

Equality Impact Assessment (EIA) Report – 2017/8

This form should be completed for each Equality Impact Assessment on a new or existing function, a reduction or closure of service, any policy, procedure, Strategy, plan or project which has been screened and found relevant to equality.

Please refer to the 'EIA Report Form Guidance' while completing this form. If you need further support please contact acesstoservices@swansea.gov.uk.

Where do you work?
Service Area: Housing and Public Health
Directorate: Place

(a) This EIA is being completed for a:

Service/ Function <input type="checkbox"/>	Policy/ Procedure <input type="checkbox"/>	Project <input type="checkbox"/>	Strategy <input checked="" type="checkbox"/>	Plan <input type="checkbox"/>	Proposal <input type="checkbox"/>
--	--	-------------------------------------	---	----------------------------------	--------------------------------------

(b) Please name and describe here:

The Homelessness Strategy (2018-2022), and accompanying Action Plan, sets out the guiding principles for the development and delivery of homelessness services in Swansea over the next four years. It will ensure that the services and support in place for those at risk of, or experiencing homelessness are as effective and accessible as possible. It also aims to inform stakeholders of the levels of homelessness in Swansea and provide a baseline to measure future progress and performance.

(c) It was initially screened for relevance to Equality and Diversity on: 14/3/18

A full EIA was opened in April 2018, the EIA has now been updated to reflect the outcomes of the consultation which took place between 1st September and 30th September.

(d) It was found to be relevant to...

Children/young people (0-18)	<input checked="" type="checkbox"/>	Sexual orientation	<input checked="" type="checkbox"/>
Older people (50+).....	<input checked="" type="checkbox"/>	Gender reassignment	<input checked="" type="checkbox"/>
Any other age group	<input checked="" type="checkbox"/>	Welsh language	<input checked="" type="checkbox"/>
Disability	<input checked="" type="checkbox"/>	Poverty/social exclusion.....	<input checked="" type="checkbox"/>
Race (including refugees).....	<input checked="" type="checkbox"/>	Carers (including young carers).....	<input checked="" type="checkbox"/>
Asylum seekers	<input checked="" type="checkbox"/>	Community cohesion	<input checked="" type="checkbox"/>
Gypsies & Travellers.....	<input checked="" type="checkbox"/>	Marriage & civil partnership	<input checked="" type="checkbox"/>
Religion or (non-)belief	<input checked="" type="checkbox"/>	Pregnancy and maternity	<input checked="" type="checkbox"/>
Sex.....	<input checked="" type="checkbox"/>		

(e) Lead Officer

Name: Rosie Jackson

Job title: Senior Policy & Leasehold Officer

Date: 18/10/18

(f) Approved by Head of Service

Name: Mark Wade

Date: Head of Housing & Public Protection

Section 1 – Aims (See guidance):

Briefly describe the aims of the initiative:

What are the aims?

The aim of Swansea's Homelessness Strategy is to ensure that every person has access to good quality advice, accommodation and support at the earliest possible opportunity in order to prevent homelessness.

This Strategy is intended to increase the ability of the Council and its partners to prevent homelessness wherever possible. Prevention through early identification and intervention, as well as equitable and easy access to services, will reduce homelessness. Where it cannot be prevented, the Strategy aims to minimise the distress of the experience through rapid and robust service responses. This will be achieved through adoption of the following five objectives:

Objective 1: Ensuring service users are at the centre of service delivery

Objective 2: Prioritising early intervention and prevention of homelessness

Objective 3: Ensuring suitable accommodation is available for people who are or may become homeless

Objective 4: Ensuring appropriate support is available for people who are or may become homeless

Objective 5: Providing robust responses to support rough sleepers and eliminating the need for individuals to sleep rough

Who has responsibility?

Steve Porter – Operations Manager Community Housing

Jane Harries – Landlord Services Manager

Mark Wade – Head of Housing and Public Health

Martin Nicholls – Director of Place

Cllr Andrea Lewis – Cabinet Member for Homes and Energy

Who are the stakeholders?

All residents of Swansea are potential stakeholders, if taking the view that the risk of homelessness could potentially affect anyone. However more specifically:

- Households who are insecurely housed or at risk of homelessness within 56 days.
- Service users of temporary accommodation
- Service users of supported accommodation
- Service users of tenancy support
- Rough sleepers

In addition, there are a wide range of organisations and internal Council services who are stakeholders and have been involved in the development of the Strategy or as specific consultees. The full list is attached at appendix 1.

The Strategy has been developed in order to fulfil the requirements of the Housing (Wales) Act 2014, therefore the Welsh Government is also a key stakeholder and funder.

