

# Equality Impact Assessment (EIA)

For advice on this document please contact Clare Muir on 72119 or email [Clare.Muir@reading.gov.uk](mailto:Clare.Muir@reading.gov.uk).

Please contact the Project Management Office at [pmo@reading.gov.uk](mailto: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:

Implementation of a Dynamic Purchasing System for Emergency Accommodation

Directorate: DEGNS  
 Service: Housing Needs

Name: Selina Ma  
 Job Title: Contracts and Monitoring Officer  
 Date of assessment: 16.06.2023

## Version History

Version	Reason	Author	Date	Approved By
1	Report draft to go to Policy Committee	Selina Ma	23.06.2023	

## Scope your proposal

- **What is the aim of your policy or new service/what changes are you proposing?**
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The establishment of a pseudo dynamic purchasing systems (DPS) under the Light Tough Regime (LTR) for the provision of emergency accommodation provided by the Housing Needs department. The Council will advertise for landlords/agents acting on their behalf who can provide emergency accommodation on a nightly basis for households in Reading that are or become homeless who have no alternative accommodation available to them. The Council seeks to procure accommodation via the LTR to establish a pool of providers who are competent to provide accommodation as required. There will be no limit on the number of providers that can join the DPS, however they will be required to meet minimum standards for property condition, maintenance and management.

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- **Who will benefit from this proposal and how?**
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Those who require homelessness assistance from the Council - The DPS under the LTR will ensure that all providers have met minimum standards in relation to accommodation and facilities provided. Additionally, should any providers fall short of the expected standards an inbuilt mechanism to suspend such providers will enable any quality issues to be addressed. This will ensure that an equitable and consistent quality of accommodation is secured for households placed into emergency accommodation.

This procurement process will replace and formalise current arrangements, which have emerged over time in an ad hoc manner, therefore ensuring that the Council is compliant with EU regulations on procurement. In addition, there currently is no formal oversight in terms of pricing. Providers will be asked to submit prices with which they will be ranked from cheapest to most expensive with the aim of encouraging them to set their rates competitively. Council officers will be required to select placements based on price and location although there is scope for placements to be made with more expensive providers if certain circumstances, such as risk management, arise. This change will benefit the Council.

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- **What outcomes does the change aim to achieve and for whom?**

The main aim for this procurement process is to ensure that there is a sufficient supply of suitable accommodation for use by the Council to accommodate homeless households under its statutory duties, powers or obligations under the Housing Act 1996 and Homelessness Reduction Act 2017. The procurement process will help ensure that accommodation provided to homeless households meets defined property standards whilst achieving best value for money. The DPS offers an open, transparent system which provides equity and compliance as well as a consistent methodology for sourcing placements, with evaluation based on price and location.

This procurement process will formalise current arrangements where ad hoc agreements are currently in place with various providers thus ensuring that the Council is compliant with EU regulations on procurement.

The procurement process will also allow for greater oversight across providers in terms of property standards and expectations of providers in how they manage the accommodation.

The change also aims to ensure that flexibility regarding accommodation remains - by not specifying a minimum or maximum number of providers the ability to increase or reduce supply as demand dictates is preserved.

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- **Who are the main stakeholders and what do they want?**

Households who are homeless and owed a duty by the Council to secure accommodation under Part 7 of the Housing Act 1996 as well as households who are provided emergency accommodation via discretionary powers - such as in times of severe weather under the Severe Weather Emergency Protocol or during public health emergencies such as Covid - Anecdotal feedback from households indicates that they wish to remain in Reading with minimal disruption to family/work life. So far as is possible, the Council aims to meet this requirement and will continue to do so through the ongoing procurement process with priority being given to accommodation located within the Borough.

Current providers of emergency accommodation - Currently used providers will be consulted on the proposed DPS with the option to provide feedback on all the proposed changes. Previously in 2017, providers were consulted about the possibility of a DPS being established in the same way as is currently planned. At that time all respondents were in favour of the overall intention and aim of the DPS and welcomed the consistency in terms of property standards and oversight that the new process will bring.

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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?

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- 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:

Age - under 18's presenting as individuals and not part of a family unit.

- 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

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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:**

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An EqIA is relevant.

