

## BSP EQUALITY IMPACT AND NEEDS ANALYSIS

<b>Directorate</b>	<b>Social Services</b>
<b>Service Area</b>	<b>Housing and Support</b>
<b>Service/policy/function being assessed</b>	<b>Housing and Support for Ex Offenders</b>
<b>Which borough (s) does the service/policy apply to</b>	<b>Richmond and Wandsworth</b>
<b>Staff involved in developing this EINA</b>	<b>Alan Hagger</b>
<b>Date approved by Directorate Equality Group (if applicable)</b>	
<b>Date approved by Policy and Review Manager</b> All EINAs must be signed off by the Policy and Review Manager	<b>20<sup>th</sup> March 2025</b>
<b>Date submitted to Directors' Board</b>	<b>25<sup>th</sup> March 2025</b>

### 1. Summary

Richmond and Wandsworth currently commission 31 units of accommodation and support for male ex-offenders, currently provided by NACRO. There is currently no provision for women.

The contract is now due for renewal. A report to the Commissioning Board and Procurement Board in March 2024 proposed a review of housing and support for ex-offenders which would come back to the Commissioning Board in 2025.

The review has now been completed and recommends that the housing and support is recommissioned. Significant changes, however, will need to be made to the specification and service to address issues that have arisen, and to meet the demands of a changing pattern of needs and supply.

Housing and support for ex-offenders is now a major concern for the government who have instituted a fundamental review of the current state of prison services, and pathways from prison. The government have also set up a review of prisons and women, reflecting the disproportionate impact on women, particularly of short sentences. It is the government policy to reduce the number of women in prison on short sentences which requires a community response.

The proposal has five elements:

1. To recommission the existing 31 units of housing and support for ex-offenders and go out to full tender.
2. To work with internal and external partners to provide positive move on opportunities for the existing residents and ongoing move on opportunities to ensure throughput from the 31 units.
3. To establish a new women ex-offenders housing and support service
4. To work with partner organisations to build on and develop the existing ex offender women's hub in Wandsworth to provide support to the residents of the new women's housing and others in the community.
5. To adapt referral routes to the housing and support services to ensure that housing and support needs are being met irrespective of the other circumstances of the ex-offenders with additional support for people with mental health and substance misuse issues.

Discussions are taking place with London Probation regarding these services and there is an in-principal agreement that additional funding will be made available through a co-commissioning arrangement which will enhance the projects' ability to support ex-offenders with additional needs

## 2. Evidence gathering and engagement

### a. What evidence has been used for this assessment? For example, national data, local data via DataRich or DataWand

Evidence	Source
Data from Mosaic	Mosaic
Data from the existing provider	NACRO Housing
2021 Census Data	DataWand

### b. Who have you engaged and consulted with as part of your assessment?

Many organisations and individuals have supported the development of policies and understanding. These include different parts of the Metropolitan Police, particularly Project ADDER, NHS England regarding the Reconnect Programme, and neighbouring authorities. Specifically:

Individuals/Groups	Consultation/Engagement results	Date	What changed as a result of the consultation
HMP Bronzefield and HMP Wandsworth and 31 units	User engagement exercises	Mid November 2024	Establishing a clearer focus on demand wants and needs in order to encourage greater engagement in treatment post prison
NACRO and NACRO residents	Information about need and existing service users	Ongoing	Information on the needs of circumstances of service users. Also meetings with residents who made us aware of their position.
Women In Prison, Forward Trust, One Small Thing, St Mungos	Referral routes, role of agencies, enabled visit to Bronzefield and discussion with residents	Ongoing	Specialist knowledge and experience of working with women in the criminal justice system as well as detailed information on government intentions in this area
HMPs Wandsworth and Bronzefield	Many aspects of the prison including lead officers for housing, substance misuse, health and mental health	Ongoing	The housing status of people leaving prison and where referral routes are not preventing homelessness
Departments within Wandsworth and Richmond Councils	Housing regarding the roles and responsibilities, AFEO, Prevention Duty, Vision Housing	Ongoing	Duties and potential responses to the needs of ex-offenders in housing need

Probation Services	CAS 1,2 and 3. Issues with housing offenders, move on into independent living	Ongoing	Understanding of probations responsibilities regarding housing and the limitations inherent in securing sustainable housing and support when needed
Voluntary organisations	Including JABB, PACT, Bromley Trust and other specialists	Ongoing	Specialist knowledge of offender services and potential funding opportunities

### 3. Analysis of need

Analysis by NACRO of Ministry of Justice data studying people leaving prison between April 2023 and March 2024 revealed that there is currently an increase in the numbers of people leaving prison, 31% of prison leavers, who are homeless. A UK Parliament survey found that 67% of people released without sustainable accommodation will reoffend, twice the figure for others leaving prison.

