Appendix 3

Form to be used for the Full Equalities Impact Assessment

Service Area: Housing Services		Section:	Date of Initial assessment: 11th October 2022	Key Person responsible for assessment: Amie Rickatson	Date assessment commenced: 30th January 2023
Name of Policy to be assessed:			Housing, Homelessness and Rough Sleeping Strategy 2023-28		
1. In what area are there concerns that the policy could have a differential impact			Race √	Disability √	Age √
			Gender reassignment √	Religion or Belief √	Sexual Orientation √
			Sex √	Pregnancy and Maternity √	Marriage & Civil Partnership √
Other strategic/ equalities considerations			• Oxford City Council Strategy • Equality, Diversity and Inclusion Strategy • Financial Inclusion Strategy • Zero Carbon Oxford Partnership Action Plan • Thriving Communities Strategy	• Asset Management Strategy • People Strategy • Oxford Local Plan • Oxfordshire Homelessness and Rough Sleeping Strategy • Oxford Economic Strategy • City Centre Action Plan	• Medium Term Financial Plan • HRA Business Plan • Green Space Strategy • Financial Inclusion Strategy
2. Background:			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		

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

	As our 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.
	A 6 week public consultation on the draft strategy was launched in November 2022, to establish if we had set the right comments to achieve our priorities within the strategy. We also asked respondents if they had any feedback on the Equality Impact Assessment completed for the draft strategy. All feedback received from the consultation was carefully reviewed and amendments have been made to the Strategy where appropriate. Following the consultation, we have also developed an Action Plan which sets out how we will achieve our commitments and this document will be used to review our progress over the 5 year strategy period.
	This Equality Impact Assessment has been updated following the consultation and amendments to Strategy and accompanying action plan.
3. Methodology and Sources of Data: The methods used to collect data and what sources of data	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. 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 compiles and then analyse the information. 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. All our sources are referenced in the review and evidence base.
4. Consultation This section should outline all the consultation that has taken place on	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.

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	**How we consulted** Our approach to this statutory consultation was comprehensive and included: • An online public survey • Launched a social media campaign to promote the consultation, advertised the consultation on our choice-based lettings website and included a recording on our telephone lines. • Held 3 in-person stakeholder events, focussing on different priorities within the draft Strategy • Held an online stakeholder event, covering all 5 priorities • We worked with colleagues across the communities' team and attended community events to discuss priorities within the draft strategy and encourage feedback from residents of Oxford. • Held a session with individuals who have lived experience of homelessness • Attended a meeting with Tenant Ambassadors • Held a Member's briefing • The Economic Development Team encouraged attendees of the Economic Growth Board to engage with the consultation • Details of the consultation were included in newsletters that are circulated to businesses and partners operating in the City Centre. In total, we had 103 responses to the online survey. Headlines from online survey responses: • 75% of responses were made by members of the public[1]. The majority – 73% whom were Oxford residents. • 46% of respondents described themselves as female; 44% as male; 7% preferred not to say; 4% did not answer. • 67% of those who responded to the survey were over the age of 45. The largest individual age group was 45-54, with 22% of respondents. • Respondents overwhelmingly identified themselves as being 'White British' – 67%. In total 81% of respondents stated that they 'white' best described their ethnic group.

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[1] Not all 103 respondents responded to all questions in the survey. The answer rate is therefore based on the total number of responses for the relevant question.

- 24% of respondents stated that their day-to-day activities are limited because of a health problem or disability.
- Four stakeholder workshops took place in November and December 2023. A total of 60 individuals attended the workshops from 27 different statutory and non-statutory organisations. This included Housing Associations, County Council, community groups, third sector organisations, mental health services, supported accommodation providers and many more.

Overall, the response to the draft vision and emerging priorities was positive, both through the online consultation and feedback at the stakeholder events. With between 74% and 85% of online respondents agreeing or strongly agreeing with what we want to do.

We also asked if respondents had any comments or feedback on the Equality Impact Assessment for the draft strategy. Only 27 individuals responded to this question. We had a mixture of responses with some respondents saying they thought it was good and others saying they didn't, and equally conflicting opinions on whether the data was useful.

Following a comprehensive review of all responses to the consultation, along with a reflection on the demographics of those individuals who responded to the consultation, we made amendments to our Strategy and developed our action plan. The Action Plan sets out what we will do to achieve our commitments and will be reviewed on an annual basis.

We have a dedicated section within our Action Plan, focusing on Equality, Diversity and Inclusion. This sets out our commitments over the next 5 years which are detailed in section 5.

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
- 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
- The Black community is overrepresented in homelessness cases compared to the overall share of the population in Oxford
- Males are over represented in rough sleeping instances compared to the overall share of the population

	• A large proportion of those we owe a duty towards as well as rough sleepers, have physical and/or mental health disabilities. • A large proportion of those we owe a homelessness duty towards are in reception of benefits in relation to disability.
5. Assessment of Impact: 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	

Race	Disability	Age
Positive	Positive	Positive

Gender reassignment	Religion or Belief	Sexual Orientation
Positive	Positive	Positive

Sex	Pregnancy and Maternity	Marriage & Civil Partnership
Positive	Positive	Positive

Following the consultation into our draft strategy and accompanying EIA we have developed the work streams detailed below. These will enhance our services and inform future service development, the strategy will therefore have a positive effect on the community as a whole including those persons with protected characteristics.

• 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:
  o ensuring that we understand issues that disproportionally affect specific groups and may lead to homelessness;
  o work with communities to address such issues to better prevent homelessness;
  o review and improve how we engage with our tenants and leaseholders and ensure that inclusion is at the heart of this;

	o 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 address issues that disproportionally impact specific groups in our community and lead to homelessness. We will also help them provide feedback and help shape our services. • 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 disproportionally 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 in order to make sure that any significant changes are not due to inaccessibility • Ensure that we understand and respond to issues that disproportionally impact specific groups in our community and lead to homelessness, by improving the data that we collected and using this data to inform service delivery. • Review and improve how we engage with our tenants and leaseholder, ensuring that inclusion is at the heart of this engagement. • Consider the needs of the travelling community, and work in partnership with our neighbouring authorities to commission a new study of need for the period up to 2040. • Complete a review of all current information and advice given to customers. To ensure that information and communication is accessible, through using a range of mediums and accessible language. • Provide training for all Housing Services staff to ensure to ensure they are all skilled and confident in delivering services. • Work with Human Resources partners to have a workforce that as a whole reflects Oxford's diverse population.
6. Consideration of Measures: This section should explain in detail all the consideration of alternative	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.

approaches/mitigation of adverse impact of the policy	
6a. Monitoring Arrangements: 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.	Progress against the action plan will be monitored quarterly, including qualitative commentary. The action plan will be reviewed and updated annually to ensure that it is still relevant, there is focus on yearly actions and progress, and actions can be amended if necessary. To help inform the annual review of the action plan, key sets of data will also be monitored throughout the year. 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.
7. Date reported and signed off by City Executive Board:	
8. Conclusions: What are your conclusions drawn from the results in terms of the policy impact	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.

9. Are there implications for the Service Plans?	NO	**10. Date the Service Plans will be updated**	Spring 2023	**11. Date copy sent to Equalities Lead Officer**	31st January 2023
.13. Date reported to Scrutiny and Executive Board:	**2nd March 2023**	**14. Date reported to Cabinet:**	15th March 2023	**12. The date the report on EqIA will be published**	1st April 2023

Signed

Signed (Lead Officer)

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

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