# HOMELESSNESS & ROUGH SLEEPING STRATEGY

2020 - 2022



# DRAFT FENLAND DISTRICT COUNCIL HOMELESSNESS AND ROUGH SLEEPING STRATEGY 2020 - 2022

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**FOREWORD** 

It gives me great pleasure to introduce the latest Homelessness and Rough Sleeping Review and action plan from Fenland District Council.

Whilst we face many challenges with homelessness and rough sleeping, we do not take on these challenges alone, we work closely with valuable partners to give support and opportunity to our most vulnerable members of our community, putting our customers at the heart of everything we do is key to successfully meeting the challenge.

We have worked hard as a multi-agency partnership to build on opportunities to tackle our issues together as one team and I am proud of what has been achieved so far. However, there is still much to do and I hope that we can continue to work collaboratively with energy and vision to eliminate homelessness and rough sleeping in Fenland at the earliest opportunity.

### Councillor Samantha Hoy

Portfolio Holder for Housing

#### THE NATIONAL PICTURE

During 2019, there has been an 11.4% increase in the number of households assessed by local authorities as either homeless or threatened with homelessness according to government figures for England.

In the three months leading up to June 2019, 68,170 households were owed a homelessness prevention or relief duty from their local authority, up from 61,210 in the same quarter in 2018.

The number of people who are actually homeless hit 280,000 in 2019, 23,000 more than for the same period 3 years ago.(Shelter).

Of the 68,210 households who were homeless or threatened with homelessness, 30,670 (45%) were identified as having one or more support needs, with mental health being the most common need.

The number of households in temporary accommodation is the highest in more than a decade, with 86,130 households living in various forms of temporary housing at the end of June 2019.

In London, 16.07 households were living in temporary accommodation per 1,000 households overall, compared with a national average of 1.47 households per 1,000.

Shelter published its annual review of homelessness in England, which found that one in every 2000 people are without a home. This figure is based on the sum of those in official temporary accommodation and the number of people sleeping rough.

Households with dependent children accounted for 61,800 (71.8%) of those living in temporary accommodation, and there are 127,370 dependent children living in temporary accommodation overall.

A total of 23,430 (27.2%) households in temporary accommodation were placed in accommodation outside of their local authority, with London accounting for 86.1% of the out-of-district placements.

The new national government has pledged in its manifesto to end rough sleeping by the end of this parliament term in 5 years.

#### THE LOCAL PICTURE

Fenland is located in the East of England region with rail access to London and to Stansted Airport. It is a largely rural district, which surrounds the city of Peterborough

and comprises of villages and four market towns which are generally 10–20 miles from Peterborough. The current population is 95,300 residents (source census 2011).

Affordability remains a growing problem for Fenland District Council with the cost of buying or renting on the open market consistently high. The average house price in October 2019 was £205k Median and lower quartile house price to income ratio is 6.5 (source Hometrack),

The average cost of renting a 3 bedroom house is £173 per week (source Hometrack).

There is an active private rental market with high demand. Rents in the district can be expensive, making some private rentals unaffordable for those on benefits or a low income. Private rentals at the lower end of the market are few and far between and for those relying on housing benefit or Universal Credit (Housing element) to pay their rent, the difference between the LHA rate and the rent payable represents an average shortfall of £100-£150 per month.

#### **RESOURCES**

The council received Flexible Housing Support Grant, £125k from central government in 2018/19 along with Homelessness Reduction Act implementation funding of £61k. Both funding streams are confirmed as continuing for 2020/21 with an increase to £140k.

Additional functions such as rough sleeping and elements of private sector housing rely on the council successfully bidding for resources from central government to carry out these areas of work.

#### **LINKS WITH OTHER STRATEGIES**

Homelessness is a priority for Council's business plan and therefore actions to mitigate against homelessness remains a focus. Homelessness is a key theme in the Cambridgeshire & Peterborough Sub-Region Housing Strategy Statement, the draft Cambridgeshire and Peterborough Health and Well Being Strategy and has strong links to government policies around welfare reform and, of course, the major change to homeless legislation through the Homeless Reduction Act from April 2018.

#### **OUR CURRENT SERVICE OFFER - OUR CORE TEAM**

The Housing Options team have the responsibility for implementing the Homelessness Reduction Act (HRA). This includes homelessness prevention and relieving homelessness (finding alternative homes when prevention is not possible), case management, liaison with landlords and our customers. The team also manage temporary accommodation used for housing those individuals and families that are homeless.

The overall focus for the team is to prevent homelessness. We don't do this in isolation, but working with private and social landlords, parents, families, young and

older people and a range of statutory and voluntary agencies as well as our own internal teams including Anglia Revenues Partnership (ARP) and Private Sector Housing team.

The expanded team consists of a team of 7, 2 triage officers, 4 casework officers and one team leader. Part of the expanded team to meet the new requirements of the Homelessness Reduction Act (HRA) is funded through central government funding that we received to implement the HRA as highlighted above.

# THE HOMELESSNESS REDUCTION ACT – IMPACT ON FENLAND DISTRICT COUNCIL

From April 2018, the government announced significant changes to the way in which councils would be required to tackle homelessness.

With a focus on prevention, councils would be required to work differently, moving away from the traditional homelessness ways of working. In August 2017, the council and partners across Cambridgeshire and Peterborough were successful in obtaining government funding to launch a Homelessness Trailblazer project, essentially looking at ways of early prevention prior to the new Act coming in to force. (See Trailblazer section).

The learning from the project has helped to shape the formation of the Housing Options team.

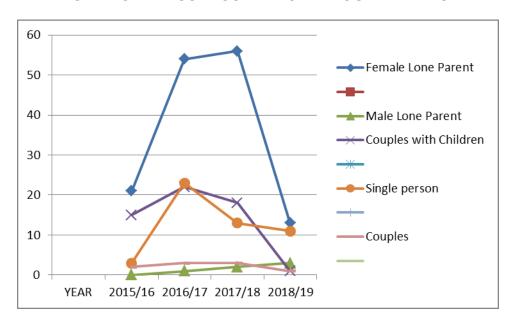
The Act extended the period of 'threatened with homelessness' from 28 days to 56 days, allowing additional valuable time to take preventative action.

There is also a "Duty to Refer" for statutory agencies to notify councils if they come into contact with someone they think may be homeless or at risk of being homeless.

A duty for councils to provide advisory services on homelessness, preventing homelessness and people's rights irrespective of whether or not they have a local connection to our area.

There is also a requirement to agree a personalised housing plan with our clients, outlining what each will do to prevent homelessness and find a suitable solution.

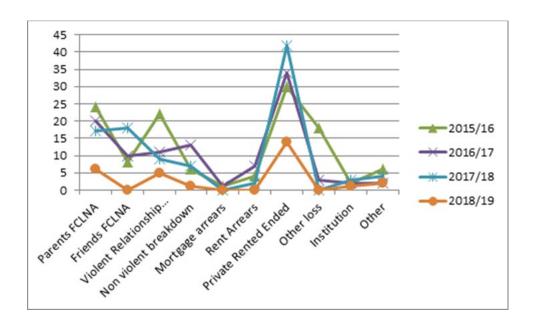




Female lone parents are the group that most need our help, followed by single people and couples with children who present to us as homeless (i.e. when prevention or relief is either too late or not applicable e.g. domestic abuse cases).

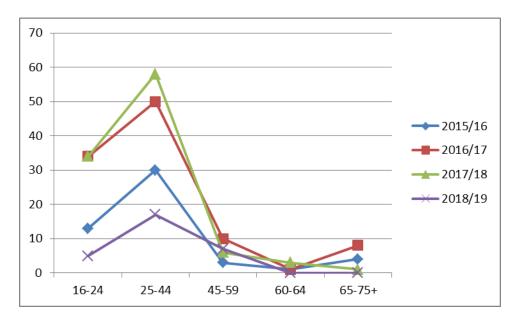
There is a downward trend, this is due to the fact that we are now preventing many of our clients from becoming homeless, this chart shows clients from 2015/16 to 2018/19 who have presented as homeless.