Section 2 - Information about Service Users (See guidance):

Please tick which areas you have information on, in terms of service users:

Children/young people (0-18)	<input checked="" type="checkbox"/>	Sexual orientation	<input type="checkbox"/>
Older people (50+).....	<input checked="" type="checkbox"/>	Gender reassignment	<input type="checkbox"/>
Any other age group	<input checked="" type="checkbox"/>	Welsh language	<input type="checkbox"/>
Disability	<input checked="" type="checkbox"/>	Poverty/social exclusion.....	<input type="checkbox"/>
Race (including refugees).....	<input checked="" type="checkbox"/>	Carers (including young carers).....	<input type="checkbox"/>
Asylum seekers	<input checked="" type="checkbox"/>	Community cohesion	<input type="checkbox"/>
Gypsies & Travellers.....	<input type="checkbox"/>	Marriage & civil partnership	<input type="checkbox"/>
Religion or (non-)belief	<input type="checkbox"/>	Pregnancy and maternity	<input checked="" type="checkbox"/>
Sex.....	<input checked="" type="checkbox"/>		

Please provide a snapshot of the information you hold in relation to the protected groups above:

The Homelessness Service collects demographic data on applicants based on the requirements of the Welsh Government. These requirements do not include all protected characteristics. Data is collected on age, household type, and race including the following:

- White
- Black / African / Caribbean / Black British
- Asian or Asian British
- Other ethnic group
- Mixed / Multiple ethnic groups

The development of the Strategy was based on an in-depth Homelessness review which used the homelessness data for 2016/17. Therefore the data collected for 2016/17 is shown below:

1143 households were found to be threatened with homelessness within 56 days in 2016/17. The majority were single males, with single parents being the next highest group.

- 39% (451) were single males
- 26% (298) were single parents with dependent children
- 21% (240) were single females
- 7% (78) were couples with dependent children
- 7% (76) were other household types

Of the 1143 households assessed as threatened with homelessness within 56 days during 2016/17:

- Less than 1% (10) were aged 16-17
- 27.5% (315) were aged 18-24
- 61% (697) were aged 25-49
- 10.5% (121) were aged 50 plus

When compared with the age breakdown of Swansea's population (2011 Census), it indicates that 18-24 year olds are at a higher risk of being threatened with homelessness. Young people in this age group make up 14% of the population as a whole, however they account for 27.5% of households threatened with homelessness.

Of the 1143 households assessed as threatened with homeless within 56 days during 2016/17:

- 85% (966) were White
- 8% (87) were Black/African/Caribbean/Black British
- 4% (51) were from other ethnic groups
- 3% (39) were Asian or Asian British

Overall 15% of households assessed as threatened with homelessness in 2016/17 were from an ethnic minority background, compared to 8% in the population of Swansea as a whole (2011 Census). The higher number of homeless applications from ethnic minority groups is largely attributed to the fact that Swansea is a dispersal area for asylum seekers. In order to effectively deal with this, the Homelessness Service has a specific Homelessness Officer who deals with refugees and asylum seekers.

The following table provides a demographic breakdown of the households who were actually homeless, or their homelessness could not be prevented:

Breakdown of household types assessed as homeless 2016/17

Household type	Single male	Single female	Single parent	Couple with children	Other household types	Total
Homeless or homelessness could not be prevented	227	93	41	19	15	395
Homeless and in priority need	35	8	4	1	6	54
Homeless, non-priority need	47	8	0	0	1	56
Intentionally homeless	1	0	0	0	0	1
Total	310	109	45	20	22	506
%	61%	21.5%	9%	4%	4.5%	

Breakdown of households assessed as homeless, by ethnic group of applicant 2016/17

Household type	White	Black / African / Caribbean / Black British	Asian or Asian British	Other ethnic group	Mixed / Multiple ethnic groups	Total
Homeless or homelessness could not be prevented	346	18	13	16	2	395
Homeless and in priority need	54	0	0	0	0	54
Homeless, non-priority need	53	0	2	0	1	56
Intentionally homeless	1	0	0	0	0	1
Total	454	18	15	16	3	506
%	90%	3.5%	3%	3%	0.5%	

Breakdown of households assessed as homeless, by age of applicant 2016/17

Household type	16-17	18-24	25-49	50 plus	Total
Homeless or homelessness could not be prevented	0	48	317	30	395
Homeless and in priority need	0	9	43	2	54
Homeless, non-priority need	0	5	50	1	56
Intentionally homeless	0	1	0	0	1
Total	0	63	410	33	506
%	0	12.5%	81%	6.5%	

In 2016/17, 54 households were found to be homeless, in priority need and in temporary accommodation. The main reasons for priority need were:

- Vulnerable due to mental illness/learning disability – 42% (23)
- Vulnerable due to physical disability – 26% (14)
- Vulnerable due to other special reason – 7% (4)
- Former prisoner – 7% (4)
- Household with dependent children – 6% (3)
- Domestic abuse 6% (3)
- Pregnant – 4% (2)
- Care leaver – 2% (1)

Causes of homelessness are also recorded for violence and harassment cases for the following groups. Violence or harassment which is:

- racially motivated (0)
- due to religion/belief (0)
- due to gender reassignment (gender identity) (0)
- due to sexual identity/orientation (1)
- due to disability (1)

Any actions required, e.g. to fill information gaps?

