

Equality Impact Assessment  
Corporate Assessment Template



<b>Policy/Strategy/Project/Procedure/Service/Function Title:</b> Cardiff Homelessness Strategy 2018-2022
<b>New/Existing/Updating/Amending:</b> New

<b>Who is responsible for developing and implementing the Policy/Strategy/Project/Procedure/Service/Function?</b>	
Name: Jane Thomas	Job Title: Assistant Director (Housing & Communities)
Service Team: Housing & Communities	Service Area: People and Communities
Assessment Date: November 2018	

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

<p>The Cardiff Homelessness Strategy 2018-2022 sets the strategic direction for tackling and preventing homelessness in the city. The Strategy sets out an overarching vision - <i>'To work with our partners to prevent homelessness in Cardiff; providing the right support at the right time to meet the housing needs of our citizens'</i> and the following high level aims:</p> <ul style="list-style-type: none"> <li>• Provide high quality housing advice services across the city, helping all citizens to find the right housing solution for them;</li> <li>• Take early action to help prevent homelessness;</li> <li>• Provide good quality temporary housing, continuing to avoid the use of bed and breakfast accommodation;</li> <li>• Work with both private and social landlords to ensure that a range of good quality permanent housing solutions are available;</li> <li>• To ensure appropriate support is available for our more vulnerable citizens;</li> <li>• Work in partnership with statutory and third sector agencies to ensure a joined up service for clients.</li> </ul> <p>The Strategy aims to improve housing and support outcomes for homeless households and those at risk of homelessness, 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 more targeted response to the needs of individual homeless households.</p>
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- 2. Please provide background information on the Strategy Function and any research done [e.g. service users data against demographic statistics, similar EIAs done etc.]**

**Background**

Under Section 50 of the Housing (Wales) Act 2014 a local housing authority must periodically carry out a homelessness review for its area, and formulate and adopt a homelessness strategy based on the results of that review. The Council must adopt a homelessness strategy in 2018 and a new strategy in every fourth year after that.

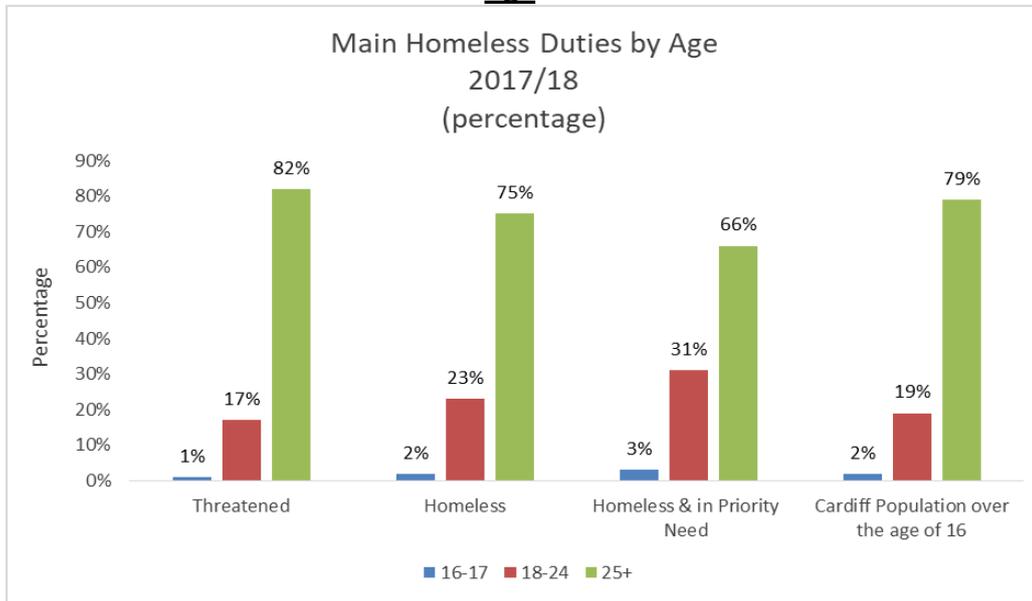
In line with these requirements a comprehensive homelessness review has been undertaken, focusing on the key themes of advice, prevention, accommodation and support. In carrying out this review a wide range of data from the Council's homelessness and advice services was considered and also data from Supporting People funded services. In addition views of services users and partners were gathered and these have informed the review.

