

Shropshire Equality and Social Inclusion Impact Assessment (ESIIA)

Contextual Notes 2014

The What and the Why:

The Equality and Social Inclusion Impact Assessment (ESIIA) tool replaces the Equality Impact Needs Assessment (EINA) tool previously in use by Shropshire Council. It is a tool to help us to identify whether or not any new or significant changes to services, including policies, procedures, functions or projects, may have an adverse impact on a particular group of people, and whether the human rights of individuals may be affected.

What we are now doing is broadening out such assessments to consider social inclusion. This is so that we are thinking as carefully and completely as possible about all groups and communities in Shropshire, including people in rural areas and people we may describe as vulnerable, as well as people in what are described as the nine 'protected characteristics' of groups of people in our population, eg Age, eg Gender Reassignment. We demonstrate equal treatment to people who are in these groups and to people who are not, through having what is termed 'due regard' to their needs and views when developing and implementing policy and strategy and when commissioning, procuring, arranging or delivering services.

It is a legal requirement for local authorities to assess the equality and human rights impact of changes proposed or made to services, such as through a new policy or a change in procedure. Carrying out ESIIAs helps us as a public authority to ensure that, as far as possible, we are taking actions to meet the general equality duty placed on us by the Equality Act 2010 to have what is called *due regard* to the three equality aims in our decision making processes. These are: eliminating discrimination, harassment and victimisation; advancing equality of opportunity; and fostering good relations.

The How:

The assessment comprises two parts: a screening part, and a full report part.

Screening (Part One) enables energies to be focussed on the service changes for which there are potentially important equalities and human rights implications. If screening indicates that the impact is likely to be positive overall, or is likely to have a medium or low negative or positive impact on certain groups of people, a full report is not required. Energies should instead focus on review and monitoring and ongoing evidence collection, enabling incremental improvements and adjustments that will lead to overall positive impacts for all groups in Shropshire.

A **full report (Part Two)** needs to be carried out where screening indicates that there are considered to be or likely to be significant negative impacts for certain groups of people, and/or where there are human rights implications. If you are not sure, a full report is recommended, as it enables more evidence to be collected that will help you to reach an informed opinion.

Shropshire Council Part 1 ESIIA: initial screening and assessment

Please note: prompt questions and guidance within boxes are in italics. You are welcome to type over them when completing this form. Please extend the boxes if you need more space for your commentary.

Name of service change

Proposed new Homelessness Strategy for Shropshire for 2015-17 including a new Homelessness Strategy Action Plan to follow the previous Homelessness Strategy for 2011-15 (as delivered to Cabinet on 14th December 2011).

Aims of the service change and description

The Homelessness Act 2002 places a duty on Local Authorities to develop and publish a Homelessness Strategy and to renew this at least every five years. The Homelessness Strategy is intended to be an active working document with an emphasis on the prevention of homelessness, through the provision of relevant advice and support, and on the provision of suitable accommodation for households where homelessness cannot be prevented.

The new Homelessness Strategy includes a review of homelessness reported throughout the county during the lifespan of the previous document (2011-15). The data analysis combined with stakeholder consultation, government policy and legislative changes have all influenced the proposed Homelessness Strategy's key aims, which are:-

- an increase in the prevention of homelessness; and
- improving outcomes for households impacted by homelessness.

To achieve the key aims of increased prevention of homelessness and improving outcomes for homeless households, the new Strategy recommends as key objectives:-

- Shropshire Council's corporate commitment to adopting a joint approach to preventing homelessness based on early intervention and continuous improvement;
- Shropshire Council's Housing Options team commitment to work towards achieving the nationally recognised 'gold standard' level of service for our customers;
- recommencement of a Homelessness Strategy Implementation Group to encourage sector-wide participation and responsibility for the effective implementation of the new Homelessness Strategy Action Plan;

The Homelessness Strategy's working Action Plan identifies specific goals and targets in order to achieve the above aims and has been based on Shropshire Council Housing Options working towards achieving the 'gold standard' level of service: 'a joint approach to preventing homelessness based on early intervention and continuous improvement' endorsed by the current Conservative government (with accreditation assessed and awarded by the Department of Communities and Local Government's National Practitioner Support Service). The Action Plan will be monitored, reviewed and updated through quarterly multi-agency Homelessness Strategy Implementation Group (HSIG) meetings.

