

## **Equality Impact Assessment Temporary to Permanent (T2P)**

### **1. Summary**

This report sets out details of the equality impact assessment undertaken in relation to the L.B.Bromley T2P Initiative.

This initiative was entered in to towards the end of 2007 with two partner Housing Associations. The assessment concludes that the T2P initiative will not lead to unlawful discrimination.

It identifies actions to be taken in order to mitigate the strategy's potential adverse effects on people for whom the scheme is targeted - i.e. the homeless

### **2. Background**

2.1 The Housing/Homelessness and Temporary Accommodation (TA) reduction strategies all include aims around prevention of homelessness, improving the standard and location of TA and increasing the supply and options of suitable TA. These aims are reflecting those of other Portfolios and the Council around improving health, educational attainment, choice and responsibility.

2.2 The main purposes of the T2P initiative is to increase the supply of suitable and long term TA, that will convert to normal general needs Housing Association accommodation in the future, to provide more TA in the boundaries of the LB of Bromley and o make more effective use of public funding by using such funding that would have gone to private landlords through housing benefit to secure the property and its asset within the social housing sector in perpetuity and thereby secure nomination rights to the property for the Council. In a number of cases the initiative would also save public money by having rents for the households - which are covered by Housing benefit - that are cheaper than the costs of the same household being in bed and breakfast or in properties leased from the private sector through Housing Associations. Funding was successfully bid for from the Settled Homes Initiative funding made available from Government funds and the requirement of the funding was to reduce the number of households in temporary accommodation and, thereby, to also assist Councils in achieving the Government target to halve the number of households in TA by the year 2010.

2.3 Under the Race Relations Act 1976 (amended in 2000 and 2003) all local authorities must have due regard to the need:

- to eliminate unlawful racial discrimination

- to promote equality of opportunity
- to promote good relations between persons of different race

The act requires public bodies to assess the impact of all functions and policies on the promotion of race equality. Bromley Council has broadened the scope of impact assessments to include gender, age, disability and sexuality. Equality Impact Assessments, which are carried out for any proposed new policy, are intended to ensure that policies do not discriminate and that, where possible, they actively promote equality.

### **3. Relevance to Equality**

3.1 The T2P initiative is relevant in relation to its potential impact for the following equality groups.

3.2 ***Ethnicity/race:*** Black and Minority Groups are known to be over-represented in the numbers presenting as homeless.

3.3 ***Disability:*** Some households approaching the Housing service have disabled people within the household or consist of a single disabled person household.

3.4 ***Gender:*** a sizeable proportion of homeless households consist of adults - with or without children - affected by domestic violence or that are young mothers.

3.5 ***Sexual orientation:*** homeless households consist of lesbian, gay, bisexual and transgender people including, for example, those affected by domestic violence or violence from others in or around their home.

3.6 ***Age :*** homelessness has no age boundaries.

### **4. Areas of Focus for the Equalities Impact Assessment**

4.1. The T2P initiative does not directly discriminate in terms of any of the relevant legislation (Race Relations Act, Disability Discrimination Act, Sex Discrimination Act, Equal Pay Act and Human Rights Act).

4.2 The focus of the assessment is therefore to consider whether the initiative might indirectly discriminate against any of the equality groups in any of the following ways:

- by excluding a specific equality category or sub group

- by affecting some equality categories or sub-groups disproportionately
- if the service cannot be accessed equally by all equality categories
- if there are barriers that might inhibit access to the service or its benefits

4.3 Arising from this analysis, a number of issues have been identified where the initiative might have an adverse effect on one of more of the equality categories and appropriate action has been identified to mitigate each effect. (See Appendix A).

## 5. Information and Data

In carrying out the assessment, a number of data sources were used. These included:

- information available from the Housing service in respect of households applying as homeless, threatened with homelessness or already living in TA.

## 6 Consultation

Consultation to inform this assessment has included the following:

- Service users, Housing Associations, other partners and staff were all consulted in the course of homeless service reviews during 2007 and further reviews in 2008

## 7 General

The T2P initiative was developed with a focus on equality particularly by aiming to provide housing that, before it is purchased, is assessed for its ability to meet known housing needs of the range of households already in temporary accommodation.