The review findings provide the evidence base upon which the Cardiff Homelessness Strategy 2018-2022 has been developed. The Strategy sets out a co-ordinated approach to assisting those threatened with and experiencing homelessness. It identifies available services and resources, and how they will be improved to ensure people receive appropriate, timely help and support.

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Equalities Data from the Homelessness Review

Age

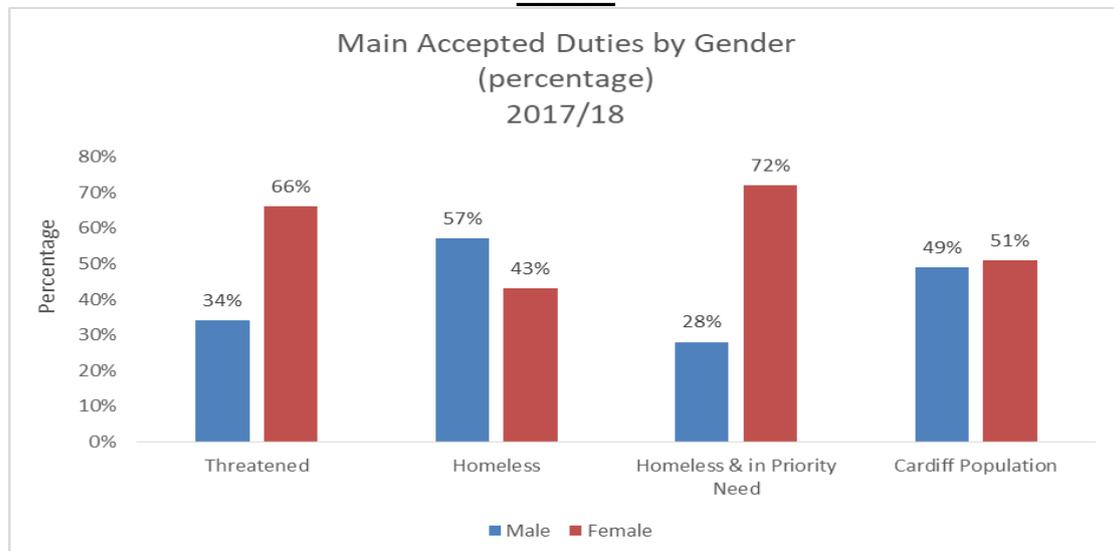


Source: Housing Options Service Data and Mid-2017 Population Estimates

The age of clients accessing homelessness services broadly fits the pattern of Cardiff as a whole, however whereas only 21% of the Cardiff population are between the ages of 16 and 24, the figure for homeless clients is slightly higher at 25%. For those clients in priority need for accommodation, the figure rises to 34%.

It should be noted that not all young people assisted with homelessness are recorded in the graph above as many enter the service through Children’s Services.

