



# Equality Impact Assessment

Homelessness & Rough Sleeping Strategy 2025-  
2030

## Contents

|   |   |
|---|---|
| <b>Document details</b> .....   | 1 |
| <b>1.0 Purpose of the Equality Impact Assessment</b> .....            | 2 |
| <b>2.0 Applicable legislation and regulations</b> .....               | 3 |
| <b>3.0 Summary</b> .....  | 4 |
| Background.....   | 4 |
| Defining homelessness and rough sleeping.....                         | 4 |
| Causes of homelessness and rough sleeping.....                        | 5 |
| Who does homelessness and rough sleeping affect in the district?..... | 5 |
| Considerations.....   | 6 |
| <b>4.0 Information</b> .....  | 6 |
| Aim of the decision.....  | 6 |
| Strategic priorities.....   | 6 |
| Intended outcome(s).....  | 7 |
| Consultations.....  | 7 |
| <b>5. Assessment of the decision</b> .....                            | 8 |
| <b>6. Impact and Mitigations</b> .....                                | 9 |

## Document details

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| <b>Title</b>   | Homelessness and Rough Sleeping Strategy 2025-2030 |
| <b>Document type</b>   | Strategy   |
| <b>Version submitted for decision</b>                                    | 1.0  |
| <b>New or Existing document</b>  | New  |
| <b>If this is an existing document, is this a major or minor change?</b> | n/a  |
| <b>Decision makers</b>   | Cabinet  |
| <b>Type of decision</b>  | Approval and adoption by the Council               |
| <b>Date of decision</b>  | 2 December 2024                                    |

|   |  |
|---|--|
| <b>Responsible department</b>   | Housing Services   |
| <b>Are other departments or partners involved in delivering this strategy, policy, plan, or project?</b><br><br><b>If 'Yes' please provide details.</b> | <p>Yes</p> <p>Officers in the following teams will be involved to some extent in the Policy's implementation and delivery:</p> <ul style="list-style-type: none"> <li>• Housing Options</li> <li>• Legal</li> <li>• Corporate Services (complaints handling &amp; equality)</li> <li>• Accounts</li> <li>• Dover District Tenants Consultative Group</li> <li>• External stakeholders (statutory and non-statutory organisations and service users)</li> </ul> |

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## **1.0 Purpose of the Equality Impact Assessment**

- 1.1 The Equality Act 2010 replaced the previous anti-discrimination laws with a single Act simplifying the law by removing inconsistencies, making it easier to understand and therefore comply with it, and strengthens it to help tackle discrimination and inequality. The Act came into force on 1 October 2010.
- 1.2 The Public Sector Equality Duty (PSED) came into force on 5 April 2011. The duty ensures that all public bodies, including Dover District Council (“the Council”):
  - play their part in making society fairer by tackling discrimination and providing equality of opportunity for all; and
  - consider the needs of all individuals in their day-to-day work, in shaping policy, delivering services and in relation to their own employees.
- 1.3 PSED encourages public bodies to understand how different people will be affected by their activities so that policies and services are appropriate and accessible to all and meet the needs of different groups of people. Where activities may have an impact to one particular group of people, public bodies are required to identify mitigations that will either lessen the impact or provide an alternative solution to meet the needs of that particular group.
- 1.4 By understanding the effect our activities have on different groups of people, and how making our services inclusive can support and increase people’s opportunities, the Council will be better placed to deliver policies and services that are efficient and effective.
- 1.5 This Equality Impact Assessment (EIA) helps the Council to ensure that we fulfil our legal obligations as per the PSED and to have due regard to:
  - a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
  - b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
  - c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

## **2.0 Applicable legislation and regulations**

- 2.1 The following legislation and regulations apply to the Strategy:
  - Part 7 of Housing Act 1996
  - Homelessness Act 2002
  - Homelessness (Suitability of Accommodation) (England) Order 2003
  - Homelessness Code of Guidance (for Local Authorities)
  - Localism Act 2011
  - Care Act 2014
  - Homelessness Reduction Act 2017
  - Rough Sleeping Strategy Delivery Plan in 2018

