Housing Executive Equality Screening Template

Part 1. Policy scoping

The first stage of the screening process involves scoping the policy under consideration. The purpose of policy scoping is to help prepare the background and context and set out the aims and objectives for the policy, being screened. At this stage, scoping the policy will help identify potential constraints as well as opportunities and will help the policy writer work through the screening process on a step by step basis.

INFORMATION ABOUT THE POLICY
Name of the policy

Homelessness Strategy 2017-2022

Is this an existing, revised or a new policy?

New strategy

What is it trying to achieve? (intended aims/outcomes)

The Strategy has five main objectives and outcomes:
1.   To prevent Homelessness. Outcome will be an increase in the number of households prevented from becoming homeless.
2.   To secure sustainable housing and support solutions for homeless households. Outcome will be a reduction in the number of households experiencing repeat homelessness.
3.   To further understand and address chronic homelessness (and rough sleeping. Outcome will be an increase in the number of chronic households assisted to sustained housing solutions.
4.   To bring the right agencies together to oversee implementation of the strategy. Outcome will be improved access to services for homeless clients.
5.   To measure and monitor need to inform the development of appropriate services. Outcome will be provision of good quality, evidence based, strategically planned homelessness services.

Are there any Section 75 categories which might be expected to benefit from the intended policy?
If so, explain how.

This policy is aimed at everyone. It seeks to help prevent homelessness, provide services for those who find themselves homeless and to monitor and learn from the experiences of homelessness. Therefore everyone should benefit. However, our experience to date and our understanding of this strategy would suggest that there will be particular benefits for men or women experiencing domestic violence, disabled people who live in accommodation not suitable to their needs or with mental health issues; migrant workers or BME households in insecure or tied accommodation, or facing racial harassment or intimidation; people facing sectarian and/or paramilitary intimidation;

LGBT people experiencing harassment or intimidation and households faced with having to move to where their family support is.

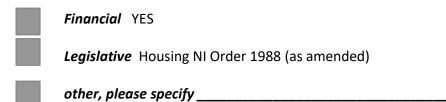***Who initiated or wrote the policy?***

Director of Regional Services

Who owns and who implements the policy?

Regional Services and Housing Services

Implementation factors

Are there any factors which could contribute to/detract from the intended aim/outcome of the policy/decision?

If yes, are they

	Financial YES
	Legislative Housing NI Order 1988 (as amended)
	other, please specify _____

Main stakeholders affected

Who are the internal and external stakeholders (actual or potential) that the policy will impact upon?

	Staff	Yes
	Service users, customers	Yes
	other public sector organisations	Yes
	voluntary/community/trade unions	Yes
	other, please specify _____	

Other policies with a bearing on this policy:

- ***what are they?***

External

1.   Draft Programme for Government owned by all Govt. Departments. Cross Departmental working to achieve reduction in housing stress.

2.   Housing Strategy owned by Department of Communities details actions for the provision of housing stock across Northern Ireland

3.   Public Health Agency Strategies:
- Making Life Better
- Protect Life
- Drugs and Alcohol

4.   Justice
- Strategic Framework for Reducing Offending 2013 – research highlights the socio economic issues associated with offending behaviour of which lack of suitable accommodation is one
- Supporting Change, A Strategic Approach to Desistance 2015 - Desistance Strategy for Northern Ireland highlights ways to help stop people from offending. Accommodation is one of the seven key pathways from offending (in addition to improved attitudes; improved health; family; finance/debt; substance misuse; education/employment/training).
- Stopping Domestic and Sexual Violence and Abuse

Internal NIHE Strategies

1.   Tenancy Sustainment Strategy: owned by Landlord Services
2.   Financial Inclusion Strategy: owned by Landlord Services
3.   Community Safety Strategy: owned by Landlord Services
4.   Rural Strategy: owned by Regional Services
5.   Community Development Strategy: owned by Landlord Services

Available evidence

Evidence to help inform the screening process may take many forms. Policy Writers should ensure that their screening decision is informed by relevant data.

