 10)</b></p> <p>Depending on the outcome of the above introduce new monitoring arrangements across SCH, evaluate response and agree long term process. <b>(If applicable from Sept 10)</b></p>
4.	Build equal opportunities monitoring and reporting mechanisms into the new IT system for homelessness and housing advice	Develop and Implement new IT system (Abritas) for Homelessness and Housing Advice team <b>(Milestone as part of action 1.8)</b>	Officer Time & Existing Budgets	<b>SCH, HST &amp; Abritas</b>	<p>Following the launch (in September 09) and piloting of the new system which is due to complete in March 09 ensure that reporting mechanisms take into account and monitor equalities &amp; diversity information <b>(Apr 10 &amp; On-going)</b></p> <p>Include additional equality and diversity strands based on the outcome of action 3 above <b>(From Sept 10).</b></p>

No.	Recommendations to Address Adverse / Differential Impacts Identified	Actions to Overcome Problem / Barrier & Related Action in the Homelessness Strategy (where applicable)	Resource*	Lead Role & Key Partners	Milestones & Target Date
5.	Provide a range of housing options to meet the needs of all potentially homeless households in the Borough	<p>Develop a wider Housing Options and Advice Service (linking with other service providers) through the launch and implementation of “Enhanced Housing Options”</p> <p>Increase pro-active partnership working between different organisations in order to enable a more holistic housing service. <b>(Ref action 1.9)</b></p>	Officer Time & Trailblazer Funding	<b>SCH &amp; HST</b> , LSC, JCP, EDT, CAB, SCT, Connexions, Pertemps, VCS, Sustain, CAB, HA’s, Private Landlords, AC & CA&RA	<p>Continue joint working with JCP to link housing and employment advice <b>(&amp; On-going)</b></p> <p>Employment Co-ordinator to carry out employment needs assessments for 35 households per quarter and Money Advisor to work with 35 new cases per quarter <b>(Quarterly measures up to Apr 11)</b></p> <p>Quarterly monitoring of the Enhanced Housing Options service – reports to CLG <b>(Quarterly up to Apr 11)</b></p> <p>Consider the possibility of including equality &amp; diversity measures within EHO monitoring information <b>(For Year 2 from Apr 10)</b></p> <p>Exit strategy &amp; future provision agreed re; integrating Enhanced Housing Options approach in to the delivery of SCH housing options service. <b>(Sept 10)</b></p>
6.	Look at Best Practice around the provision of support and services for male and same-sex victims of domestic violence and ensure that support services are advertised locally	Identify the needs of male and same-sex victims of domestic violence and investigate opportunities for improving local service provision.	Officer Time No resources identified – explore possible funding streams / bid for additional resources	<b>SCH, HST &amp; SMBC Domestic Violence Co-ordinator</b>	<p>Research best practice and resources available in other Local Authority areas <b>(Dec 10)</b></p> <p>Liaise with key partners and stakeholders and establish possible data sources / information on level of need in Solihull <b>(Dec 10)</b></p> <p>Identify gaps in provision and make recommendations for future service development <b>(Dec 10)</b></p> <p>Work with partners to agree approach to delivery, secure funding and develop preferred options <b>(Apr 11)</b></p>