The 31 units in Richmond and Wandsworth are currently fully utilised. There are however changing circumstances. Probation has new responsibilities with the introduction of the CAS3 programme, which is based on the belief that nobody should be released from prison without having a home to go to. CAS3 however, only applies to prison leavers on license. The prisons are also now recognised as overcrowded, and the government has introduced an early release programme known as SDS40.

The current housing referrals process for housing ex-offenders is complex and unclear but results in many people who are at risk of reoffending being left homeless. This particularly applies to people who are in treatment for substance misuse issues or have a history of rough sleeping. Treatment is unlikely to be successful or sustainable if the service user is without stable housing.

The summary of the results of the impact of the EINA is that, currently, women receive no support at all from the contracted services and there are not obvious alternatives for women ex-offenders within the boroughs. Alternatives that could be provided are unlikely to be local and would mitigate against family reintegration or receiving the support of friends, family, their community. Placement elsewhere will also make it difficult to access support and treatment services that have been made available to them.

The EINA also reveals that the men in the service are disproportionately from Black African and Caribbean backgrounds with a high level of health inequalities

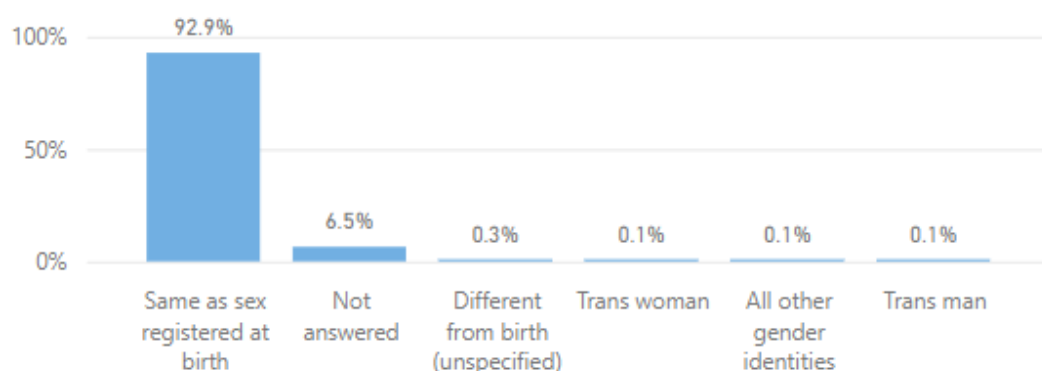
A newly commissioned service will reflect these changes. There will be a specific proposal to provide housing and support for women, allowing access to a currently unrepresented group. This will be accompanied by working in partnership with a range of voluntary organisations to develop the Wandsworth Women's Ex offender Support Hub. Discussions are already taking place to relocate the existing Hub to a more appropriate location.

There will be a proposal to seek additional support for existing residents, who are frustrated by the lack of move in opportunities, to find sustainable long term housing solutions. Finally, there will be proposals to change the referral routes to ensure that the housing is made available to those most in need, thereby maximising the number of ex-offenders in treatment and reducing reoffending.

**Potential impact on this group of residents and actions taken to mitigate impact and advance equality, diversity and inclusion**

Protected group	Findings			
Age	Data from the existing provider, Nacro Housing and Census 2021 data			
	Age group	Scheme population	Richmond Borough	Wandsworth Borough
	18 – 24	7%	5.9%	8.8%
	25 – 34	38%	11.3%	26.3%
	35 – 44	45%	15.7%	16.5%
	45 – 54	10.5%	16.2%	12.1%
	55 – 64	0%	12.2%	8.7%
	The scheme supports a higher proportion of people aged 25-44 compared to the wider borough population.			
The current scheme is for men of these age groups.				
Disability	<b>Scheme residents: 28% are disabled</b>  Wandsworth population: 11.4% are disabled Richmond population: 12.9% are disabled  There is a relatively higher percentage of people with disabilities in the scheme than in the boroughs.			
Sex	100% of residents are male. The population of both Richmond and Wandsworth are 52% female, 48% male.  All placements are currently for men which does not cater for women leaving prison, many of whom have complex needs.			
Gender reassignment	100% of residents identify as the same gender as their sex registered at birth. Most Wandsworth and Richmond residents identify as the same gender as their sex as registered at birth (Census 2021). The graph below demonstrates the proportions of the Wandsworth population by their gender identity.			