Whilst the Homelessness Service collects the demographic information that is required by the Welsh Government it has identified that this does not necessarily cover all relevant protected groups. The following action has been included in the Action Plan in order to address this:

- Review Housing Options equalities monitoring systems, this will include carrying out consultation with equalities representative groups regarding best use of equalities monitoring data, with the aim of ensuring that homelessness and housing services are accessible to all.

Section 3 - Impact on Protected Characteristics (See guidance):

Please consider the possible impact on the different protected characteristics.

	Positive	Negative	Neutral	Needs further investigation
Children/young people (0-18)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Older people (50+)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Any other age group	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Disability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Race (including refugees)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Asylum seekers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gypsies & travellers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Religion or (non-)belief	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sex	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sexual Orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Welsh Language	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Poverty/social exclusion	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Carers (inc. young carers)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Community cohesion	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Maining about your answers above, please explain in detail why this is the case.

Pregnancy and maternity →

Children/young people (0-18)

The needs of children and young people are thoroughly covered by the Homelessness Service through the provision of the BAYS+ Service (for YP aged 16-20) and the priority need status of families with children under homelessness legislation. The Homelessness Strategy and Action Plan has set out a range of actions to improve services to children and young people, for example developing an education programme in partnership with young people and improving information of the affordability and availability of independent housing for young people.

There is however the opportunity to improve consultative mechanisms and involvement of young people and children for future service development through the action in the homelessness Strategy to develop a Homelessness Charter.

Older people (50+)

Old age is recorded as a reason for priority need. There is not a significant issue of homelessness with the older population, however future demographic changes i.e. an ageing population, is likely to see an increase in levels of homelessness amongst this age group.

The age breakdown required by the Welsh Government is limited to 25 and over. This does not therefore provide a picture of homelessness amongst the older age groups. In order to address this, when data was gathered for the development of the Homelessness Strategy the age groups were broken down further to include a 50+ category. This information will continue to be collected and included in the annual review of the Strategy to ensure that levels of homelessness amongst the 50 plus age group are accurately monitored.

Any other age group

No specific impacts identified for any other age group.

Disability

Disability is recorded as a reason for priority need and individual needs are recorded on the casework management system to ensure that any suitable housing needs points are awarded and that suitable accommodation is allocated.

During the consultation a query was raised regarding the availability of an Easy Read guide – this was not prepared as part of the consultation, however the individual was offered alternatives in order to ensure they could participate. However, the view of the Council is that following this we will look at producing an easy read guide of the final version of the Strategy, given the wide range of client groups that it serves and the need for a range of formants to ensure that it is as accessible as possible.

The highest number of households who are found to be in priority need, and therefore in temporary accommodation, are vulnerable due to mental illness, learning disability and physical disabilities, which demonstrates the difficulties in finding permanent housing solutions for these client groups. There is a need to work closely with Social Services to find ways to improve outcomes for these groups. This is a specific action in the Homelessness Strategy.

Race (including refugees)

The Homelessness Service collects data on applicants based on the requirements of the Welsh Government. These requirements do not include all protected characteristics and contain a fairly limited breakdown of ethnicity – for example gypsy/traveller is not recorded. The ethnic group breakdown required by Welsh Government includes:

- White
- Black / African / Caribbean / Black British
- Asian or Asian British
- Other ethnic group
- Mixed / Multiple ethnic groups

The following action has been included in the Action Plan in order to address this:

- Review Housing Options equalities monitoring systems, this will include carrying out consultation with equalities representative groups regarding best use of equalities monitoring data, with the aim of ensuring that homelessness and housing services are accessible to all.

The Strategy contains a range of other actions to improve services for people from different ethnic backgrounds, with a particular focus on consulting with BME stakeholder to improve information available and identify and remove any potential barriers to accessing services such as language issues.

Asylum seekers and refugees

Swansea is a dispersal area for asylum seekers, therefore it is to be expected that there is a higher proportion than in the general population of households from ethnic minority groups who are threatened with homelessness. This is because an asylum seeker who is granted refugee status will be made homeless as they are obliged to leave their Home Office provided accommodation with only a few days' notice. It is therefore important that there are effective move-on arrangements in place so that refugees/former asylum seekers are able to access services quickly and effectively and to minimise the time that they have to experience the uncertainty of homelessness. Swansea has implemented robust support arrangements, with a specialist Refugee Homelessness officer in post to deal specifically with this group and quarterly meetings between the Council and the Home Office Accommodation provider to ensure effective planning can take place.

The Strategy contains actions to improve services to asylum seekers and refugees including developing specific information and advice for people who are leaving home office accommodation and to map the provision of services available for those who are ineligible for assistance, including households with no recourse to public funds.

