

SSA EQUALITY IMPACT AND NEEDS ANALYSIS

Directorate	Housing and Regeneration
Service Area	Housing Services
Service/policy/function being assessed	Changes to removal and storage arrangements and to associated charging procedure in respect of homeless households that the Council has accepted duties under the 1996 Housing Act (as amended)
Which borough (s) does the service/policy apply to	Richmond
Staff involved	Housing advice and information officers and Housing Operations officers

SUMMARY

The EINA has found that BAME and single female headed households and people with disabilities are over-represented amongst statutory homeless households to whom the revised policy would apply. This means the positive impact that households who do not have immediate access to £50 will, in the future, be able to have their possessions stored will apply to both these protected groups,. However, it does mean that individuals from these groups are more likely to incur more fees to store their possessions. In order to mitigate the impact of this individual financial assessments will be undertaken and consideration of affordability issues will be taken into account.

1. Background

Background.

Councils have a statutory duty to protect the personal property of homeless applicants when it is at risk of damage or loss and the applicant is unable to protect or deal with it themselves, and there are no other suitable arrangements in place.

This duty applies from the point the council believes an applicant may be eligible for help under the Housing Act 1996 (as amended). The duty applies to the property of the main applicant and the property of anyone else included in the application. Property includes personal belongings and furniture. The

council has to a duty to do what is reasonable to prevent loss or damage to an applicant’s property and are able to charge for this. This can include advice to them to secure possessions but also can and does involve providing removal into and out of commercially provided storage.

Current process.

Under the existing storage procedure, applicants are required to make an up-front, one-off cash payment of £50. This is non-negotiable, is not subject to a financial assessment and applies regardless of their financial circumstances, the quantity of their possessions, or the time they may need them stored. If an applicant is unable to provide the £50 cash payment they are not able to use the service. Applicants who are unable to pay are expected to make their own arrangements, even if they are homeless on the same day.

On average 20 households per year use the service.

Changes

It is proposed that the storage service be limited to homeless applicants who: a) have nowhere to store their belongings, putting them at risk of loss or damage; and b) who are unable to afford the upfront removals and storage of their belongings themselves.

Under s211.4 of the Housing Act, Councils have the right to impose conditions prior to taking steps to deal with personal property. These conditions can include levying a reasonable charge and specifying the circumstances the Council may dispose of the property. Therefore, it is proposed that, once enquiries have established that an applicant is unable to store or protect their belongings themselves, a repayment plan will be agreed with them, subject to an affordability assessment. Rather than a fixed, one-off payment, the repayment plan would reflect the length of time the property was stored and the full debt incurred by the council would be recharged to the household

2. Analysis of need and impact

Protected group	Findings
Age	<p>Data is not currently collected on individuals using the service, however data is recorded on part V11 cases (this is where the case has been accepted for full homeless duty). The data analyzed relates to the period October 2016 to October 2017 and is drawn from data held within the Saffron homelessness module for LB Richmond-upon-Thames cases. That period of time and the analysis of it represents a reliable sample of the cohort.</p> <p>This data showed that 22 people were aged 18 or under. This equates to 6.4% of people accepted for the full duty</p>

