

Equality Impact Assessment (EIA)

For advice on this document please contact Clare Muir on 72119 or email Clare.Muir@reading.gov.uk.

Please contact the Project Management Office at pmo@reading.gov.uk for advice and/or support to complete this form from a project perspective.

Name of proposal/activity/policy to be assessed:

Contracts for grant funded “move-on homes” with 24/7 Intensive Support for those rough sleeping / at risk of rough sleeping report and decision

Directorate: DEGNS
 Service: Housing Needs

Name: Selina Ma
 Job Title: Acting Rough Sleeping Initiatives Manager (Contracts and Commissioning)

Date of assessment: 14th July 2023

Version History

Version	Reason	Author	Date	Approved By
1	Report draft to go to Policy Committee	Selina Ma	14.07.23	Selina Ma

Scope your proposal

- **What is the aim of your policy or new service/what changes are you proposing?**
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Procurement, award of contracts and authorisation to enter into new contract arrangements for two specialist services for vulnerable cis and transgender females with complex needs (the Nova Project - 10 units) and for males, females and couples with complex needs at 57 Caversham Road (the Pods - 40 units). Contracts will be from April 2024 until March 2025.

An open tender may mean a change in support service provider, but the procurement process will ensure that a provider with suitable experience and expertise deliver to the same Specification and T&Cs.

- **Who will benefit from this proposal and how?**
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Those benefiting from the services, which are existing, and will continue under the same contract terms and service specification, and are the groups outlined in the paragraph above.

- **What outcomes does the change aim to achieve and for whom?**
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Both projects will be tendered to ensure best value from grant funds awarded by DLUHC and the outcomes of both of these projects, as per existing contracts, are to accommodate and support people with a rough sleeping history, with complex needs, to move-on into independent living within 2-3 years.

- **Who are the main stakeholders and what do they want?**
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- Vulnerable cis and transgender females with complex needs (The Nova Project)
 - Males, females and couples with complex needs (57 Caversham Road)
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Assess whether an EqlA is Relevant

How does your proposal relate to eliminating discrimination; advancing equality of opportunity; promoting good community relations?

- Do you have evidence or reason to believe that some groups may be affected differently than others (due to race, disability, sex, gender, sexuality, age, religious belief or due to belonging to the Armed Forces community)? Make reference to the known demographic profile of the service user group, your monitoring information, research, national data/reports etc.

Yes.

- Cis and transgender females only who will be accommodated at The Nova Project
- Those aged 18+
- Single people and couples (including same-sex couples) without dependent children

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- Is there already public concern about potentially discriminatory practices/impact or could there be? Make reference to your complaints, consultation, feedback, media reports locally/nationally.

No.

If the answer is Yes to any of the above, you need to do an Equality Impact Assessment.

If No you **MUST** complete this statement.

An Equality Impact Assessment is not relevant because:

An EqlA is relevant.

X

Selina Ma
Completing Officer

X

Lead Officer

Assess the Impact of the Proposal

Your assessment must include:

- **Consultation**
- **Collection and Assessment of Data**
- **Judgement about whether the impact is negative or positive**

Think about who does and doesn't use the service? Is the take up representative of the community? What do different minority groups think? (You might think your policy, project or service is accessible and addressing the needs of these groups, but asking them might give you a totally different view). Does it really meet their varied needs? Are some groups less likely to get a good service?

How do your proposals relate to other services - will your proposals have knock on effects on other services elsewhere? Are there proposals being made for other services that relate to yours and could lead to a cumulative impact?

Example: A local authority takes separate decisions to limit the eligibility criteria for community care services; increase charges for respite services; scale back its accessible housing programme; and cut concessionary travel. Each separate decision may have a significant effect on the lives of disabled residents, and the cumulative impact of these decisions may be considerable. This combined impact would not be apparent if decisions are considered in isolation.

Consultation

How have you consulted with or do you plan to consult with relevant groups and experts. If you haven't already completed a Consultation form do it now. The checklist helps you make sure you follow good consultation practice.

[Consultation manager form - Reading Borough Council Dash](#)

Relevant groups/experts	How were/will the views of these groups be obtained	Date when contacted
Consultation undertaken with St Mungo's, current providers of The Nova Project, in establishing case-by-case assessment and access criteria for The Nova Project.	Sector research and experience/existing female only services have informed the Service Specification for service delivery at The Nova Project.	November 2021

Collect and Assess your Data

Using information from Census, residents survey data, service monitoring data, satisfaction or complaints, feedback, consultation, research, your knowledge and the knowledge of people in your team, staff groups etc. describe how the proposal could impact on each group. Include both positive and negative impacts. (Please delete relevant ticks)

- Describe how this proposal could impact on racial groups
- Is there a negative impact? No

No impact on racial groups.

Access is not restricted to either The Nova Project or 57 Caversham Road on any ground apart from age (18 or over) or gender (cis or transgender female) for The Nova Project.

Those who rough sleep in Reading are predominantly single, white males aged 35+ who state that they are heterosexual and Christian/have no religious beliefs. 57 Caversham offers the same level of 24/7 supported environment that The Nova Project does. Whilst this is the trend in demography for people that rough sleep, other/any racial groups would not be precluded from accessing either project should they meet the criteria regarding a rough sleeping background, local connection and needing the level of support offered.