Finally, as a significant positive step toward achieving the key aims stated above, identified in the new Homelessness Strategy, it is also being recommended that Shropshire Council implement the powers introduced in section 148 of the Localism Act 2011. This is to enable the Council's Housing Options team to discharge its accommodation duty, owed toward

households under sections 193 or 195 of the Housing Act 1996, through the provision of a private rented sector accommodation offer of a suitable assured shorthold tenancy which is for a fixed term of at least twelve months.

Intended audiences and target groups for the service change

Shropshire-wide population
Service users
Shropshire Council
Employees
Housing-related support providers and organisations
Housing providers across Shropshire
Internal and external stakeholder partners, including Health and Criminal Justice services

Evidence used for screening of the service change

Knowledge of service including homelessness statistics and wider housing needs analysis informed new Strategy aims and SMART Action Plan (continued periodic reviews of statistics and housing needs will ensure Homelessness Strategy Action Plan remains relevant as an active working document for agencies county-wide to tackle homelessness and its effects)
Stakeholder and service user consultations carried out to inform Homelessness Review
Homelessness Strategy Action Plan to be managed via HSIIG meetings to be held every three months
Ongoing statistical reports and analysis to monitor and review service progress against Action Plan

Specific consultation and engagement with intended audiences and target groups for the service change

- DCLG's published 'P1E' quarterly reports of homelessness statistics for Shropshire and wider housing needs analysis utilising Council databases – confirmed wider national trend of increasing homeless presentations in last two years and continuing increase in homelessness due to parental/ family exclusions, private landlords ending tenancies and relationship breakdown involving domestic abuse;
- Stakeholder partner organisations consultation event held at Shirehall on 14th July 2015 – confirmed need for continuous improvement in working together and early intervention to prevent homelessness;
- Stakeholder organisations' service users questionnaire consultation between 21st and 31st July 2015 – very limited but positive response indicating high level of customer satisfaction amongst respondents;
- Public consultation via Shropshire Council website between 1st October and 13th November 2015 – again very limited response with a couple of constructive e-mail reminders for needs of all service user groups to be addressed.

Potential impact on Protected Characteristic groups and on social inclusion

Guidance notes on how to carry out the initial assessment

Using the results of evidence gathering and specific consultation and engagement, please consider how the service change as proposed may affect people within the nine Protected Characteristic groups and people at risk of social exclusion.

1. Have the intended audiences and target groups been consulted about:
 - their current needs and aspirations and what is important to them;
 - the potential impact of this service change on them, whether positive or negative, intended or unintended;
 - the potential barriers they may face.
2. If the intended audience and target groups have not been consulted directly, have representatives been consulted, or people with specialist knowledge, or research explored?
3. Have other stakeholder groups and secondary groups, for example carers of service users, been explored in terms of potential unintended impacts?
4. Are there systems set up to:
 - monitor the impact, positive or negative, intended or intended, for all the different groups;
 - enable open feedback and suggestions from a variety of audiences through a variety of methods.
5. Are there any Human Rights implications? For example, is there a breach of one or more of the human rights of an individual or group?
6. Will the service change as proposed have a positive or negative impact on fostering good relations?
7. Will the service change as proposed have a positive or negative impact on social inclusion?

Guidance on what a negative impact might look like

| | |
|------------------------|--|
| High Negative | Significant potential impact, risk of exposure, history of complaints, no mitigating measures in place or no evidence available: urgent need for consultation with customers, general public, workforce |
| Medium Negative | Some potential impact, some mitigating measures in place but no evidence available how effective they are: would be beneficial to consult with customers, general public, workforce |
| Low Negative | Almost bordering on non-relevance to the ESIIA process (heavily legislation led, very little discretion can be exercised, limited public facing aspect, national policy affecting degree of local impact possible) |

Initial assessment for each group

Please rate the impact that you perceive the service change is likely to have on a group, through inserting a tick in the relevant column.