- National Rough Sleeping Strategy 2019
- Domestic Abuse Act 2021

2.2 The following Council documents relate to this Strategy:

- Tenancy Strategy 2021-2026
- Temporary Accommodation Tenancy Agreement
- Corporate Plan 2023-2027
- Safeguarding Policy (2024)
- Domestic Abuse (Housing) Policy (2024)
- Vulnerable Tenant Policy (2024)
- Equality Policy

2.3 Other documents informing the Strategy include:

- Kent and Medway Housing Strategy 2020-2025 'A Place People want to call Home'
- Kent and Medway Homelessness Local Connection Referral Protocol
- Joint Protocol between KCC and LHAs to address needs of intentionally homeless families with children and Guidance document for IH and families with complex needs
- Kent and Medway Duty to Refer Protocol
- A protocol for social landlords to address domestic abuse
- Domestic Abuse and Information Sharing Guidance Note
- Temporary Accommodation Placing Protocol

## 3.0 Summary

### Background

3.1 Under Sections 1 and 3 of the Homelessness Act 2002 the Council is required to produce a Homelessness and Rough Sleeping Strategy at least every 5 years. The Council last produced a Homelessness and Rough Sleeping Strategy in 2020, which covered the period between 2020-2024.

3.2 The proposed Homelessness and Rough Sleeping Strategy 2025 – 2030 will replace the existing Strategy and sets out how the Council will continue to work with its partners to prevent and relieve homelessness and rough sleeping in the district and provide adequate support to service users to be supported off the street into accommodation.

### Defining homelessness and rough sleeping

3.4 The legal definition of homelessness includes those without access to accommodation which is reasonable for them to continue to occupy such as people staying with family and friends, people living in squats and those in temporary accommodation provided by the Council. A person is threatened with homelessness if it is likely they will become homeless within 56 days, this might be because they have been given a notice under section 21 of the Housing Act 1988.

3.5 Rough sleepers are defined for the purposes of rough sleeping counts and estimates as:

- People sleeping, about to bed down (sitting on / in or standing next to their bedding) or actually bedded down in the open air (such as on the streets, in tenements, doorways, parks, bus shelters or encampments).
- People in buildings or other places not designed for habitation (such as stairwells, barns, sheds, car parks, cars, derelict boats, stations or 'bashes').

The definition of 'rough sleepers' does not include people in hostels or shelters people in campsites or other sites used for recreational purposes or organised projects, squatters or travellers.

### Causes of homelessness and rough sleeping

3.6 Homelessness can adversely affect virtually every aspect of a person's life, from their sense of safety and social support to overall health and life expectancy. For children and families, homelessness can lead to devastating consequences including developmental delays, disruptions in education, and family separation.

3.7 The causes of homelessness and rough sleeping can be divided into structural factors and individual factors. Structural explanations locate the causes of homelessness in broader forces, and individualist explanations focus on the individual's vulnerabilities and circumstances. However, these factors can be interrelated and reinforced by each other. The table below provides a breakdown of structural and individual factors.

| Structural factors   | Individual factors  |
|--|---|
| <ul style="list-style-type: none"> <li>• Poverty</li> <li>• Inequality</li> <li>• Housing supply and affordability</li> <li>• Unemployment and insecure employment</li> <li>• Access to social security</li> </ul> | <ul style="list-style-type: none"> <li>• Poor physical health</li> <li>• Mental health problems</li> <li>• Experience of violence, abuse and neglect</li> <li>• Drug and alcohol problems</li> <li>• Relationship breakdown</li> <li>• Experience of care or prison</li> <li>• Bereavement</li> <li>• Refugees</li> </ul> |

### Who does homelessness and rough sleeping affect in the district?

3.8 Homelessness can affect anyone regardless of their background or circumstances. Based on the assessment of information in the Homelessness and Rough Sleeping Review 2024 which covered a 5-year period (2018/19 – 2023/24) certain groups approached the Council for homelessness support more than others. These included:

- People living in private rented accommodation
- People living with family or friends
- People who suffer from physical or mental ill health or disability
- Those with a history of homelessness