Proportion of the selected population by Gender Identity



Proportion of selected population by gender identify

Gender Identity	% of borough population
Same as sex registered at birth	93.38%
Not Answered	5.63%
Different from birth (unspecified)	0.15%
Trans Woman	0.09%
All other gender identities	0.09%
Trans man	0.07%

**Marriage and civil partnership**

None of the residents of the existing service are currently married or in a civil partnership. This compares to the wider borough population as per the table below:

Marital Status	% Richmond	% Wandsworth
Never married and never registered a civil partnership	49.48	55.81
Married or in a registered civil partnership	35.91	32.99
Divorced or civil partnership dissolved	8.03	6.38
Widowed or surviving civil partnership partner	4.66	3.01
Separated, but still legally married or still legally in civil partnership	1.93	1.81

**Pregnancy and maternity**

None. Women who are pregnant or with small children are not supported under current arrangements.

**Race/ethnicity**

Data from the existing provider, Nacro Housing and Census 2021 data

Ethnic group	Current scheme	Wandsworth	Richmond
Asian/Asian British	3.5%	11.7%	8.9%
Black, Black British, Black Welsh, Caribbean or African	75.6%	10.1%	1.9%
Mixed or Multiple ethnic groups	3.5%	4.1%	5.5%
White or White British	7%	67.8%	80.5%

The current users are disproportionately from African British or Caribbean backgrounds in comparison to Richmond and Wandsworth population data.

Religion and belief, including non-belief	Data from the existing provider, Nacro Housing and Census 2021 data			
	Religion and belief	Current scheme	Wandsworth	Richmond
	Muslim	24%	10%	4%
	Christian	62%	45%	43%
	Non-belief	14%	36%	38%
	There is a relatively high proportion of men who identify as Christian and Muslim, in comparison to borough averages. There is also a relatively low percentage of residents who identify as non-belief.			
Sexual orientation	3.5% of current service users have identified as having a sexual orientation other than straight or heterosexual.			
	The 2021 Census was the first time it collected data on sexual orientation.			
	The question was voluntary and only asked of people aged 16+. In Wandsworth 5.2% and in Richmond 3.4% of 16+ year olds stated that they were either gay/lesbian, bisexual or any other sexual orientation.			
Across groups i.e. older LGBT service users or Black, Asian & Minority Ethnic young men.	No data available for current service users.			
Socio-economic status (to be treated as a protected characteristic under Section 1 of the Equality Act 2010) Include the following groups: Deprivation (measured by the 2019 English Indices of Deprivation) <ul style="list-style-type: none"><li>Low-income groups &amp; employment</li><li>Carers</li><li>Care experienced people</li></ul>	Data from the existing provider, Nacro Housing			
	Socio-economic status		Current scheme	
	Health inequalities		52%	
	Low-income groups		100%	
	Carers		0%	
	Single parent		3.5%	
	Care experienced people		10%	
	There is a higher percentage of residents who suffer from health inequalities, or who are in low-income groups.			
	There is also a high percentage who were in the care system as children.			

<ul style="list-style-type: none"> <li>• <b>Single parents</b></li> <li>• <b>Health inequalities</b></li> <li>• <b>Refugee status</b></li> </ul>	
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#### Data gaps

Data gap(s)	How will this be addressed?
There is evidence of health inequalities, but details are not currently available.	Further information is being sought from the service provider.
Gender reassignment data is not available	In the new contract the service provider will be required to collect this information.
High number of black Caribbean/African/other	There is no clear explanation as to why this imbalance exists as it doesn't reflect the Wandsworth and Richmond or prison populations. We will have a meeting with the current providers as well as speak to colleagues in the Commissioning of Quality and Assurance team to understand this data further.

#### 4. Impact

The service is currently disproportionately utilised by men from Black African and Caribbean groups, see above. Consultation with the current users has demonstrated that they are anxious to move on but have lacked suitable opportunities. This proposal will include measures to support that aspiration. Not to support recommissioning would adversely affect that group of men as the support they have been receiving would no longer be available. Successful move on will require a corporate approach across departments of the local authorities.

Of the current resident group, 28% are considered disabled compared to 12% for Richmond and 11% for Wandsworth. Not recommissioning the service would adversely and disproportionately affect disabled people.

The services are specifically for men and there is no equivalent for women. This proposal will address this by working with partners to provide housing and support for women and to enhance the existing one stop community hub for female ex-offenders. Not to recommission the 31 units would remove the opportunity to address the lack of support for this vulnerable group.

