

Equality Impact Assessment
Corporate Assessment Template

Policy/Strategy/Project/Procedure/Service/Function Title: Cardiff Rough Sleeper Strategy 2017-2020
New/Existing/Updating/Amending: New

Who is responsible for developing and implementing the Policy/Strategy/Project/Procedure/Service/Function?	
Name: Jane Thomas	Job Title: Assistant Director, Housing & Communities
Service Team: Policy and Development	Service Area: Communities - HANR
Assessment Date: February 2017	

1. What are the objectives of the Policy/Strategy/Project/ Procedure/ Service/Function?

The Cardiff Rough Sleeper Strategy 2017-2020 sets the strategic direction for tackling and preventing rough sleeping in the city. The Strategy sets out an overarching vision - 'to work towards ending rough sleeping in Cardiff' - and the following high level aims:

- To work to understand the causes of rough sleeping;
- To work with partners to ensure support is directed towards ending and not reinforcing rough sleeping;
- To ensure early intervention to prevent rough sleeping becoming entrenched;
- To develop a range of accommodation and support solution tailored to individual needs.

The Strategy aims to improve housing and support outcomes for rough sleepers and those at risk of rough sleeping, recognising and responding to the vulnerability and diversity of needs of these groups in Cardiff. The Strategy is intended to bring about early and multi-agency intervention, offering a bespoke response to the needs of individual rough sleepers.

2. Please provide background information on the Policy/Strategy/Project/Procedure/Service/Function and any research done [e.g. service users data against demographic statistics, similar EIAs done etc.]

A variety of data has informed the understanding of rough sleeping in Cardiff, as set out in the Strategy. This includes local data from the Homeless Outreach Team, housing waiting list data, homelessness statistics and information from the Police, Health and third sector colleagues.

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Monitoring Rough Sleepers

The Council's Homeless Outreach Team undertakes weekly monitoring of Cardiff's rough sleeper population. Records show that over the last 2 years, the number of people sleeping rough has steadily increased. Numbers peaked during August 2016, with 68 individuals recorded in one week and a weekly average for the month of 60 individuals. These are the highest figures ever recorded in the city. The Welsh Government organises an annual count of rough sleepers, Cardiff's returns show an upward trend, with 26 individuals observed in 2014, 30 in 2015 and 53 in 2016.

Demographic Snapshot

During the week ending 28th October 2016 (prior to the operation of additional 'cold weather' emergency accommodation), the Outreach Team engaged with a total of 52 rough sleepers. Of these:

- 88% were male and just 12% were female
- 42% were aged 30 and under; 44% were aged 31-45; only 6% were aged 46-55; 8% were over 55
- 37 were White Welsh; 3 White British; 1 White Irish; 10 EEA Nationals
- In terms of disability, 57% had substance misuse issues; and 43% had mental health issues.

Generic Issues

It is recognised that rough sleepers are more at risk of being subjected to exploitation, violence and hate crimes than the general homeless population. Women, those from BME backgrounds, those with any form of disability and LGBTQ people are especially vulnerable to attack and negative attitudes.

3 Assess Impact on the Protected Characteristics

3.1 Age

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative/]** on younger/older people?

	Yes	No	N/A
Up to 18 years	x		
18 - 65 years	x		
Over 65 years	x		

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

The Rough Sleeper Strategy will have a positive differential impact for people of all age groups. Younger and older people in particular are more vulnerable whilst sleeping rough. Older rough sleepers are more likely to be physically frail and have health issues. Younger people have fewer life experiences and are therefore open to exploitation and abuse.

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What action(s) can you take to address the differential impact?

The strategy proposes closer collaboration between statutory and third sector partners, with an expectation on earlier intervention. For older people, joint outreach with Health colleagues would result in more appropriate and timely onward referrals.

For younger people (under 18), both the Police and Children’s Services are automatically notified to ensure a wraparound response. Younger rough sleepers aged 16-25 are able to access a specific ‘Young Persons Gateway’, which brings together advice, family mediation, support and accommodation to ensure that young vulnerable people can access housing services best suited to their needs.

We will continue to monitor any differential impacts on age throughout the life of this strategy, and make any adjustments as necessary.

3.2 Disability

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on disabled people?

