

## Full Equality Impact Assessment (EqIA) Proforma

An EqIA is a tool to assess whether a decision, policy, service or function pays 'due regard' to the Public Sector Equality Duty, which requires public bodies to:

- Eliminate discrimination
- Advance equality of opportunity
- Foster good relations

The Equality Duty covers the following 9 **protected characteristics**:

**Age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, marriage and civil partnership.** In addition, this EqIA process includes **care experience, rurality, socio-economic status and armed forces personnel/veterans.**

The EqIA process has two stages:

- **Screening EqIA:** This checks whether a decision, policy, service or function pays due regard to the Equality Duty; to provide any high-level advice or take immediate action; to determine if further analysis is needed through an EqIA.
- **Full EqIA:** Sometimes called Equality Analysis, this looks at a decision, policy, service or function in terms of data and information, research and evidence from consultation/engagement on all nine protected characteristics and rurality and socio-economic status. A full EqIA includes an action plan.

Where an EqIA relates to the Council Member Decision it should be included as an appendix to the report.

**Section 1: About the Decision, Policy, Service or Function**

Name of Decision/Policy/Service/Function being assessed	Homelessness and Rough Sleeping Strategy 2024 – 2029.
Job Title of Officer completing EIA	On behalf of Caroline Wagstaff Assistant Director of Housing and Claire Watters. Completed by Chris Root external equality diversity and inclusion expert.
Department/service area	Housing
Telephone number and email contact	
Date of Assessment	3/2/24
Objectives of decision/policy/service/function	Westmorland and Furness Council's Homelessness and Rough Sleeping Strategy sets out how the newly formed Unitary Council will work collaboratively to meet the needs of residents at risk of or who are experiencing homelessness and rough sleeping.
Key stakeholders and consultees	

## Section 2: Information Gathering

Consider the sources of **relevant** information, evidence, data and research that will help you build up a picture of the likely impact of your decision/policy/service/function on the protected characteristic groups.

Information Source	Location of data/information (give a link here if applicable)	What does the data/information tell us?
	There is various data reporting within this strategy including government statistical data with links alongside the data graphs.	<p>The data graphs show by Barrow/Eden/South Lakeland and total Westmorland and Furness:</p> <ol style="list-style-type: none"> <li>1. Number of households by initial assessment of homelessness duty: Total owed a prevention or relief duty.</li> <li>2. Main Duty Accepted.</li> <li>3. Care experienced young people 18+ owed a prevention or relief duty.</li> <li>4. Households with an offending history owed a duty.</li> <li>5. Westmorland and Furness support needs of households owed a duty.</li> <li>6. Domestic Abuse support needs identified by households owed a duty.</li> <li>7. Support needs of household owed a prevention or relief duty: Served in HM Forces.</li> <li>8. Numbers of households in temporary accommodation during 2023/24.</li> <li>9. Annual rough sleepers snapshot up to 2023.</li> </ol>
<i>Add rows as necessary</i>		<p>The strategy includes charts on:</p> <ol style="list-style-type: none"> <li>1. Reasons for loss of last settles home for households.</li> <li>2. Reasons for homelessness presentation</li> <li>3. Housing Needs charts.</li> </ol>

		<ol style="list-style-type: none"><li>4. LHA Weekly Rates and Average Private rent based on ONS data 2021/22.</li><li>5. People rough sleeping on a single night June 2020 – March 2023.</li><li>6. New people sleeping rough on a single night October 2020 to March 2023.</li><li>7. Performance charts.</li></ol>
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### Section 3: Assessment of Impact

From the information, evidence, data and research you have gathered, use this section to identify the risks and benefits for each of the different protected characteristic groups.

