



## Appendix 2

### Form to be used for the Full Equalities Impact Assessment

<b>Service Area:</b> Housing Services	<b>Section:</b>	<b>Date of Initial assessment:</b>	<b>Key Person responsible for assessment:</b>	<b>Date assessment commenced:</b>
<b>Name of Policy to be assessed:</b>		Draft Housing, Homelessness and Rough Sleeping Strategy		
<b>1. In what area are there concerns that the policy could have a differential impact</b>	Race ✓	Disability ✓	Age ✓	
	Gender reassignment ✓	Religion or Belief ✓	Sexual Orientation ✓	
	Sex ✓	Pregnancy and Maternity ✓	Marriage & Civil Partnership ✓	
<b>Other strategic/ equalities considerations</b>	<ul style="list-style-type: none"> <li>• Oxford City Council Strategy</li> <li>• Equality, Diversity and Inclusion Strategy</li> <li>• Financial Inclusion Strategy</li> <li>• Thriving Communities Strategy</li> </ul>	<ul style="list-style-type: none"> <li>• Asset Management Strategy</li> <li>• Oxford Economic Strategy</li> <li>• People Strategy</li> <li>• Zero Carbon Oxford Action Plan</li> <li>• Oxford Local Plan</li> </ul>	<ul style="list-style-type: none"> <li>• Inclusive Economy Strategy</li> <li>• People Strategy</li> <li>• Cleaner, Greener Oxford Strategy</li> <li>• Oxfordshire Homelessness and Rough Sleeping Strategy</li> </ul>	

## 2. Background:

Give the background information to the policy and the perceived problems with the policy which are the reason for the Impact Assessment.

Homelessness strategies set out how a council and its partners are to prevent homelessness, ensure that sufficient accommodation and support is available for people who are or may become homeless, and seek to prevent them becoming homeless again. There is a legal duty for councils to publish a homelessness strategy based on the results of a homelessness review at least every five years. The national Rough Sleeping Strategy further requires local authorities to include rough sleeping in their homelessness strategies. A housing strategy sets out a council's vision for housing in the local area, in particular affordable housing, but also covers our role as a social landlord, and the private rented sector. There is no legal obligation for a council to have a housing strategy in place, but it is good practice to have one, and in particular for Oxford which faces significant housing challenges.

The development process for Oxford's new Housing, Homelessness and Rough Sleeping Strategy started in early 2021, when we started working on a review of homelessness in Oxford and the wider evidence base. A homelessness review is a comprehensive examination of homelessness in a local authority area, which is carried out to inform the creation of homelessness strategy for that area. The purpose of the review is 'to determine the extent to which the population in the district is homeless or at risk of becoming homeless, assess the likely extent in the future, identify what is currently being done and by whom, and identify what resources are available to prevent and tackle homelessness' (Homelessness code of guidance for local authorities, Chapter 2, paragraph 2.15). Because our strategy will cover housing and homelessness, the homelessness review has been joined with information on housing to ensure a full strategy evidence base is created.

The review and evidence base includes information about numbers of homeless people and families who are homeless, and how services have performed to support homeless people, as well as data on protected characteristics for the people we are providing services. It also includes wider housing issues, such as the Council's role as a social landlord, what's happening in the private rented sector, the plans to build more affordable housing in the future, and the need to tackle the role housing plays in carbon emissions.

The comprehensive review and evidence base has underpinned and informed the of Oxford's Housing, Homelessness and Rough Sleeping Strategy that sets out the Council's strategic response to prevent all forms of homelessness and tackle the housing challenges the city faces. Formulating a strategy affects all of the communities in Oxford and if we do not use enough or accurate data and

