

EQUALITY IMPACT ASSESSMENT TOOL

The council has a statutory duty to consider the impact of its decisions on age, disability, gender reassignment, pregnancy & maternity, race, religion or belief, sex (gender) and sexual orientation.

The Council also has a duty to foster good relations between different groups of people and to promote equality of opportunity.

Completing an EIA is the simplest way to demonstrate that the Council has considered the equality impacts of its decisions and it reduces the risk of legal challenge. EIAs should be carried out at the earliest stages of policy development or a service review, and then updated as the policy or review develops. EIAs must be undertaken when it is possible for the findings to inform the final decision. Keep all versions of your EIA. An EIA should be finalised once a final decision is taken.

When you should undertake an EIA:

- You are making changes that will affect front-line services
- You are reducing the budget of a service, which will affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles (particularly if it impacts on frontline services).
- EIAs also need to be undertaken on how a policy is implemented even if it has been developed by central government (for example cuts to grant funding).

Who should undertake the EIA:

The person who is making the decision or advising the decision-maker

Guidance and tools for completing EIAs are available on the WIRE:

https://officesharedservice.sharepoint.com/sites/intranet/wcc-comms/Pages/Equality-Impact-Assessments-.aspx

An EIA e-learning module is available for all Westminster staff: www.learningpool.com/westminster/course/view.php?id=159

When you have completed an EIA, please send the final copy to Equalities@westminster.gov.uk

It is the responsibility of the service to complete an EIA to the required standard and the quality and completeness of EIAs will be monitored by EMT.

Title

Draft Rough Sleeping Strategy for Public Consultation

What are you analysing?

- What is the purpose of the policy/project/activity/strategy?
- In what context will it operate?
- Who is it intended to benefit?
- What results are intended?
- Why is it needed?

This EIA provides an assessment of the impacts of the proposals included in the Westminster Rough Sleeping Strategy 2017-2022.

Although it is not a legal requirement, the Council has a rough sleeping strategy in order to articulate its approach to tackling this difficult issue and improving people's lives. This is a particularly important issue for the City Council. Rough sleeping is a growing problem nationally, but is particularly acute in Westminster, which has by far the highest number of rough sleepers in the country (the latest street count data showed Westminster with 260 rough sleepers — out of a London total of 960); Brighton and Hove had the second largest number with 144). A key reason for this is our unique location — in the heart of the capital city and the centre of its transport network, a place that brings together businesses, visitors and tourists, and people arriving here from all over the London, the UK and the rest of the world to an extent simply not seen anywhere else in the UK.

The 2013 – 2016 Rough Sleeping Strategy has now expired. The city's approach is being reviewed and reassessed in the current context (including historically high numbers of non-UK/Republic of Ireland nationals rough sleeping, continued constraints on public sector resources and changing national and local approaches to homelessness) and a new draft strategy has been developed for the next three years, which aims to bring key partners and stakeholders together to reduce rough sleeping across the city and support people to rebuild their lives.

The key underpinning objective in the strategy is to support people away from the streets with a new emphasis on preventing people from starting to sleep rough in the first place. We are uncompromising in our view that there is no place for rough sleeping in Westminster; as the most visible and damaging form of homelessness, it is something that a leading, twenty-first century global city simply cannot ignore. It is harmful and dangerous for those sleeping rough and for communities more widely. A strategy has an important role in setting out the direct actions it will take and how we will measure its results. It will also form the basis for multi-agency partnership working and to draw attention to what the public can do to help.

The initial proposals put forward by the council were subject to public consultation, including with individuals with protected characteristics and groups that represent them, between September and November 2016, and we have now considered the feedback and updated the strategy for final publication. This EIA reflects the proposals contained in the proposed strategy.

This EIA draws upon four key sources of information:

 2015/16 data from the Combined Homelessness and Information Network (CHAIN), a multiagency database recording information about rough sleepers and the wider street population in London. CHAIN is commissioned and funded by the Greater London Authority (GLA) and

- managed by St Mungo's, a charity that operates rough sleeping, homelessness and other services across the country.
- Data from our street counts, which gives a snap shot of who is rough sleeping in Westminster on a given night.
- Evidence collected through the Westminster Homeless Action Together (WHAT) week, where over 250 rough sleepers were interviewed by volunteers over the course of a week in July 2016.
- o Information gathered through consultation on the draft strategy.