Equality group	Positive (tick)	Adverse (tick)	Neutral (tick)	What is the impact?	Mitigating actions proposed (to address adverse impact)
Age	✓	✓		<p><b>Young People:</b> Care experienced young people have been specifically identified within the strategy as a group who are at greater risk of homelessness than adults in the wider population. This will priorities and assist this group of young people.</p> <p><b>Older People:</b> It is noted in page 36 of the Action plan is a proposed long term target to contact caravan parks. This may be an area that some older people may benefit from as a short term target.</p> <p>Consideration must be given to the most accessible form of communications for all. It is accepted that good technology and digital communication will support the delivery of service for many, however the Council must make</p>	<p>Although care experienced young people are quite rightly identified as a group at risk of homelessness it should not lesson the service that young people fleeing domestic abuse, young people fleeing home because of coming out as gay, or those who may be being sexually exploited.</p> <p>If older people are living in under occupied family housing and are starting to struggle with stairs due to mobility or disability accessing, a single level home which is accessible and away from the main noise of the town may suit them better thus releasing family housing and making available on the waiting list.</p> <p>This strategy needs to consider the Public Sector (Website and Mobile Application) Accessibility Regulation 2018.</p>

Equality group	Positive (tick)	Adverse (tick)	Neutral (tick)	What is the impact?	Mitigating actions proposed (to address adverse impact)
				sure those who would be excluded from this form of communication due to age, disability, poverty/cost or in some rural areas signal, can still have the same level of service.	It may benefit the strategy to put the this particular regulation within the section in page 25 titled - Legal context.
Disability	✓	✓		<p>There are references to people with a disability within the strategy, but it may benefit from a section on responding to people with physical or mental disabilities, the Public Sector Duty of 'Reasonable Adjustment.</p> <p><b>The strategy states on page 26 that: In the section:</b> Priority need applies automatically if: The applicant is assessed by the council as vulnerable. It is for the Council to decide whether the person is vulnerable for the purposes of a homeless application. Being vulnerable means being much more vulnerable than most people if they were homeless, and likely to suffer more harm in the same situation. People do not always have a priority need if they are disabled or have a health condition. <b>Officers take a composite approach and consider individual circumstances.</b></p>	<p><b>Note:</b> Section proposed is drafted for consideration at the end of this form, including some Veteran's needs.</p> <p><b>It is advised that the end of this paragraph reads:</b></p> <p>Officers take a composite approach and consider individual circumstances, the Equality Act 2010 and its protected characteristics.</p>

Equality group	Positive (tick)	Adverse (tick)	Neutral (tick)	What is the impact?	Mitigating actions proposed (to address adverse impact)
Sex	✓			The section in the strategy on domestic abuse and victims and perpetrators page 18 refers to and is in line with the Domestic Abuse Act 2021.	
Gender reassignment	✓			<b>Action Plan pages 33 to 37. The second section in yellow, in the second and third action:</b> It is important that it states that the actions will ensure clients with protected characteristics can access services.	
Marital and civil partnership status	✓			<b>Action Plan pages 33 to 37. The second section in yellow, in the second and third action:</b> It is important that it states that the actions will ensure clients with protected characteristics can access services.	
Pregnancy and maternity	✓			<b>Action Plan pages 33 to 37. The second section in yellow, in the second and third action:</b> It is important that it states that the actions will ensure clients with protected characteristics can access services.	
Race	✓			<b>Action Plan pages 33 to 37. The second section in yellow, in the second and third action:</b> It is	

Equality group	Positive (tick)	Adverse (tick)	Neutral (tick)	What is the impact?	Mitigating actions proposed (to address adverse impact)
				important that it states that the actions will ensure clients with protected characteristics can access services.	
Religion and/or belief	✓			<b>Action Plan pages 33 to 37. The second section in yellow, in the second and third action:</b> It is important that it states that the actions will ensure clients with protected characteristics can access services.	
Sexual orientation	✓			<b>Action Plan pages 33 to 37. The second section in yellow, in the second and third action:</b> It is important that it states that the actions will ensure clients with protected characteristics can access services.	
Care Experience	✓			Care experienced young people have been specifically identified within the strategy as a group who are at greater risk of homelessness than adults in the wider population. This will priorities and assist this group of young people.	
People in rural areas		✓		This strategy states that good technology and digital	This strategy must show how due to some people living in some rural areas