Gypsies & travellers

Further information is required on the impact of the homelessness service, Strategy and Action Plan on households with a Gypsy/Traveller background. Currently the homelessness service's equality monitoring does not collect data on this ethnic group therefore levels of homelessness and contact with the service are unknown. However, in order to satisfy the requirements of the Housing (Wales) Act 2014, the Council undertook a detailed Gypsy Traveller Accommodation Assessment, which was published in 2016. This identified a need for an additional seven pitches. The Council will update the assessment in-line with Welsh Government requirements or when a significant change in the Gypsy Traveller population is identified by the Council's Gypsy Traveller Liaison Officer.

Religion or (non-)belief

Data is not collected regarding an individual religion or beliefs. However, individuals' circumstances are taken into account to ensure that culturally appropriate services are provided when required.

Sex

Data is collected regarding the sex of applicants, and when necessary services are provided on a female or male only basis – for example domestic abuse services.

Sexual Orientation

Further information is required on the impact of the homelessness service, Strategy and Action Plan on sexual orientation. Whilst data is collected on homelessness caused by violence or harassment relating to sexual orientation, the number of cases is very low. However, there is the potential that homelessness could be caused due to a person's sexual orientation but without violence or harassment per se.

Gender reassignment

Further information is required on the impact of the homelessness service, Strategy and Action Plan on gender reassignment. Whilst data is collected on homelessness caused by violence or harassment relating to sexual orientation, the number of cases is very low. However, there is the potential that homelessness could be caused due to a person going through gender reassignment but without violence or harassment per se.

Welsh Language

Neutral impact – however all public information produced by the Housing Service, including the Strategy, Action Plan and consultation, is available bi-lingually. The Homelessness Service can provide services in Welsh upon request – there are currently three permanent fulltime members of staff who are fluent Welsh Speakers, including two Homelessness Caseworkers.

Poverty/social exclusion

Homelessness is a severe form of poverty and social exclusion. The Strategy has a clear link with the Council's poverty agenda and Swansea's Wellbeing Strategy as it has a significant role in contributing to the achievement of the objectives to ensure that children have the best start in life and building stronger communities through the early intervention and prevention of homelessness. The Strategy aims to prevent homelessness wherever possible and provide robust, effective responses when it is unavoidable. Homelessness prevention rates are high in Swansea - homelessness was prevented in 73% of cases in 2016/17, which compares well to the overall Welsh figure of 62%.

Carers (inc. young carers)

Neutral impact. This issue has not arisen during the consultation and was not identified during the Homelessness Review. However, the service will engage with the Young Carers Forum as part of the development of the Homelessness Charter for Children and Young People to ensure that their needs and opinions are taken into account.

Pregnancy and maternity

Whilst there are no impacts that are specific for this particular group within the Strategy, households who contain a pregnant woman are classed as in priority need under homelessness legislation.

Any actions required, e.g. actions to further investigate impact?

Whilst the Homelessness Service collects the demographic information that is required by the Welsh Government it has identified that this does not necessarily cover all relevant protected groups. The following action has been included in the Strategy in order to address this:

- Review Housing Options equalities monitoring systems, this will include carrying out consultation with equalities representative groups regarding best use of equalities monitoring data, with the aim of ensuring that homelessness and housing services are accessible to all.

Section 4 - Engagement:

Please consider all of your engagement activities here, e.g. participation, consultation, involvement, co-productive approaches, etc.

What engagement has been undertaken to support your view? How did you ensure this was accessible to all?

The development of the Homelessness Strategy has been significantly influenced and informed by service users' views. The Welsh Government requires consultation to be undertaken with service users as part of developing a strategic approach to homelessness. It states that homeless people should be consulted about:

- Their own views on their situation
- Their needs
- Their experience of services and "what works"
- Any barriers to services
- Any suggestions for improvement

The consultation for the Homelessness Strategy has been in two stages:

- **Stage 1** – consultation as part of the Homelessness Review and development of the Strategy which took place throughout 2017
- **Stage 2** – Consultation on the completed draft Strategy and Action Plan which took place in August/September 2018

Stage 1 Consultation

The first stage of consultation was taken as part of the review of homelessness which formed the evidence base for the development of the Strategy and included the following:

a) Service users – via a survey distributed by service providers, which was also available on-line (131 responses received)

In order to ensure that the survey was accessible, support and housing providers were asked to support and encourage their service users to complete the survey and support and assistance was also offered by Council officers on request.