| Protected Characteristic groups and other groups in Shropshire | High negative impact <i>Part Two ESIIA required</i> | High positive impact <i>Part One ESIIA required</i> | Medium positive or negative impact <i>Part One ESIIA required</i> | Low positive or negative impact <i>Part One ESIIA required</i> |
|---|---|--|---|--|
| Age (please include children, young people, people of working age, older people. Some people may belong to more than one group eg young person with disability) | | High – end use of inappropriate emergency accommodation for 16&17 year olds | | |
| Disability (please include: mental health conditions and syndromes including autism; physical disabilities or impairments; learning disabilities; Multiple Sclerosis; cancer; HIV) | | | | Low |
| Gender re-assignment (please include associated aspects: safety, caring responsibility, potential for bullying and harassment) | | | | Low |
| Marriage and Civil Partnership (please include associated aspects: caring responsibility, potential for bullying and harassment) | | | | Low |
| Pregnancy and Maternity (please include associated aspects: safety, caring responsibility, potential for bullying and harassment) | | High - end use of inappropriate emergency accommodation for expectant mothers and households with dependent children | | |
| Race (please include: ethnicity, nationality, culture, language, gypsy, traveller) | | | | Low |
| Religion and belief (please include: Buddhism, Christianity, Hinduism, Islam, Judaism, Non conformists; Rastafarianism; Sikhism, Shinto, Taoism, Zoroastrianism, and any others) | | | | Low |

| | | | | |
|---|--|--|--|-----|
| Sex (please include associated aspects: safety, caring responsibility, potential for bullying and harassment) | | | | Low |
| Sexual Orientation (please include associated aspects: safety; caring responsibility; potential for bullying and harassment) | | | | Low |
| Other: Social Inclusion (please include families and friends with caring responsibilities; people with health inequalities; households in poverty; refugees and asylum seekers; rural communities; people you consider to be vulnerable) | | High – improved outcomes for households impacted by the threat of homelessness | | |
| | | | | |

Decision, review and monitoring

| Decision | Yes | No |
|----------------------------------|-----|----|
| Part One ESIIA Only? | | |
| Proceed to Part Two Full Report? | | |

If Part One, please now use the boxes below and sign off at the foot of the page. If Part Two, please move on to the full report stage.

| Actions to mitigate negative impact or enhance positive impact of the service change |
|---|
| <p>Stakeholder consultation was carried out as part of the Homelessness Review last year. The Homelessness Strategy Implementation Group will monitor and review the impact of the new Strategy Action Plan quarterly.</p> <p>In seeking to discharge the Council's statutory duty to accommodate homeless households, under section 193 of the Housing Act 1996, via an offer of private rented sector accommodation it is proposed:-</p> <ol style="list-style-type: none"> not to utilise any property which has given cause for a Shropshire Council Environmental Health Officer to write to the owner in the previous twelve months due to unsatisfactory property conditions following their assessment under the Housing Health & Safety Rating System from the Housing Act 2004; and not to utilise any property of a landlord whom, where it has been established by Shropshire Council Public Protection service, has in the past twelve months been responsible for harassment or illegal eviction of a tenant. |

Actions to review and monitor the impact of the service change

As above, also it is proposed that the Homelessness Strategy Implementation Group quarterly meetings will be chaired by the Deputy Portfolio Holder for Housing, presently Councillor Robert Macey – elected Conservative party member for Gobowen, Selattyn and Weston Rhyn division.

Activity at Part One screening stage

| Names (list those involved in carrying out assessment) | Job titles | Contact details |
|--|--------------------------------|---|
| Lucas Riley | Senior Housing Options Officer | lucas.riley@shropshire.gov.uk Tel: (01743) 258901 |
| Date commenced | | |
| Date updated | | |
| Date transferred to ESIIA | | |
| Internal Scrutiny by | | |

Scrutiny at Part One screening stage

| People involved | Signatures | Date |
|--|------------|------|
| <i>Lead officer carrying out the screening</i> | | |
| <i>Any internal support</i> | | |
| <i>Any external support</i> | | |
| <i>Head of service</i> | | |

Sign off at Part One screening stage

| Name | Signatures | Date |
|-------------------------------|------------|------|
| <i>Lead officer's name</i> | | |
| <i>Head of service's name</i> | | |

Note for 2014 refresh of our corporate equality impact assessment approach: Shropshire Council has referred to good practice elsewhere in refreshing the EINA material and replacing it with this ESIIA material. The Council is grateful in particular to Leicestershire County Council, for graciously allowing use to be made of their Equality and Human Rights Impact Assessments (EHRIsAs) material and associated documentation.

For further information on the use of ESIIAs: please contact your head of service or contact Mrs Lois Dale, Principal Rural Policy Officer and internal policy support on equality, via telephone 01743 255667, or email lois.dale@shropshire.gov.uk.