Equality group	Positive (tick)	Adverse (tick)	Neutral (tick)	What is the impact?	Mitigating actions proposed (to address adverse impact)
				communication will support the delivery of service.	with a poor signal still have the same level of service.
Socio-economic status	✓			Homelessness and Rough Sleeping is primarily but not exclusively due to social economic status. The emphasis on continued support and a strategic approach to supporting people to stay in accommodation is a main driver of this strategy.	
Armed Forces Personnel/Veterans	✓			It is noted that the strategy on page 11 refers to a commitment to support Veterans.	<b>Note</b> that the chart on page 21 identifies that the number of people aged 16 + who have previously services in the armed forces is above the nation average and so additional resourced may be needed.

### Section 4: Action Planning

What is the negative/ adverse impact or area for further action?	Actions proposed to reduce/ eliminate the negative impact	Who will lead on the action(s)?	Resource implications/ resources required	When? (target completion date)	Monitoring Arrangements
All adverse impacts are noted within the protected characteristics section with proposed action.					
Action Plan pages 33 to 37	<p>In the first section in blue:  <b>The fourth action</b> should include people with a disability.  <b>The fifth action:</b> should include veterans.  <b>The fifth action:</b> which is about rolling out training should have a short-term target as March 2027 is too long a target date.</p>				

Action Plan pages 33 to 37	<p>The second section in yellow:</p> <p><b>The second and third action:</b> Important that it states that the action will ensure clients with protected characteristics can access services.</p>				
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## Section 5. Outcome of Equality Impact Assessment (tick appropriate box)

**No major change needed** - the analysis shows the policy is robust and evidence shows no potential for discrimination.

**Adjust the policy/service/function** - alternatives have been considered and steps taken to remove barriers or to better advance equality. Complete the action plan.

**Adverse impact(s) identified but continue** - this will need a justification or reason. Complete the action plan.

✓ x

## Section 6. Review

Date of the next review of the Equality Impact Assessment	2026 (Due to the changing nature of homelessness EIA should be carried out every two years.
Who will carry out this review?	

## Responding to people with physical or mental disabilities, including some Veteran's needs. (Place at the end of the Complex Needs section on page 17).

This strategy will consider all the protected characteristics of the Equality Act 2010 and its Public Sector Duty 2011. In particular it will take due regard and consider how people with a physical or mental disability can received 'Reasonable Adjustment' in all service areas.

**Glossary: Definitions of Protected Characteristics**

**Age:** This refers to a person having a particular age or being within an age group.

**Disability:** A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. Includes: Physical/sensory disability; Mental Health; Learning disability.

**Sex:** This refers to a person being either male or female.

**Gender reassignment:** This is the process of transitioning from one sex to another, considered a personal process rather than a medical one and it does not require someone to undergo medical treatment in order to be protected.

**Marital and civil partnership:** Legal recognition of a same-sex couple's relationship. Civil partners must be treated the same as married couples on a range of legal matters.

**Maternity:** The period after giving birth. It is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, including as a result of breastfeeding.

**Race:** It refers to a group of people defined by their colour, nationality (including citizenship), ethnic or national origins. Includes, Asian, Black and White minority ethnic groups inc. Eastern Europeans, Irish people and Gypsy Travellers.

**Religion or belief:** "Religion" means any religion, including a reference to a lack of religion. "Belief" includes religious and philosophical beliefs including lack of belief (for example, Atheism). The category includes Christianity, Islam, Judaism, Hinduism, Buddhism, and non-religious beliefs such as Humanism.

**Sexual orientation:** This is whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

**Other protected areas:**

**Transgender:** Everyone whose gender identity is neither male nor female as legally defined at birth and is not undergoing a process of gender resignation.

**Rurality:** Differential impact on people in rural areas.

**Socio-economic status:** Differential impact on people due to household or personal income.

**Armed Forces Personnel/Veterans.**