Of the 131 people who responded to the survey:

- **Gender:** There was a reasonably even split between gender with 47% of respondents stating they were male while 52% were female (1% did not say). 91% of respondents stated that their gender was the same as they were assigned at birth, 4% stated that it was not and 5% preferred not to say.
- **Age:** Predominately respondents were aged under 45 (82%) with 27% in the 16-25 category. 18% were over the age of 45.
- **Ethnicity:** 94% of respondents were white and 6% were from a BME background (1% did not state their ethnicity)
- **Illness/disability:** 57% stated that they had a long-standing illness or disability, 40% said that they did not (3% preferred not to say). This is a significantly higher proportion than the general population of Swansea who state they have a long-term illness with is 23%¹.
- **Sexuality:** 85% said that they were heterosexual, 3% that they were gay/lesbian, 3% said that they were bi-sexual and 8% preferred not to say (1% stated other).

b) Four service user focus groups – Servicer users from a range of Wallich Services; Service users from Crisis; Young People engaged with homelessness and support services; and women currently receiving support from Women's Aid and BASWO

In order to ensure that the focus groups were accessible an open offer was made to all members of the Supporting People and Homelessness Forum (which consists of all support and housing providers along with key homelessness organisations) to hold focus groups with their service users in locations that best suited each group.

c) Service Providers – via a survey and prioritisation exercise with the Supporting People and Homelessness Forum.

An on-line survey was undertaken with providers of homelessness, support and advice services during March 2017 to gather their views on the issues and priorities that should be addressed by Swansea's Homelessness Strategy. 28 responses were received.

d) The general public – via an on-line survey (116 responses received)

What did your engagement activities tell you? What feedback have you received?

Stage 1: Summary of findings

Across all the consultation responses some clear, common issues have emerged for consideration in the development of the Homelessness Strategy, including:

Information

- Raise general public awareness of homelessness, advice and support services in order to ensure a more widespread understanding of where people can go if faced with a housing crisis.

- Develop an education approach/programme to target young people. Do this in

¹ Census 2011

conjunction with young people following a co-production² approach.

- Improve use of the internet, social media, and texts to provide information on services and advice that are available.
- Improve understanding of homelessness issues of some professionals – in particular social workers, GPs and the Job Centre. But also important to ensure that all staff have an understanding and empathetic manner.
- Need to ensure that service users are fully aware of their rights and responsibilities. Look at developing Service Standards/Homelessness Charter - should be done in conjunction with service users following a co-production approach.
- Need for effective co-ordination and communication across agencies, e.g. local authority (Social Services, Housing, Education, Supporting People), Health, Probation, 3rd Sector) and also with service users.

Early intervention and prevention

- Need to increase focus on early intervention to prevent problems from escalating.
- Early access to tenancy support before eviction takes place.
- Improved family mediation services.

Rough sleeping

- Increasing levels of homelessness and rough sleeping – need to improve service provision for rough sleepers. E.g. developing a “solution centre” with a wide range of support, advice and facilities available.
- Ensure that the basic needs of people who are unable or unwilling to engage with services are met e.g. access to washing and cooking facilities for rough sleepers.

Access to housing and support

- Need for rapid access to affordable and appropriate permanent accommodation. For example: need to find ways to improve access to the private rented sector.
- Need to improve provision of housing and support for people with complex needs e.g. mental health, learning disabilities and drug and alcohol issues.
- Substance misuse – service users identified difficulties with recovery in shared accommodation / hostel environments where others are still using.
- Develop a Housing First approach to deal with the needs of rough sleepers and individuals with complex needs.
- Improve information around employment and support to find sustainable work.
- Not enough suitable properties for young single people – more variety/wider range of accommodation is needed.
- Need to improve access to mental health support – across a range of needs including young people; and early access to lower level counselling/support.
- Need to ensure that young people are able effectively have a say in the development of their support packages.

Digital inclusion

- Need for improved access to phones and the internet via service providers.

Address impacts of welfare reform

- Need to develop services/approaches to alleviate the impacts of welfare reform including:
 - Meeting high levels of need/demand for welfare benefits advice
 - Meeting high levels of need/demand for debt and financial advice.
 - Need to develop affordable accommodation for people under the age of 35 – due to introduction of shared accommodation rate. *NB the introduction of the shared accommodation rate in social housing has now been scrapped but there is still a need to provide access to affordable accommodation for under 35s in the private rented sector*

² Co-production is one of the main principles of the Social Services and Well-being (Wales) Act 2014. It means encouraging individuals to become more involved in the design and delivery of services that they need for themselves.

Stage 2 Consultation

The second stage was the formal consultation process on the draft Strategy and Action Plan. This took place between 1st September and 30th September 2018, and involved the following elements:

- *Survey* – an on-line survey (hard copies were also available) was open to all stakeholders (24 responses received). The survey was widely promoted with stakeholders. See appendix A for stakeholder list.
- *Email responses* – a number of stakeholders chose to respond via email, including Shelter and Crisis.
- *Drop in sessions* - Two drop in sessions were held during September, which were open to the public and partner organisations.
- *Scrutiny*
- A Scrutiny Working Group was held during August 2018 to look at the Homelessness Service.
- A special meeting of the Scrutiny Programme Committee was held on 1st October in order to provide the opportunity to feed directly into the consultation process.
- Poverty Reduction Policy Development Committee – the Committee considered the development of the Strategy and Action Plan in March and August 2018 and were supportive of the proposals.

Stage 2 : Summary of findings

The survey provided the opportunity for people to have their say on the aims, objectives, key principles and areas for development. There was also the opportunity to provide further comments on each section of the Strategy. The quantitative results from the survey are below (full results also included in appendix C of the Cabinet Report).