Gender

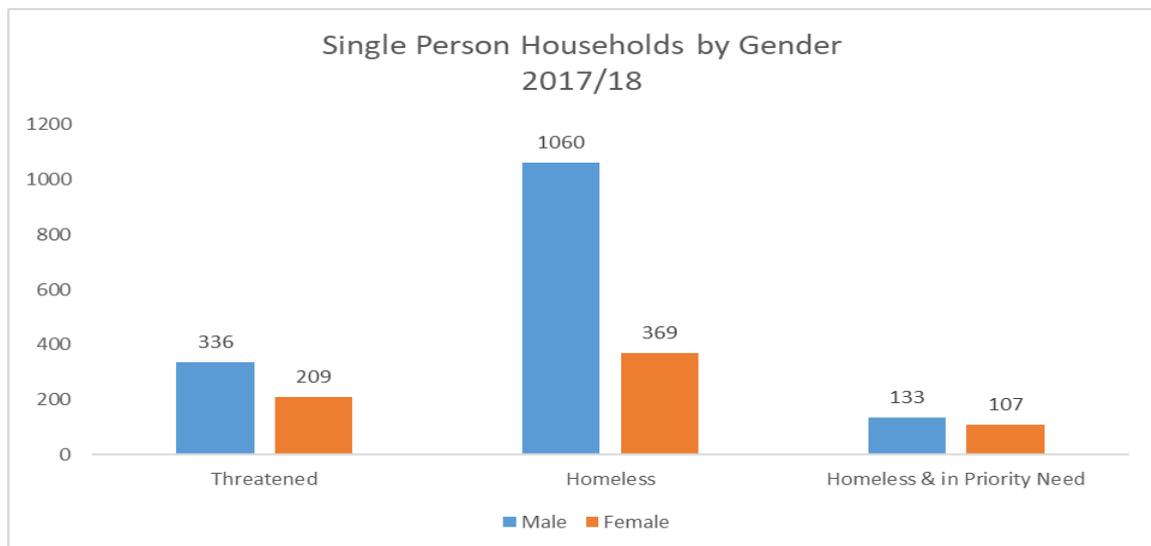


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In 2017/18, 66% of applicants threatened with homelessness were female. 57% of homeless applicants were male. However, there was a significantly higher proportion of females who were homeless and in priority need (72%). This compares with a Cardiff-wide gender split of 51% females to 49% males.

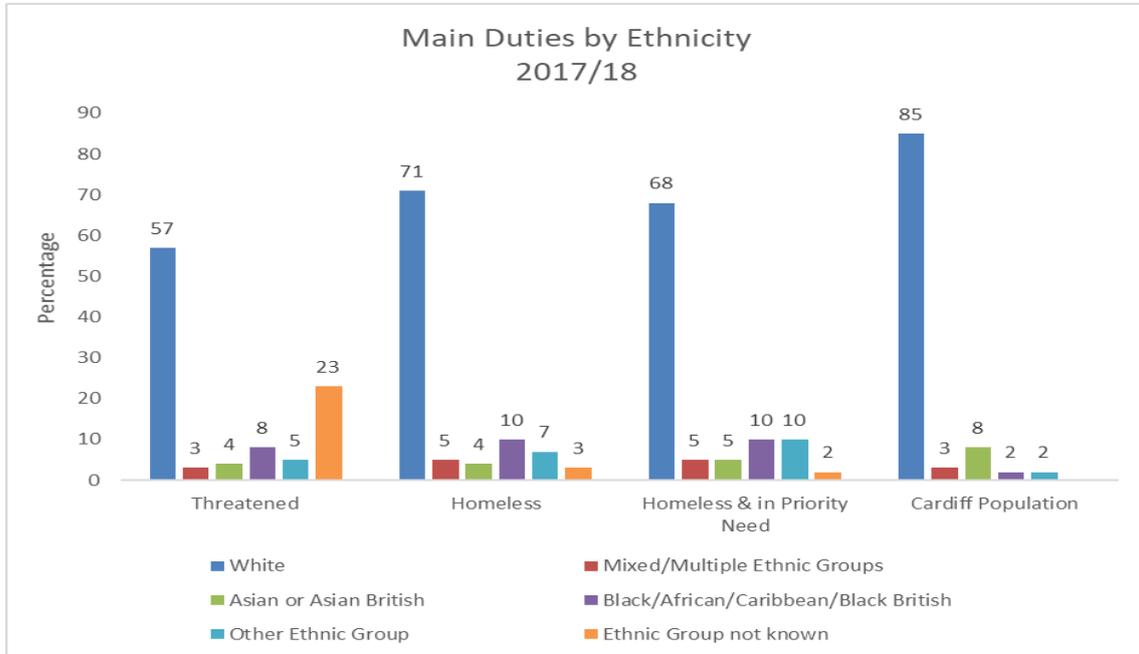
This data should be treated with caution however, as the high proportion of female clients threatened with homelessness and homeless and in priority need may be in part attributed to the fact that for administration purposes the female member of the household *within a couple* is always recorded as the main applicant.



