

Equality Impact Assessment

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

Name of the proposed change	Placements Policy
Purpose of proposed change	<p>The rise in the homelessness has caused Local Authorities to procure more accommodation out of borough to cater for increased demand. Although, in the first instance, the Council will use very endeavour to house applicants in the borough the rise in homelessness makes it increasingly likely that the Council will need to place more applicants out of Croydon.</p> <p>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 placements policy meets this requirement.</p>
Is this a change to a policy, practice or service?	No
Who has senior level responsibility for the proposed change?	<i>Beatrice Cingtho-Taylor</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.

<p>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></p>	<p><input checked="" type="checkbox"/> Communities <input type="checkbox"/> Employees</p>
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<p>Is the impact on equality low, medium or high?</p>	<p>The Council recognises that the housing needs of applicants are best met by providing accommodation in the local area where they have been living. However, like many local authorities increases in homelessness have led to temporary accommodation being sourced in other London boroughs or out of London. The purpose of this policy is to ensure that those in this position are treated fairly and equitably when decisions are made as to where a household is placed.</p>
<p>Summary of EQIA outcome:</p>	<p>The policy provides clarity as to where a family will be placed by providing a criteria against which decisions are made. In some circumstances, where the housing need is unusual and not defined in the policy, the Director will retain discretionary decision-making powers.</p> <p>In summary, the Council though recognising the need of applicants to be housed in the area, has produced the policy to ensure fairness and consistent in the placing of those owed a housing relief duty by the Council.</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 any discrimination, harassment and victimisation in the placing of housing applicants in temporary housing</p>
<p>Advancing equality of opportunity</p>	<p>The Council is committed to producing a policy which ensures that decisions around housing placements are based solely on housing and support needs. In additions it recognises the need of some protected groups (ie disability, mental health) to be given greater priority for rehousing locally if for example they are reliant on medical or social services support which cannot be provided elsewhere</p> <p>Disability.</p> <p>The Census 2021 data shows that 15.8% of residents in Croydon identify themselves as disabled under the Equality Act 2010).</p> <p>The policy places high importance on assessing placements of disabled applicants in temporary accommodation fairly and</p>

Equitably. 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.

An assessment of placements in Croydon shows the following:-

Disability	Croydon	London Borough	Not in London Borough	Grand Total
Learning Disability	13	3	3	19
Mental Disability	51	21	4	76
No Disability	2074	917	214	3205
Physical Disability	119	39	8	166
Total	2257	980	229	3466

- 92% of applicants placed have no disability
- 5% of applicants have a physical disability-under 5% are placed in a London borough or out of London
- 2% of applicants have a mental disability-2% of applicants are placed in a London borough or outside London
- Under 1% have a learning disability-6 people with a learning disability are housed outside Croydon.

The proposed policy introduces a criteria and structure by which placements into temporary accommodation by those with a disability will be fairly determined.

Age

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 data show the following in terms of the age groups placed:-

Age	Croydon	Out of Borough	Out of London	Total
19-29	23%	29%	35%	26%
30-49	53%	52%	50%	53%
50-69	22%	18%	14%	20%
Total	2256	980	229	3365

This does not include under 18s and over 70's age groups

This shows current placement allocations to be proportionate in each age category

With regards to Care leavers, all decisions around placements will be taken in conjunction with Children's Social Services through the Care Leavers Pathway panel

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.

An assessment of current placements into temporary accommodation shows the following

	Black	White	Mixed	Asian
% of all applications	47%	21%	8%	13%
% in Croydon	48%	22%	8%	14%
% in London boroughs	45%	30%	9%	12%
% out of London	42%	25%	10%	7%

The current profile of allocations by race to Croydon, London boroughs and outside of London is consistent with the ethnicity profile. Once the policy is agreed the placements policy will review these stats periodically.

Gender

Sex	Total	Nos. in Croydon	Nos. in London Boroughs	Outside London
Male	29%	47%	30%	30%
Female	70%	52%	70%	70%
Prefer not to say	1%	1%	1%	----
Total in Nos	3477	2266	982	229

The provision of single accommodation for the homeless within Croydon accounts for the greater presence of males temporarily housed in Croydon.

Additionally, those who are single homeless or rough sleeping are over 50% male.