- Victims and survivors of Domestic Abuse
- Single adult households

## Considerations

- 3.9 For many individuals who approach the Council it may be the first time they have experienced being homeless or at risk of becoming homeless. Therefore, it is likely that many will have very little understanding of the process or the help that is available. It is important that during what is likely to be a very stressful time, the Council's advice and support is consistent, and delivered in an empathetic manner. Consideration should be given to the needs of the individual as is practicable.
- 3.10 Not all individuals will be aware that once a Section 21 Notice ('no fault eviction') has been issued that this places them at risk of becoming homeless and that they can approach the Council for support to prevent this. The government has introduced a proposed end to Section 21 Notices in the 'Renters' Rights Bill' (formerly the Renters Reform Bill), however at present, there is no indication for when this is likely to be made law and the proposed introduction of reforms may lead to some landlords leaving the market entirely.
- 3.11 Some households may not be eligible for homelessness support, because they do not meet immigration conditions and / or have no recourse to public funds. This means that households cannot receive benefits, access council housing or be supported with homelessness. This is usually because an individual's visa or leave to remain says they cannot get this help. However, it might be possible for families with no recourse to public funds to get some help from social services and other external support services.

## 4.0 Information

### Aim of the decision

- 4.1 The aim of this decision is for Cabinet to approve and adopt the Homelessness and Rough Sleeping Strategy 2025-2030, to ensure that the Council is compliant with our duties and obligations as stipulated in Homelessness legislation.

### Strategic priorities

- 4.2 There are 5 strategic priorities. These are:

#### **1. Strategic Priority 1: Early intervention and homeless prevention**

- Improve collaboration with support services for better prevention and relief solutions.
- Improve early intervention to prevent households being evicted.
- Improve tenancy support and sustainment to prevent homelessness and repeat homelessness.

#### **2. Strategic Priority 2: Improve advice, information and options for homeless households**

- Communication and messaging deliver consistent information regarding housing options and challenges, to manage client and partner expectations.

- Vulnerable individuals are supported adequately, and reasonable adjustments made, and they are provided with a range of options when they approach the Council for support.
3. **Strategic Priority 3: Increase available affordable housing and reduce our reliance on private sector temporary accommodation**
    - Improve access to private sector accommodation to meet the needs of households who are homeless or at risk of homelessness
    - Increase and deliver high quality Council-owned affordable housing
    - Reduce our reliance on private sector temporary accommodation
  4. **Strategic Priority 4: Use available resources more effectively**
    - Make best use of government funding and where eligible apply for grants geared towards preventing homelessness and rough sleeping.
    - Make best use of our existing housing stock.
  5. **Strategic Priority 5: Reduce and work towards ending rough sleeping**
    - Improve our understanding of the causes of rough sleeping and identify practical solutions to reduce its occurrence.
    - Support people to move off, and stay off, the streets.

#### Intended outcome(s)

- 4.3 The Action Plan sets out the objectives and actions that the Council and others will take to reduce the occurrence of homelessness through effective prevention and relief, and work towards reducing rough sleeping with the aim of ending it. The Strategy proposes that progress and outcomes are reported to the Councils Housing Working Group.

#### Consultations

- 4.4 Statutory and non-statutory organisations were invited to attend Focus Groups sessions in April 2024 to discuss the current and future impacts to homelessness and rough sleeping in the district, and to feedback / comment on the proposed strategic priorities.
- 4.5 A wider consultation was carried out on a draft version of the Strategy over a 5-week period between August-September 2024, involving in-person meetings with agencies and service users. An email was sent to local authorities, public authorities, statutory and non-statutory organisations, and service users to provide feedback on the draft documents.
- 4.6 The Dover District Tenants Consultative Group (DDTCG) was also consulted on the summary of the Strategy on 1 October 2023. Feedback received from the DDTCG on the strategic priorities was positively received by the Group.
- 4.7 All feedback and comments given at each consultative stage has been incorporated as part of the review and development of the Strategy and Action Plan.