Of those clients in *single person households* and threatened with homelessness, 336 (62%) were male. For those clients who became homeless, 1060 (74%) were male and for those homeless and in priority need, 133 (55%) were male. This compares with a Cardiff-wide gender split of 51% females to 49% males.

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**Ethnicity**



The ethnicity of clients accessing homelessness services broadly follows the pattern of the city, however one point of note is that although Black/African/Caribbean/Black British people account for 2% of the Cardiff population, they account for 10% of homeless clients.

The high number of Ethnic Group not known is due to data coming from sources other than the Housing Options Service, with different monitoring systems in place.

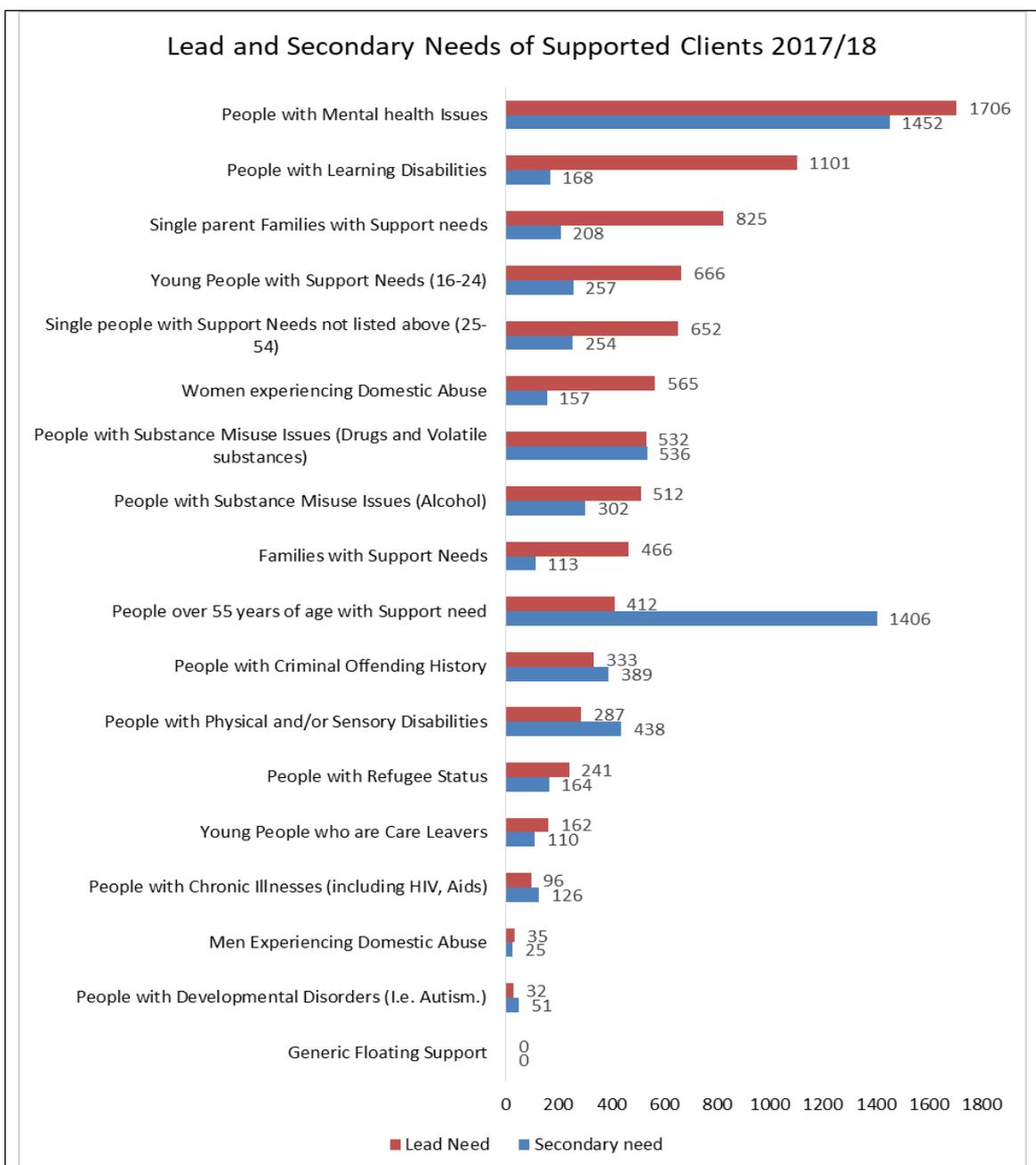
**Disability**

Supporting People Data

