

Equality Impact Assessment

Stage 1: The proposed change that is being assessed and responsibility for the EQIA.

Name of the proposed change	Homelessness and Rough Sleeping Strategy 2024-2029
Purpose of proposed change	Under the Homelessness Act 2002 all local authorities are required to produce a Homelessness and Rough Sleeping Strategy every five years. Article 14 of the Human Rights Act 1998 requires that there must be no unjustified discrimination within the scope of human rights on any grounds, such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth, or other status. The purpose of this EIA is to carry out a self-assessment to ensure the Council's proposed strategy meets this requirement.
Is this a change to a policy, practice or service?	No
Who has senior level responsibility for the proposed change?	<i>Susmita Sen</i>
Who is completing this assessment?	<i>Simon James</i>
Indicate where your EQIA will be submitted to including date where known:	<i>[The EQIA will be submitted to Cabinet alongside the Draft strategy for Members' consideration and if appropriate, approval.]</i>

Stage 2: Deciding what relevance, the proposed change has for equality.

Is the proposed change likely to impact on any of the following? <i>If there is no equality relevance for either go to Stage 7 and get sign off</i>	<input checked="" type="checkbox"/> Communities <input type="checkbox"/> Employees
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<p>Is the impact on equality low, medium or high?</p>	<p>The Council's delivery of its Homelessness and Rough Sleeping Strategy has a high impact on those in protected groups who stand a significantly higher chance of experiencing Homelessness or Rough Sleeping. The Strategy prioritises improved accessibility of service delivery within the Housing Needs Service which also involves enhanced partnership with Voluntary Sector Organisations who work 'on the ground' with those who are homeless or rough sleeping.</p>
<p>Summary of EQIA outcome:</p>	<p>A priority of the strategy is to provide more direct contact to those in housing need and ensure the service has the tools to tackle the principle causes of homelessness such as mental health difficulties, domestic abuse and drugs and alcohol addiction problems which disproportionately impact upon protected groups.</p> <p>The outward facing approach set out in the strategy will therefore have a positive impact upon our Communities.</p>

Stage 3: Describe how the proposed change might impact on the council's ability to undertake the Public Sector Equality Duty and commitment to anti-racism (N.B. this can be both positive or negative):

<p>Eliminating discrimination, harassment, victimisation</p>	<p>The proposed changes will help in identifying, addressing and eliminating discrimination, harassment and victimisation</p>
<p>Advancing equality of opportunity</p>	<p>The Council is committed to providing a service which can adapt to the multiple causes of homelessness and rough sleeping. By acting at an earlier stage and giving greater emphasis on prevention, the strategy purports to prevent homelessness by working with residents in housing need many of whom can be categorised as belonging to a Protected group.</p> <p>The Homelessness Strategy has been developed to deliver the requirements of the Homelessness Reduction Act which requires an agile service with the expertise to prevent homelessness amongst the above categories and the changed way of working will benefit these groups</p> <p>Disability.</p>

The Census 2021 data shows that 15.8% of residents in Croydon identify themselves as disabled under the Equality Act 2010).

The Strategy places high importance on working to prevent homelessness and it is important that this is a priority in the housing needs service with regards to disabled residents.

An assessment of 14,750 applicants owed support need across London between October and December 2022 involving those who had been owed a preventative or relief duty by London Councils found the following.

- 14.4% of applicants had a history of mental health problems.
- 13.9% suffered physical ill health or disability.
- 5.4% had Alcohol or drug dependency.
- 2.8% had a Learning disability.

For this period, Croydon figures are unreliable and unlikely to be reflective of need but there is no reason to suppose that the London wide averages do not apply.

However, with regards to residents owed a relief duty because of mental health or physical disability/ill health

Amongst London Councils of 7,890 applicants in temporary accommodation between October and December 2022

- 9.5% had a physical disability or ill health.
- 6.8% defined themselves as having mental health issues.

This compares with Croydon, where of 278 cases in accommodation in the same period

- 4.9% had a physical disability or illness.
- 9.8% had a mental illness.

The Strategy recognises that temporary accommodation can be a particularly challenging experience if you have a mental illness or physical disability and adopts a preventative approach to those in this category who face losing their home. Where this is unavoidable, the strategy commits the Council to an approach whereby it fully considers the need of each applicant.

Information relating to those who are Rough Sleeping gained from a survey carried out of 1223 people in Q3 2023/24 showed the following

- 29% had difficulties with drugs.

- 28% had alcohol reliance.
- 49% cited mental health difficulties.
- 31% had combined mental health, drugs or alcohol difficulties.
- 33% cited no problems.

This demonstrated the determination stated in the Strategy to develop the expertise both within Housing Needs and the Voluntary Sector to tackle these causes of homelessness.