Protected group	Positive	Negative
Age	There are risks with an ageing population in the current scheme. With the new proposals, current	There may be a level of concern and disruption for some existing residents about the changes that are being made. The provider will be responsible for

	members will be supported to move on from the accommodation into appropriate funded services.	supporting the residents, emphasising that new opportunities will be provided through the changes which they have asked for.
<b>Disability</b>	The 28% of the residents with a disability will have access to suitable housing. This will be a requirement of the efforts to secure move on accommodation additional funding. Cross-departmental cooperation will ensure that residents with disabilities will only relocate successfully into suitable accommodation with support where necessary.	See above.
<b>Sex</b>	The current imbalance between men and women will be addressed and women will have access to housing and support for the first time. The lack of support for female ex-offenders will be addressed directly with the implementation of these proposals.	<p>The proposals will reduce the availability of supported housing for men. However, the duration of stay in the new accommodation will be significantly shortened to a maximum of 2 years. After this period, residents will receive assistance to transition into supported move-on accommodation, creating space for more men to access the service.</p> <p>Men and women will be in separate accommodation so there are no negative impacts anticipated.</p>
<b>Gender reassignment</b>	No residents have reported that their gender identity is different from their sex as registered at birth. It is important that residents should feel safe to report their gender identity. Residents will be placed in the most appropriate service on a case-by-case basis following risk assessment.	No negative impacts anticipated.
<b>Marriage and civil partnership</b>	By moving into mainstream housing, residents will be able to have live-in relationships and families. Existing residents cannot form a family home in the scheme. This should be addressed, where appropriate, with successful relocation of existing residents. New residents will not remain in the service for long periods and will be able to prepare, with	There may be a level of anxiety for people who will be relocating. This will be addressed through support being made available from the provider.



	support, for being reunited with existing family or to form new families.	
<b>Pregnancy and maternity</b>	The new women's service could provide housing for offenders who are pregnant as opposed to being in prison where the baby will be removed after 18 months. This issue is not applicable for existing residents. For new residents, it is planned that there will be a facility for a mother and baby, or links to a new mother and baby unit being formed at the current time out of borough.	Limited local provision could result in new mothers being placed outside the borough. To address this, a new national unit is being established in Hampshire to support pregnant ex-offenders and new mothers.
<b>Race/ethnicity</b>	The predominantly Black African and Caribbean residents will have a new opportunity to move into mainstream housing. Currently the service is disproportionately used by Black British men. This group have expressed frustration with the lack of housing alternatives they have been offered, and some have been living in the scheme for up to 15 years. The proposals would support these men to move on and address the disproportionate use of the scheme from one group.	It is necessary to understand the reason why this has occurred to avoid any negative impacts by relocation.
<b>Religion and belief, including non-belief</b>	N/A	N/A
<b>Sexual orientation</b>	Currently, only 3.5% of current users identify as other than straight heterosexual. This may be because the environment makes it difficult to express any other sexual orientation. New, sustainable housing opportunities with case-by-case support can look to address this.	No negative impacts anticipated or identified.
<b>Socio-economic status (to be treated as a protected characteristic under Section 1 of the Equality Act 2010) Include the following groups:</b> <ul style="list-style-type: none"> <li>• Deprivation (measured by the</li> </ul>	This proposal will ensure that the very high percentage of residents and likely future residents, who will be subject to health inequalities will be able to secure suitable long-term housing, avoiding potential homelessness including street homelessness. Relocation and reintegration into mainstream housing and society will provide the person with new	People suffering from health inequalities are currently in a supported housing service and may be more anxious than others about any potential change. They will need to receive support from the provider. It is also imperative that the new housing arrangements are appropriate and adequate to meet the person's needs.

<b>2019 English Indices of Deprivation)</b> <ul style="list-style-type: none"> <li>• Low-income groups &amp; employment</li> <li>• Carers</li> <li>• Care experienced people</li> <li>• Single parents</li> <li>• Health inequalities</li> <li>• Refugee status</li> </ul>	opportunities to address deprivation. When in treatment for substance misuse, links will be made to the Individual Placement Scheme (IPS) to enable residents to access employment.	
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## 5. Actions to advance equality, diversity and inclusion

Action	Lead Officer	Deadline
Work with voluntary and statutory organisations to provide move on accommodation for existing service users. This must be cognisant of the 28% of residents who are disabled	Alan Hagger	From April 2025
Establish new housing and support service and enhance community-based support service for female ex-offenders	Alan Hagger	Ongoing
Revise referral route into housing for all ex-offenders in the greatest need of housing and support	Alan Hagger	March 31 <sup>st</sup> 2026
Ensure ongoing move on opportunities for future residents	Alan Hagger	From April 2025
Ensure stable and fair referral routes for women to access new housing and support service.	Alan Hagger	As vacancies become available
To ensure that a new specification will require that EDI considerations are included in staff induction and training.	Alan Hagger	Ongoing
Seek explanations as to why the services currently provide disproportionately for African and Caribbean men	Alan Hagger	April 2025

## 6. Further Consultation (optional section – complete as appropriate)

Consultation planned	Date of consultation
Reports to CDP and CSP and seek feedback.	Ongoing