What evidence/information (both qualitative and quantitative) have you gathered to inform this policy? Specify details for each of the Section 75 categories that evidence is required for.

Section 75 category	Details of evidence/information: The Homelessness strategy is centred on a wide range of intelligence and information. This includes:
Religious belief	1. Waiting list trends and analysis of all client groups
Political	2. Allocations patterns and housing market analysis

opinion	3. Ongoing liaison and consultations with representative groups.
Racial group	Reference Documents used in formulating strategy:
Age	1. Europe 2020 - A strategy for smart, sustainable and inclusive growth, European Commission (2010) http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2010:2020:FIN:EN:PDF
Marital status	2. COMMISSION STAFF WORKING DOCUMENT Confronting Homelessness in the European Union Accompanying the document COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS Towards Social Investment for Growth and Cohesion - including implementing the European Social Fund 2014-2020, European Commission (2013)http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52013SC0042&from=EN
Sexual orientation	
Men and women	
Disability	3. http://www.nihe.gov.uk/measuring_homelessness_and_housing_exclusion_in_northern_ireland.pdf
Dependants	4. At what cost? An estimation of the financial costs of single homelessness in the UK, Crisis & University of York (2015) https://www.york.ac.uk/media/chp/documents/2015/CostsofHomelessness.pdf

5. Evidence Review Of The Costs Of Homelessness, Department for Communities & Local Government (2012) https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7596/2200485.pdf

6. Housing Options In Scotland A Thematic Inquiry, Scottish Housing Regulator (2014) https://www.scottishhousingregulator.gov.uk/sites/default/files/publications/Housing%20Options%20Report%20-%20Web%20Version.pdf

6. Making Every Contact Count, Department For Communities and Local Government (2012) https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/417230/150325_Addressing_Complex_Needs_-_final_publication_amended.pdf

7. Addressing Complex Needs – Improving Services for Vulnerable People, Department for Communities and Local Government (2015) https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/417230/150325_Addressing_Complex_Needs_-_final_publication_amended.pdf |

	8. The Homelessness Monitor: Wales 2015, Crisis (2015) http://www.crisis.org.uk/data/files/publications/HomelessnessMonitorWales2015_final.pdf
5	9. The Homelessness Monitor: Scotland 2015, Crisis (2015) http://www.crisis.org.uk/data/files/publications/HomelessnessMonitorScotland_FINAL.pdf

Needs, experiences and priorities

Taking into account the information referred to above, what are the different needs, experiences and priorities of each of the following categories, in relation to the particular policy/decision? Specify details for each of the Section 75 categories that are affected.

Section 75 category	*Details of needs/experiences/priorities*
Religious belief	Availability of stock is often limited in the more popular areas with low turnover. Many of these areas are single identity which limits choice with many households not fully aware of the full range of housing choices available to them.
Political opinion	Sectarian and/or paramilitary threats can often require an immediate or emergency response.
Racial group	BREXIT issues may impact on homelessness
	Racial intimidation can require immediate or emergency response
	Migrant Workers may lose eligibility during their stay in Northern Ireland
	Migrant Workers can often lose tied accommodation with no or limited notice.
	BME families in accommodation may need support to sustain their homes in a new and unfamiliar environment.
Age	Aging population impacts on housing mix requirements and/or support needs
	Ongoing support needs of 16/17 yr olds

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	Potential impact of Age discrimination law changes
	Prevention issues including information on Welfare reform impacts; alcohol and drug abuse including legal highs
	Young people (including school children) understanding their future housing needs and choices
Marital status	
Sexual orientation	Issues raised in relation to unsuitable hostel accommodation for young LGBT people.
Men and women	Male and female domestic violence victims requiring appropriate accommodation.
	Family breakdown generally increasing the pressure on homelessness
Disability	Increasing harassment of disabled people requiring appropriate responses
	Accommodation not suitable for the needs of the household
Dependants	Accommodating non family carers
	Severe overcrowding

Part 2. Screening questions

Introduction

In making a decision as to whether or not there is a need to carry out an equality impact assessment, the Policy Writer should consider the answers to the questions 1-4.