Age

Croydon has the highest number of 0-19 year olds in London . There are approximately 80,321 residents aged 15 and under, 257,325 residents aged 16 to 64 years old.

In addition, Croydon also has an increased profile of those who are over 65 with a 19.6% growth in that age group since 2011.

The Homeless and Rough Sleeping Strategy recognises the need this will entail in terms of additional general needs and Sheltered and Extra Care accommodation – (see section on Housing Supply) and commits to a Housing and Regeneration Strategy that will work with Partner Housing Associations with the aim of delivering the affordable accommodation that is needed.

The Strategy also commits to protocol with Children and Families with the aim of ensuring that Care Leavers (those who are 16,17 or18 to 20) have a smooth transition into suitable housing which avoids homelessness for this vulnerable group.

In terms of age groups facing homelessness an assessment of 14,130 cases in London boroughs between October and December 2022 showed the typical profile for those most likely to be owed a relief duty

	16-17	18-24	25-34	35-44	45-54	55-64	65-74	75plus
London %	-1	15	29	26	16	9	3	1
Croydon %	0	17	26	19	17	8	3	2

*Figures do not include do not knows

The Strategy recognises the need for a protocol with Statutory Health Sector to resolve the issue of delayed Hospital Discharges a principal causes of homelessness amongst the elderly.

Although age patterns in Croydon of those agreed for a homeless duty are broadly similar to other London Boroughs scrutiny of Q1 and Q2 information for 2022/23 suggest a lower incidence of homelessness within the 35-44 age range.

This is contrary to information gained in the Councils Rough Sleeping Survey (3rd Quarter 2023/24) which sets out the average age range of 1456 rough sleepers surveyed which suggests a higher rate of homelessness between 26 and 45.

U 18	18-25	26-35	36-45	46-55	55 plus
%	9	28	29	21	13

Our strategy is to work with Rough Sleepers to prevent them getting entrenched into a life on the street and utilise experience with the Council and the Voluntary Sector to tackle the issues which are causing the pattern of homelessness

Race

The table below sets out the ethnic mix in Croydon in the 2011 and 2021 census.

	White	Black	Asian	Mixed	Other	TOTAL
Croydon 2011	55.1%	20.2%	16.4%	6.6%	1.8%	100.0%
Croydon 2021	48.4%	22.6%	17.5%	7.6%	3.9%	100.0%

The table sets out ethnicity data for those who the Council owe a relief duty (have been offered temporary accommodation).

%	% White	% Black	% Asian	% Mixed	Other	% Not known
Q3 2020						
London Boroughs	30	30	12	6	10	12

Croydon	33	37	8	10	1	11
Q3 2021						
London Boroughs	29	31	10	6	8	16
Croydon	27	45	8	10	2	8
Q3 2022						
London Boroughs	31	29	12	6	8	13
Croydon	26	45	12	11	2	4

This demonstrates the following;

- That those who are Black are significantly more likely to experience homelessness than those who are White or Asian
- This is also the case if you are of Mixed parentage.

Additionally, our Rough Sleeping Audit carried out in Q3 2024/5 showed the following

- 49.5% were described as White including 27.4% White British, 17.1% White Other and 3% White Roma/Gypsy and 1% White Irish
- 26% were Black and 13% Asian with the remainder described as Other.

The New Homelessness and Rough Sleeping Strategy will prioritise the prevention of homelessness and with the Voluntary Sector work target Communities who are more likely to face housing need.

Sex

DLUHC figures show the following in terms of **one parent families housed in temporary accommodation** housed in 2022

	Total of all Households	Female single parent	Male single parent
London	30,240	6,460 (21%)	650 (2%)
Croydon	1,500	85 (6%)	15 (1%)

Due to the lack of housing supply, the Strategy recognises that many households are spending longer periods in temporary accommodation than is ideal. It will seek to provide more support for those in this situation, where appropriate consult with residents in hostel accommodation and seek to keep them updated about their application for permanent housing

Nationally, domestic abuse claimants rose from 23,920 in 2018/19 to 32,600 in 2021/22 and applications to the Family Justice Centre which show this disproportionately affecting women rose threefold since 2017 to over 2,000 in 2023 with Social Housing residents likely to be over represented in these figures.

Of those in temporary accommodation in London Boroughs, 6.4% of 7,890 cases in 2022 were made homeless because of domestic abuse whilst in Croydon 2.4% of 278 cases were described in this category. These figures however are likely to have risen significantly over the last two years.

The Strategy commits itself to improving the response to domestic violence and includes developing on the relationship with the Family Justice Centre.

In terms of 14,540 single adults seeking a homelessness service in London, nearly 46% were women with prevailing issues including scarcity of accommodation in the private sector, mental health issues, drugs and alcohol and fleeing violence.