The Strategy is:

- Easy to read: 19 responses – 17 agree, 2 disagree
- Easy to understand: 18 responses – 15 agree, 3 disagree
- An appropriate length: 18 responses – 16 agree, 2 disagree
- Well laid out 18 responses: 18 responses – 12 agree, 6 disagree
- Informative 18 responses: 18 responses – 15 agree, 3 disagree

Do you agree or disagree that the:

- Aim of the Strategy is clear: 19 responses – 16 agree, 3 disagree
- Aim of the Strategy is the right one for Swansea: 18 responses – 14 agree, 3 disagree, 1 don't know
- Objectives are clear: 18 responses – 16 agree, 3 disagree
- Objectives are the right ones for Swansea: 18 responses – 11 agree, 4 disagree, 3 don't know

Do you agree or disagree that the key priorities of the Strategy are:

- Clear: 19 responses – 14 agree, 5 disagree
- The right ones for Swansea: 18 responses – 13 agree, 5 disagree

Objective 1: Ensuring service users are at the centre of service delivery

Do you agree or disagree that the areas for development for objective 1:

- Are clear: 24 responses – 17 agree, 7 disagree
- Are the right ones for Swansea: 22 responses – 16 agree, 4 disagree, 2 don't know

Objective 2: Prioritising early intervention and prevention of homelessness

Do you agree or disagree that the areas for development for objective 2:

- Are clear: 24 responses – 19 agree, 5 disagree
- Are the right ones for Swansea: 22 responses – 17 agree, 5 disagree

Objective 3: Ensuring suitable accommodation is available for people who are or may become homeless.

Do you agree or disagree that the areas for development for objective 3:

- Are clear: 24 responses – 19 agree, 5 disagree
- Are the right ones for Swansea: 23 responses – 16 agree, 7 disagree

Objective 4: Ensuring appropriate support is available for people who are or may become homeless

Do you agree or disagree that the areas for development for objective 4:

- Are clear: 24 responses – 19 agree, 4 disagree, 1 don't know
- Are the right ones for Swansea: 21 responses – 16 agree, 5 disagree

Objective 5: Providing robust responses to support rough sleepers and eliminating the need for individuals to sleep rough

Do you agree or disagree that the areas for development for objective 4:

- Are clear: 22 responses – 17 agree, 5 disagree
- Are the right ones for Swansea: 23 responses – 17 agree, 6 disagree

How have you changed your initiative as a result?

Stage 1 Consultation

The priorities identified in stage 1 of the consultation have directly influenced and informed the contents of the Strategy and Action Plan. All the issues raised by service users and stakeholders (as listed above) have been incorporated.

In addition some of the specific consultation with organisations resulted in the development of actions based on issues they identified, including:

- Additional actions relating to the needs of refugees and asylum seekers were added as a result of discussions with the Welsh Refugee Council:
 - Identify and prepare for the implications of the Immigration Act 2014 e.g. Right to Rent checks and Britain's exit from the EU.
 - Develop information specifically for refugees to provide targeted housing advice.
 - Map the provision in place to assist and advise individuals who are ineligible for homelessness and housing assistance which includes households with "no recourse to public funds"
- Additional actions relating to the needs of women fleeing domestic abuse were added as the result of discussions with the Key 3 Co-ordinator:
 - Review the provision of temporary supported accommodation for households with complex needs experiencing domestic abuse.

Additional actions relating to improving the economic resilience of households and reducing the impact of poverty and social exclusion have been added as a result of discussions with the Poverty and Prevention Service:

- Develop stronger links with Poverty & Prevention Service to ensure that homeless households have access to training, employment and education services.

The demographic information collected for the Homelessness Review and Strategy was broken down further to better monitor levels of homelessness amongst older people following discussions with the Council's Life Stages Partnership Manager. The Homelessness data age breakdown now includes a 50plus age category and this will continue to be monitored.

Stage 2 Consultation

Overall, the consultation responses to the Strategy and Action Plan have been positive. There is general agreement over the Council's proposals and vision for the delivery and improvement of Homelessness Services over the next four years. A number of suggestions have been made to create some additional actions and modify a small number of the existing actions, and where possible these suggestions have been incorporated into the final documents. The full consultation responses are included in the Cabinet report (appendix C), along with the Council's response to the comments and details of any changes made to the Strategy and Action Plan as a result.

Feedback mechanisms have included:

- Regular meetings of the Supporting People and Homelessness Forum – service provider and other stakeholders.
- Attendance at Crisis Member conference 2017 and 2018
- Summary of consultation responses included as part of Cabinet report.

Any actions required (e.g. further engagement activities, mitigation to address any adverse impact, etc.):

Development of the Homelessness Charter is a key action within the Strategy and will take a co-productive approach to ensure that service users are at the centre of service delivery and development. This will include specific work with children and young people.