	<p>32 were aged 61 or over. This equates to 13.33% of people accepted for the full duty. This is below the borough profile for Richmond which has 17% of residents as aged 61 or over.</p>
Disability	<p>This data is not currently captured.</p> <p>However, the EINA conducted in the preparation for the refresh of the Homeless Strategy found that there were 48 accepted homeless cases in 2015/16 found to be in priority need due to having a physical disability or mental health issue. They account for 21% of homeless acceptances for the year of which 11% was related to a physical disability as the priority need reason which is higher than the borough demographic of people who indicated that they have a long-term health problem or disability that affects their day to day life.</p>
Gender (sex)	<p>212 people accepted were female. This equates to 62.3% of all people accepted. This is above the borough average for Richmond of 51%. This means any changes are likely to impact more on women than men.</p> <p>This data reflects the findings on the EINA on the Homeless Strategy which found that the highest proportion of those accepted as homeless in the borough were lone female parents who accounted for 47% of accepted households in 2015/16, a decrease from 52% in 2013/14 although it is hugely disproportionate to the borough profile where 4.4% of households are lone female parents.</p> <p>In 2015/16, couples with dependent children accounted for 24% of accepted homeless households, one person male households accounted for 12% of homeless acceptances, followed by one person female households which accounted for 10% of accepted households. Lone male parent households and other household groups accounted for 2% and 4% of homeless acceptances respectively.</p>
Gender reassignment	<p>There is little information on gender reassignment amongst those using homelessness services in Richmond. Although the facility is available for the collection of this data the information collected is not statistically significant as a large proportion of applicants did not answer this question.</p>
Marriage and civil partnership	<p>This data is not currently captured for part VII acceptances however the EINA on the Homeless Strategy found that 24% of accepted homeless households in 2015/16 were a couple with dependent children which is lower than the borough profile. Therefore, it is likely</p>

	<p>that the percentage of married and civil partnership homeless households is also lower than the borough profile as the majority of homeless acceptances are single parents with dependent children or vulnerable single person households.</p>
<p>Pregnancy and maternity</p>	<p>This data is not currently captured for part VII acceptances however the EINA on the Homeless Strategy found that 10% (23) of acceptances in 2015/16 were found to be in priority need as the household included a pregnant woman where there were no other dependent children in the household.</p>
<p>Race/ethnicity</p>	<p>98 people accepted for the full duty were BME. This equates to 31.5% of all people accepted who disclosed their ethnicity. This is above the borough average for Richmond of 14%. This means any changes are likely to impact more on BME residents than non BME residents.</p> <p>The EINA on the Homeless Strategy found that the percentage of those in BME groups accepted as homeless in 2015/16 was disproportionate to the borough demographic, being much higher at 29% of acceptances compared with 14% of the population.</p> <p>The proportion of homelessness decisions and acceptances were in a similar proportion to each other for all ethnic groups.</p> <p><u>White Households</u> White households account for 62% of homelessness decisions and 61% of homelessness acceptances in the borough in 2015/16. Those who identified themselves as ‘White Other’ in 2015/16 were overrepresented amongst homelessness acceptances at 20% compared with 14% of the population. Other white ethnic groups accepted as homeless was lower than the borough demographic.</p> <p><u>Asian Households</u> The percentage of households accepted as homeless in 2015/16 that identify as Asian, were slightly overrepresented at 10% compared with the borough profile of 7%.</p> <p>The key reason given for homelessness among all decisions relating to Asian households is the termination of an AST.</p> <p><u>Black Households</u> Black households were significantly overrepresented in the proportion of acceptances. 2% of the Borough’s residents identify themselves as black but formed 8% of acceptances in 2015/16.</p>

	<p>The main reason given for homelessness by households identifying as Black out of all homelessness decisions between 2013/14 and 2015/16 is the loss of an AST. The next most common reasons included relatives/friends no longer able to accommodate (14%) and relationship violence from a partner (11%).</p> <p><u>Mixed Ethnic Group Households</u> Mixed ethnic group households were slightly overrepresented in homelessness acceptances in 2015/16 with 5% of compared with 3% of the population.</p> <p>The most common reason given for homelessness from this group out of all homelessness decisions from 2013/14 to 2015/16 was loss of an AST with 27%, followed by 25% who said that their parents were no longer able to accommodate and 11% who cited relationship violence from a partner.</p> <p><u>Other Ethnic Minority Groups</u> Those in other ethnic minority groups were overrepresented in 2015/16 making up 6% of acceptances compared 2% of the population.</p>
Religion and belief, including non belief	There is no reliable information for the religion and belief of residents using homelessness services. This will be addressed in the new homelessness strategy.
Sexual orientation	<p>This data is not currently captured.</p> <p>The EINA on the Homeless Strategy found that data on sexual orientation is not reported in the P1E Returns but is collected by LBRuT. Of the cases between 2010/11 and 2015/16 where the lead applicant disclosed their sexual orientation, 94% of cases were listed as heterosexual, 3% as “other”, 1% as bisexual and 2% as gay or lesbian. These figures were broadly in line with national statistics, such as the Integrated Household Survey which found that in 2014 93% of the British population identified as heterosexual, 1% as gay or lesbian, 1% as bisexual and 0.3% as “other”¹. However, the data on homelessness cases in the Borough is not comprehensive, for 69% of homelessness decisions between 2010/11 and 2015/16, sexual orientation was not recorded. In addition, as there were so few cases, it is difficult to identify trends in the homelessness cases where a decision has been made.</p>

