

EQUALITY IMPACT ASSESSMENT

Name of activity:	Temporary Accommodation Placement Policy	Date Completed:	5th August 2019		
Directorate / Division responsible for activity:	Strategic Housing	Lead Officer:	Hannah Edwards and Nikki Hargrave		
Existing Activity	<input type="checkbox"/>	Existing activity, new / proposed policy	x	Changing / Updated Activity	<input type="checkbox"/>

What are the aims / main purposes of the activity?

Section 17.49 of the 'Homelessness Code of Guidance' (published by the Ministry for Housing, Communities and Local Government (MHCLG)) states:

"Where accommodation which is otherwise suitable and affordable is available nearer to the authority's district than the accommodation which it has secured, the accommodation which it has secured is not likely to be suitable unless the applicant has specified a preference, or the accommodation has been offered in accordance with a published policy which provides for fair and reasonable allocation of accommodation that is or may become available to applicants."

The proposed 'TA Placement Policy' sets out the Council's approach for how homeless households will be prioritised for temporary accommodation (TA) when there is no TA available in:

- a) The local authority area, or
- b) An area within the local authority district that an applicant would prefer to be placed into to access for example, schools, place of work, family

The policy applies to all households placed in temporary accommodation by the Council under Section 188 *The Relief of Homelessness Duty* and Section 193 *The Main Homelessness Duty* arising out of the Housing Act 1996. It also applies to any accommodation:

1. Secured under a power to provide temporary accommodation pending a review or appeal
2. Secured to meet any duty owed to an intentionally homeless household
3. Secured to meet any interim accommodation duty pending the outcome of a local connection referral to another local authority

Please note, whilst the Policy document itself is "new", the procedure it conveys is not. The Policy documents the existing process used to determine how households are prioritised for a placement into TA.

What are the main actions and processes involved?

All households will be placed in accommodation within the Borough if a sufficient number of suitable units are available at the time of placement. Where there is a shortage of local units on any given day the Council may decide to keep aside a number of local vacant units in anticipation of applicants presenting who meet the criteria for a local placement. If there isn't a sufficient number of local temporary accommodation units available, a household will be placed in a suitable unit outside of our area, but as close to this local authority's district as possible based on the practicality of sourcing units on any given day.

Relevant facts regarding the household's circumstances and needs will be gathered by officers in the course of their enquiries through completing their assessment of an applicant's circumstances under section 189A of the Housing Act 1996. The impact of these and any other relevant circumstances will be considered both individually and cumulatively.

Households will be given priority for an 'in area' placement if they meet criteria as laid out in section 4 of the Policy. This does not mean that they are guaranteed to receive an offer of 'in area' accommodation when any TA duty arises. It may be that at the time any temporary accommodation duty is owed there are no vacancies in area and, if this is the case, an offer of suitable TA will be made as close as possible with priority given to any household that meets one or more of the criteria set out below, to be given a suitable offer of temporary accommodation within area as soon as is reasonably practicable to do so.

Who is intended to benefit & who are the main stakeholders?

The TA Placement Policy is not intended to place any household at an advantage or disadvantage, but to describe the procedure for prioritizing households for placement into temporary accommodation.

Have you already consulted on / researched the activity?

No consultation is required or necessary.

Impact on people with a protected characteristic

Protected characteristics / groups	Is there an impact (Yes / No)	If Yes, what is it and identify whether it is positive or negative
Age	No	Neutral – The Policy documents the existing procedure for placing clients into TA, and is not restricted to, or directed at, any particular group of people. The decision whether to place outside of the borough is based on the availability of suitable TA within the Borough, along with the needs/circumstances of the household. The Policy makes no specific reference to age, and is unlikely to discriminatorily impact younger/older people.