Section 5 – Other impacts:

Please consider how the initiative might address the following issues - see the specific Section 5 Guidance

Foster good relations between different groups	Advance equality of opportunity between different groups
Elimination of discrimination, harassment and victimisation	Reduction of social exclusion and poverty

Foster good relations between different groups

The Homelessness Strategy sets out a key action to develop the Homelessness Charter. This work will provide the opportunity to foster good relations between different groups. It is intended that the Charter will be co-produced with a wide range of service users, and therefore will give opportunities to tackle prejudice and promote understanding between people from different groups.

Advance equality of opportunity between different groups

A key principle of the Strategy is to ensure equality of access to services and promote social inclusion and community cohesion. The needs of different groups have been taken into account during the development of the Strategy and a number of actions are included in the Homelessness Strategy to improve equality of opportunity: for example

- Consult with BME stakeholders and service users to improve ways services are provided to households with language barriers and cultural differences.
- Improve information available for specific groups such as refugees

Reduction of social exclusion and poverty

Homelessness is a severe form of poverty and social exclusion. The Strategy has a clear link with the Council's poverty agenda and Swansea's Wellbeing Strategy as it has a significant role in contributing to the achievement of the objectives to ensure that children have the best start in life and building stronger communities through the early

intervention and prevention of homelessness. The Strategy aims to prevent homelessness wherever possible and provide robust, effective responses when it is unavoidable. Homelessness prevention rates are high in Swansea - homelessness was prevented in 73% of cases in 2016/17, which compares well to the overall Welsh figure of 62%.

Elimination of discrimination, harassment and victimisation

A key principle of the Strategy is to safeguard people from harm. Causes of homelessness that are monitored include whether households have become homeless due to violence or harassment. Whilst the numbers in these categories are very low it provides the service with the opportunity to monitor trends in this area and identify if there are any areas for concern.

What work have you already done to improve any of the above?

See comments under each issue.

Is the initiative likely to impact on Community Cohesion? Please provide details.

A key principle of the homelessness Strategy is to ensure equality of access to services and promote social inclusion and community cohesion.

How does the initiative support Welsh speakers and encourage use of Welsh?

The Homelessness Service can provide services in Welsh upon request – there are currently three permanent fulltime members of staff who are fluent Welsh Speakers, including two Homelessness Caseworkers.

Actions (to mitigate adverse impact or to address identified gaps in knowledge).

See comments under each issue.

Section 6 - United Nations Convention on the Rights of the Child (UNCRC):

Many initiatives have an indirect impact on children and you need to consider whether the impact is positive or negative in relation to both children's rights and their best interests. Please read the UNCRC guidance before completing this section.

Will the initiative have any impact (direct or indirect) on children and young people (think about this age group holistically e.g. disabled children, those living in poverty or from BME communities)? If not, please briefly explain your answer here and proceed to Section 7.

All initiatives must be designed / planned in the best interests of children and young people.

Best interests of the child (Article 3): The best interests of children must be the primary concern in making decisions that may affect them. All adults should do what is best for children. When adults make decisions, they should think about how their decisions will affect children. This particularly applies to budget, policy and law makers.

Please explain how you meet this requirement:

The Strategy has a clear role to help fulfil Swansea's Wellbeing Strategy as it has a significant role in contributing to the achievement of the objectives to ensure that children have the best start in life through the early intervention and prevention of homelessness.

The needs of children and young people have been taken into account during the development of the Strategy including:

- There has been consultation with young people through relevant organisations –

including a focus group with young people who are service users of Swansea Young Single Homelessness Project

- Safeguarding is an underlying principle running through the Strategy
- The Homelessness Service takes the needs of children into account when dealing with families who are experiencing homelessness, for example efforts are made to ensure least disruption for children such unnecessary school moves.

During the consultation process, the Scrutiny Programme Committee identified a need for the Strategy to make a stronger commitment to the UNCRC. Therefore a commitment to upholding the UNCRC has been added to the “Key Principles” of the Strategy, and this has been strengthened by an additional action within the Strategy to develop a Homelessness Charter specifically for Children and Young People. The specific articles that are relevant to the Strategy are:

Article 3: Everyone who works with children should always do what is best for each child.

Article 12: Your right to say what you think should happen and be listened to.

Article 13: Your right to have information.

Article 16: Your right to have privacy.

Article 19: You should not be harmed and should be looked after and kept safe.

Article 22: Refugee children have the same rights as children born in Wales.

Article 23: Your right to special care and support if you are disabled so that you can lead a full and independent life.

Article 28: Your right to learn and to go to school.

Article 30: Your right to use your own language.

Article 31: Your right to relax and play.

Actions (to mitigate adverse impact or to address identified gaps in knowledge).

- Additional key principle added to the Strategy to uphold the UNCRC.
- Development of a homelessness charter for children and young people added to Action Plan.