Details of the lead person completing the screening/EIA

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Date sent to Equalities@westminster.gov.uk

tbc

Version number and date of update

V3 – updated on 05/04/17

SECTION 1: Initial screening: Do you need to complete an Equality Impact Assessment (EIA)?

Not all proposals will require an EIA, this initial screening will help you decide if your project or policy requires a full EIA by looking at the potential impact on any equality groups.

Does the project, policy or primpact on any of the follow						
	None	Positive	Negative	Not sure		
Disabled people						
Particular ethnic groups						
Men or women (include						
impacts due to pregnancy/	<u>—</u>		_			
maternity)						
People or particular sexual						
orientation/s						
People who are proposing to						
undergo, are undergoing or						
have undergone a process or						
part of a process of gender						
reassignment						
People on low incomes						
People in particular age						
groups						
Groups with particular faiths						
and beliefs						
Are there any other groups		\boxtimes				
that you think may be						
affected negatively or						
positively by this project,						
policy or proposal?						
Yes, people who have been in						
the armed forces or in						
institutional settings						
If the answer is "negative What do you think that the communities will be?						
None / Baining		<u> </u>	Cignificant			
None/ Minimal			Significant			
None or minimal impact would	ho whore	Significant im	nact would be wh	ara thara is		
there is no negative impact ider		_	pact would be wh dentified that has			
where there will be no change t		•				
services for any groups.	io tile	1111	pact on any group	·		
services for any groups.						

	If the answer is "significant" consider doing a full EIA
1.3	Using the screening information in questions 2.1 and 2.2, should a full EIA be carried out on the project, policy or proposal
	Yes ⊠ No □
1.4	How have you come to this decision?

EQUALITY IMPACT ASSESSMENT

SECTION 2: BUILDING AN EVIDENCE BASE

2.1	 If you do not formally collect surveys or consultations, cell 	t data about a particular group then use the results of local nsus data, national trends or anecdotal evidence (indicate see attempt to complete all boxes.				
	How many people use the service currently? What is this as a % of Westminster's population?	2,857 people were engaged with and offered support whilst sleeping on Westminster's streets in 2015-16. Over 50% of these were supported away from the streets and did not spend a second night out. There are currently 414 clients in supported accommodation in Westminster through the rough sleeping pathway. This represents 0.2% of Westminster's population.				
		The below assesses equalities information across all rough sleepers in the borough, but it must also be taken into account that different cohorts within the overall rough sleeping population have differing (often multiple and cross-cutting) needs. For example, within the most entrenched population of rough sleepers there is a greater prevalence of complex support needs compared to the most people who are on the streets for a very short period of time and exit rough sleeping very quickly after an intervention.				
	Age People aged 26–55 are more likely to sleep rough than the wider Westminster population. Age Rough Sleepers Westminster					

					ality Impact Ass	essment
			(Chain 2015/	-	Population	
		_			(2011 Census)	
		Under 18	2%		18%	
		18-25	12%		11%	
		26-35	28%		23%	
		36-45	30%		17%	
		46-55	20%		12%	
		Over 55	10%		20%	
Disability	CH	IAIN does	not systemation	cally i	record whethe	r people
	ha	ve a physic	al or learning d	isabili	ty ¹ . Although th	ere is no
	sp	ecific data	on disabilities (using	the definition u	nder the
	Eq	uality Act),	there is data	about	a much wider	range of
	se	lf-identified	support need:	of ro	ough sleepers.	
		Support N	leed (CHAIN 20)15/1	6)	
		Drugs		36%		
		Alcohol		27%		
		Mental He	ealth -	47% (compared to 17	'% of
			1	the na	ational average	of
			1	people	e aged 18-64	
				estima	ated to have a	
				comm	non mental diso	rder²)
		None		28%		
	In	the Commo	on Health Asses	ssmen	nt Tool (CHAT), a	a form
	со	mpleted by	268 service us	ers w	ithin the Westn	ninster
	ro	ugh sleepin	g pathway, 889	% of p	eople said they	had a
	me	ental health	ı issue. Further	more,	, in the WHAT ${\sf w}$	veek
	fin	idings:				
			•	said t	hey had a chror	nic
			n issue			
			•		hey had a physi	
			•	d limit	t the type of ho	using
		•	could access			
			•		hey have had tr	
			_	ecaus	e of a mental he	ealth
	-		or concern.			
Sex					ch more likely	
		_			so true in West	
			_	•	% of rough sle	•
	Westminster in 2015/16 were women, this is higher than the London average.					
	Line	e condon a		C 14	loctminates	
			Rough Sleeper		estminster	
			(CHAIN		opulation	
			2015/16)		2014 Mid-year	
		Momon	170/		stimates)	
	1	Women	17%	48	8%	