Supporting People funded services provide housing-related support to clients who are homeless or at risk of becoming homeless. The following graph shows the lead and secondary needs of all clients who received support during 2017/18:

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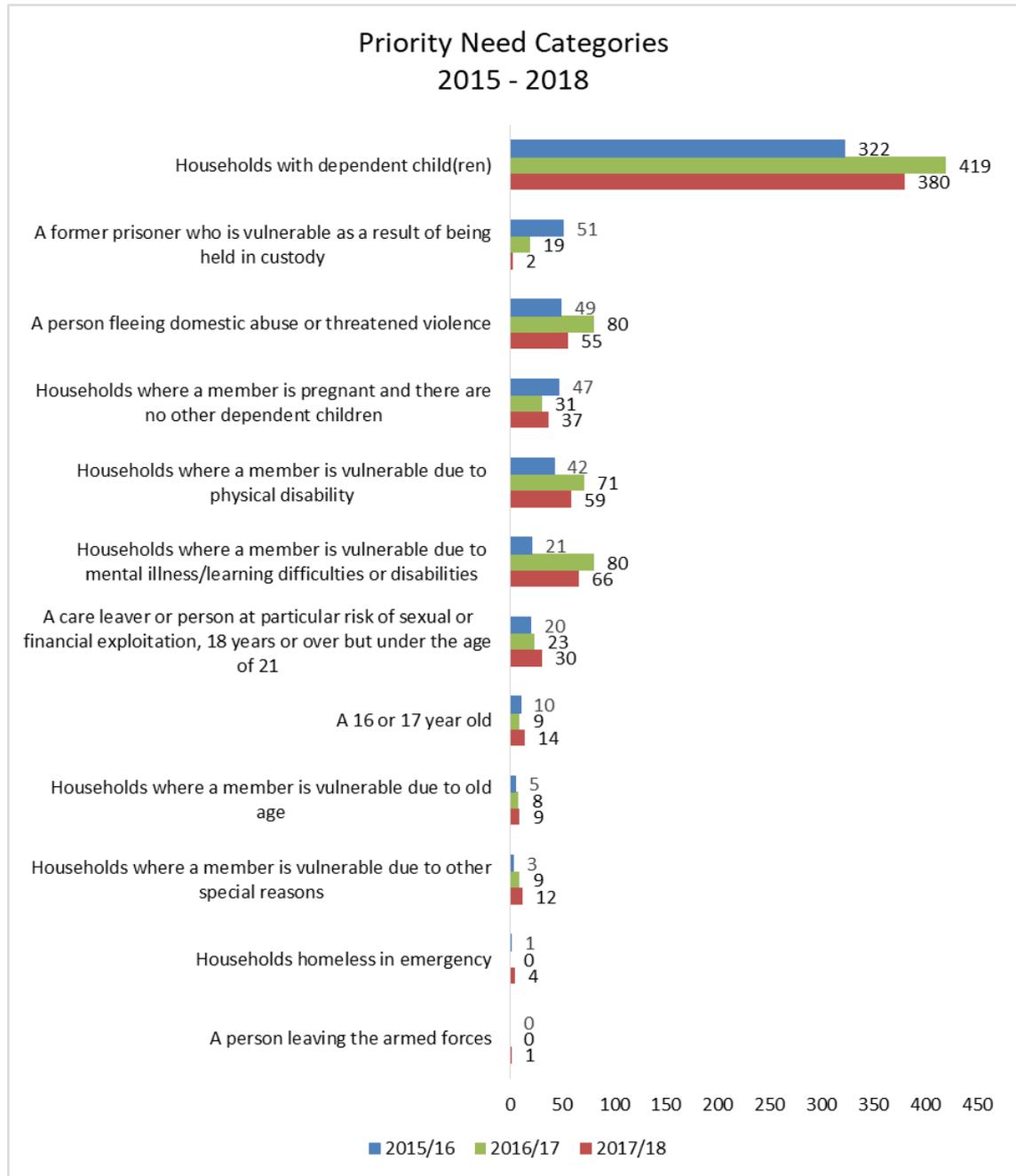
- Mental Health Issues were the greatest lead and secondary need for all supported clients during 2017/18. Reporting identified 1706 clients with mental health as a lead need and 1452 as a secondary need.
- Learning disabilities was the second largest lead need at 1101 clients.
- Misuse of substances generated significant support needs. In total 1882 clients had misuse of either drugs or alcohol as a lead or secondary need.
- The number of people with a support need relating to physical and/or sensory disability was relatively low – 287 clients had a lead need and 438 clients had a secondary need.