## 5. Assessment of the decision

- 5.1 The table below assesses if the decision is likely to be relevant to the three aims of the Equality Duty.
- 5.2 If the decision is relevant to the three aims of the Equality Duty, the Impact and Mitigations table must be completed to show how it is relevant and what the impact(s) will be.

| <b>Aim</b>  | <b>Relevance<br/>Yes/No</b> |
|---|-----------------------------|
| Eliminate discrimination, harassment, victimisation.  | <b>Yes</b>                  |
| Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not. | <b>Yes</b>                  |
| Foster good relations between persons who share relevant protected characteristics and persons who do not share it.   | <b>Yes</b>                  |

## 6. Impact and Mitigations

| Characteristic   | Age   |
|--|---|
| <b>Relevance</b><br>High / Medium / Low                        | Medium  |
| <b>Impact of the decision</b><br>Positive / Neutral / Negative | Neutral / Negative  |
| <b>Reasons for impact</b>                                      | <p>Homelessness can impact anyone. An individual's age can determine the type of support they may need, but it does not determine whether prevention or relief support is given if they meet the eligibility criteria, and a duty is owed.</p> <p>The overarching aim of the Strategy is to have a positive impact to the lives of households who find themselves homeless or at risk of homelessness due to circumstances often out of their control, by providing them with housing advice, and prevention if they are at risk of becoming homeless, or relief if they are homeless. While our goal is to support households, we are sometimes limited by what we can do which is mainly down to the availability of housing and legislation / regulations.</p> <p>Our review of homelessness and rough sleeping showed that in most cases the main applicant was aged between 18-34 (52%), while homelessness appears to impact less so on elderly households (65-74, 3% and 75+, 0.02%). The data suggests that homelessness appears to impact on younger households. A likely reason for this is that younger households, if they are not in social housing, tend to live in privately rented accommodation, and therefore, are more at risk of being issued a valid Section 21 'no fault' eviction notices. Being issued a 'valid Section 21' was one of the main reasons for homeless applications in the district.</p> <p>However, elderly individuals who are homeless or at risk of becoming homeless, may require additional support with completing forms, particularly if they are online, as well as finding information on our website designed to help them through the process. It is also more likely that they will have a disability or a chronic condition that means they require additional support.</p> |

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|                           | <p>The review also showed that there were 1,180 children who were homeless and living in temporary accommodation (TA) over the 5-year period. Children and families can be adversely affected by homelessness, especially where they are placed in TA for long periods of time. The experiences of homelessness can lead to developmental delays, disruptions in education, and family separation.</p> <p>The availability and type of temporary accommodation in the district is limited and may mean that suitable properties may not be located in the district, or do not meet all the needs of the applicant and their household.</p>  |
| <p><b>Mitigations</b></p> | <p>We will endeavour to provide tailored support and advice to meet the needs of the household or individual. The Strategy states that we will consider the types of communication methods we use to reach and help as many people as possible. In doing so we will ensure that the information we use on our website, leaflets, guides and other forms of communication is clear and in 'plain English'. If required we will also provide adapted copies, such as large print and translated copies (where necessary).</p> <p>The Council will also consider making reasonable adjustments to our service provision if that would assist an individual or household with equal access to housing options support. We will also work with other external organisations that can provide specialist support, or we can signpost households to such services. The Strategy also proposes providing better information around Section 21s, responsibilities of both tenants and landlords, as well as continuing to prevent evictions through landlord liaison.</p> <p>We will attempt to place households and individuals in accommodation that meets their needs, however this may not always be possible. The Council has a programme of increasing our housing stock including increasing the number of Council owned TA properties that are managed by us. We will where possible and where there is a need, attempt to bring forward units that are accessible / adaptable.</p> <p>Where there are children within a homeless household, we will work with other agencies to support them and / or signpost families to other agencies for support. Where possible we will try to place families in TA that causes the least amount of disruption as possible, for example, placing the family in TA that is close to their children's school, or where there are good public transport connections. In accordance with the Homelessness (Suitability of Accommodation) (England) Order 2003, we will not place households with children in bed and breakfast accommodation, except where there is no other accommodation available. If so, this will only be for a maximum of 6 weeks. This includes children aged 16 and 17 years old.</p> |