If the Screening Team's conclusion is <u>none</u> in respect of all of the Section 75 equality of opportunity and/or good relations categories, then it is recommended that the policy is "screened out". This means no further action is required for this policy.

If the Screening Team's conclusion is <u>major</u> in respect of one or more of the Section 75 equality of opportunity and/or good relations categories, then consideration must be given to subjecting the policy to the equality impact assessment procedure.

If the Screening Team's conclusion is <u>minor</u> in respect of one or more of the Section 75 equality categories and/or good relations categories, then consideration should still be given to proceeding with an equality impact assessment, or to:

- measures to mitigate the adverse impact; or
- the introduction of an alternative policy to better promote equality of opportunity and/or good relations.

The Screening team should consider the following issues as indicators of "major impact".

a) The policy is significant in terms of its strategic importance;

b) Potential equality impacts are unknown, because, for example, there is insufficient data upon which to make an assessment or because they are complex, and it would be appropriate to conduct an equality impact assessment in order to better assess them;

c) Potential equality and/or good relations impacts are likely to be adverse or are likely to be experienced disproportionately by groups of people including those who are marginalised or disadvantaged;

d) Further assessment offers a valuable way to examine the evidence and develop recommendations in respect of a policy about which there are concerns amongst affected individuals and representative groups, for example in respect of multiple identities;

e) The policy is likely to be challenged by way of judicial review;

f) The policy is significant in terms of expenditure.

In favour of 'minor' impact

a) The policy is not unlawfully discriminatory and any residual potential impacts on people are judged to be negligible;

b) The policy, or certain proposals within it, are potentially unlawfully discriminatory, but this possibility can readily and easily be eliminated by making

appropriate changes to the policy or by adopting appropriate mitigating measures;

c) Any asymmetrical equality impacts caused by the policy are intentional because they are specifically designed to promote equality of opportunity for particular groups of disadvantaged people, e.g. Traveller families, Older people, Disabled people.

d) By amending the policy there are better opportunities to better promote equality of opportunity and/or good relations.

In favour of none

a) The policy has no relevance to equality of opportunity or good relations.

b) The policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity or good relations for people within the equality and good relations categories.

c) Equality of opportunity and good relations have been fully accommodated within the policy development process and all risks are adequately managed.

The Screening Team must take into account the evidence presented above and consider the questions set out below.

Screening questions

1	What is the likely impact on equality of opportunity for those affected by this policy, for each of the Section 75 equality categories? minor/major/none

It is important to note that Equality and Good Relations are viewed as dynamic factors within this strategy. Equality needs and good relations issues change constantly and this strategy and the local action plans must remain flexible to address needs as and when they arise. It is proposed that equality will be included as a standing item on the agenda at future meetings of the Performance Management group to ensure that there is an opportunity for any panel/forum member to introduce issues at any time during the lifespan of the strategy.

Section 75 category	Details of policy impact	Level of impact? minor/major/none
Religious belief	At a strategic level trend data on waiting lists and allocations, waiting times and points analysis (particularly at local levels) feeds into various complementary housing strategies including the Strategic guidelines for the Social Housing Development programme. The Homelessness Strategy acknowledges the many circumstances particular to Northern Ireland and, for example, we utilise expert information and guidance from many sources including NIACRO/Base 2 where religion, faith and/or political opinion may have a bearing on a specific case. Full and holistic housing and support needs assessment to be carried out for every client and solution tailored to the specific needs of the client. The assessment will take into consideration any religious or political issues which are significant to ensure client can sustain housing solution.	None
Political opinion		None
Racial group	Ongoing monitoring of the strategy will allow flexibility to be responsive to emerging issues, eg, "Brexit" and any impact they may have on racial groups. This Strategy will ensure that staff engage with appropriate support providers relevant to the racial group of an individual/household across all three Housing Executive regions. Examples of such services	**Minor**