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Priority Need and Disability

Legislation states ‘a person who is vulnerable as a result of old age, mental illness or handicap or physical disability or other special reason, or with whom such a person resides or might reasonably be expected to reside’ can be considered in priority need for housing.



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There has been an increase of 214% in the number of clients being found in priority need as they are vulnerable due to mental illness, learning difficulties or disabilities for the period April 2015 to March 2018.

Although this is a significant increase the total number of clients in this group is relatively low (66 in 2017/18), considering the increase seen in other parts of the service, particularly in those receiving floating support.

Clients being found in priority need as they are vulnerable due to physical disability increased by 40% over the period. The actual number of clients was again relatively low (59 in 2017/18).

### 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.**

In 2017/18, 25% of all homeless clients and 34% of all priority need homeless clients were under the age of 25, this compares to 21% of the Cardiff population. The Homelessness Strategy will have a positive differential impact for young people.

Clients 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. Data indicates a 41% decrease in the number of young people accessing mediation over the period 2015-2018, and a 56% reduction in the number returning home following intervention.

The Council has recently agreed proposals for a new city centre youth hub to improve advice services to young people. Mediation services will be reviewed as part of this project.

Accommodation and Support services for young people are currently in the process of being recommissioned and have been subject to a separate equality impact assessment. Under the new arrangements better monitoring and targets will be put in place to ensure positive outcomes for young people.

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

The Strategy recognises the need for improved family mediation to prevent homelessness.

A positive impact is expected as a result of the recommissioning of Accommodation and Support for young people - careful specification of services will ensure that services for young people improve. The new City Centre Youth Hub will also improve advice services for young people.

**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			
Physical Impairment	<b>x</b>		
Visual Impairment			
Learning Disability			
Long-Standing Illness or Health Condition			
Mental Health	<b>x</b>		
Substance Misuse	<b>x</b>		
Other			

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

It is expected that the Strategy will have a positive impact on clients with disabilities - specific issues have been identified around mental health and complex needs.