No.	Recommendations to Address Adverse / Differential Impacts Identified	Actions to Overcome Problem / Barrier & Related Action in the Homelessness Strategy (where applicable)	Resource*	Lead Role & Key Partners	Milestones & Target Date
7.	Prevent youth homelessness and ensure that a range of options are available to help young people in housing need	<p>Complete the redevelopment of Yorkswood House and Mildenhall House to provide additional units of supported accommodation for young people aged 16 – 25 <b>(Ref action 1.1 and 2.9)</b></p> <p>Evaluate the 'crashpad' pilot and assess the need for the permanent provision of emergency / direct access accommodation for young people (16 &amp; 17 year olds) <b>(Ref action 1.11)</b></p> <p>Implement protocol for vulnerable young people between SCH and Education &amp; Children's Services <b>(Ref action 1.12)</b></p> <p>Work with local schools and colleges to raise awareness of homelessness and housing advice and prevention services</p> <p>Re-launch the homeless education programme to prevent homelessness amongst young people. <b>(Ref action 2.1)</b></p> <p>Explore the options for the provision of other forms of temporary / supported accommodation for young people e.g. supported lodgings / nightstop <b>(Ref action 2.19)</b></p> <p>Provide starter homes and employment / training opportunities for young people <b>(Ref action 2.20)</b></p> <p>Develop a life skills pre-tenancy training programme for 16 – 25 year olds <b>(Ref action 2.21)</b></p>	Officer Time, Existing Budgets & Trailblazer Funding	<b>HST, SCH, SCT &amp; ECS</b> SHA HCA, Support Providers, Connexions, St Basil's, Support Providers, local schools & colleges & Waterloo HA	<p>Yorkswood House Redevelopment = complete &amp; on-going monitoring of the scheme now required <b>(On-going)</b></p> <p>Outcome of funding bid announced and future of Mildenhall House agreed <b>(Dec 10)</b></p> <p>Implementation of joint protocol monitored via the quarterly steering group meetings and file spot-checks <b>(On-going)</b></p> <p>Monitor the schools attended by 16 &amp; 17 year olds approaching the prevention team <b>(On-going)</b></p> <p>Work with partner agencies and local schools &amp; colleges to establish demand &amp; agree approach to delivery <b>(June 10)</b></p> <p>Deliver education programme in schools <b>(from Sept 10)</b></p> <p>Research best practice &amp; temporary accommodation options for young people available in other Local Authority areas <b>(Mar 10)</b></p> <p>Carry out options appraisal and work with partners to develop preferred options <b>(By Nov 10)</b></p> <p>Starter Homes pilot evaluated and future options set out <b>(Apr 10)</b></p> <p>Scope extent and focus of life skills programme with partners <b>(Feb10)</b></p> <p>Develop and agree curriculum &amp; launch training programme <b>(May 10)</b></p>

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		Work with internal and external partners to address the range of issues experienced by young people and provide a 'joined-up' service <b>(Ref action 2.22)</b>			Provide housing advice to young people from a range of locations, work with partners to develop formal referral arrangements and explore the possibility of having a Single Access Point for young people <b>(Aug 2010)</b>
8.	Recognising the fact that not all homeless / potentially homeless households approach the Council for advice and assistance work with statutory and VCS partners to capture data across the Borough and present a more detailed picture of homelessness	Develop a common monitoring system / approach to sharing data about homeless and potentially homeless households with partner organisations <b>(Ref action 2.14)</b>	Officer Time, Existing Budgets & Partner Resources	<b>HST</b> SCH, MAHF, VCS, SCT, HA's, CAB, CA&RA, BSWA & Support Providers	Establish key partners and the data they collect <b>(June 10)</b>  Research national and regional good practice around multi-agency monitoring <b>(June 10)</b>  Develop a methodology for data collection and pilot approach <b>(Oct 10)</b>
9.	Look at the provision of additional support and accommodation for vulnerable groups	Implement hospital discharge protocol with Birmingham & Solihull Mental Health teams to ensure homeless people with mental health needs are linked into appropriate services <b>(Ref action 1.6)</b>  Develop and monitor housing options for customers with identified vulnerability and ensure they are supported to engage in the process and to achieve independent living <b>(Ref action 2.11)</b>	Officer Time, Existing Budgets & Partner Resources	<b>SCH, B&amp;SMHT &amp; SCT</b> Support Providers, SCT, HA's, VCS, Sustain, E&CS, WMPS, Welcome & BSWA.	Review & monitor the implementation of the hospital discharge protocol <b>(Sept 10 &amp; On-going)</b>  Engage with agencies and VCS organisations & map gaps in current provision for customers with identified vulnerability <b>(On-going)</b>  Work with vulnerable clients & their family / support networks to achieve independent living <b>(On-going)</b>  Develop materials in user friendly formats that support vulnerable client groups e.g. makaton <b>(Sept 10 &amp; on-going)</b>  Prioritise key areas for future development in Care Trust Independent Living & Extra Care Housing Strategy <b>(April 10)</b>