- Describe how this proposal could impact on Sex and Gender identity (include pregnancy and maternity, marriage, gender re-assignment)
- Is there a negative impact? No

The Nova Project offers accommodation to vulnerable females requiring 24/7 support who have a history of, or are at risk of rough sleeping. The project provides a protected environment for cis and transgender females in accordance with the following Service Specification criteria:

The Provider must: “Ensure transgender clients are not excluded from access to the Service. Referrals for transgender clients should be discussed and considered alongside all other referrals at the Specialist Projects Panel on a case-by-case basis so that the most appropriate housing offer is made for the client, considering both the needs of the client and other service users at the Service.”

People identifying as female will be considered in accordance with this referral and access criteria.

There is a justifiable reason for a female only service where there can be disproportionate risks towards females who rough sleep/are at risk of rough sleeping as identified within independent sector research. This shows that a safe female-only space is key to recovery and moving away from addiction/lifestyles on the streets where mixed gender supported

environments can present additional risk of continued unhealthy/co-dependent relationships, risk of domestic abuse and/or forced sex-working. 57 Caversham Road provides the same 24/7 supported environment and support offer for couples (including same sex couples), males and females with complex needs who do not meet the criteria of The Nova Project. This ensures equality of support offer.

No negative impact identified.

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- **Describe how this proposal could impact on Disability**
 - **Is there a negative impact? No**

Access is not restricted to either The Nova Project or 57 Caversham Road on any ground apart from age (18 or over) or gender (cis or transgender female) for The Nova Project. Those with disabilities, requiring accessible accommodation and presenting with complex needs will be assessed and able to access either project.

No impact on disability.

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- **Describe how this proposal could impact on Sexual orientation (cover civil partnership)**
 - **Is there a negative impact? No**

57 Caversham Road accommodation can be offered to couples (including same sex couples). All couples are accommodated in separate units due to the size of units/to reduce any potential risk of domestic abuse.

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- **Describe how this proposal could impact on age**
 - **Is there a negative impact? No**

Both The Nova Project and 57 Caversham Road are for single people/couples without dependent children and are for those aged 18 or over only. This is justifiable given the complex and multiple needs of those accommodated, including offending histories and substance misuse creating an unsuitable environment for families and children. Other young person's projects with 24/7 support, including parent and baby units, are commissioned to meet the needs of those aged under 18 and aged 18 - 24 (e.g., the YMCA Reading) and these provide a specialist environment for this age group and 16/17-year-olds owed a statutory responsibility by the local authority.

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- **Describe how this proposal could impact on Religious belief**
 - **Is there a negative impact? No**

Access is not restricted to either The Nova Project or 57 Caversham Road on any ground apart from age (18 or over) or gender (cis or transgender female) for The Nova Project.

Those who rough sleep in Reading are predominantly single, white males aged 35+ who state that they are heterosexual and Christian/have no religious beliefs. 57 Caversham offers the same level of 24/7 supported environment that The Nova Project does. Whilst this is the trend in demography for people that rough sleep, other/any religious groups would not be precluded from accessing either project should they meet the criteria regarding a rough sleeping background, local connection and needing the level of support offered.

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- **Describe how this proposal could impact on the Armed Forces community (including reservists and veterans and their families)**
 - **Is there a negative impact? No**
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Both The Nova Project and 57 Caversham Road are for single people/couples without dependent children and are for those aged 18 or over only. This is justifiable given the complex and multiple needs of those accommodated, including offending histories and substance misuse creating an unsuitable environment for families and children, including the families of veterans/reservists.

However, any member of the Armed Forces community, including reservists and veterans who meet the service criteria of sleeping rough/at risk of rough sleeping, with a local connection and multiple needs (mental ill-health, offending histories and substance misuse) could be referred into and offered accommodation.

Make a Decision

If the impact is negative then you must consider whether you can legally justify it. If not you must set out how you will reduce or eliminate the impact. If you are not sure what the impact will be you **MUST** assume that there could be a negative impact. You may have to do further consultation or test out your proposal and monitor the impact before full implementation.

1. **No negative impact identified - Go to sign off**
2. **Negative impact identified but there is a justifiable reason**
You must give due regard or weight but this does not necessarily mean that the equality duty overrides other clearly conflicting statutory duties that you must comply with.
3. **Negative impact identified or uncertain**

What action will you take to eliminate or reduce the impact? Set out your actions and timescale

The Nova Project is for cis and transgender female clients only and therefore male clients will not be permitted to access the project. This project is commissioned following evidence of increased risk to females who rough sleep/are at risk of rough sleeping regarding domestic abuse from males, an inability to break away from unhealthy relationships, including forced sex working, when accommodated alongside males/partners - this has been researched and evidenced across the sector and is demonstrated in an independent report by St. Mungo's (2015) Rebuilding Shattered Lives - The Final Report: Getting the right help at the right time to women who are homeless or at risk.

The Nova Project has been commissioned alongside 57 Caversham Road, with the same level of support and the same support provider (now and under any retender/ recommission) to ensure that males and couples with a history of rough sleeping and with complex needs receive the same level of service and support offer.

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- **How will you monitor for adverse impact in the future?**
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Outcomes - positive move-on, evictions and abandonments will be monitored and compared across the KPIs of each service.

Demographic data - including sexuality, gender identity - will be collated and compared against rough sleeping population data.

X

Selina Ma
Completing Officer

X

Lead Officer