Section 7 - Monitoring arrangements:

Please explain the monitoring arrangements for this initiative:

Monitoring arrangements:

The EIA Action Plan will form part of the annual monitoring arrangements for the Homelessness Strategy which include:

- A steering group will be established to oversee the implementation of the Strategy and Action Plan.
- The Action Plan will be reviewed on an annual basis and progress reported to the Cabinet Member for Homes and Energy
- An annual update will be produced including Action Plan progress and an up-date of the key homelessness statistics
- An annual review day will be held with the Supporting People and Homelessness Forum

Actions:

No further actions needed

Section 8 – Outcomes:

Having completed sections 1-5, please indicate which of the outcomes listed below applies to your initiative (refer to the guidance for further information on this section).

Outcome 1: Continue the initiative – no concern
Outcome 2: Adjust the initiative – low level of concern
Outcome 3: Justify the initiative – moderate level of concern
Outcome 4: Stop and refer the initiative – high level of concern.

For outcome 3, please provide the justification below:

For outcome 4, detail the next steps / areas of concern below and refer to your Head of Service / Director for further advice:

Section 9 - Publication arrangements:

On completion, please follow this 3-step procedure:

- 1. Send this EIA report and Action Plan to the Access to Services Team for feedback and approval – accesstoservices@swansea.gov.uk**
- 2. Make any necessary amendments/additions.**
- 3. Provide the final version of this report to the team for publication, including email approval of the EIA from your Head of Service. The EIA will be published on the Council's website - this is a legal requirement.**

EIA Action Plan:

Objective - What are we going to do and why?	Who will be responsible for seeing it is done?	When will it be done by?	Outcome - How will we know we have achieved our objective?	Progress
Review Housing Options equalities monitoring system.	Casework Team Leader	June 2019	<ul style="list-style-type: none"> Completed consultation with equalities representative groups re. best use of monitoring data Improved equalities monitoring system in place taking into account the requirements of the Equality Act. 	
Produce an easy-read guide of the Strategy and Action Plan.	Community Housing Operations Manager	January 2019	Easy read version will be available.	
Continue to work with equalities groups and carry out additional consultation as part of the annual review of the Homelessness Strategy and Action Plan in order to address information gaps identified by the EIA e.g. Swansea Bay LGBT forum, Gypsy Travellers.	Community Housing Operations Manager	December 2019	Additional information gather on the views of protected groups.	
Children & Young People				
<ul style="list-style-type: none"> Additional key principle added to the Strategy to uphold the UNCRC. Development of a homelessness charter for children and young people added to Action Plan. Ensure engagement with Young 	Community Housing Operations Manager	Dec 2019	<ul style="list-style-type: none"> Homelessness Charter for Children & Young People in place. Principles of co-production are incorporated into the design and delivery of services to 	

Carers Forum as part of the development of the Homelessness Charter.			ensure that people with experience of homelessness are meaningfully involved in planning services.	
Gypsies & travellers				
More data required – see action to review Housing Options equalities monitoring system.				
Sexual Orientation				
More data required – see action to review Housing Options equalities monitoring system.				
Gender reassignment				
More data required – see action to review Housing Options equalities monitoring system.				

Homelessness Strategy Consultation Stakeholder list
External
RSLs – Chief Executives
• Gwalia (Pobl)
• Coastal
• Family
• First Choice
Health
Chief Executive
Chair of Health and Housing Group
Head of Public Health
Head of Primary Care
Assistant Director of Strategy & Partnerships
Planning and Partnerships Manager for ABMU – Chair of HaVGHAP
Mental Health & Learning Disabilities Delivery Unit
Western Bay Partnership
Supporting People Regional Collaborative Committee
WLGA
South Wales Police
Assistant Police and Crime Commissioner
Probation
Community Rehabilitation Programme (CRC)
Regional Substance Misuse Area Planning Board
Supporting People & Homelessness Forum Members (support & accommodation providers)
Prisons
• Parc
• Swansea
• Eastwood
ADAPT
BME Groups
• Chinese community
• Ethnic Minorities and Youth Support Team
• African Community Centre
• Swansea Bay Racial Equality Council
• Muslim Engagement & Development
• Race Council Cymru
• Welsh Refugee Council
LGBT Groups/Disability Groups/BME groups (consultation documents circulated by Access to Services Team)
DWP Partnership Officer
Shelter
CAB
SCVS
Wallich
Caer Las

Crisis
Swansea Young Single Homelessness Project
BAYS+ Project
Landlord Forum – Private rented Sector
Financial Inclusion Steering Group
Swansea Poverty Action Network (SPAN)
Safer Swansea Partnership
Drug and alcohol agencies
• Dyfodol
• WACADA
• Sands Cymru
Internal
Scrutiny
All Councillors
Plus Cabinet Office
All Heads of Service
Supporting People Team
Domestic Abuse Co-ordinator
Migration, Asylum Seeker and Refugee Coordinator
Adult Prosperity and Wellbeing Manager
Live well, Age Well Strategy
Housing Benefit
City Centre Management
Welfare Rights Unit