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|  | <p>Where, despite assistance from the Council, a household's homelessness persists and there are children, we will refer the family (with their consent) to the children's social service authority (Kent County Council) in accordance with the Children Act 1989.</p> <p>Regular monitoring and analysis may identify reasons that have not been anticipated. Action will be taken to mitigate any barriers identified.</p> |
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| <b>Characteristic</b>  | Disability  |
| <b>Relevance</b><br>High / Medium / Low                        | Medium  |
| <b>Impact of the decision</b><br>Positive / Neutral / Negative | Neutral / Negative  |
| <b>Reasons for impact</b>                                      | <p>Homelessness can impact anyone. An individual's disability can determine the type of support they may need, but it does not determine whether prevention or relief support is given to them if they meet the eligibility criteria, and a duty is owed.</p> <p>The overarching aim of the Strategy is to have a positive impact to the lives of households who find themselves homeless due to circumstances often out of their control, by providing them with housing advice, and prevention if they are at risk of becoming homeless, or relief if they are homeless. While our goal is to support households, we are sometimes limited by what we can do which is mainly down to the availability of housing and legislation / regulations.</p> <p>Our review of homelessness and rough sleeping showed that 'history of mental health problems' (24%), 'physical ill health and disability' (17%) and 'learning disability' (9%) were identified as the support type needed most by homeless households.</p> <p>Individuals with a disability, whether physical or mental, may require additional support throughout the process, particularly if they are required to read information online, if the information is complicated or if they are required to attend the Council offices.</p> |

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|                    | The availability and type of temporary accommodation in the district is limited and may mean that suitable properties may not be located in the district, or do not meet all the needs of the applicant and their household.  |
| <b>Mitigations</b> | <p>We will endeavour to provide tailored support and advice to meet the needs of the household or individual.</p> <p>The Strategy states that we will consider the types of communication methods we use to reach and help as many people as possible. In doing so we will ensure that the information we use on our website, leaflets, guides and other forms of communication is clear and in 'plain English'. If required we will also provide adapted copies, such as large print and translated copies (where necessary).</p> <p>Where an individual or household member has a disability, we will make reasonable adjustments to our service provision if that would assist an individual or household with equal access to housing options support. We will also work with other external organisations that can provide specialist support, or we can signpost households to such services.</p> <p>We will attempt to place households and individuals in accommodation that meets their needs, however this may not always be possible. In some cases, prevention or relief duties can be ended with an accepted offer in supported accommodation. The Council also has a programme to increase its household stock, including increasing the number of Council-owned TA. We will, where possible and where there is a need, attempt to bring forward units that are accessible / adaptable.</p> <p>Regular monitoring and analysis may identify reasons that have not been anticipated. Action will be taken to mitigate any barriers identified.</p> |

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| <b>Characteristic</b>  | Gender             |
| <b>Relevance</b><br>High / Medium / Low                        | Medium             |
| <b>Impact of the decision</b><br>Positive / Neutral / Negative | Neutral / negative |

**Reasons for impact**

Homelessness can impact anyone. An individual's gender does not determine whether prevention or relief support is given to them, since if they meet the eligibility criteria for homeless support, a prevention, relief or main duty is owed.

The overarching aim of the Strategy is to have a positive impact to the lives of households who find themselves homeless due to life circumstances which can often be out of their control, by providing them with housing advice, and prevention if they are at risk of becoming homeless, or relief if they are homeless. While our goal is to support households, we are sometimes limited by what we can do which is mainly down to the availability of housing and what is stipulated in legislation / regulations.

Our Review demonstrated that while homelessness affects all genders, there were identifiable trends between households owed a prevention or relief duty:

- **Households with dependent children** who required prevention support were overwhelmingly more likely to consist of '*Single adult – female*' households (60%)
- **Households without dependent children** who required prevention support were more likely to consist of '*Single adult – male*' households (42%)
- **Households with dependent children** who required relief support were overwhelmingly more likely to consist of '*Single adult – female*' households (60%)
- **Households without dependent children** who required relief support were overwhelmingly more likely to consist of '*Single adult – male*' households (63%)
- Men are overwhelmingly more likely to be sleeping rough on any given night (84%) than women (16%).

Under homelessness legislation, households with dependent children living with them or who might reasonably be expected to live with them have priority need for accommodation.

Our review also showed that the fifth type of support need for homeless households was because they were a victim / survivor of domestic abuse (7%). While domestic abuse can affect anyone, regardless of their gender or background, it does disproportionately impact women. Under the Domestic Abuse Act 2021, the Council has a duty to source suitable accommodation for the victim and members of their household. While we always endeavour to locate suitable accommodation in the district, this might not always be available or possible. Support is also provided by other organisations.

The availability and type of temporary accommodation in the district is limited and may mean that suitable properties may not be located in the district, or do not meet all the needs of the applicant and their household.