	include, but are not limited to: • STEP project – (South region – guidance for migrant workers in the Dungannon area) • Language/Communication Support for Voluntary hostels • STEM project Information on the range of support services that are provided via Supporting People funding across all regions can be found at http://www.nihe.gov.uk/SPOCCNET/.	
Age	Holistic assessment of client need designed to ensure sustainable solution found, appropriate to the housing and support needs of the client. This Strategy will ensure that staff engage with appropriate support providers relevant to the age of an individual/household across all three Housing Executive regions. Examples of such services include, but are not limited to: • Action for Children (North Region - Supported Lodging and Floating Support for young people at risk) • Age North Down and Ards (South Region – floating support for young people) • Apex Housing Association (North Region – various schemes for elderly) • BCM Housing Support for Young People (Belfast Region – floating support for young people) • Flax Foyer (Belfast Region – accommodation for young people) • MACS (South Region – floating support for young people) • Northern Health and Social Care Trust (North Region - Floating support for older people	None

	with mental health problems) • Simon Community (Belfast Region – accommodation based service for young people) • Southern Health and Social Care Trust (South Region – accommodation for older people) • Praxis Care Group – (North Region – scheme for young people at risk and/or leaving care) • Triangle (North Region – floating support) Information on the range of support services that are provided via Supporting People funding across all regions can be found at http://www.nihe.gov.uk/SPOCCNET/.	
Marital status	**No impact**	None
Sexual orientation	Improved data gathering and data sharing protocols designed to ensure correct support solutions in place for all client groups. Staff will ensure that where appropriate a referral will be made to an appropriate advocacy or support group where further advice or assistance beyond Housing Solutions and Support may be required. In addition a recent Research report commission ed by the Housing Executive called " Through Our Eyes" recommended engagement of the voluntary sector to train front line staff on LGBT issues. A pilot of this training has been completed and further training will be delivered in line with the implementation of the redesign of housing services. Information on the range of support services that are provided via Supporting People funding across all regions can be found at http://www.nihe.gov.uk/SPOCCNET/.	None
Men and women	This Strategy specifically addresses homelessness where it is directly associated with gender. Each case will be assessed individually however we will draw on	None

12	a range of services that may be able to provide advice or support for cases associated with gender. Examples of such services include, but are not limited to: • Women's Aid • Men's Advisory Project • The Rainbow Project	
Disability	Frontline NIHE staff will pull upon the necessary Health and Support services to ensure sustainable housing and support outcome. This Strategy will ensure that staff engage with appropriate support providers relevant to any individual/household with a disability across all three Housing Executive regions. Examples of such services include, but are not limited to: • Apex Housing Association (North Region – various schemes for people with learning disabilities) • Ardkeen Supported Housing (Belfast Region – accommodation based service for people with physical or sensory disabilities) • Autism Initiatives (North Region – floating support for people with learning disabilities) • Crescent Supported Living (Belfast Region – accommodation based support for people with learning disabilities) • Leonard Cheshire (South Region – accommodation and floating support for physically disabled) • NIAMH (South Region – accommodation for applicants with mental health vulnerabilities) • Southern Health and Social Care Trust (South Region – floating support for applicants with sensory impairment)	None

13	• Triangle Housing Association (North Region – various schemes for people with learning disabilities) In addition to the schemes listed above there are examples where applicants with physical disabilities are assisted in to sustainable accommodation or by preventing homelessness where there are options such as adaptations which may allow an individual to remain in their property. Information on the range of support services that are provided via Supporting People funding across all regions can be found at http://www.nihe.gov.uk/SPOCCNET/.	
Dependants	Holistic assessment will ensure that all of a client's circumstances are considered and addressed where possible. This Strategy will ensure that staff engage with appropriate support providers relevant to the dependants within a household across all three Housing Executive regions. Examples of such services include, but are not limited to: • Clarendon Shelter (North Region – scheme for homeless families with support needs) • First Housing Aid & Support Services (North Region – Shepherds View scheme to assist teenage parents) • Homecare (South Region – floating support) • NIHE (Provision of a number of hostels for homeless families with support needs) • Women's Aid (Support across all three regions) This strategy has a significant degree of flexibility and local autonomy built in to it to ensure local managers can accommodate a wide range of customer needs. This may on occasion include large or very large	None

14	families and we have employed in the past and will employ innovative local solutions appropriate to the needs of the household. Information on the range of support services that are provided via Supporting People funding across all regions can be found at http://www.nihe.gov.uk/SPOCCNET/.	