¹ There is a field for outreach workers to tick yes/no for Learning Disability but this field is not mandatory. There is also a field for outreach workers to use to indicate whether a rough sleeper has a physical health problem. This does not equate to a physical disability as it draws in a much wider range of conditions.

² PANSI and POPPI, Oxford Brookes University 2014

		Appendix 2	<u> </u>	
	Men	83%	52%	
Race	likely to slee	able shows ethr p rough in Wes e of the overall	tminster, com	pared to the
	Race		Rough Sleepers (Chain 2015/16)	Share of Westminste Population (2011 Census)
	White –	British	27%	35%
	White –	Irish	2%	2%
	White –	Other	38%	24%
	Traveller NB These people of ethnicity Romania 2014/15 nationals this ethn CHAIN m of all rou Westmin	e figures include of Roma of, usually of on origin. In Romanian of recorded in oic category on oade up 13.6% ogh sleepers in		 0% - Gypsy or Irish Traveller Romany (part of Other Ethnic Group – Any other) - 3.9%⁴
	Black		8%	7.5%
	Arab		0%	7%
	Asian		2%	14.5%
	Mixed		1%	5%
	Westminster sleepers wer Of those from Romanians r sleepers see	CHAIN, 33% of r were from the re from Central m the CEE, 69% made up 32.8% n across the city the second high	UK in 2015/1 and Eastern E were from Ro of the total no y. After the Ul	.6. 47% of rought European (CEE Omania, and Umber of roug K and Romania
Religion or belief	CHAIN does rough sleepe	not gather in ers.	formation on	the religion
Sexual orientation		not gather inf pers. Howeve		the sexuality WHAT we

 $^{^3}$ Roma Support Group/St. Mungos/City of Westminster, Rough Sleeping Roma in the City of Westminster (June 2016) 4 3.9% of Westminster's population are part of Other Ethnic Group – Any other, which includes Romani people

Gender Re-assignment	questionnaire, of the 265 respondents, 95% identified as heterosexual and 4% identified as gay, lesbian or bisexual. It is estimated that up to 10% of the Westminster population may be gay, lesbian, bisexual or transgender (LGBT). CHAIN does not gather information on the sexuality or transgendered status of rough sleepers. However, in the WHAT week questionnaire, 0.4% of respondents identified
Pregnancy and Maternity	as transgender. CHAIN does not gather information on this. However, although the numbers are small, pregnant women are likely to be particularly vulnerable and it is important to engage with and support them at the earliest opportunity.
Marriage and Civil Partnership	There has been evidence of an increase in the number of couples sleeping rough on the streets and the dimensions of these relationships can include substance misuse and domestic violence.
People with institutional and armed forces history	People with institutional and armed forces history are more likely to sleep rough than the rest of the population. According to CHAIN, in 2015/16: • 10% of rough sleepers in Westminster had been in the armed forces at some point in their lives. 65% of those with armed forces experience were non-UK nationals • 12% had been in care at some point in their lives • 32% had been in prison at some point in their lives
Low incomes	Although there is no data recorded about the incomes of rough sleepers, unemployment generally increases the likelihood of becoming homeless; one of the key reasons for rough sleeping is an inability to pay for or maintain a home. It is however, also the case that some individual rough sleepers could afford access to certain types of housing but choose not to do so in order to maximise remittances.

2.2 Are there any equality groups that are overrepresented in the monitoring information relative to their size of the population? If so, this could indicate that the proposal may have a disproportionate impact on this group even if it is a universal service. Information about Westminster's population is on the Equalities page on the WIRE.