#### REASONS FOR LOSS OF ACCOMMODATION



The highest area for demand is from loss of private rented accommodation, followed by violence and parents being unable to provide accommodation. This is a fairly consistent pattern since 2015/16. However, numbers have reduced significantly in 2018/19 due to the Homelessness Reduction Act (HRA) and the new way of preventing homelessness. We have carried out liaison and mediation between landlords and their tenants and helped with rent arrears to save tenancies.

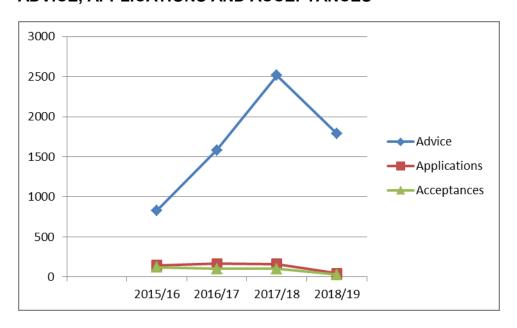
#### **AGE OF CLIENTS**



The age of our clients approaching us has been fairly consistent since 2015/16. The age group of clients who contacted us for help was 25 to 44 years, followed by 16-24 years.

For 16 & 17 year olds, we have jointly developed a county wide protocol with Cambridgeshire County Council.

#### ADVICE, APPLICATIONS AND ACCEPTANCES



This chart shows the number of advice, applications and acceptances received in a whole year.

You will notice a peak in 2017/18 for advice, reducing dramatically in 2018/19 with the introduction of the HRA and prevention going forward. The number of applications and acceptances have also gone down for the same reason in 2018/19.

#### 80 70 60 Household placed in 50 Bed and Breakfast 40 Households placed in 30 Temporary Accommodation 20 10 2015/16 2016/17 2017/18 2018/19

#### TEMPORARY ACCOMMODATION

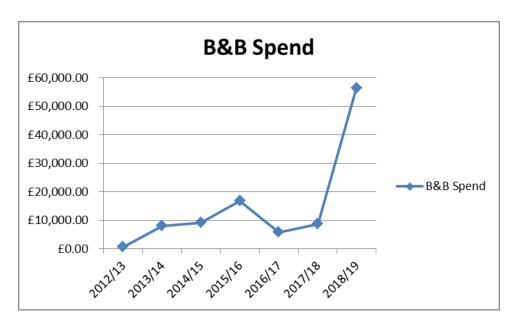
The chart shows the number of people in temporary accommodation and bed and breakfast. This has increased under the HRA.

This is due to the fact that we are seeing a greater number of people requiring assistance that have a form of vulnerability or approached the council late in the process meaning that we could not prevent or relieve their homelessness.

The council now has a duty to provide advice and assistance at the prevention and relief stages for anyone, irrespective of if they have a local connection to Fenland or not. The main duty stage happens when prevention and relief has either failed or it is not suitable to prevent, e.g. in cases of domestic abuse, or the customer makes contact too late.

The use of bed and breakfast is normally used for out of office hours or where hostel accommodation and other temporary placements are not available or suitable.

#### **BED AND BREAKFAST SPEND**



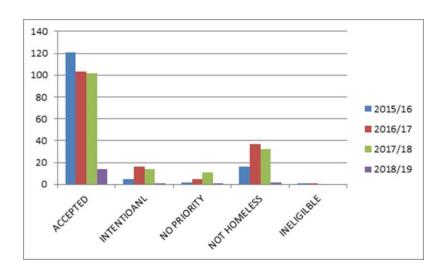
Spend on bed and breakfast accommodation has increased due to the number of clients requiring temporary accommodation and existing provision being full. Spend peaked in 18/19 due to the HRA implementation, the team were assisting more people than previously due to the remit of the HRA for all local authorities to give advice and assistance to anyone who contacted the council, irrespective of whether or not they had a local connection to Fenland. In 19/20 the spend on B&B was £14,565 which included 1 month of additional COVID related spending and therefore shows a dramatic drop in the use of B&B through effective prevention.

We have accessed better options for temporary accommodation on a night by night basis which is better for our clients and has meant significant cost savings to mitigate the increase in demand.

#### TEMPORARY ACCOMMODATION

The council has a 7 unit hostel, works with Clarion Housing to provide 9 units of self-contained accommodation and Chorus Homes to provide an additional 5 units. We are also now using a night by night self-contained accommodation provision which is cheaper than bed and breakfast and provides a better option for our customers.

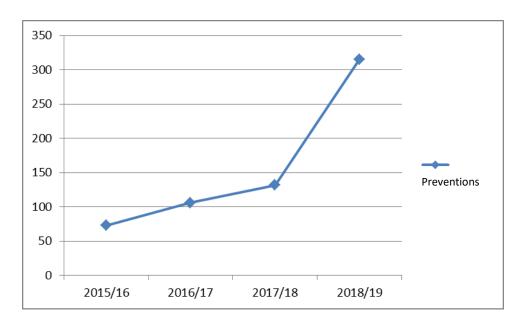
#### **CASE DECISIONS**



The chart shows the number of homelessness acceptances (at the homelessness stage) the number of intentional cases, those who are not in priority need, not homeless and ineligible.

You can see in 2018/19 the difference made in service to our applicants with the HRA way of working in comparison to the old legislation. It is clear that the number of acceptances decreased dramatically, from 121 acceptances in 2015/16 to 29 in 2018/19. The team were able to prevent and not take the number of homelessness applications in the first place.

#### HOMELESSNESS PREVENTION



The HRA places an emphasis on preventing homelessness and from the chart above you can see the upward trend in successful preventions from 73 in 2015/16 to 315 in 2018/19 under the HRA, rising to 390 in 19/20. This has significantly changed the service we offer to our customers for the better.

#### THE CURRENT CORE SERVICE OFFER - OUR SUPPORT PARTNERS

The council works closely with a range of key partners both statutory and voluntary sectors as part of its strategic and statutory functions.

This is key to helping often customers with complex needs and in particular those customers who are rough sleeping where mental health, alcohol and substance misuse are often common.

- Ferry Project Octavia View Hostel Night shelter
- Foyer 16-25 year olds
- Supported Housing The Staithe,
- Domestic Abuse Refuge
- Mental Health services & Social Care
- Drug and alcohol services CGL
- Rural Citizens Advice Cambridgeshire FDC funded
- Access Migrant advice
- Rosmini Centre Migrant Advice
- Housing related support service (CCC funded)
- Registered providers e.g. Clarion

#### **OUR SUPPORT PARTNERS (TIME LIMITED FUNDING)**

The council has been proactive in bidding for funding to help tackle rough sleeping and homelessness and maintains regular contact with MHCLG to push for further funding to have the opportunity to bid for additional and much needed resources.

Project	To do	Time limit and total funding achieved
Migrant Outreach Service	Outreach support and interventions to resolve accommodation issue	2019/20 £136,625
Cold Weather Funding	Provision of temporary accommodation	November 2019 – March 2020 £50,000
Rough Sleeper Initiative	Provision of a day hub	June 2019 – June 2020 £131,125
Rough Sleeper	Co-ordinating action to	November 2019 –
Coordinator	prevent rough sleeping	November 2020 £35,000
Rough Sleeper Initiative	Day Hub, outreach	April – March 2020/21
continuation funding	service, co-ordinator post, support staff and bespoke interventions fund	£340,000

The council works in partnership with Cambridgeshire County Council, who fund and manage the Housing Related Support contracts. Key recipients of this funding include Ferry Project, The Wisbech Foyer, Staithe, Fenland Young People's Project. Due to funding constraints savings are currently being made and services are being redesigned to make savings and still meet the need. The council are actively involved in the recommissioning of services for housing related support including the transformation of services to make sure any changes contribute to meeting the objectives of this strategy.