	<p>information, or interpret this in the correct way, our strategy, and policies and procedures developed under it, may have unintended negative effects on people with protected characteristics.</p> <p>As our draft strategy is based on research, data and information into the community needs for housing, including disability needs, gender, family housing needs and risk of homelessness, we have been able to use this understanding to ensure our housing strategy meets their needs.</p> <p>The draft strategy will be updated as necessary following consultation before it is implemented. This Equality Impact Assessment will be updated taking into account any further developments and any further changes to the draft strategy before it is finalised.</p>
<p><b>3. Methodology and Sources of Data:</b></p> <p>The methods used to collect data and what sources of data</p>	<p>The review and evidence base, which has informed the strategy, was initially conducted over a period of 6 months, from early 2021 to summer 2021. It has since been updated to incorporate more recent data, national and local developments as well as feedback from consultation on the review and evidence base carried out during summer 2021.</p> <p>We have used a large number of sources, including statutory homelessness statistics, internal data bases, Census data, data from the Office for National Statistics, research carried out by renowned national homelessness organisations and charities, and national policies to compile and then analyse the information.</p> <p>We have compared the findings of this homelessness review with older sets of data for Oxford, such as the evidence base for previous Housing and Homelessness Strategy. We have done this so that we see local and national trends.</p> <p>All our sources are referenced in the review and evidence base.</p>
<p><b>4. Consultation</b></p> <p>This section should outline all the consultation that has taken place on</p>	<p>An important part of gathering additional information and making sure that we had not missed any vital data or information, or that we had interpreted information wrong, was to hold a public consultation on the review and evidence base.</p> <p><b>How we consulted</b> Our approach to this non-statutory consultation was comprehensive and included:</p>

the EIA. It should include the following.

- Why you carried out the consultation.
- Details about how you went about it.
- A summary of the replies you received from people you consulted.
- An assessment of your proposed policy (or policy options) in the light of the responses you received.
- A statement of what you plan to do next

- Public consultation via an online survey available on the Council's consultation portal. Relevant information about the consultation, including the full length review and evidence base document, and a summary document were available on this page.
- Delivered two stakeholder events (online) to which informed and experienced partner organisations, both statutory and non-statutory, were invited. At these sessions, we presented the key information and findings from the review and held discussions with smaller groups, in line with the online survey questions.
- We held a session with elected members, where we briefed members on the review findings and the draft vision and priorities, which was followed by an open discussion to collect thoughts and feedback.
- Oxford City Council Tenants Ambassadors held a session where they jointly put together as a group put together a response to the consultation in line with the online survey.
- Held an online meeting with representatives from the Lived Experience Advisory Forum. The intention at this meeting was to cover similar topics as covered in the stakeholder events, however, the majority of the discussion that took place centred on the provision and commissioning of service for those experiencing or those who have experienced rough sleeping.
- We worked with the relevant portfolio holders to create five videos that we used as part of a social media campaign to promote the consultation, they were also used on our consultation platform and the Council website to provide short and bite-sized information about the emerging priorities and consultation.

In total, we had 52 responses to the online survey. Headlines from online survey responses:

- 64% of responses were made by members of the public, the majority – 31 (60%) of whom were residents in Oxford.
- 54% of respondents described themselves as female
- 62% of those who responded to the survey were over the age of 45. The largest individual age group was 45-54, with 25% of respondents.
- Respondents overwhelmingly identified themselves as being 'White British' – 71%. In total 78% of respondents stated that they 'white' best described their ethnic group.
- Two stakeholder engagement took place towards the end of July. Around 130 invitations to take part in these sessions were sent out to organisations (statutory and non-statutory) that are informed and experienced in issues relating to homelessness. This included Housing Associations, supported accommodation providers, activity and day centres, advice centres,

other local authorities, community groups, mental health services and many more. A total of 33 individual attended one of the two sessions, representing 23 different organisations.

- An online session with representative from the Lived Experience Advisory Forum was attended by a total of 10 persons.

Overall, the response to the draft vision and emerging priorities was positive, both through the online consultation and feedback at the stakeholder events.