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| <b>Mitigations</b> | <p>We will endeavour to provide tailored support and advice to meet the needs of the household or individual.</p> <p>We will make reasonable adjustments to our service provision if that would assist an individual or household with equal access to housing options support. We will also work with other external organisations that can provide specialist support, or we can signpost households to such services.</p> <p>We will always endeavour to source accommodation that is suitable in relation to the applicant and those living with them, to meet their needs.</p> <p>In 2024, the Council published its Domestic Abuse Policy 2024 for Housing which also covers homeless applicants. The Policy sets out how the Council will respond to incidents of domestic abuse within its own housing stock and how it will work collaboratively with other agencies to provide support, and secure accommodation, for victims / survivors of domestic abuse.</p> <p>The Council will also follow the protocols published by the Kent Housing Group and the Kent and Medway Safeguarding Adults Board (KMSAB) to support homeless applicants who are domestic abuse victims.</p> <p>The Council has a programme of increasing our housing stock including increasing the number of Council owned TA properties that are managed by us.</p> <p>Regular monitoring and analysis may identify reasons that have not been anticipated. Action will be taken to mitigate any barriers identified.</p> |
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| <b>Characteristic</b>  | Gender reassignment |
| <b>Relevance</b><br>High / Medium / Low                        | Medium              |
| <b>Impact of the decision</b><br>Positive / Neutral / Negative | Neutral             |

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|---------------------------|---|
| <b>Reasons for impact</b> | <p>Homelessness can impact anyone. An individual's gender reassignment does not determine whether prevention or relief support is given to them, since if they meet the eligibility criteria for homeless support, a prevention, relief or main duty is owed.</p> <p>The overarching aim of the Strategy is to have a positive impact to the lives of households who find themselves homeless due to life circumstances which can often be out of their control, by providing them with housing advice, and prevention if they are at risk of becoming homeless, or relief if they are homeless. While our goal is to support households, we are sometimes limited by what we can do which is mainly down to the availability of housing and what is stipulated in legislation / regulations.</p> <p>The availability and type of temporary accommodation in the district is limited and may mean that suitable properties may not be located in the district, or do not meet all the needs of the applicant and their household.</p> |
| <b>Mitigations</b>        | <p>We will endeavour to provide tailored support and advice to meet the needs of the household or individual, and endeavour to source suitable accommodation.</p> <p>We will make reasonable adjustments to our service provision if that would assist an individual or household with equal access to housing options support. We will also work with other external organisations that can provide specialist support, or we can signpost households to such services.</p> <p>The Council has a programme of increasing our housing stock including increasing the number of Council owned TA properties that are managed by us.</p> <p>Regular monitoring and analysis may identify reasons that have not been anticipated. Action will be taken to mitigate any barriers identified.</p>  |

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|--|--------------------------------|
| <b>Characteristic</b>  | Marriage and civil partnership |
| <b>Relevance</b><br>High / Medium / Low                        | Medium                         |
| <b>Impact of the decision</b><br>Positive / Neutral / Negative | Neutral                        |



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|----------------------------------|---|
| <p><b>Reasons for impact</b></p> | <p>Homelessness can impact anyone. A household's marriage or civil partnership does not determine whether prevention or relief support is given to them, since if they meet the eligibility criteria for homeless support, a prevention, relief or main duty is owed.</p> <p>The overarching aim of the Strategy is to have a positive impact to the lives of households who find themselves homeless due to life circumstances which can often be out of their control, by providing them with housing advice, and prevention if they are at risk of becoming homeless, or relief if they are homeless. While our goal is to support households, we are sometimes limited by what we can do which is mainly down to the availability of housing and what is stipulated in legislation / regulations.</p> <p>The availability and type of temporary accommodation in the district is limited and may mean that suitable properties may not be located in the district, or do not meet all the needs of the applicant and their household.</p> |
| <p><b>Mitigations</b></p>        | <p>We will endeavour to provide tailored support and advice to meet the needs of the household or individual, and endeavour to source suitable accommodation.</p> <p>We will make reasonable adjustments to our service provision if that would assist an individual or household with equal access to housing options support. We will also work with other external organisations that can provide specialist support, or we can signpost households to such services.</p> <p>The Council has a programme of increasing our housing stock including increasing the number of Council owned TA properties that are managed by us.</p> <p>Regular monitoring and analysis may identify reasons that have not been anticipated. Action will be taken to mitigate any barriers identified.</p>  |