#### WHAT HAVE WE ACHIEVED TOGETHER? PRIVATE SECTOR HOUSING

To ensure that we are successful in preventing homelessness as well as relying on the private rented sector (PRS) to rehouse our clients (often with incentives) we need to ensure that properties are in good condition, safe and well managed.

The function of the council's PRS team is key to this. The Council successfully bid for additional funding in both Wisbech and March under MHCLG's Controlling Migration Fund (CMF) to conduct proactive street by street property inspections, looking for issues. This is a snap shot of activity which provides an insight in to the scale of the issues being found and not reported by tenants. This is particular common within the migrant community.

Below is a summary of enforcement activity relating to the funded project.

Measure	Cumulative between March 2018 & March 2020
Total Number of Properties Inspected	2713
Interventions Taken (see table below)	923
Information packs issued	315
Smoke Detectors brough in to use	365
Hazards Removed	657

#### Breakdown of interventions since March 2018

Interventions	Cumulative
Smoke Detector defect letters (Private Rented Sector)	152
Smoke Detector advisory eltters (Owner Occupied)	158
Formal Inspection Appointment letters	149
Notice requesting information	12
Informal Letter requesting remedial repair	375
HMO declaration notices	60
Enforcement Notice issued	44

# WHAT WE HAVE ACHIEVED TOGETHER? – OUTREACH SERVICE – ROUGH SLEEPING

Fenland has had relatively low numbers of rough sleepers historically, averaging around 7. An increase in numbers was experienced on our official count in 2018. At the formal (externally verified) annual rough sleeper count 23 individuals were found to be rough sleeping on a single snap shot in November 2018 dropping to 11 in November 2019. However in November 2019 our outreach team were at the time working with 35 rough sleepers.

We are currently working with 52 rough sleepers as part of the COVID response.

Whilst we continue to explore individual root causes, there is a clear pattern of migrant workers who are no longer wanted for work, this can be due to a number of factors including addiction, poor mental health or injury. Homelessness amongst migrant workers occurs when accommodation is linked to work. Often, little or no notice is given to individuals in these circumstances resulting to sofa surfing (sleeping on friends sofas as a temporary measure) and ending in homelessness.

This area of work is linked closely with the work of Operation Pheasant, a multiagency task force formed in 2012 by Cambridgeshire Police and the council in response to increased theft of food and rough sleeping, evidence was traced back to poorly managed and maintained private rented sector housing as the root cause of the issue including criminality and exploitation of residents.

There is clear evidence that some migrant workers face exploitation and cases of both this and Modern Slavery has been prevalent in Fenland linked closely to the private rented sector and unlicensed gangmaster activity.

The council submitted a bid under the Controlling Migration Fund (CMF) in 2017-19 (£86,400) via MHCLG to help provide support to rough sleepers. The bid was successful again in 19/20 £136,625 and Change Grow Live (CGL) are undertaking this role currently. Other funding that the Council has secured with partners include:

- Cold Weather Funding MHCLG in November 2018 for £24,000 for extended cold weather provision through the Ferry Project and deposits for private rented homes. The bid was successful again in 2019, £50,000 for extended cold weather provision along with bespoke interventions fund for CGL
- Rough Sleeper Initiative MHCLG In 2019/20 successful bid to fund the Ferry Project Day Centre Hub for £131,125. To provide a day hub for rough sleepers, directing to support to address the root cause for homelessness, rehousing in to suitable accommodation across tenures and accessing training and work.
- Rough Sleeper Coordinator post In 19/20 MHCLG have funded £35,000 for a post to coordinate action for rough sleepers across Fenland between partner agencies.
- A bid for continuation funding for Hub, outreach service ,rough sleeper coordinator and additional support in the night shelter has been successful for the period 20/21. The amount is £340,000.

#### **OUTCOMES FOR ROUGH SLEEPERS**

#### CGL outreach service (from June 2019 – February 2020)

- 29 people prevented from rough sleeping this includes successful referrals to Ferry project/Octavia View, housing secured via private rented sector, tenancy sustained via mediation with landlords and tackling harassment and voluntary repatriations.
- 40 clients have been assisted with settled status claims to legally remain in the UK. If Settled Status is granted, access to benefits is accessible.

#### Ferry Project Day Hub outcomes (from June 2019 – February 2020)

Additional Cold Weather fund (launched 25<sup>th</sup> November 2019) – 980 bed spaces used through this initiative between November 2019 and January 2020. Severe Weather Emergency Provision (SWEP) – from 1<sup>st</sup> November 2019 to 31<sup>st</sup> December 2019 158 Clients registered.

- 131 Male / 27 Female
- 68 EU Clients / 87 UK Clients / 3 non EU
- 39 clients have been assisted with therapeutic interventions such as counselling and mental health assessments.
- 38 Supported into Hostel services
- 54 Supported into Night shelter
- 2 Reconnected to Romania
- 6 Supported into work and accommodation
- 10 supported with Prevention of Homelessness
- All clients have opportunity to access other funding streams offered to help with Training and employability for example the Building Better Opportunities Fund and Community Led Local Development.
- The Hub have supported clients in opening Bank accounts, benefit claims, prescription medication, registering with GP's, organising patient transport, and hand holding where required to appointments such as Doctors, Opticians, Department of Work Pensions, providing phones to allow clients to access work as often Employers need them to have a phone to text shift times.
- Supporting to access Drug and Alcohol services.
- Worked with Landlords and other agencies to reduce risk of homelessness.
- We have also helped clients access their records from Employers and Inland Revenue.
- This is in addition to meeting clients immediate needs in the Hub by:
  - Delivery of Fenland's first Housing First model partnership work with LD team, Cambs. County Council Housing Related Support Grant, FDC Benefits Team (Anglia Revenues Partnership)

#### **COVID-19 RESPONSE**

With the outbreak of the world wide pandemic in late March 2020, the council was required by MHCLG to very quickly provide individual accommodation to all of those people rough sleeping and housed together in the night shelter.

The council worked with a range of businesses and with Ferry Project to achieve this, along with the provision of food for around 57 clients.

Each individual had an existing support plan from Ferry Hub or CGL Outreach. The work under the new 2020/21 RSI bid has continued, with a view to providing the best chance of everyone moving on to more settled accommodation once lockdown is lifted. This approach also included ensuring that each individual's plan included ongoing treatment support where applicable and accessibility to public funds to ensure that options moving forward were sustainable. Accommodation options included private and social rented homes, supported move on, supported living and night shelter.

As well as support and essential provisions, each individual received guidance translated in to their own language to understand and adhere to government guidance on social distancing and how to react should they become symptomatic. This advice was shared with accommodation proprietors to ensure that staff were also keeping safe during lockdown.

Regular monitoring was undertaken in relation to this client group by Public Health England, Housing Board, Cambridgeshire Police, Multi Agency Incident Cell and MHCLG.

#### HOMELESSNESS TRAILBLAZER PROJECT

In 2017 the council submitted a bid to MHCLG on behalf of Cambridgeshire and Peterborough councils along with the Office of the Police and Crime Commissioner and Cambridgeshire County Council to work together with broader stakeholders to undertake early prevention (pre 56 days) with customers who were showing early signs of being homeless.

The purpose of this area of work was to work with broader partners including Registered Providers, Multi Agency Safeguarding Hub, landlords and agents to raise awareness and take action where homelessness was threatened.

#### Highlights include:

 The team have worked up protocols with key partners including Criminal Justice and Housing, Mental Health, Substance Misuse and Housing and hoarding.