In addition to the comments we received through the consultation, as a team, we also took note and reflected on what went well and what we want to change for the statutory consultation of the draft strategy. We have incorporated the following:

- Keep public consultation using online survey
- Stakeholder engagement sessions in person; attending a range of meetings and organisations in person, if possible under the government guidance at the time of the consultation.
- We want to reach a wider group of people, in particular those who are more likely to be faced with homelessness. We had no responses from persons identifying as Black or Black British – Caribbean/African and only 1 as 'any other black background'. This is important to note, as our review of homelessness is clear that the Black community is overrepresented in homelessness cases compared to the overall share of the population in Oxford. Ahead of the next consultation we will seek approach community groups to ensure we reach a more representative mix of people.
- Work with a representatives (individual and groups) from the Oxford community, such as the Lived Experience Advisory Forum, to develop a comprehensive approach to consulting and seek views on our draft strategy, in particular those groups that we have perversion struggled to reach, that represent people with protected characteristics, and those that are disproportionately affected by homelessness. help us carry out consultation with persons with lived experience of homelessness
- Work with the Tenant Ambassador group to help us carry out consultation with households within our own accommodation

Summary of key equalities related identified in the review and evidence base that we will introduce mitigations for include:

- Housing is unaffordable for many in the city

	<ul style="list-style-type: none"> <li>• We hold little data on people with certain characteristics, such as the LGBT community and we do therefore not know the full extent of how this group is affected by homelessness</li> <li>• The Black community is overrepresented in homelessness cases compared to the overall share of the population in Oxford</li> <li>• Males are over represented in rough sleeping instances compared to the overall share of the population</li> <li>• Proportionately, there has been a decrease in women that we accept a duty towards since the introduction of new legislation in 2018.</li> <li>• A large proportion of those we owe a duty towards as well as rough sleepers, have physical and/or mental health disabilities.</li> <li>• A large proportion of those we owe a homelessness duty towards are in reception of benefits in relation to disability.</li> </ul>									
<p><b>5. Assessment of Impact:</b> Provide details of the assessment of the policy on the six primary equality strands. There may have been other groups or individuals that you considered. Please also consider whether the policy, strategy or spending decisions could have an impact on safeguarding and / or the welfare of children and vulnerable adults</p>	<table border="1"> <tr> <td data-bbox="763 746 1167 938"> <p><b>Race</b> Positive</p> </td> <td data-bbox="1167 746 1570 938"> <p><b>Disability</b> Positive</p> </td> <td data-bbox="1570 746 2096 938"> <p><b>Age</b> Positive</p> </td> </tr> <tr> <td data-bbox="763 938 1167 1043"> <p><b>Gender reassignment</b> Positive</p> </td> <td data-bbox="1167 938 1570 1043"> <p><b>Religion or Belief</b> Positive</p> </td> <td data-bbox="1570 938 2096 1043"> <p><b>Sexual Orientation</b> Positive</p> </td> </tr> <tr> <td data-bbox="763 1043 1167 1190"> <p><b>Sex</b> Positive</p> </td> <td data-bbox="1167 1043 1570 1190"> <p><b>Pregnancy and Maternity</b> Positive</p> </td> <td data-bbox="1570 1043 2096 1190"> <p><b>Marriage &amp; Civil Partnership</b> Positive</p> </td> </tr> </table> <p>Please see below for consideration measures we are proposing for the strategy and its work streams are detailed below. These will enhance our services and inform future service development and improvement and by implementing our strategy, the strategy will therefore have a positive effect on the community as a whole an in particular persons with protected characteristics.</p>	<p><b>Race</b> Positive</p>	<p><b>Disability</b> Positive</p>	<p><b>Age</b> Positive</p>	<p><b>Gender reassignment</b> Positive</p>	<p><b>Religion or Belief</b> Positive</p>	<p><b>Sexual Orientation</b> Positive</p>	<p><b>Sex</b> Positive</p>	<p><b>Pregnancy and Maternity</b> Positive</p>	<p><b>Marriage &amp; Civil Partnership</b> Positive</p>
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- As part of the consultation on the draft Housing, Homelessness and Rough Sleeping Strategy, we will also consult and ask for feedback on this Equality Impact Assessment. Feedback will be taken into account when updating the EIA in the process of updating and finalising the strategy.
- We are developing a comprehensive approach to consultation in respect of the strategy and this Equality Impact Assessment (see above page 5)
- Work with colleagues across the Council throughout the life of the Housing, Homelessness and Rough Sleeping Strategy to deliver the Council's commitments set out in the Equality, Diversity and Inclusion Strategy, including:
  - ensuring that we understand issues that disproportionately affect specific groups and may lead to homelessness;
  - work with communities to address such issues to better prevent homelessness;
  - review and improve how we engage with our tenants and leaseholders and ensure that inclusion is at the heart of this;
  - use our programme of capital investment to set an example of high standards and inclusive design and planning for social housing.
- Conduct comprehensive equality impact assessment for new key policies and working practises, such as the Tenancy Strategy and the Allocation Policy, to ensure truly fair access to our services for those with protected characteristics
- Engage better with key community groups to help them provide feedback and help shape our services
- Ensure information and communication is accessible, through using a range of mediums and accessible language
- Improve our data collection so that we can better understand the impact of homelessness on people with certain characteristics, such as the LGBT community; use this data to inform service development
- Seek to understand better why black people and their families living in Oxford are disproportionately made homeless, and engage with service users, in order to improve our services to combat this trend.
- Routinely report and use data to understand shifts in the profiles of persons that we support in relation to homelessness, such as a recent decrease in women, in order to make sure that any significant changes is not due to inaccessibility