	Yes	No	N/A
Hearing Impairment	x		
Physical Impairment	x		
Visual Impairment	x		
Learning Disability	x		
Long-Standing Illness or Health Condition	x		
Mental Health	x		
Substance Misuse	x		
Other			

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

The Rough Sleeper Strategy will have a positive differential impact for disabled people. Disabled people in particular would find it more difficult to cope and are more vulnerable whilst sleeping rough. Whilst many accommodation services are DDA compliant, some emergency accommodation, such as churches, are not fully compliant.

What action(s) can you take to address the differential impact?

The strategy proposes closer collaboration between statutory and third sector partners, with an expectation on earlier intervention. For disabled people, joint outreach with Health and Social Care colleagues would result in more appropriate and timely onward referrals. Emergency accommodation will be reviewed to ensure it can be accessed by disabled people, however where it cannot, measures will be put in place to ensure any disabled person is offered suitable accommodation, even if this requires moving other clients. A support pathway will be developed to assist those with health or substance misuse issues.

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We will continue to monitor any differential impacts on disability throughout the life of this strategy, and make any adjustments as necessary.

3.3 Gender Reassignment

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on transgender people?

	Yes	No	N/A
Transgender People (People who are proposing to undergo, are undergoing, or have undergone a process [or part of a process] to reassign their sex by changing physiological or other attributes of sex)		x	

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

No current rough sleepers have indicated that they had undergone gender reassignment, therefore it is difficult to assess any specific needs or differential impacts relating to this group. The overarching Cardiff Housing Strategy 2016-2021 commits to improving our equalities monitoring, which should result in a more comprehensive data set on which to base future services / provision.

What action(s) can you take to address the differential impact?

We will continue to monitor rough sleepers with regard to gender reassignment and will work with equalities organisations to identify the specific housing needs of this group. Any issues identified will be addressed through this Strategy's associated action plans.

We will continue to monitor any differential impacts on gender reassignment throughout the life of this strategy, and make any adjustments as necessary.

3.4. Marriage and Civil Partnership

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on marriage and civil partnership?

	Yes	No	N/A
Marriage		X	
Civil Partnership		X	

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

No differential impacts identified.

What action(s) can you take to address the differential impact?

Not applicable.

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3.5 Pregnancy and Maternity

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on pregnancy and maternity?

	Yes	No	N/A
Pregnancy	x		
Maternity	x		

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

The Rough Sleeper Strategy will have a positive differential impact for pregnant women. Pregnant women in particular would find it more difficult to cope and are more vulnerable whilst sleeping rough.

What action(s) can you take to address the differential impact?

The strategy proposes closer collaboration between statutory and third sector partners, with an expectation on earlier intervention. For pregnant women, joint outreach with Health and Social Care colleagues would result in more appropriate and timely onward referrals. In addition, the midwives in the Elan team provide outreach care and support for homeless women (including anyone found to be rough sleeping) who require additional social support.

We will continue to monitor any differential impacts on pregnancy and maternity throughout the life of this strategy, and make any adjustments as necessary.

3.6 Race

Will this Policy/Strategy/Project//Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
White		X	
Mixed / Multiple Ethnic Groups		X	
Asian / Asian British		X	
Black / African / Caribbean / Black British		X	
Other Ethnic Groups		X	

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

No differential impacts identified. Whilst ethnicity will not restrict a rough sleeper's access to services, for some, their nationality will impede access, for example, whether they are from a member state of the European Economic Area.

What action(s) can you take to address the differential impact?

In Cardiff, the Reconnection Service aims to repatriate rough sleepers with their country / county of origin. Additionally, the Council intends to enter into a joint protocol with Immigration Services and South Wales Police to address the issue of EEA nationals sleeping rough in the city. We will continue to monitor any differential

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impacts on race throughout the life of this strategy, and make any adjustments as necessary.

3.7 Religion, Belief or Non-Belief

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on people with different religions, beliefs or non-beliefs?

	Yes	No	N/A
Buddhist		x	
Christian		x	
Hindu		x	
Humanist		x	
Jewish		x	
Muslim		x	
Sikh		x	
Other		x	

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

No negative differential impacts identified.

What action(s) can you take to address the differential impact?

Not applicable. Any rough sleeper who wishes to practice their belief may use the prayer room facility in Cardiff Central Library.

3.8 Sex

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on men and/or women?

	Yes	No	N/A
Men	X		
Women	X		

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

The Rough Sleeper Strategy will have a positive differential impact for men and women. Although the majority of rough sleepers are male, females who are sleeping rough are more at risk from violence, intimidation and exploitation.