- The service is closely aligned to all council Housing Advice/Options teams and led by Fenland.
- Since the start of the project in August 2017, the team have received more than 1300 referrals in to the service, with the highest demand from Fenland clients (650) until the end of December 2019.
- The team have trained over 250 people from 20 organisations around motivational interviewing free of charge. This has included train the trainer to ensure that the learning is sustained and embedded across many organisations.
- Support has been provided to registered providers to reduce evictions.
- A landlord rent solution service was launched to enable landlords to receive a free service to help advise them about their roles and responsibilities and that of their tenants. The team have successfully undertaken mediation, assisted with rent in advance and with payment of arrears via benefits teams to prevent homelessness successfully.
- Since the launch of the service 572 preventions have been achieved.
- Research undertaken by the Cambridgeshire and Peterborough Housing Board has demonstrated that for every £1 spent on the Trailblazer team and it's projects (2017-19) more than £18 is saved across the public sector.

#### **HOUSING FIRST**

Housing First is an evidence based approach to successfully supporting homeless people with high needs and histories of entrenched or repeat homelessness to live in their own homes.

The overall philosophy of Housing First is to provide a stable, independent home first and then provide intensive personalised support and case management to homeless people with multiple needs.

The council, in partnership with Ferry Project were keen to explore the Housing First model for Fenland.

We learnt from the experience of Cambridge City and considered how it could be implemented in Fenland.

Under the Government's Rough Sleeper Initiative funding, the council are working in partnership to expand Housing First in Fenland. Cambridgeshire County Council were successful in their bid to employ navigators to support Housing First clients. The funding is for one year and the council is working with partners to rent/lease properties for this pilot.

#### **CASE STUDY**

The council had been part of a multi-agency team trying to find a housing solution for an entrenched rough sleeper. X had been rough sleeping for around 20 years and were well known in Fenland. X did not fit any other housing solution due to their needs and life choices, a very hard to reach client falling through thresholds for broader partner assistance. A long term rough sleeper now has their own flat with bespoke support.

The success of this was effective partnership between Ferry Project providing the accommodation, Learning disability Team who are funding Ferry Project to provide additional night time support, Cambridgeshire County Council for stretching the Housing Related Support Grant Ferry Project have for support in the daytime and FDC benefits team (Anglia Revenues Partnership) to assist with payment of the housing element of the rent.

To date, the Housing First Solution for this individual has been very successful, we will take the learning and experience from this case to move forward and hopefully extend this initiative should appropriate funding become available for broader implementation.

#### **TACKLING EMPTY HOMES**

Fenland has approximately 500 properties that have been empty for over 6 months. We are keen to get as many of these properties back in to use to provide much needed homes for our community, including those who are homeless.

This has been a priority area for the council and since December 2019 currently have a post holder in place initially for 1 year to progress this.

#### **DOMESTIC ABUSE**

The council works in partnership with Refuge to provide 12 units of accommodation for women and families fleeing domestic abuse in Fenland. The Refuge also provide an outreach service for survivors of Domestic Abuse in Fenland.

Multi Agency Risk Assessment Conference (MARAC) are also held on a regular basis via telephone conference call to discuss the most high risk cases. Agencies involved in MARAC are Police, Independent Domestic Violence Advocate (IDVA's), Health, Social Workers, Schools and Housing. All agencies work together to keep the survivor safe. Survivors have an Independent Domestic Violence Advisor (IDVA) who supports them and is their main contact.

An identified need has emerged across Cambridgeshire and Peterborough for additional move on accommodation from households in a refuge.

#### **CARE LEAVERS**

The Council have worked with Break Charity and Clarion to provide new move-on accommodation for 2 Care Leavers in 2019. There is a need for 8 further additional places and the Council is working with Break and Clarion to see how this need can be met.

#### **ETHNICITY**

#### **FOREIGN NATIONALS**

The proportion of accepted applicants on the Housing Register who are Foreign Nationals has remained fairly consistent over the past 5 years (15% of the current housing register are non-white British). Of the European Economic Area (EEA) Nationals, Lithuanian is the highest nationality.

#### **BME HOUSEHOLDS**

The BME population is significant throughout the district, particularly within the town of Wisbech, a hub for migrant employment. A recent study undertaken by Professor Greenfields shows Lithuanians at 37 per cent are the largest group of migrant workers, followed by Romanians at 23 per cent and Bulgarians at 20 per cent.

Inward migration demographics have changed and are ever changing. We believe that Lithuanians are still the largest Eastern European migrants in the area but there is now a large population of Bulgarians and Romanians including increasing numbers of Roma.

#### **GYPSIES AND TRAVELLERS**

The 2011 census identified 0.3% of the population as a white Gypsy/Irish Travellers in Fenland, equating to an overall figure of just under 500 Gypsy & Travellers recorded as residing in the District.

In 2016 a sub-regional Gypsy & Traveller Accommodation Assessment was undertaken. The study was carried out on the basis of the changes to the planning definition of a Gypsy, Traveller or Travelling Show person which meant that persons who ceased to travel permanently would no longer be considered under the definition of a Gypsy & Traveller. The findings of the survey identified that there was no requirement to provide additional Gypsy & Traveller pitches in the District.

For Travelling Show people, 12 additional pitches were identified to be provided over the Local Plan period up to 2036. The survey also identified that 61 Gypsy & Traveller households no longer meet the definition but have a housing need. This need, in planning terms, will be addressed as any other part of the settled community through current housing planning policies.

The Gypsy Traveller Accommodation Needs Assessment (GTANA) is currently being refreshed and will be complete by the summer 2020.

#### **WELFARE REFORMS**

The implementation of a major national programme of welfare reforms is well under way. Key aims are to cut the overall welfare bill and encourage people into work.

A key driver of the welfare changes is to make it financially worthwhile for people to take on paid employment rather than claim benefits. This, combined with advice and support around seeking employment, education and/or training should lead to improved opportunities for some people who would previously have been caught in the benefit trap.

Universal Credit was introduced across the district in May 2019. This has replaced six other benefits, including housing benefit, and be provided in a single monthly payment. Nationally the risk of Universal Credit claimants falling into rent arrears has been found to be high, increasing the risk of homelessness.

To date, some of our clients have found it challenging to manage their finances. Advice is available via P3 and Rural Cambs CAB and the Vulnerable Work Coaches within Department for Work and Pensions teams within Job Centres.

#### DEMAND FOR SOCIAL HOUSING

The council commissions Clarion Housing to deliver its statutory function of managing the council's allocations policy which is consistent across all of Cambridgeshire and West Suffolk (the Housing Sub Region).

During 2019/20 there were 1125 people registered on the Housing Register under the following bands. (April 2020).

Band A urgent need to Band D adequately housed.

Emergency Band	Band A	Band B	Band C	Band D	Total
4	127	304	369	321	1125

#### PRIVATE RENTED ACCOMMODATION

Median private rented accommodation costs in the district can be expensive. Universal Credit (Housing Element) entitlement is restricted to the Local Housing Allowance (LHA) for the area. The following table shows the LHA rate for Peterborough for each size of property along with the weekly median rent. The difference each week makes access to the private rent sector difficult for many households in receipt of benefit or on a low income, averaging between £100 - £150 per month shortfall and often requiring a deposit of rent in advance.

One particular reason for the increase that we have seen in HMOs in the District is due to the fact that they provide cheaper accommodation for people, although rents are still higher than Local Housing Allowance rates

Many Landlords still do not accept Housing Benefit and so Housing Options have to build and maintain relationships with those that do.