	<ul style="list-style-type: none"> <li>Provide training for all of our staff to ensure they are all skilled and confident in delivering services and work with HR partners to have a workforce that as a whole reflects Oxford's diverse population</li> </ul>
<p><b>6. Consideration of Measures:</b></p> <p>This section should explain in detail all the consideration of alternative approaches/mitigation of adverse impact of the policy</p>	<p>There are no known adverse equality impacts of the strategy or work streams coming out of this. The measures and work streams under the Housing, Homelessness and Rough Sleeping Strategy will have positive impacts on all groups of the community and therefore no mitigation measures have been put into place.</p>
<p><b>6a. Monitoring Arrangements:</b></p> <p>Outline systems which will be put in place to monitor for adverse impact in the future and this should include all relevant timetables. In addition it could include a summary and assessment of your monitoring, making clear whether you found any evidence of discrimination.</p>	<p>Following consultation on the draft strategy, which includes questions on equality impacts and equality considerations, the draft strategy will be updated as necessary before it is finalised and implemented.</p> <p>The strategy action plan will be updated regularly and informed by what data tells us.</p> <p>We will keep monitoring the main homelessness data sets, and as stated above, introduce others where we do not have sufficient information at present, to see trends and put in place mitigations if we discover that any measures introduced under this strategy is adversely affecting certain groups in Oxford's communities.</p>
<p><b>7. Date reported and signed off by City Executive Board:</b></p>	
<p><b>8. Conclusions:</b></p> <p>What are your conclusions drawn from the results in terms of the policy impact</p>	<p>That we adopt and deliver the Housing, Homelessness and Rough Sleeping Strategy in order to address the inequality gaps that are created due to the unaffordability of housing in the city.</p>



<b>9. Are there implications for the Service Plans?</b>	NO	<b>10. Date the Service Plans will be updated</b>	Spring 2023	<b>11. Date copy sent to Equalities Lead Officer</b>	
<b>13. Date reported to Scrutiny and Executive Board:</b>		<b>14. Date reported to Cabinet:</b>	19 <sup>th</sup> October 2023	<b>12. The date the report on EqIA will be published</b>	19 <sup>th</sup> October 2023

Signed (completing officer)

Signed (Lead Officer)

**Please list the team members and service areas that were involved in this process:**

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