2	Are there opportunities to better promote equality of opportunity for people within the Section 75 equalities categories?	
Section 75 category	*If Yes, provide details*	*If No, provide reasons*
Religious belief		In these groups the policy screening team have agreed that the strategy fully accommodates the issues associated with the section 75 groups. In addition we have agreed to include Equality Issues as a standing item on the agenda of the Local Inter-agency Homelessness Strategy Implementation Groups. This will provide a platform for consideration of any new, changing or emerging equality issues.
Political opinion		
Racial group		
Age		
Marital status		
Sexual orientation		
Men and women		
Disability		
Dependants	There is still no clear resolution of the issue where a carer may need an additional bedroom for a carer. The Homelessness strategy however has a degree of flexibility to accommodate changing issues in the future.	

3 To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion or racial group? minor/major/none		
Good relations category	**Details of policy impact**	**Level of impact minor/major/none**
Religious belief	The Homelessness strategy does not impact directly on good relations	
Political opinion		
Racial group		

4 Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?		
Good relations category	**If Yes, provide details**	**If No, provide reasons**
Religious belief	The Homelessness strategy does not impact directly on good relations	
Political opinion		
Racial group		

Additional considerations

Multiple identity

Generally speaking, people can fall into more than one Section 75 category. Taking this into consideration, are there any potential impacts of the policy/decision on people with multiple identities?
(For example; disabled minority ethnic people; disabled women; young Protestant men; and young lesbians, gay and bisexual people).

Homelessness services are delivered to households which can often be multi-layered and complex. This is addressed by each applicant household being subjected to a detailed and in-depth homeless assessment with a full and frank assessment of all the aspects of the household and those within it in the context of the realistic housing choices/options available to them.

Provide details of data on the impact of the policy on people with multiple identities. Specify relevant Section 75 categories concerned.

Disability Duties:

1. Does this policy affect (or have the potential to affect) disabled people.

Yes

2. If yes, how does this policy pay due regard to the promotion of positive attitudes towards disabled people?

Disabled people are considered at both a strategic level taking into account those generic issues associated with disability, design, harassment, appropriate accommodation, as well as the individual needs identified through the household interviews.

3. If yes, does this policy provide any opportunity for the engagement of, or participation of any stakeholder representatives, e.g. Housing Community network.

Yes

4. If yes, what efforts have been made to encourage the participation of disabled people?

Housing Solutions and Support Teams across NI will create local Homelessness Strategy Implementation Groups and will seek appropriate service user input to the development of Local Homelessness Action Plans.

Human Rights:

The Screening Team must consider the Human Rights "Convention Checklist" set out below. The Screening Team must be satisfied that the policy does not interfere (unless justified by a legitimate, necessary and/or proportionate aim) with any of the rights listed. On occasion, the Screening Team may require legal advice to assure the Board/CXBC of adequate consideration of Human Rights.

There are no specific Human Rights Issues.

ADDITIONAL HUMAN RIGHTS CONVENTIONS:
There are many international instruments that the UK Government have made commitments to progressively realise. Some of these impact on housing policy and it is important that when we make policy that we can assure the Board that cognisance of these instruments has been observed. This is particularly important where policies affect or have the potential to affect children and young people and disabled people. The Screening Team may wish to seek additional legal advice or views of representative groups.

Part 3. Screening Team decision

Does this policy require an equality impact assessment? No

Reasons for the decision:

There are no significant equality issues that require an Equality Impact Assessment

Part 5 - Approval and authorisation

Screened by:	*Position/Job Title*	*Date*
Tony Steed Richard Tanswell	*Equality Unit Manager* *Homelessness Strategy Manager*	
Approved by:		

Note: A copy of the Screening Template for each policy should be placed on the website for public access.

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