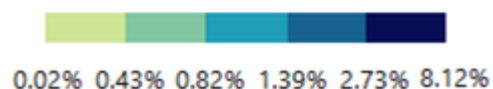
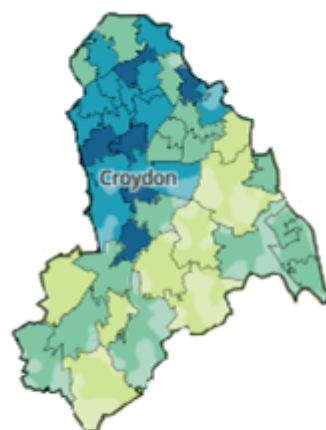
Within Rough Sleeping, our figures note that 85% of those homeless in Croydon at the time of our last review were men (Q3 24/25)

Gender identity -From census data 0.89% of Croydon residents identify as a gender different from sex registered at birth.

With higher populations in Central Croydon and North Croydon where there is a greater propensity of social housing, areas to note are Broad Green & Waddon (1.86%), Purly North (1.56%), Selhurst South & West Croydon (1.49%) and Thornton Heath North West (1.48%).

This can be seen from the map shown below.

Gender Identity Different from Birth



Sexuality -

Based on the results from ONS Census 2021, we can estimate that around 3% identify as being LGBT. the LGBT+ community in Croydon.

A comparison of applications made in 2022 between the average of London Boroughs and Croydon shows the following;

22/23	Total	Heterosexual	Gay/Lesbian	Other	Prefer not to say	Not known
LONDON	55,270	40,120	810	1390	10,420	2,520
%		73	1.5	2.5	19	4
CROYDON	2,272	1,878	34	41	309	0
%		83	1.5	1.5	14	0

- A higher percentage of applicants declared themselves as heterosexual in Croydon compared with the average London Borough

	<ul style="list-style-type: none"> At the same time a lower number (14% against 19%) stated they would prefer not to say. <p>Our new strategy is committed to providing a holistic approach to the multiple causes of homelessness, including housing need faced within the LGBT community caused by discrimination or exclusion.</p> <p>Pregnancy and Maternity -The strategy takes a preventative approach to homelessness and seeks to move away from the use of temporary accommodation although at present the rise in homelessness is preventing this. Every endeavour is used to house those who are pregnant sensitively.</p> <p>Faith</p> <table data-bbox="533 587 996 954"> <thead> <tr> <th>Total:</th> <th>Croydon</th> <th>London</th> </tr> </thead> <tbody> <tr> <td>Christian</td> <td>48.9%</td> <td>40.7%</td> </tr> <tr> <td>No religion</td> <td>25.9%</td> <td>27.1%</td> </tr> <tr> <td>Muslim</td> <td>10.4%</td> <td>15.0%</td> </tr> <tr> <td>Sikh</td> <td>0.4%</td> <td>1.6%</td> <td>0.9%</td> </tr> <tr> <td>Jewish</td> <td>0.2%</td> <td>1.7%</td> <td>0.5%</td> </tr> <tr> <td>Buddhist</td> <td>0.6%</td> <td>0.9%</td> </tr> <tr> <td>Other religion</td> <td>0.8%</td> <td>1.0%</td> </tr> <tr> <td>Not answered</td> <td>6.9%</td> <td>7.0%</td> </tr> <tr> <td>Hindu</td> <td>5.9%</td> <td>5.1%</td> <td>1.8%</td> </tr> </tbody> </table> <p>The table below sets out a comparison between Croydon and London re Faith. There are no significant findings in terms of representation of faith groups requiring housing needs advice.</p>	Total:	Croydon	London	Christian	48.9%	40.7%	No religion	25.9%	27.1%	Muslim	10.4%	15.0%	Sikh	0.4%	1.6%	0.9%	Jewish	0.2%	1.7%	0.5%	Buddhist	0.6%	0.9%	Other religion	0.8%	1.0%	Not answered	6.9%	7.0%	Hindu	5.9%	5.1%	1.8%
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Fostering good relations	<i>The Council has accepted that its Housing Needs Service needs to be improved and it is committed to working with the Community, Voluntary and Statutory Sector as well as residents to achieve this. A Homelessness Forum consisting of local voluntary groups will be started by December 2024 to encourage increased joint working.</i>																																	
Embedding anti-racism	The strategy's delivery plan commits the Council to carry out annual audits to ensure service delivery is delivered fairly and consistently in terms of ethnicity and the other protected groups.																																	

Stage 4: What evidence has been considered and what consultation has been carried out?