#### Median Average Weekly Private Rent Costs April 20

- 1 bed £111
- 2 bed £144
- 3 bed £173
- 4 Bed £231

#### Local housing Allowance (LHA) rate April 2020

Wisbech and surrounding village is covered by Kings Lynn LHA (called Broad Rental Market Area), March, Chatteris, Whittlesey and surrounding villages is covered by Peterborough LHA. (April 2020 rates)

	Shared		1 Bed		2		3 Bed		4 Bed		
			Rate		Bed		Rate		Rate		
					Rate						
	Weekly	Monthly	Weekly	Month	Wee	Monthl	Weekl	Monthl	Weekl	Mont	hly
				ly	kly	У	У	У	У		
Peterboroug	£ 58.1	£ 252.55	£ 96.4	£	£	£	£	£	£	£ 70	66.5
h	2		2	418.97	120.	523.73	138.61	602.29	176.41		4
					53						
Kings Lynn	£ 56.2	£ 244.29	£ 92.1	£	£	£	£	£	£	£ 74	42.6
	2		8	400.54	117.	510.74	135.62	589.30	170.91		4
					54						

#### **HOME OWNERSHIP**

The average house price for Fenland in October 2019 was approximately £204,716 (based on average price on ales and valuations), with the lower quartile averaging £150,000 (an £5000 increase in the last 12 months). Figures from the Cambridgeshire Sub Regional Housing Market Bulletin shows average median house prices are 6.5 times the average income, whilst comparisons between the lower quartile figures show house prices to be 9.1 times higher than income. As a general rule, house prices of 3-3.5 times income are considered affordable.

For many households therefore living in the district home ownership continues to be unaffordable.

#### **FLOATING SUPPORT**

A county wide floating support service is in place delivered by P3 to support a range of clients of working age who may need housing related support to help them to maintain their accommodation. In 18/19 196 of 17 -24 year old clients were assisted by P3.

#### STAKEHOLDER HOMELESSNESS REVIEW EVENT JANUARY 2020

The stakeholder consultation event was held on 6 January 2020 and attended by 31 stakeholders and partners.

The event set the scene for what had been achieved and actions undertaken in relation to trends and partnership working.

#### **ACTION PLAN DEVELOPMENT**

In light of the evidence collated the following service development initiatives are being added to the Homelessness and Rough Sleeper action plan:

#### Rough sleeper issue

- Increase provision of accommodation for clients with support needs -Housing First model
- · Implementation of the rough sleeper initiative bid
- Establish a public donation application to help support local charities
- Continue to promote the outreach service for rough sleepers
- Develop a community app of services that assist supporting rough sleepers and how the community can give appropriate help
- Engagement with local GP's to enable registration for migrant rough sleepers
- Liaison with Public health and roll out of dual diagnosis protocol
- Collate data on vulnerability clients with mental health, substance misuse and offending
- Understanding the gaps in mental health and substance misuse services
- Workforce development of front line staff to understand the assessment of mental health capacity and how best to make the case for additional support.

#### Homelessness Reduction Act

- Provision of smaller new accommodation for single parents
- Co- ordination of support for ex- offenders
- Carry out a campaign in relation to private sector housing enforcement
- Joint working between local partners statutory and voluntary
- Training for partners around cultural differences to improve cohesive working and understanding of need
- Investigation in to private sector evictions

This is alongside updating and refreshing the actions already contained in the 2018 action plan. Please see appendix 1 for the action plan developed.

#### **CONCLUSIONS**

It is clear that the need for a continued and dedicated focus towards homelessness both locally and nationally is essential.

With the introduction of the HRA in April 2018, we have seen a significant increase in caseloads for our team, this in turn has resulted in the highest ever rate of homelessness preventions, largely by accessing the private rented sector.

The customers that have approached the council have been of consistent category since 2015/16, with single lone females with children being the most prevalent. With the HRA enabling all customers to approach any council for

assistance, we have seen a marked increase in those with some form of vulnerability, in particular mental health and substance misuse, especially with customers who are rough sleeping.

We have worked hard to meet our needs by proactively bidding for government funding and have been fortunate to work with specialist organisations including Ferry Project and CGL to make a very positive impact for our customers.

Developing and embedding protocols with partners has helped to get better outcomes for our customers, save scarce resources for statutory partners and prevent unnecessary delay in assisting.

Prevention of homelessness is better for our customers and their families, their health and wellbeing.

We are working closely with Clarion and private sector landlords to help with accommodation options for our clients.

We will continue to be driven and passionate about vulnerable people and will strive to unlock funding to meet future needs along with our partners.

April 2020

# FENLAND DISTRICT COUNCIL - HOMELESSNESS & ROUGH SLEEPING STRATEGY ACTION PLAN 2020/22

Intervention	Task	Intended Outcome	Resources & Timescale	Progress	Lead
Objective 1. Preventio options	n of homelessness and housing				
1.0 Develop protocols, work force development and case work to prevent early signs of homelessness	<ul> <li>Develop the following protocols and implement:</li> <li>Criminal Justice and Housing - embedding via Task and Finish Group</li> <li>Mental Health and Substance Misuse</li> <li>Hoarding</li> <li>Hospital Discharge with Queen Elizabeth Hospital, Kings Lynn, Peterborough City Hospital, Hinchingbrook Hospital Huntingdon &amp; Addenbrooks Hospital Cambridge</li> <li>Workforce development with partners e.g. registered providers</li> </ul>	Customers prevented from becoming homeless	Funding from partners to progress the project  February - November 2020		Head of Housing & Community Support  Housing & Communities Manager  Trailblazer Homeless Prevention Manager
1.2 Carry out a review of prevention techniques and options	Review undertaken and changes made to respond to the needs of our clients	Prevention service that meets the needs of Fenland's customers	Existing resources and DCLG grant funding April 2020		Housing & Communities Manager & Housing Options Team Leader  Trailblazer

Intervention	Task	Intended Outcome	Resources & Timescale	Progress	Lead
		Outcome	Timescale		Homeless Prevention Manager  Private Sector
1.3 Tackle rogue landlord activity in	Link in with Operation Pheasant to gather intelligence via Private Sector	Reduced illegal activity in the	Existing resources		Housing Officer  Housing & Communities
Fenland	Housing team linking with Housing Options Continue to serve enforcement	private rented sector			Manager Housing Options
	notices on poor quality properties				Team Leader Private Sector
					Housing Officers
					Operation Pheasant partnership
1.4 Housing sub-region - Housing Allocations Review	Review the policy to update following Homelessness Reduction Act and also to ensure clarity in where policy sits in relation to local lettings	Making affordable housing as accessible as	Existing resources		Head of Housing & Community Support
	policies (Registered Providers)	possible to our customers			Housing & Communities Manager
					Housing Options
1.5 Work in partnership with Anglia	Ensure links to ARP are taken up together with partners	Homelessness prevented	Ongoing		Team Leader Housing Options Team Leader

Intervention	Task	Intended Outcome	Resources & Timescale	Progress	Lead
Revenues Partnership (ARP) to promote the Discretionary Housing Payment scheme					Senior Community Support Officer

# Objective 2 – Eliminate rough sleeping in Fenland

Intervention	Task	Intended	Resources &	Progress	Lead
		outcome	Timescale		
	Deliver the rough sleeping Initiative	Reduced	Successful		Housing &
		numbers of	MHCLG Bid		Communities
2.0 Continue to	<ul> <li>Continue delivery of the Day</li> </ul>	rough sleepers	£340,320		Manager
reduce the numbers	Hub – deliver housing				
of rough sleepers	solutions for all rough sleepers		June 20/21		CGL & Ferry
each year	to meet their needs				Project
	<ul> <li>Outreach Service x 3 workers</li> </ul>				Rough Sleeper Co
	<ul> <li>Night shelter support provision</li> </ul>				Ordinator
	(2.5 FTE)				
	<ul> <li>Bespoke intervention funds for</li> </ul>				
	CGL outreach and Ferry				
	Project Hub	Monitoring the	Bi Monthly May,		Outreach Team &
	<ul> <li>Rough Sleeper Co-ordinator</li> </ul>	impact of	July, Sept, Nov		FDC
	Conduct bi monthly rough	funding	(main count		
	sleeper counts		below), Jan &		
	<ul> <li>Submit monthly monitoring</li> </ul>		March		
	under DELTA system		<b>NA</b> (1.1		
			Monthly		