Disability	No	Neutral – The Policy documents the existing procedure for placing clients into TA, and is not restricted to, or directed at, any particular group of people. The decision whether to place outside of the borough is based on the availability of suitable TA within the Borough, along with the needs/circumstances of the household. The presence of a person with a physical or mental disability within the household <i>may</i> (according to the criteria set out in section 4 of the Policy) <i>prioritise</i> that household for an ‘in area’ placement, however such placements are not guaranteed and are still subject to the availability of suitable accommodation at that time, therefore the overall impact is still neutral.
Gender reassignment	No	Neutral – The Policy documents the existing procedure for placing clients into TA, and is not restricted to, or directed at, any particular group of people. The decision whether to place outside of the borough is based on the availability of suitable TA within the Borough, along with the needs/circumstances of the household. The Policy makes no specific reference to gender reassignment, and is unlikely to discriminatorily impact people undergoing gender reassignment.
Marriage & civil partnership	No	Neutral – The Policy documents the existing procedure for placing clients into TA, and is not restricted to, or directed at, any particular group of people. The decision whether to place outside of the borough is based on the availability of suitable TA within the Borough, along with the needs/circumstances of the household. The Policy makes no specific reference to marital status, and is unlikely to discriminatorily impact people based on their marital status.
Pregnancy & maternity	No	Neutral – The Policy documents the existing procedure for placing clients into TA, and is not restricted to, or directed at, any particular group of people. The decision whether to place outside of the borough is based on the availability of suitable TA within the Borough, along with the needs/circumstances of the household. The presence of a child within the household <i>may</i> (according to the criteria set out in section 4 of the Policy) <i>prioritise</i> that household for an ‘in area’ placement, however such placements are not guaranteed and are still subject to the availability of suitable accommodation at that time, therefore the overall impact is still neutral.
Race	No	Neutral – The Policy documents the existing procedure for placing clients into TA, and is not restricted to, or directed at, any particular group of people. The decision whether to place outside of the borough is based on the availability of suitable TA within the Borough, along with the needs/circumstances of the household. The Policy makes no specific reference to race, and is unlikely to discriminatorily impact people based on their race.

Religion & belief	No	Neutral – The Policy documents the existing procedure for placing clients into TA, and is not restricted to, or directed at, any particular group of people. The decision whether to place outside of the borough is based on the availability of suitable TA within the Borough, along with the needs/circumstances of the household. The Policy makes no specific reference to religion and beliefs, and is unlikely to discriminatorily impact people based on their religion and beliefs.
Sex	No	Neutral – The Policy documents the existing procedure for placing clients into TA, and is not restricted to, or directed at, any particular group of people. The decision whether to place outside of the borough is based on the availability of suitable TA within the Borough, along with the needs/circumstances of the household. The Policy makes no specific reference to gender, and is unlikely to discriminatorily impact people based on the gender to which they identify.
Sexual orientation	No	Neutral – The Policy documents the existing procedure for placing clients into TA, and is not restricted to, or directed at, any particular group of people. The decision whether to place outside of the borough is based on the availability of suitable TA within the Borough, along with the needs/circumstances of the household. The Policy makes no specific reference to sexual orientation, and is unlikely to discriminatorily impact people based on the sexual orientation to which they identify.
Whilst Socio economic disadvantage that people may face is not a protected characteristic; the potential impact on this group should be also considered	No	Neutral – The Policy documents the existing procedure for placing clients into TA, and is not restricted to, or directed at, any particular group of people. The decision whether to place outside of the borough is based on the availability of suitable TA within the Borough, along with the needs/circumstances of the household. The ability of the household to afford travel costs resulting from the location of the accommodation is a consideration when assessing the suitability of an offer of TA, plus all placements are still subject to the availability of suitable accommodation at that time, therefore the overall impact is still neutral.

What evidence has been used to assess the likely impacts?

The TA Placement Policy documents existing practices, and in the past three years no one has requested a review of their temporary accommodation based on the suitability of its location.

What resource implications are there to deliver actions from this EIA?

None above and beyond what exists already to provide the service.

Outcome following initial assessment		
Does the activity have a positive impact on any of the protected groups or contribute to promoting equality, equal opportunities and improving relations within target groups?	No	
Does the activity have a negative impact on any of the protected groups, i.e. disadvantage them in any way.	No	

Decision following initial assessment			
Continue with existing or introduce new / planned activity	Yes	Amend activity based on identified actions	No

Action Plan			
Impact identified	Action required	Lead Officer	Deadline
n/a		Hannah Edwards and Nikki Hargrave	

Monitoring & Review	
Date of last review or Impact Assessment:	n/a
Date of next 12 month review:	Review as and when any changes made to policy
Date of next 3 year Impact Assessment (from the date of this EIA):	Review as and when any changes made to policy

Signed by Person Completing:	Hannah Edwards
Date Sent to HR and Equalities Team:	10 th September 2019
Approved by Head of Service:	Diana Maughan

Crawley Borough Council Equality Impact Assessment



Completed Equality Impact Assessment	Key findings	Future actions
<p>Directorate / Division:</p> <p>Function or policy name:</p> <p>Officer completing assessment (Job title):</p> <p>Date of assessment:</p>	<p>Strategic Housing Services</p> <p>Temporary Accommodation Out of Borough Placement Policy</p> <p>Hannah Edwards - Strategic Housing Performance, Policy and Project Officer</p> <p>5th August 2019</p>	