Data collection	<p><i>This strategy primarily uses data collected by all Boroughs for the Department of Levelling Up, Housing and Communities. This provides information on all homelessness applications made in the Borough on a quarterly basis breaking down into information about applicants with protected characteristics. For the purposes of this exercise information up unto December 2022 was only available. This will be updated by September 2024 when work on the new system is brought up to date. Croydon have accepted the need to improve the clarity and accuracy of its information particularly in the area of Support needs.</i></p> <p><i>In addition, information collected on the census is used through the Croydon observatory as well as information from the Annual Review of Rough Sleeping in the Borough.</i></p>
Consultation	<p>The Homelessness and Rough Sleeping Strategy has involved a consultation with Residents with up to 360 people responding to a survey. There have been online public meetings with the Croydon Communities Consortium with 30 people attending and a wide consultation with Voluntary and Statutory Sector.</p>

Stage 5: Identify any adverse or positive impact and mitigation steps that can be or have been taken.

Guidance on Impact Scores: Consider the impact of your proposal by giving a numerical score to both the likelihood of an impact and the severity of an impact against each characteristic. This should draw upon the evidence you cited at Stage 3.

<p>Use the key below to score the likelihood of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p>	<p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p>
<p>Use the key below to score the severity of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p>	<p>1 = Low 2 = Medium 3 = High</p>
<p>The score for likelihood and severity are then multiplied.</p>	<p>e.g. Unlikely to impact =1, Low impact =1, total score =1</p>

Characteristics		Likelihood of impact	Severity of impact	Impact score	Summary of impact (positive, negative, no impact or unknown)*	If negative or unknown, what can be or has been done to mitigate this? Please provide clear actions and timelines.**
Protected Characteristics (Equality Act 2010)	Age	2	1	2	Positive- As set out above , the strategy presents a variety of proposals that are beneficial for the young and elderly and demonstrates the Councils commitment to provide better housing services for all.	Positive.
	Disability	2	1	2	Positive- The strategy will seek to ensure that residents with disabilities have fair and equitable access to services.	.
	Gender Reassignment	1	1	1	Positive- This strategy will ensure that this group gets treated fairly and equitably when seeking housing support.	Data collected within this group may not be representative.
	Marriage or Civil Partnership	1	1	1	Positive- The service collects data on this group which can demonstrate service equitability	In August 2023, the Council embarked upon three-year programme to proactively collect data via tenancy audits, aimed at visiting 33% of tenants each year This exercise will be completed in August 2026.
	Pregnancy and Maternity	2	1	2	Positive- This strategy will ensure that those who are	

Characteristics		Likelihood of impact	Severity of impact	Impact score	Summary of impact (positive, negative, no impact or unknown)*	If negative or unknown, what can be or has been done to mitigate this? Please provide clear actions and timelines.**
					pregnant are treated sensitively with an emphasis on preventing homelessness from occurring.	
	Faith	2	1	2	Positive- The Strategy allows better access to services for all communities	
	Race	2	1	2	Positive -The changes to the service will allow better access to those communities who are more likely to become homelessness -identified as Black or Mixed Parentage	
	Religion or Belief	2	1	2	Positive - This strategy will mean we will deliver more responsive services to those in the Faith communities.	
	Sex	2	2	4	Positive The Strategy recognises key issues such as domestic violence towards women and undertakes to improve access to our service. Equally, it seeks to tackle the huge problem with rough sleeping amongst men.	

Characteristics		Likelihood of impact	Severity of impact	Impact score	Summary of impact (positive, negative, no impact or unknown)*	If negative or unknown, what can be or has been done to mitigate this? Please provide clear actions and timelines.**
	Sexual Orientation	2	1	2	The strategy seeks to continue to provide a range of avenues for residents irrespective of sexual orientation to access.	

* *Unknown impact may only be used where there is no data or evidence available and must be accompanied by an action plan for how to collect this.*

** *Mitigations must be referenced in the Equalities comments of the substantive report and in its recommendations.*

Stage 6: What is the outcome of your assessment? Select one of these four options:

Decision	Definition	Conclusion - Mark 'X' below
No major change	Our analysis demonstrates that the proposed change is robust. The evidence shows no potential for discrimination, and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.	X This Strategy seeks to improve the service and communication to all residents and use a variety of intervention to tackle the multiple causes of homelessness
Adjust the proposed change	We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. If you reach this conclusion, ensure you have completed Section 5 above.	
Continue the proposed change despite potential for adverse impact	We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, there are justifiable reasons to continue as planned. If you reach this conclusion, ensure you have completed Section 4 above, clearly setting out your justifications.	
Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	

Stage 7: EQIA Monitoring and Sign Off

How will the EQIA be reviewed and monitored, including timescales?	<i>[EQIAs must be reviewed every 2 years or sooner if new data or impact is identified.]</i>		
Equalities advice received from:	<i>Ken Orlukwu Senior Equalities Officer</i>	Date:	09/07/2024
EQIA approved by:	<i>Beatrice Cingtho-Taylor (Director of Housing – Homelessness Prevention and Accommodation</i>	Date:	09/07/2024