	Establish an operational monitoring group and a strategic group to monitor and maximise outcomes for our clients	Monitoring the impact of funding	Fortnightly  November 2020	Housing & Communities Manager  CGL & Ferry
	Conduct annual rough sleeper count (verified)		November 2020	Project Rough Sleeper Co ordinator
2.1 Carry out review of Severe Weather Emergency Provision (SWEP)	Review of procedures undertaken to ensure procedure meets the legislative requirements of SWEP and awareness to partners and teams and website	Fulfil statutory duties to rough sleepers during severe weather conditions efficiently and effectively	Homeless prevention grant By 30 September 2020	Housing Options Team Leader Ferry Project
2.2 Enable development of Housing First	Deliver additional units of Housing First accommodation model	Meet the need of vulnerable homeless people requiring support	Exiting Resources CCC RSI Bid Partner resources	Housing & Communities Manager Cambridgeshire County Council Ferry Project Support providers

# Objective 3. Temporary Accommodation, supported homes and supply of private rented homes

3.0 Undertake review	Enable partners to establish	Homeless	Existing resources	Housing &
and provision of	supported accommodation and	customers		Communities
temporary	temporary accommodation within	facilitated to		Manager and Housing

accommodation	Fenland including provision in Whittlesey	remain in temporary accommodation during case decision making process		Options Team Leader
3.1 Facilitate the delivery of additional homes for rent	40 empty homes brought back in to use  Work with Cambridgeshire & Peterborough Combined Authority and our own Commercial and Investment strategy to focus on providing homes to rent	Reduction in homelessness	Existing resources	Private Sector Housing Team
3.2 Enable additional provision of supported accommodation	Work together with key partners to expand provision of supported accommodation	Meet the needs of our vulnerable customers and prevent homelessness	Existing resources	Housing & Communities Manager Housing Options Team Leader
3.3 Provision of supported accommodation for young parents	Deliver 4 units of supported accommodation for 16-25 year old single parents	Meet the needs of single young parents to enable a successful and sustainable move on	Cambridgeshire County Council Ferry Project	Housing & Communities Manager Housing Options Team Leader Cambridgeshire County Council Ferry Project
3.4 Provision of supported accommodation for care leavers	Deliver additional units of accommodation for care leavers to achieve up stream homelessness prevention	Meet the need of care leavers	TBC	Head of Housing & Community Support Break Charity
3.5 provision of new affordable accommodation for	Work with partners to deliver smaller units of accommodation (2 bed)	Meeting the needs of our customers	Central government grant	Head of Housing & Community Support

single parents				
3.6 Work with	Supporting good Landlords with early	Meeting the	Existing resources	Housing &
Landlords to maintain	intervention with potential tenant	needs of our		Communities
existing stock	issues such as rent arrears to	customers		Manager
	prevent homelessness via the			Housing Options
	Landlord Rent Solutions Service			Team Leader

# **Objective 4. Resources and training**

4.0 Establish private Sector Landlord engagement	Contacts established in Fenland with Private Sector landlords  Facilitate landlord and agent events in Fenland  Include partners to assist with support and advice for landlords and agents	Increase in quality of private sector accommodation to meet the needs of customers	Homeless Trailblazer resources  Homeless Prevention grant	Housing & Communities Manager  Trailblazer team  Private Sector Housing team  Housing Options Team Leader
4.1 Ensure specialist homelessness and linked training is identified for staff as part of the Council's appraisal programme (springboard).	Yearly review of training and development needs for all staff	Staff enabled to perform more effectively to meet the demands of the service in a customer focussed and efficient way.	Homeless prevention grant	Housing & Communities Manager  & Housing Options Team Leader
4.2 Respond to	Seek funding	Improved opportunities and outcomes	MHCLG	Housing &

external funding opportunities to assist in delivery	opportunities to assist in the delivery of support and	for our customers		Communities Manager
of the strategy	provision of services in Fenland			Partners
	Establish opportunities for joint bidding with CGL drug and alcohol services for outreach			
4.3 Increase knowledge and awareness of our services with others	Undertake shared training opportunities with statutory and voluntary organisations	Improved knowledge of staff and working relationships to benefit our customers	Existing resources	Housing Options Team Leader

# **Objective 5. Reaching our customers**

5.0	Ensure access and information about our service is up	Housing Options information is reviewed with our customers	Clear accessible information for our customers	Exiting resources  Quarterly updates	Housing Options Team Leader
	to date and broadly accessible	Update website linked to Trailblazer	about our services	Quarterly updates	Link with social Prescriber post
	to our customers and partners	Continue to use language Line		Existing resources	
		Continue to use language Line translation service for our non English speaking customers		Existing resources	
		Street Link service publicised			

# Objective 6. Accessibility and standards

6.0 Ensure compliance with	Corporate Customer Service Excellence achieved	Increased standard of	Existing resources	Housing Options Team Leader
Customer Service Excellence		customer service	March 2020	Private Sector Housing
6.1 Achieve the Bronze Standard of service for Veterans across the council	Undertake evidence based assessment of services to meet the criteria	Increased standard of customer service for Veterans	Existing resources April 2020	Senior Community Support Officer Head of HR

# Objective 7. Diversity & Co hesion

7.0 Ensure that the Housing Options Team contribute to maintaining the Council's responsibility towards equality and diversity	Responsibilities met within Equality Act 2010	A service accessible to all in Fenland who needs it.	Existing resources	Housing Options Team Leader
7.1 Ensure that	Review EIA's annually	Service is	Existing resources	Housing Options
Equality Impact		accessible to		Team Leader
Assessments are up		our customers	Annually April	

to date 2020	
7.2 Ensure homelessness advice services are fit for purpose in relation to non English speaking customers including Romanian & Bulgarian presentations  Monitor the impact of Romania & Bulgaria around homelessness – feed in to the Council's Diverse Communities Forum and tension monitoring groups  Advice services are fit for purpose April 2020  April 2020	Housing Options Team Leader

# **Objective 8. Partnership working**

8.0 Ensure that Fenland remains a partner in the Cambridge sub Regional Homelessness Strategy Group	Full contribution to Homelessness county wide group including reviews of Sub Regional Lettings Policy	Establish good practice and where possible opportunities for sub-regional projects	Existing resources and CLG grant funding Ongoing	Housing & Communities Manager
8.1 Work in partnership with registered providers and local 3 <sup>rd</sup> sector organisations operating in Fenland to help prevent homelessness	Work in partnership with registered providers and third sector to prevent homelessness by joint visits & initiatives etc.  Support third sector to access external funding to tackle homelessness	Improved partnership working with Registered Providers and 3 <sup>rd</sup> Sector in tackling homelessness	Existing resources Ongoing	Housing & Communities Manager & Housing Options Team Leader Trailblazer team Job Centre Plus

8.2 Work in partnership to develop service review of homelessness and delivery of services	Participate in the Housing Related Support Review	Reshaping support services	Cambridgeshire County Council Ongoing		Cambridgeshire County Council
8.3 Ensure Fenland teams remain an integral partner in Operation Pheasant and associated operations	Take a proactive approach to tackling poor housing conditions and treatment of tenants (including migrant population – exploitation and modern slavery) within the private rented sector.  Establish co ordinated approach around Child Sexual exploitation including training  Publicise our success	Reducing migrant exploitation within the housing sector including planning, Private Sector Housing & Housing Options	Existing resources Ongoing		Housing & Communities Manager  Housing Options Team Leader  Private Sector Housing Officer
8.4 Tackling rogue landlords	Take a proactive approach to tackling rogue landlords including action to prosecution where appropriate.	Private sector housing market in Fenland free from	Existing resources	Successful Bid March 2018 MHCLG	Housing & Communities Manager