Mental Health

The numbers of clients with Mental Health issues is increasing and this is the lead need for support in clients accessing support services. This was echoed by the findings of the service-user survey.

Whilst there has been an increase in the number of clients being found in priority need as they are vulnerable due to mental illness, learning difficulties or disabilities for the period April 2015 to March 2018, the actual number recorded is relatively low compared to the numbers presenting in other areas of the service with mental health issues.

Complex Needs

A significant proportion of rough sleepers have one or more support needs relating to substance misuse, mental health or alcohol. Of the 69 individuals recorded as at 5th October 2018, the following lead support needs were identified:

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- Substance Misuse 35 (51%);
- Mental Health 17 (25%);
- Alcohol 15 (22%).

These figures are fairly typical of the rough sleeper population, many of whom also have secondary support needs.

Physical Impairment

Numbers of clients with support needs due to physical and /or sensory disabilities are relatively low, as are the numbers being found in priority need as they are vulnerable due to physical disability.

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

A review of how mental health issues are identified during the initial homelessness assessment is required to ensure all needs of the client are being met.

To better address complex needs, the multi-disciplinary city centre team will be expanded to include dedicated substance misuse and mental health workers; an additional homeless nurse and counselling service. Support staff will also be trained in providing trauma-informed services.

Additional accommodation for those clients with physical disabilities is being made available at Litchfield Court and as part of the Young Persons Accommodation and Support recommissioning. This will also be built into any future recommissioning.

**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
<b>Transgender People</b> (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)			<b>X</b>

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

Currently homelessness services are provided to a very small number of clients identifying as transgender.

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

No negative impact anticipated, however careful monitoring of services will take place to ensure that no service users are unduly impacted by the implementation of the

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Strategy and that the most vulnerable continue to be supported.

### 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.**

Currently provision exists within the Single Persons and Family Gateway to accommodate couples. No specific issues relating to this client group identified.

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

No negative impact anticipated, however careful monitoring of services will take place to ensure that no service users are unduly impacted by the implementation of the Strategy and that the most vulnerable continue to be supported.

### 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			

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

Pregnant women and people who reside with them have a priority need for housing and will have access to accommodation via the Family Gateway. There is also support for pregnant young people through the Young Persons Gateway leading into the Family Gateway. The number of households in priority need due to a member being pregnant has remained fairly stable over the period 2015-2018.

Pregnancy or maternity of an adult non-dependent household member, leading to overcrowding, may be contributing to increased numbers of parental notices. Parents, friends or relatives being no longer willing or able to accommodate has been identified as the biggest cause of homelessness in 2017/18.

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

No negative impact anticipated, however careful monitoring of services will take place to ensure that no service users are unduly impacted by the implementation of the Strategy and that the most vulnerable continue to be supported.

It is proposed that the Cardiff Housing Allocation Scheme be amended so that applicants given parental, friends or relative notices, and where there are significant/exceptional circumstances, be given additional priority if they remain at home in the short term.

**3.6 Race**

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

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

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

The review demonstrated that the ethnicity of clients accessing our homelessness services broadly follows the pattern across Cardiff. However, whilst Black/African/Caribbean/Black British people account for 2% of the Cardiff population, they account for 10% of homeless clients.

There are a high number of households in Cardiff needing to move on from accommodation provided by the National Asylum Support Service (NASS) following a decision on their case.

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

The reasons for differential impact of homelessness on Black/African/Caribbean/Black British groups will be explored further.

A review of the Asylum Seeker Pathway is required to ensure these clients receive help prior to losing their NASS accommodation.

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**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?

	<b>Yes</b>	<b>No</b>	<b>N/A</b>
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.**

Religion is not reported in the Welsh Government data for homeless clients, however the client survey report produced for the homelessness review does give a snapshot of the religions of 445 clients who answered the survey. 268 clients did not regard themselves as belonging to any particular religion.