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| <b>Characteristic</b>  | Pregnancy and maternity  |
| <b>Relevance</b><br>High / Medium / Low                        | Medium   |
| <b>Impact of the decision</b><br>Positive / Neutral / Negative | Neutral  |
| <b>Reasons for impact</b>                                      | <p>Homelessness can impact anyone. An individual's pregnancy or maternity status does not determine whether prevention or relief support is given to them, since if they meet the eligibility criteria for homeless support, a prevention, relief or main duty is owed.</p> <p>The overarching aim of the Strategy is to have a positive impact to the lives of households who find themselves homeless due to life circumstances which can often be out of their control, by providing them with housing advice, and prevention if they are at risk of becoming homeless, or relief if they are homeless. While our goal is to support households, we are sometimes limited by what we can do which is mainly down to the availability of housing and what is stipulated in legislation / regulations.</p> <p>A pregnant woman, and anyone that lives with her or is reasonably be expected to live with her, has a priority need. This is the case regardless of how long she has been pregnant.</p> <p>The availability and type of temporary accommodation in the district is limited and may mean that suitable properties may not be located in the district, or do not meet all the needs of the applicant and their household.</p> |
| <b>Mitigations</b>   | <p>We will endeavour to provide tailored support and advice to meet the needs of the household or individual, and endeavour to source suitable accommodation.</p> <p>We will make reasonable adjustments to our service provision if that would assist an individual or household with equal access to housing options support. We will also work with other external organisations that can provide specialist support, or we can signpost households to such services.</p> <p>The Council has a programme of increasing our housing stock including increasing the number of Council owned TA properties that are managed by us.</p>   |

|  |  |
|--|--|
|  | Regular monitoring and analysis may identify reasons that have not been anticipated. Action will be taken to mitigate any barriers identified. |
|--|--|

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|--|---|
| <b>Characteristic</b>  | Race  |
| <b>Relevance</b><br>High / Medium / Low                        | Medium  |
| <b>Impact of the decision</b><br>Positive / Neutral / Negative | Neutral / Negative  |
| <b>Reasons for impact</b>                                      | <p>Homelessness can impact anyone. The overarching aim of the Strategy is to have a positive impact to the lives of households who find themselves homeless due to life circumstances which can often be out of their control, by providing them with housing advice, and prevention if they are at risk of becoming homeless, or relief if they are homeless. While our goal is to support households, we are sometimes limited by what we can do which is mainly down to the availability of housing and what is stipulated in legislation / regulations.</p> <p>However, individuals / households need to meet the qualifying criteria to be eligible for homelessness support, which includes meeting the immigration conditions. <b>Qualifying criteria and immigration conditions are set by the UK Government.</b> To access homeless assistance individuals must have:</p> <ul style="list-style-type: none"> <li>○ British or Irish citizenship</li> <li>○ EU settled status</li> <li>○ Indefinite leave to remain (ILR)</li> <li>○ Refugee status or humanitarian protection</li> <li>○ Leave to remain with recourse to public funds</li> </ul> <p>Some EU citizens with pre-settled status also qualify. From 30 January 2023 individuals can also get homelessness help if they have limited leave to remain as a victim of human trafficking or slavery.</p> <p>If an individual or household does not meet the conditions above or has 'no recourse to public funds', they are not eligible for homelessness support. 'No recourse to public funds' is an immigration restriction which means that affected individuals / households cannot access welfare benefits, housing or homeless assistance.</p> |