	Areas of work include:  1. Increased capacity within the Private Sector Housing Team to tackle poor living conditions and overcrowding  2. Undertaking of a property survey in Wisbech to scope the private rental market  3. Undertake a property survey in March to scope the private rental market  Publicise action taken and outcomes	exploitation, decent standard, well managed and safe homes	Private Sector Housing Enforcement Officers £193k Ending June 2020	Private Sector Housing Officers  Housing Options Team Leader  Operation Pheasant  Anglia Revenues Partnership – Fraud Team
8.5 Co ordinate partners to share intelligence around rough sleepers to tackle the issue (See 2.0)	<ul> <li>Share intelligence between FDC Housing Options Team and partners (Police, Social Care, Ferry Project, Rosmini, Inclusion etc)</li> <li>Joint partnership outreach work with Migrant Outreach Worker and CGL drug and alcohol services</li> <li>Support for night shelter development via Rough Sleeper Co ordiantor post</li> <li>Map all reports of rough sleepers as part of RSI bid return</li> <li>Promote Street-Link with</li> </ul>	A co ordinated and effective approach to tackling rough sleepers	DCLG prevention grant  Rough Sleeper Initiative fund secured £340k Day Hub secured with Ferry Project Migrant Outreach service 1920/21	Housing & Communities Manager Housing Options Team Leader Rough Sleeper Co ordinator Ferry Project CGL Statutory & third sector partners

B.6 Develop App. For voluntary donations to local charities and clear guidance for how the community can give help also how to signpost to find help		members and the community			
8.7 Develop protocols with partners to develop improved services for our customers (See 1.0)  8.8 Build continued awareness of Early Help and Adult Early Help and Adult Early Help and Safeguarding services 8.9 Workforce Development – Understanding Mental Health Assessment of Capacity  8.10 Link in with the  Develop the following protocols across Cambridgeshire and Peterborough:  Develop the following protocols across Cambridgeshire and Peterborough:  Timely response to housing and support solutions for our customers  Trailblazer Project fund Existing resources  November 2020  Appropriate  Manager  Housing Options  Team Leader  Appropriate  Multi agency approach to customers needs  Increased  Course costs  FDC Housing Options  Team Leader  Tom Leader  Tom Leader  Trailblazer Project fund Existing resources  Manager  Housing Appropriate  Mousing Appro	voluntary donations to local charities and clear guidance for how the community can give help also how to signpost to	for the community to donate to local charities and clear guidance for how the community can give help also how to signpost to find	resources for		ŭ .
8.8 Build continued awareness of Early Help and Adult Early Help and safeguarding services  8.9 Workforce Development – Understanding Mental Health Assessment of Capacity  Training of front line staff in case with regard to the assessment of an individual's capacity  8.10 Link in with the  Continue with training and awareness of safeguarding Appropriate multi agency approach to customers needs  Increased Course costs  FDC Housing Options  Course costs  FDC Housing Options  Team Leader  Front Line staff to make the best case for appropriate Mental Health treatment  Existing resources  All Staff Safeguarding leads  Safeguarding leads  FDC Housing Options  Team Leader  Foundaries and how to make the best case for appropriate Mental Health treatment  Existing resources  Housing &	8.7 Develop protocols with partners to develop improved services for our	across Cambridgeshire and Peterborough:	to housing and support solutions for	fund Existing resources	Housing & Communities Manager Housing Options Team Leader
8.9 Workforce Development – Understanding Mental Health Assessment of Capacity  8.9 Workforce Development – Understanding Mental Health Assessment of Capacity  8.10 Link in with the  Training of front line staff in understanding the mental health system and how to make the case with regard to the assessment of an individual's capacity  Increased confidence of Front Line staff to make the best case for appropriate Mental Health treatment  Ensure the council is linked in  Increased course costs  FDC Housing Options Team Leader  Front Line staff to make the best case for appropriate Mental Health treatment  Ensure the council is linked in  Effective  Existing resources  Housing &	awareness of Early Help and Adult Early Help and		multi agency approach to customers		
	8.9 Workforce Development – Understanding Mental Health Assessment of	understanding the mental health system and how to make the case with regard to the assessment of an individual's	confidence of Front Line staff to make the best case for appropriate Mental Health	Course costs	

Young Persons	people being developed by	working to	County Council	Manager
Strategy	Cambridgeshire County Council	benefit young		Cambridgeshire
		people in		County Council
		Fenland		
8.11 Participate in	Ensure the council is up to date	Improved	Anglia Revenues	Housing Options
Universal Credit	with universal Credit role out	service to our	Partnership	Team Leader
Support meetings		customers		Senior Community
				Support Officer

### **Objective 9. Consultation**

9.0 Provide comprehensive accessible consultation opportunities to customers and key stakeholders regarding policies and procedures and accessibility of our services	Capture feedback of Housing Options service on regular basis Review comments received – both informal or formal  Document changes made in response to comments	Apply Customer Service Excellence approach to consultation	Existing resources		Housing Options Team Leader
9.1 Carry out consultation with private sector landlords to improve our advice services to private sector landlords and their tenants in Fenland.	Work with National landlords Association to inform our support and advice offer to landlords Support the National landlords Association to reach private sector landlords and agents in Fenland Develop website and press coverage to showcase advice to landlords	Improved service to customers and quality of private rented accommodation increased	Existing resources & DCLG Grant	Existing resources	Housing Options Team Leader  Private Sector Housing Team Leader  Trailblazer Team

### INTRODUCTION

From 1<sup>st</sup> April 2011, the Equality Act 2010 introduced a new legal duty on all public authorities.

The three arms of the act focus on the need for public authorities to have 'due regard' to the need to:

- Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act:
- advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
- **foster good relations** between people who share a protected characteristic and people who do not share it.

The protected groups (previously known as equality strands) are as follows:

- Age
- Disability
- Gender reassignment
- Pregnancy and maternity
- Race
- Religion or belief
- Gender
- Sexual orientation
- Marriage and civil partnerships (eliminate unlawful discrimination only)

The duty means that – as previously – we should analyse the effect of existing and new policies and practices on equality. However it does not specify how we should do this.

The equality analysis should be proportionate and relevant – not just a tick box exercise. In some cases the written record will be a quick set of bullet points or notes under each heading. Others will need a more detailed explanation. However, legal cases on the meaning of the previous general equality duty make it clear that we must carry out the analysis **before making the relevant policy decision**. This has not changed.

A meaningful equality analysis will help the Council make the best decisions or formulate a policy which best meets our customers needs.

#### A SIMPLE GUIDE TO ASSESSING EQUALITY

### What is Equality Impact Assessment (EqIA)?

- EqIA is the act of systematically assessing the likely (or actual) effects of policies or services on people based on the protected characteristics as defined in the Equality Act 2010:
  - Age
  - Disability
  - Gender reassignment
  - Pregnancy and maternity
  - Race
  - Religion or belief
  - Gender
  - Sexual orientation
  - Marriage and civil partnerships
- This means looking at the three arms of the Equality Act, as set out in the table below, in relation to a policy or service, before a decision is made.

	Eliminating unlawful discrimination, harassment and victimisation	Advancing equality of opportunity between different groups	Fostering good relations between different groups
Disability			
Age			
Pregnancy and maternity			
Race			
Religion or belief			
Sex			
Gender reassignment			
Sexual orientation			
Marriage and civil partnerships			

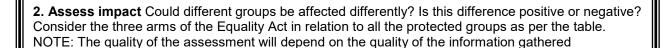
 It includes looking for opportunities to promote equality, as well as removing or reducing negative or adverse impacts.

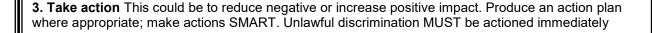
### Why is it important?

- Assessing equality helps us understand the needs of our customers, makes sure our decisions meet those needs, and are also cost effective
- As a public authority we also have a **legal** duty to show "due regard" for equality in decision making and the way services are provided
- To be able to show "due regard", we need to show that consideration of equality took place prior to a decision being taken; that equality issues were considered, and that this consideration was rigorous, open minded, and involved thinking about the three arms of the Equality Act as part of this process, and that potential adverse impacts were either removed or reduced.
- Documenting our equality analysis helps the Council show it has had "due regard" for equality if decisions are challenged. If "due regard" for equality can not be shown, decisions may be overturned at judicial review. This could result in lost time, money and negative publicity.
- The sooner equality is considered in a process; the more efficiently that process can be carried out.