¹ ONS (2015) *Sexual Identity by Region, UK*. Available from:

<http://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/referencetable04sexualidentitybyregionuk>

3. Impact

Protected group	Positive	Negative
Race/ethnicity	<p>BME residents are over-represented in the data collected for Part VII acceptances. This means that the changes proposed will impact more on BME residents.</p> <p>The introduction of affordability assessment means that instead of a flat £50 fee that a plan based on financial circumstances will be agreed.</p> <p>Also it means that if an applicant does not have access to funds to pay for storage they will still be offered storage (unlike currently when they would have to wait until they had £50 and would have to arrange storage themselves).</p> <p>The policy will only apply to new users of the service and will not apply to households who currently have possessions in storage.</p>	<p>BME residents are over-represented in the data collected for Part VII acceptances. This means that the changes proposed will impact more on BME residents.</p> <p>As it is proposed to move to a repayment plan that covers the full cost of storage as opposed to a one off fee this will mean that there is a risk that BME residents will pay more in the future than they currently do. To mitigate the impact of this an affordability assessment will be undertaken to ensure the applicant can meet the costs.</p> <p>As it is proposed that storage will in future just be provided for those who: have nowhere to store their belongings, and who are unable to afford the upfront removals and storage of their belongings themselves this may mean that BME residents will have to arrange their own storage when in the past it was arranged for them. Whilst this is a change it reflects practice in other boroughs support can be directed at those who require help</p>
Gender	<p>Female residents are over-represented in the data collected for Part VII acceptances. This means that the changes proposed will impact more on female residents. The impact set out above therefore also apply to female residents</p>	<p>Female residents are over-represented in the data collected for Part VII acceptances. This means that the changes proposed will impact more on female residents. The impact and mitigating actions set out above therefore also apply to female residents</p>

Age	The age profile of Part VII acceptances reflects the age profile of the borough, however data shows that lone female parents accounted for 47% of accepted households in 2015/16. This means that the changes proposed may impact on households with children. The impact set out above therefore also apply to households with children	Data shows that lone female parents accounted for 47% of accepted households in 2015/16. This means that the changes proposed may impact on households with children. The impact and mitigating actions set out above therefore also apply to households with children
Disability	The profile of homeless acceptances exceed the borough profile. the changes will therefore impact more on disabled residents.	The profile of homeless acceptances exceed the borough profile. the changes will therefore impact more on disabled residents.
Gender reassignment	Data not available. Positive impacts are as outlined above.	Data not available. Negative impacts and mitigating actions are as outlined above.
Marriage and civil partnership	24% of accepted homeless households in 2015/16 were a couple with dependent children which is lower than the borough profile.	24% of accepted homeless households in 2015/16 were a couple with dependent children which is lower than the borough profile.
Pregnancy and maternity	Comparative data not available. Positive impacts are as outlined above.	Comparative data not available. Negative impacts and mitigating actions are as outlined above.
Religion and belief, including non belief	Data not available. Positive impacts are as outlined above.	Data not available. Negative impacts and mitigating actions are as outlined above.
Sexual orientation	Data not available. Positive impacts are as outlined above.	Data not available. Negative impacts and mitigating actions are as outlined above.

4. Actions

Action	Lead Officer	Deadline
Affordability assessment to be undertaken to ensure the applicant can meet the costs	Head of Housing	Immediately upon policy becoming effective.

	Services (Allocations and Provision)	
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