	<b>No</b>	<b>%</b>
<b>Buddhist</b>	1	0.6
<b>Christian (Including Church in Wales, Catholic, Protestant and all other Christian denominations)</b>	99	55.9
<b>Hindu</b>	2	1.1
<b>Jewish</b>	0	0.0
<b>Muslim</b>	59	33.3
<b>Sikh</b>	3	1.7
<b>Other</b>	8	4.5
<b>Prefer not to say</b>	5	2.8
<b>Total number of respondents</b>	<b>177</b>	<b>100.0</b>

This data broadly follows the same pattern as the population data from the 2011 Census however the percentage of people belonging to the Muslim religion is much larger.

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

No negative impact anticipated, however careful monitoring of services will take place to ensure that no service users are unduly impacted by the implementation of the Strategy and that the most vulnerable continue to be supported.

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**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 Housing Options Service data highlights a disproportionate number of clients who are single males. The reasons and possible actions to address this will be explored as part of implementing the Strategy.

The Strategy will have a positive impact on females. Much of Cardiff's hostel provision is mixed sex, however the new Gender Specific Gateway has been set up to meet the growing need for accommodation based on gender, particularly for women fleeing Domestic Abuse or Sexual Violence. There are a total of 55 Gender Specific Units.

In addition, Ty Tarian was established in 2017 for women with high support needs and at risk of exploitation currently inappropriately placed in other frontline homeless provision. The project provides 5 units of specialist accommodation with 24 hour support, and one to one sessions with the dual diagnosis project worker and in-house psychotherapist.

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

The reasons for the differential impact of homelessness on males will be explored further in taking forward the Strategy.

**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 impact identified.

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

No negative impact anticipated, however careful monitoring of services will take place to ensure that no service users are unduly impacted by the implementation of the Strategy and that the most vulnerable continue to be supported.

#### 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.

All Welsh language policies will be followed. Service users should be able to express a language preference upon first contact with services.

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

No negative impact anticipated, however careful monitoring of services will take place to ensure that no service users are unduly impacted by the implementation of the Strategy and that the most vulnerable continue to be supported.

#### 4. Consultation and Engagement

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

Consultation has taken place with partners as part of the Homelessness Review and comments have informed aspects of the Strategy.

Consultation has also taken place with service users to establish views on current services and what they would like to see changed. These views have also fed into the Review and Strategy.

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

Groups	Actions
Age	The Strategy recognises the need for improved family mediation to prevent homelessness.
Disability	A review of how mental health issues are recorded during the initial homelessness assessment is required to ensure all needs of the client are being met.

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	<p>To better address complex needs, the multi-disciplinary city centre team will be expanded to include dedicated substance misuse and mental health workers; an additional homeless nurse and counselling service. Support staff will also be trained in providing trauma-informed services.</p> <p>Additional accommodation for those with a physical disability will be provided at Litchfield Court and through future recommissioning.</p>
Gender Reassignment	None.
Marriage & Civil Partnership	None.
Pregnancy & Maternity	Possible changes to the Cardiff Housing Allocation Scheme to prioritise clients with parental notices in exceptional circumstances (i.e. overcrowding due to pregnancy /maternity of adult non-dependents in the property).
Race	<p>The reasons for differential impact of homelessness on Black/African/Caribbean/Black British groups will be explored further.</p> <p>A review of the Asylum Seeker Pathway is required to ensure these clients receive help prior to losing their NASS accommodation.</p>
Religion/Belief	None.
Sex	The reasons for the differential impact of homelessness on males will be explored further.
Sexual Orientation	None.
Welsh Language	None.
Generic Over-Arching [applicable to all the above groups]	None.

#### 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.

#### 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.

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Completed By :	Date:
Designation:	
Approved By:	
Designation:	
Service Area:	

- 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 2536 / 3262 or email [equalityteam@cardiff.gov.uk](mailto:equalityteam@cardiff.gov.uk)