	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%)

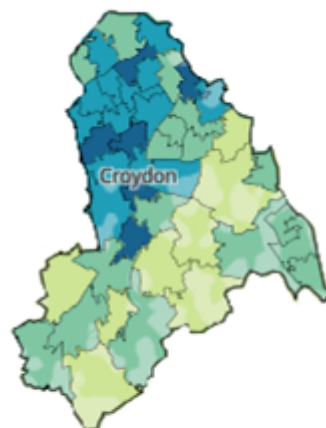
The above table shows Women as the lead applicant in 21% of all households explaining the greater number of women housed out of Borough. This includes women who are fleeing violence

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%), Purley 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



0.02% 0.43% 0.82% 1.39% 2.73% 8.12%

From a survey of those placed in temporary accommodation, there were no applicant's self-identifying as having a gender identity different from Birth who were displaced although a small number (under 5) preferred not to say). Applicants in this category who were likely to be relocated would have any medical or social needs considered at the discretion of the Director of Housing or through the criteria set out in the policy if applicable.

Sexuality -

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

	<p>Pregnancy and Maternity -The policy will use every endeavour to house those who are pregnant in temporary accommodation sensitively.</p> <p>Faith</p> <table border="1"> <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> </tr> <tr> <td>Jewish</td> <td>0.2%</td> <td>1.7%</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> </tr> </tbody> </table> <p>The table above sets out a comparison between Croydon and London regarding faith. There are no significant findings in terms of representation of faith groups in relation to housing placements although best endeavours will be used when an applicant raises the need to be allocated close to a faith community</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%	Jewish	0.2%	1.7%	Buddhist	0.6%	0.9%	Other religion	0.8%	1.0%	Not answered	6.9%	7.0%	Hindu	5.9%	5.1%
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Fostering good relations	The Council recognises 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 improve joint working.																														
Embedding anti-racism	The Council is committed to carry out annual audits to ensure placements are 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>This Placements policy primarily uses</p> <p>a) Data collected by Croydon in respect of temporary housing placements over the last three years with regards to those placed in Croydon. London Boroughs or out of London</p>
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	<p>b) Information from the 2021 census</p> <p>c) data collected by all boroughs for the government. This provides information on all homelessness applications and temporary accommodation on a quarterly basis breaking down into information about applicants with protected characteristics.</p>
Consultation	No consultation with applicants.

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.

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>1 = Unlikely to impact</p> <p>2 = Likely to impact</p> <p>3 = Certain to impact</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>1 = Low</p> <p>2 = Medium</p> <p>3 = High</p>
The score for likelihood and severity are then multiplied.	e.g. Unlikely to impact =1, Low impact =1, total score =1

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 policy will monitor allocations by age group to ensure there is no discrimination. The policy	Positive.

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.**
					will also ensure that care leavers are sensitively placed.	
	Disability	2	1	2	Positive- The strategy will seek to ensure that residents with disabilities have fair and equitable access to services and their needs are taken into account when considering placements for temporary accommodation.	.
	Gender Reassignment	1	1	1	Positive- This policy 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 homelessness and temporary accommodation data (HCLIC government returns) on this group which can demonstrate service equitability.	.

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.**
	Pregnancy and Maternity	2	1	2	Positive- The policy will ensure that those who are pregnant are treated sensitively with an emphasis on placing those in this situation safely.	
	Race	2	1	2	Positive -The changes to the service will be monitored to ensure consistency of allocations by race.	
	Religion or Belief	2	1	2	Positive- This policy will use best endeavours to place faith groups sensitively	
	Sex	2	2	4	Positive The policy recognises key issues such as domestic violence towards women and in the first instance commits to finding families accommodation in Croydon.	
	Sexual Orientation	1	1	1	Lack of data on this protected group make the impact difficult to predict	

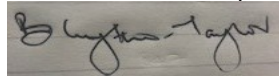
* *Unknown impact may only be used where there is no data or evidence available and must be accompanied by an action plan for how to collect this.*

** *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 policy 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:	Ken Orlukwu (Senior Equalities Officer)	Date:	05/09/24
EQIA approved by:	Beatrice Cingtho-Taylor (Director of Housing – Homelessness Prevention & Accommodation) 	Date:	24/09/24