Yes, as outlined above, in Westminster, the below groups are overrepresented in the rough sleeping population relative to their size of the population in Westminster:

- People aged between 26 55
- Men are more likely to sleep rough than women- although the reasons for and experiences of rough sleeping for women are distinctive
- People from White Other and Gypsy, Romany and Irish Traveller groups (particularly those from Central and Eastern European countries)
- People with complex support needs
- People with institutional and armed forces history

However, it should be noted that most rough sleepers do not have a local link to Westminster and come from elsewhere (either overseas or within the UK)

2.3 Are there any equality groups that are underrepresented in the monitoring information relative to their size of the population? If so, this could indicate that the service may not be accessible to all groups or there may be some form of direct or indirect discrimination occurring.

Yes, as outlined above, in Westminster, the below groups are underrepresented in the rough sleeping population relative to their size of the population in Westminster:

- People aged under 18 or over 55
- Women although the reasons for and experiences of rough sleeping for women are distinctive
- People from White British, Arab, Asian, Mixed and Other groups
- There is not enough data to assess whether LGBT people are over or under-represented in this group or whether people with a particular faith or religion are over or under represented.

However, as set out above, it should be noted that most rough sleepers do not have a local link to Westminster and come from elsewhere (either overseas or within the UK)

SECTION 3: ASSESSING THE IMPACT

In order to be able to identify ways to mitigate any potential impact it is essential that we know what those potential impacts might be.

3.1 Consultation Information

This section should record the consultation activity undertaken in relation to this project, policy or proposal

We undertook significant informal engagement with partner agencies in the early stages of development of the strategy. This included voluntary sector service providers with on the ground experience, the Metropolitan Police and the Central London Clinical Commissioning Group.

We also benefited from extensive engagement with rough sleepers themselves through the Westminster Homeless Action Together (WHAT) week in September. This provided unprecedented insight from speaking to over 250 rough sleepers in Westminster throughout the WHAT week which was also used to inform the strategy.

The strategy was subject to full public consultation between 26 September and 4 November 2017. The consultation involved a number of different forms of engagement with stakeholders ranging from residents, businesses and BIDs to voluntary sector organisations, public sector agencies and service users. In additional to a formal survey, during the consultation period, officers attended a number of events such as the Open Forum Public Meeting on 6 October, promoted the consultation through existing partnership meetings such as the West End Partnership and spent time talking to businesses in hotspot areas such as Victoria and the Strand.

Overall we estimate that we engaged with 417 people or organisations via a number of channels, although there may be a small amount of duplication in these numbers where people were spoken to face-to-face as well as submitting a written response for example.

3.2 What might the potential impact on individuals or groups be?

Consider disability, race, gender, sexual orientation, transgender, age, faith or belief and those on low incomes and other excluded individuals or groups

Overall, it is assessed that the impact of the strategy on the various equalities groups will be positive – both those among rough sleepers and those in the wider community who are affected by it. Rough sleeping in any form is harmful and dangerous and the key underpinning objective in the strategy is to prevent it as far as possible and then to support people away from the streets, regardless of the person's age, gender, sexual orientation, transgender, race, faith or belief or disability. The strategy emphasises the importance of tailored approaches to help individuals off the streets. There is no evidence that any of the proposed services are inaccessible for any particular group (leaving aside the issue of those who cannot access housing benefit or do have no legal recourse to public funds, which is a matter of national policy and legislation and so falls outside the scope of this assessment).

The draft strategy proposes to introduce a new person-centred assessment and referral process which will be used by all agencies working with a rough sleeper across the sector are likely to have a beneficial impact on all groups — which will focus on the individual needs of the rough sleeper, who is working with them and the support available. In particular, it will follow the service user through all of the agencies involved, to reduce the need for individuals to provide the same

(frequently personal) information on numerous occasions. Furthermore, proposals to commission a new assessment centre which enables people's needs to be assessed more holistically over a longer period of time is likely to have a positive impact on all groups.

Some of the new commitments in the draft strategy are aimed specifically at some of the equalities groups, such as objectives around focussing support on people with mental health issues. Preventing people being discharged from hospital and prison without somewhere to stay will have positive impacts on people with health, or mental health problems, and those from an offending background. The commitment to taking a tailored approach to women who sleep rough is also likely to have a positive impact on this group by responding to the different experiences of female rough sleepers and providing specialist services to meet these needs.