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|                    | <p>For some non-UK applicants, English may not be their first language, and therefore they may find it difficult to understand information provided to them.</p> <p>The Homelessness Review showed that there was a slightly disproportionate impact to 'Black / African / Caribbean / Black British' and 'Other ethnic groups' compared to the Census 2021 ethnicity demographics of the district.</p> <p>The availability and type of temporary accommodation in the district is limited and may mean that suitable properties may not be located in the district, or do not meet all the needs of the applicant and their household.</p>  |
| <b>Mitigations</b> | <p>We will endeavour to provide tailored support and advice to meet the needs of the household or individual, and endeavour to source suitable accommodation.</p> <p>The Council does not have any authority over how immigration conditions are set and is legally required to abide by them when carrying out its homelessness duties.</p> <p>For individuals who do not qualify for homeless assistance there are organisations that may be able to provide support, such as the No Recourse to Public Funds Network (NRPF), the No Accommodation Network (NACCOM) and Homeless Link. When reviewing our webpages we will ensure that there are sources of information about organisations such as those listed for households to access. We will also signpost households to such services if they contact us for support but are not eligible.</p> <p>We will ensure that information on our webpages is concise and uses plain English.</p> <p>We will make reasonable adjustments to our service provision if that would assist an individual or household with equal access to housing options support. We will also work with other external organisations that can provide specialist support, or we can signpost households to such services.</p> <p>The Council has a programme of increasing our housing stock including increasing the number of Council owned TA properties that are managed by us.</p> <p>Regular monitoring and analysis may identify reasons that have not been anticipated. Action will be taken to mitigate any barriers identified.</p> |

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| <b>Characteristic</b>  | Religion, Belief or Lack of Belief   |
| <b>Relevance</b><br>High / Medium / Low                        | Medium   |
| <b>Impact of the decision</b><br>Positive / Neutral / Negative | Neutral  |
| <b>Reasons for impact</b>                                      | <p>Homelessness can impact anyone. An individual's religion, belief or lack of belief does not determine whether prevention or relief support is given to them, since if they meet the eligibility criteria for homeless support, a prevention, relief or main duty is owed.</p> <p>The overarching aim of the Strategy is to have a positive impact to the lives of households who find themselves homeless due to life circumstances which can often be out of their control, by providing them with housing advice, and prevention if they are at risk of becoming homeless, or relief if they are homeless. While our goal is to support households, we are sometimes limited by what we can do which is mainly down to the availability of housing and what is stipulated in legislation / regulations.</p> <p>The availability and type of temporary accommodation in the district is limited and may mean that suitable properties may not be located in the district, or do not meet all the needs of the applicant and their household.</p> |
| <b>Mitigations</b>   | <p>We will endeavour to provide tailored support and advice to meet the needs of the household or individual.</p> <p>We will make reasonable adjustments to our service provision if that would assist an individual or household with equal access to housing options support. We will also work with other external organisations that can provide specialist support, or we can signpost households to such services.</p> <p>The Council has a programme of increasing our housing stock including increasing the number of Council owned TA properties that are managed by us.</p> <p>Regular monitoring and analysis may identify reasons that have not been anticipated. Action will be taken to mitigate any barriers identified.</p>   |

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| <b>Characteristic</b>  | Sexual orientation   |
| <b>Relevance</b><br>High / Medium / Low                        | Medium   |
| <b>Impact of the decision</b><br>Positive / Neutral / Negative | Neutral  |
| <b>Reasons for impact</b>                                      | <p>Homelessness can impact anyone. An individual's sexual orientation does not determine whether prevention or relief support is given to them, since if they meet the eligibility criteria for homeless support, a prevention, relief or main duty is owed.</p> <p>The overarching aim of the Strategy is to have a positive impact to the lives of households who find themselves homeless due to life circumstances which can often be out of their control, by providing them with housing advice, and prevention if they are at risk of becoming homeless, or relief if they are homeless. While our goal is to support households, we are sometimes limited by what we can do which is mainly down to the availability of housing and what is stipulated in legislation / regulations.</p> <p>The availability and type of temporary accommodation in the district is limited and may mean that suitable properties may not be located in the district, or do not meet all the needs of the applicant and their household.</p> |
| <b>Mitigations</b>   | <p>We will endeavour to provide tailored support and advice to meet the needs of the household or individual.</p> <p>We will make reasonable adjustments to our service provision if that would assist an individual or household with equal access to housing options support. We will also work with other external organisations that can provide specialist support, or we can signpost households to such services.</p> <p>The Council has a programme of increasing our housing stock including increasing the number of Council owned TA properties that are managed by us.</p> <p>Regular monitoring and analysis may identify reasons that have not been anticipated. Action will be taken to mitigate any barriers identified.</p>   |