No.	Recommendations to Address Adverse / Differential Impacts Identified	Actions to Overcome Problem / Barrier & Related Action in the Homelessness Strategy (where applicable)	Resource*	Lead Role & Key Partners	Milestones & Target Date
		<p>Prioritise the development of additional support services and housing options for the following vulnerable groups :</p> <ul style="list-style-type: none"> <li>- Offenders</li> <li>- People with alcohol problems</li> <li>- People with physical and sensory disabilities</li> <li>- People with learning disabilities</li> <li>- Victims of domestic violence</li> </ul> <p><b>(Ref action 3.2)</b></p>			<p>Work with the Care Trust to ensure that priority continues to be given to the delivery of housing related support to vulnerable groups <b>(All existing Supporting People contracts end Mar 11)</b></p> <p>Depending on the outcome of the above and the resources available commission / remodel services as appropriate <b>(April 11)</b></p>
10.	<p>Provide up to date and regular training for all frontline officers working in the homelessness and housing advice service and for partner organisations working with customers who may need o access housing options services.</p>	<p>Implement a training programme to ensure all frontline officers receive regular updates on equality and diversity.</p> <p>Target more in-depth training at those officers who need more specialised knowledge to aid them in their decision making processes.</p> <p>Ensure that regular training is provided to staff and partner organisations re: policies and procedures in place to cover the housing options service.</p>	SCH – Existing training budgets	<b>SCH</b>	<p>Ensure that all staff delivering the housing options service receive regular updates to equalities &amp; diversity training <b>(April 10 &amp; On-going)</b></p> <p>Identify areas for more detailed training &amp; deliver to housing options officers so that they are aware of specific issues that may arise for certain groups and how this may impact upon their experience of homelessness. <b>(Apr 10 &amp; On-going)</b></p> <p>Ensure that all officers are aware of policies and procedures and that training is regularly updated to take into account any amendments or updates. <b>(April 10 &amp; On-going)</b></p> <p>Work with partner organisations to ensure that all frontline officers are aware of the help &amp; advice available from the housing options team &amp; that where applicable are aware of the policies and procedures in place. <b>(Apr 10 &amp; On-going)</b></p>

No.	Recommendations to Address Adverse / Differential Impacts Identified	Actions to Overcome Problem / Barrier & Related Action in the Homelessness Strategy (where applicable)	Resource*	Lead Role & Key Partners	Milestones & Target Date
11.	Investigate the barriers faced by both gypsies and travellers and asylum seekers and refugees in terms of accessing homelessness services. Depending on the results of this exercise further activity may be required.	Carry out research to ascertain any adverse impacts that could be experienced by gypsies and travellers or refugees and asylum seekers in accessing homelessness services and make recommendations to overcome any barriers that are identified.	Officer Time, Existing Budgets & Partner Resources	<b>HST, SCH &amp; SCT</b>	Review existing information relating to the needs of gypsies and travellers and refugees and asylum seekers ( <b>October 10</b> )  Analyse any local data available ( <b>October 10</b> )  Gaps identified and further action recommended ( <b>December 10</b> )

\*NB - Where mention is made of existing time and resources it should be noted that a number of posts within the SCH housing options and homelessness prevention team are on temporary contracts and the ability to retain and expand the existing structure is dependent on the bid for LAA reward money to invest in the service (further information included under section 8). If this bid were unsuccessful it may impact on the ability to deliver some of the actions included in this action plan.