What action(s) can you take to address the differential impact?

Greater collaboration between services will ensure that outreach provision includes mixed gender staff teams. Earlier intervention should minimise the additional risks posed to women of sleeping rough. A commitment has been included in the strategy to develop a specialist pathway through services for females at high risk of exploitation. We will consider requirements for both genders as part of the wider review of accommodation and support services.

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We will continue to monitor any differential impacts on men and women throughout the life of this strategy, and make any adjustments as necessary.

3.9 Sexual Orientation

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on the following groups?

	Yes	No	N/A
Bisexual		X	
Gay Men		X	
Gay Women/Lesbians		X	
Heterosexual/Straight		X	

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

No differential impacts identified. The overarching Cardiff Housing Strategy 2016-2021 commits to improving our equalities monitoring, which should result in a more comprehensive data set on which to base future services / provision.

What action(s) can you take to address the differential impact?

We will continue to monitor rough sleepers with regard to sexual orientation and will work with equalities organisations to identify the specific housing needs of this group. Any issues identified will be addressed through this Strategy's associated action plans.

We will continue to monitor any differential impacts on sexual orientation throughout the life of this strategy, and make any adjustments as necessary.

3.10 Welsh Language

Will this Policy/Strategy/Project/Procedure/Service/Function have a **differential impact [positive/negative]** on Welsh Language?

	Yes	No	N/A
Welsh Language	X		

Please give details/consequences of the differential impact, and provide supporting evidence, if any.

Rough sleepers, the same as anyone else, should be able to express a language preference upon first contact with services. Currently, the number of bilingual staff is limited.

What action(s) can you take to address the differential impact?

Greater collaboration between services will ensure that outreach provision includes bilingual staff from the Council and partner agencies. Welsh language training is encouraged within the Council.

Cardiff Rough Sleeper Strategy and associated public documents will comply with new Welsh Language standards under the Welsh Language Act. All documents will be translated into Welsh and any publicity on schemes delivered by the Council will also

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be available in Welsh. Organisations that receive Welsh Government or Council grant funding must similarly ensure that they provide publicity material in both English and Welsh.

4. Consultation and Engagement

What arrangements have been made to consult/engage with the various Equalities Groups?

Early consultation took place with key partners involved in the delivery of support services to rough sleepers and significant changes were made to the content and ambition of the Strategy. Further consultation then took place with a wider range of partners, including Tai Pawb; Diverse Cymru; Faith groups; Stonewall and Race Equality First, and the Strategy was further amended as a result.

5. Summary of Actions [Listed in the Sections above]

Groups	Actions
Age	Please see considerations listed above.
Disability	Please see considerations listed above.
Gender Reassignment	Please see considerations listed above.
Marriage & Civil Partnership	Please see considerations listed above.
Pregnancy & Maternity	Please see considerations listed above.
Race	Please see considerations listed above.
Religion/Belief	Please see considerations listed above.
Sex	Please see considerations listed above.
Sexual Orientation	Please see considerations listed above.
Welsh Language	Please see considerations listed above.
Generic Over-Arching [applicable to all the above groups]	The strategy proposes closer collaboration between statutory and third sector partners, with an expectation on earlier intervention. Improved case management systems will similarly ensure that data on the protected characteristics will be captured at source to enhance service delivery. This data will also be used to inform the further development of this Rough Sleeper Strategy in identifying additional areas of concern. Specific commitments to develop specialist support pathways for certain protected characteristics will be actioned during the implementation of the strategy.

6. Further Action

Any recommendations for action that you plan to take as a result of this Equality Impact Assessment (listed in Summary of Actions) should be included as part of your Service Area's Business Plan to be monitored on a regular basis.

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7. Authorisation

The Template should be completed by the Lead Officer of the identified Policy/Strategy/Project/Function and approved by the appropriate Manager in each Service Area.

Completed By : Louise Powell	Date: 15.02.17
Designation: Policy Officer	
Approved By: Jane Thomas	Date: 28.02.17
Designation: Assistant Director, Housing & Communities	
Service Area: Communities	

- 7.1 On completion of this Assessment, please ensure that the Form is posted on your Directorate's Page on CIS - *Council Wide/Management Systems/Equality Impact Assessments* - so that there is a record of all assessments undertaken in the Council.

For further information or assistance, please contact the Citizen Focus Team on 029 2087 3059 or email citizenfocus@cardiff.gov.uk