As already noted, national legislation and policy mandate a different approach in the case of some individuals from outside the UK. Some non-UK nationals are not entitled to access some services provided in the city. The draft Strategy refers to the council's support for enforcement work to reduce rough sleeping among those who do not have rights to be in the UK (e.g. overstayers, failed asylum seekers, CEE nationals not exercising their treaty rights). This is in keeping with the overall approach of seeking to move people from the street as quickly as possible, reducing the scope for harm. The strategy sets out a number of actions to support those involved - we will work with agencies such as Routes Home to help supported connections where possible, and will broker bed spaces for the most vulnerable non-UK nationals to help support people through the process. The key underlying premise of the strategy is that rough sleeping is harmful and dangerous and there is a strong argument that returning someone to their country of origin (where they would have a better chance of accessing social assistance, accommodation and public funds) is a better outcome for the individual than leaving them on the streets of London. On balance the proposals in the draft Strategy for these groups are considered to be likely to have a positive impact for these groups.

SECTION 4: REDUCING & MITIGATING IMPACT

As a result of what you have learned, what can you do to minimise the impact of the proposed changes on equality groups and other excluded / vulnerable groups, as outlined above?

4.1	Where you have identified an impact, what can be done to reduce or mitigate the								
	impact? (Remember to think about the Council as a whole, another service area may already be								
	providing services which can help to deal with any negative impact).								
	Consider what actions can be put in place to remove or reduce your identified impact(s). Record								
	all potential actions to show you have considered all options. Please note if no mitigating actions								
	have be	en identified.							
	Column A – Issues or barriers, Column B – what changes can be made to remove or								
	things to take into account reduce barriers or negative impacts (Remember to think								
			about the Council as a whole, another service area may already be						
	There	afila af usush alasusus in	providing services which can help to deal with any negative impact).						
	11	ofile of rough sleepers in	Ensure the new board to oversee the implementation of						
		rough changes (such as	the strategy considers and reports on the strategy's						
		in couples, increases in	impacts on equality groups during its implementation.						
		from different countries) wissues arise as a result of	Dorticular attention will be noid to any changes as a						
			, ,						
		changes	result of the UK decision to leave the European Union						
4.2			d the potential or actual effect on equality, what						
	action	are you taking?							
		1. No major change	Your analysis demonstrates that the policy is robust and						
		(no impacts	the evidence shows no potential for discrimination and you						
		identified)	have taken all appropriate steps to advance equality &						
			foster good relations between groups.						
		2. Adjust the policy	You will take steps to remove barriers or to better advance						
			equality.						
		3. Continue the policy	You will adopt your proposal, despite any adverse effect						
		(impacts identified)	provided you are satisfied that it does not unlawfully						
			discriminate and it is justified.						
		4. Stop and remove	There are adverse effects that are not justified and cannot						
	the policy be mitigated. The policy is unlawfully discriminating.								
4.3		document the reasons	•						
	The strategy is likely to have positive impacts on all groups. Robust measures will be put in place								
	for monitoring the impacts of the strategy and its equalities impacts.								

SECTION 5: ACTION PLAN

This section is for actions related any of the 9 protected characteristic: Age, Disability, Gender, Gender reassignment; Pregnancy & maternity, Race, Sexual Orientation or Religion/Belief

5.1	Complete the action plan if you need to reduce or remove the negative impacts you have identified, take steps to foster good relations or fill data
	gaps.

Please include the action required by your team/unit, groups affected, the intended outcome of your action, resources needed, a lead person responsible for undertaking the action (inc. their department and contact details), the completion date for the action, and the relevant RAG rating: R(ed) – action not initiated, A(mber) – action initiated and in progress, G(reen) – action complete.

NB. Add any additional rows, if required.

Action Required	Equality Groups Targeted	Intended outcome	Resources Needed	Name of Lead, Unit & Contact Details	Completion Date (DD/MM/YY)	RAG
Enter additional rows if required						

THIS SECTION TO BE COMPLETED BY THE RELEVANT SERVICE MANAGER	
SIGNATURE:	
FULL NAME:	
UNIT: EMAIL & TELEPHONE EXT:	
DATE (DD/MM/YYYY):	

WHAT NEXT?

It is the responsibility of the service to complete an EIA to the required standard and the quality and completeness of EIAs will be monitored by EMT.

All completed EIAs should be sent to: Equalities@westminster.gov.uk