As TA contains a proportionately larger number of the more vulnerable households in the Borough and aims to provide better standard, in Borough and long term accommodation it is, by its nature, benefiting those households who might more frequently appear in the groups that are most disadvantaged or, possibly, discriminated against. For example, households from a BME background feature considerably higher in the housing service compared to the proportion in the Boroughs population and, thereby, feature in a higher proportion in TA.

In addition, where it is financially viable, the initiative aims to help particular households by preventing homelessness in the first place through purchase of the property with the household in situ and converted to becoming a Housing Association tenant or shared owner. The difficulties of achieving this should not be underestimated but will be targeted at specific properties - e.g., those containing a disabled member and where the property is already adapted to meet their needs.

Conversely, where a property is on the market and is such that it might meet a specific households needs that have been difficult to meet - again this might be an already adapted property, then if it is financially viable so to do the property will be purchased and let to the household under this initiative.

## **8. Mitigating measures**

Appendix A below sets out actions which have, or will be, taken to mitigate the adverse effects that the T2P initiative might have for individual equality groups. These can be summarised as follows:

- Ensuring that properties are purchased across the Borough - albeit each property purchased has to be financially viable under the terms of the initiative.
- Ensuring that properties of different sizes are purchased - albeit that it is the 2 and 3 bed properties that are usually financially viable with some 4 bed properties in less expensive parts of the Borough.
- Ensuring that for each property that is being considered for purchase a specific Housing Manager assesses its ability to meet the need of a household in TA.
- Ensuring that all households in TA or approaching as homeless are made aware of the initiative as an option to meet their housing needs.
- Ensuring that staff are aware of the initiative in order to propose it as an option for homeless or potentially homeless households and to make them aware of the implications of the initiative.
- Ensuring that staff, through awareness of the initiative, can identify the potential homeless households where it might be possible to purchase the property with the household in situ.

**Appendix A: Temporary to Permanent Housing Initiative - Equality Impact Assessment Issues and Mitigating Measures**

<i>Issue</i>	<i>Potential Adverse Effect</i>	<i>Actions to date</i>	<i>Future action(s)</i>	<i>Target Outcome</i>	<i>Lead officer</i>	<i>Timescale</i>
Properties purchased across Borough	If only on existing estates or cheaper areas then replicate potential disadvantage and concentration of social housing – but note more expensive parts of Borough are not financially viable	Hsng Assoc partners instructed to find properties across Borough and include potential for new build properties – but note financial viability of each is paramount	Continue wide focus for properties being purchased	At least 40% of properties not to be on existing large social housing estates.	Andy Harfield	Throughout duration of Initiative to its close in Summer 2008
Range of sizes of properties purchased	If only smaller (e.g. 2bed) properties purchased then more likely to only assist one group of households – but note many larger or small properties are not financially viable	Hsng Assoc partners instructed to find properties of a range of sizes – but note financial viability of each is paramount	Continue ensuring a range of property sizes are purchased	Mainly 2 and 3 bed properties purchased but with an aim to try to have 10% 1 and 4 bed	Andy Harfield	Throughout duration of Initiative to its close in Summer 2008
Ensure properties purchased meet needs of homeless households	Purchased properties standing empty. Effect viability of initiative and likely success of a future bid for funds which would be to detriment of homeless households	Procedure for Hsng Assoc to seek approval of property to be purchased before offer made is built in to SLA with Hsng Assoc and being complied with	Continue with process already in place	No property purchased that is difficult to let	Lynnette Chamielec	Throughout duration of Initiative to its close in Summer 2008
All homeless households are made aware of the T2P initiative <b>AND</b> Ensuring all staff aware of the T2P initiative	Inequitable access to the properties – in particular those who might be more articulate or regular contactors of the Housing service.	All staff briefed at Divisional mtngs. Key front line staff briefed in Team mtngs. Staff information sheet produced on “What is Temp2Perm”	Visiting staff to discuss with all households in TA. T2P properties to be advertised on Choice Based Lettings system	Opportunity to be offered a T2P property available to all households for whom it is suitable for	Mark Damiral, John McBrearty and Philip Dodd	Throughout duration of Initiative to its close in Summer 2008