### How can equality be assessed?

**1. Gather information** This can be consulting with relevant groups, using a previous EqIA as a starting point, consultations carried out by other services, details of the service 'hard to reach groups', customer satisfaction surveys, MOASIC data, consider relevance to equality





**4. Summarise** your findings on the EqIA form. Where it is clear from initial information gathering that a policy will not have any effect on equality, this may simply be a sentence recording this; the greater the relevance to equality, the greater the level of detail required. Publish your findings

**5. Monitor** the on-going effects of the policy on equality. This is usually in the form of the annual review carried out in October of each year, to fit in with the service planning cycle. The Equality Act is a **continuing** duty!

### **Equality Analysis Record**

## **Equality Impact Assessment**

Title of service or policy	Homelessness and Rough Sleeping Strategy (inc.action plan)
Name of team	Housing and Community Support – Housing Options
Date of assessment	May 2020

An Equality Impact Assessment is a process of systematically reviewing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The primary concern is to identify any discriminatory or negative consequences for a particular group or sector of the community. Equality impact Assessments (EIAs) can be carried out in relation to service delivery as well as employment policies and strategies.

1.	Identify the aims of the poli	icy or service and how it is implemented.
	Key questions	Answers / Notes
1.1	Briefly describe purpose of the service/policy including:	The aim of the Housing Options team is to prevent all customers from becoming homeless.  MHCLG state that it is a requirement for all council's to publish a Homelessness and Rough Sleeper strategy and action plan outlining what action it will take to provide relevant services for all clients.  This includes:  Management of temporary accommodation  Provision of a reactive 24/7 service for all clients requiring housing advice and assistance  Strategic approach to improving services for all clients along with partner organisations outside of the council
1.2	Provide brief details of the scope of the policy or service being reviewed.	The Homelessness and Rough Sleeping Strategy and action plan includes how the council will provide options and services for all of our clients with a focus on prevention homelessness to adequately fulfil its requirements under the legislation and to provide openness and transparency to the public on how we work and how we will go about our duties.

1.3	Do the aims of this policy link to or conflict with any other policies of the Council?	The policy links in with the council's Busin Community Safety and The Council's Hea	
3. Assessment of impact	how the service or policy:  Meets any particula some way.	analysed, or the results of consultation or ar needs of each of the eleven equalities	groups or helps promote equality in
3	Could have a negal	Examples of what the service has done to promote equality	Examples of potential negative or adverse impact and what steps have been or could be taken to address this
3.1	Gender – identify the impact/potential impact of the policy on women, men and transgender people	Action taken to remove risk to health, safety and welfare.  The policy has no impact with regards gender.  Our services are based on guidance, legislation and written policy and are provided to all regardless of gender.	There are not considered to be any adverse impact regarding gender.  When officers are contacted by members of the community there is a need to identify people's gender and their identify and eligibility to receive services.
3.2			

	Disability - identify the impact/potential impact of the policy on disabled people (ensure consideration of a range of impairments including both physical and mental impairments)	Action taken to remove risk to health, safety and welfare.  The policy has no impact with regards disability  Our services are based on guidance, legislation and written policy and are provided to all regardless of a person disabilities.	When communicating on housing advice there is the potential that a person has not understood what is expected of them or the consequences of not complying with what has been required, as a result of their disability.  It is important to make sure that people have understood what is required of them and the consequences for not taking action and that assistance can be provided where appropriate.
3.3	Age – identify the impact/potential impact of the policy on different age groups	Action taken to remove risk to health, safety and welfare.  The policy has no impact with regards to age  Our services are based on guidance, legislation and written policy and are provided to all regardless of a persons age.  We always offer home visits and make hard copies of information available on request.  However, within the legislation vulnerability is considered based on the age of the most vulnerable group. This is a statutory requirement and is not influences by our polices or procedures.	A lot of housing services information is available via the internet and although most age groups have access to the internet and email some of the older generation may not have the confidence or ability to access the internet.  Where possible we always provide hard copies of documents on request and give verbal advice in person or over the phone.

3.4				
J.#	Race – identify the impact/potential impact on different black and minority ethnic groups	Action taken to remove risk to health, safety and welfare.  The policy has no impact with regards to race  Our services are based on guidance, legislation and written policy and are provided to all regardless of a persons race.  We offer translation services in a variety of languages.  All officers are aware and can access a phone service to provide verbal translation. We also provide a translation booklet which offers translations in the 5 key languages identified in the area and we enclose this with all letters/schedules of work where appropriate.	Information gathered during contact with the team indicates that migrant workers are potentially vulnerable to poor housing conditions. The council's Housing Enforcement Policy and this strategy and action plan supports redress of those issues.	
3.5	Sexual orientation - identify the impact/potential impact of the policy on lesbians, gay, bisexual & heterosexual people	Action taken to remove risk to health, safety and welfare.  The policy has no impact with regards to sexual orientation	LGBT community may experience harassment and 'hate crime' and be reluctant to come forward with complaints about their property conditions.  When officer's are contacted by clients there is a need to find out the occupants	
		Our services are based on guidance, legislation and written policy and are provided to all regardless of a persons sexual orientation.	of the property and the occupancy of their home.  Lack of knowledge or understanding or assumptions about sexual orientation	

			may cause embarrassment leading to people being reluctant to access the service.  Training and development of the team to be aware of sensitivities in this area can help ensure all residents who have concerns with housing options can come forward to the council.
3.6	Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	Action taken to remove risk to health, safety and welfare.  The policy has no impact with regards to religion and belief  Our services are based on guidance, legislation and written policy and are provided to all regardless of a persons religion or belief.  We show respect and flexibility for religious beliefs and festivals and try and be aware of cultural differences.	No specific issues identified
3.7	disadvantaged – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances	Action taken to remove risk to health, safety and welfare.  The policy has no impact with regards to socio-economic  Our services are based on guidance, legislation and written policy and are provided to all regardless of a persons	These residents may be less of aware of the services we offer and how to approach us for information and guidance.

		socio-economically circumstances  We assist people where possible with completing any forms they need and explain things avoiding technical jargon.  We are also in the process of having our letter templates plain English checked and we have built up a variety of contacts in various organisations to enable us to signpost users to other service providers.	Our services are supplied at no cost to our clients
3.8	Gender reassignment	Action taken to remove risk to health, safety and welfare.  The policy has no impact with regards to gender re-assignment  Our services are based on guidance, legislation and written policy and are provided to all regardless of a persons gender reassignment	No issues identified
3.9	Pregnancy & Maternity	Action taken to remove risk to health, safety and welfare.  The policy has no impact with regards to pregnancy and maternity  Our services are based on guidance, legislation and written policy and are provided to all regardless of a persons pregnancy and maternity circumstances	No issues identified
3.10	Marriage & Civil partnerships	Action taken to remove risk to health, safety and welfare.	No issues identified

		The policy has no impact with regards to marriage and civil partnership  Our services are based on guidance, legislation and written policy and are provided to all regardless of a persons marriage and civil partnership circumstances	
3.11	Human Rights	Action taken to remove risk to health, safety and welfare.  The policy has no impact with regards to human rights  Our services are based on guidance, legislation and written policy and are provided to all regardless of a persons human rights	No issues identified, although the work of Operation pheasant has supported many residents into the national referral mechanism who may have had their rights compromised though modern day slavery and exploitation linked to private rented accommodation.
	nge needed □ <b>Agreed</b> nsider policy □ <b>N</b>	Adjust the policy D N Adverse imp	act but continue □ <b>N/A</b> Stop and

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