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31/07/2023

**X** Selina Ma

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Completing Officer  
Signed by: Ma, Selina

**X**

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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
Existing providers of emergency accommodation currently used by RBC	A survey outlining the proposed changes to the process will be sent out inviting providers to give their feedback.	July 2023

## 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
- 

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 and those who access statutory homelessness services are in the main are white individuals. Whilst this is the trend in demography for people that sleep rough and access statutory homelessness services, any other racial groups are not precluded from approaching the Council for homelessness assistance. There are no restrictions placed on accessing statutory or non-statutory services because of race. Anyone aged 18+ can approach the service for a homelessness assessment, and where assessed as appropriate, emergency accommodation will be provided.

- 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
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Data drawn from RBC's database from 1<sup>st</sup> April 2022 to 31<sup>st</sup> March 2023 indicates a near equitable split of 60/40 of female to male lead applicants placed into emergency accommodation - it should be noted that this information is drawn from households where rent accounts were in place and there are some instances where a placement ends prior to a rent account being set up.

Rough sleeping is more common amongst men than women; with over 80% of individuals sleeping rough in Reading being male. Reviewing placements made under discretionary powers over the same period, 40% of placements were provided to women despite women accounting for less than 20% of those sleeping rough. This approach is proportionate given that there are accepted elevated risks to females who sleep rough as shown through independent sector research (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).

Under the Housing Act 1996, pregnant women are designated automatic priority need. This means there is statutory duty to provide emergency accommodation if

they are eligible and homeless and are offered emergency accommodation where required.

Marriage and civil partnership - No positive or negative effects resulting from marital or civil partnership status have been identified as likely to arise from this change.

Gender reassignment - Transgender people are at risk of experiencing discrimination and being victims of hate crime. Stonewall estimated that 2 in 5 trans people (40%) nationally have experienced a hate crime or incident because of their gender identity in the last 12 months. This elevated risk to trans people is taken into account when being assessed for homelessness assistance.

Those requiring homelessness assistance, can approach the Council's Housing Needs teams. There are no restrictions on access and all approaching the service will be provided with a homelessness assessment, and where assessed as appropriate, accommodation will be provided.

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

Those with disabilities, requiring homelessness assistance, are able to approach the Council's Housing Needs teams. There are no restrictions on access and all approaching the service will be provided with a homelessness assessment, and where assessed as appropriate, accommodation will be provided. There is a more limited supply of adapted/accessible property in the private rented sector however, through the establishment of the DPS the Council aims to increase its pool of accommodation which is accessible/adapted.

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

No positive or negative effects resulting from sexual orientation or civil partnership status have been identified as likely to arise from this change. Those requiring homelessness assistance, can approach the Council's Housing Needs teams. There are no restrictions on access and all approaching the service will be provided with a homelessness assessment, and where assessed as appropriate, accommodation will be provided.

- **Describe how this proposal could impact on age**

- **Is there a negative impact? No**
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Anyone aged 18+ can approach the service for a homelessness assessment, and where assessed as appropriate, emergency accommodation will be provided. The provision of emergency accommodation by Housing Needs is for those aged 18+. In instances where an individual aged 16/17 presents as homeless, the Housing Needs department are not legally able to provide emergency accommodation as this responsibility falls to Brighter Futures for Children (BFfC). To ensure that the needs of 16/17 year olds are met a joint protocol between Housing Needs and Brighter Futures for Children (BFfC) is in place. The protocol requires an officer from each organisation to conduct a joint assessment of the needs of the young person and any provision of emergency accommodation is the responsibility of children's services (BFfC). The proposed change will not have any affect in this area.

- **Describe how this proposal could impact on Religious belief**
  - **Is there a negative impact? No**
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No positive or negative effects resulting from religious belief have been identified as likely to arise from this change. Those requiring homelessness assistance, can approach the Council's Housing Needs teams. There are no restrictions on access and all approaching the service will be provided with a homelessness assessment, and where assessed as appropriate, accommodation will be provided.

- **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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No positive or negative effects resulting from being a member of the Armed Forces community have been identified as likely to arise from this change. Those requiring homelessness assistance, can approach the Council's Housing Needs teams. There are no restrictions on access and all approaching the service will be provided with a homelessness assessment, and where assessed as appropriate, accommodation will be provided.

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## 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.

(Delete numbers below which don't apply)

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

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There is no identified negative risk arising from this change in the procurement of emergency accommodation to meet both the Council's statutory duties and aims via discretionary powers. Anyone approaching the Housing Needs department for assistance will be offered a homelessness assessment and where assessed as eligible homeless and in priority need will be provided with a statutory emergency placement. Other routes into emergency accommodation are also available via discretionary powers which are used in circumstances to encourage engagement with support for complex needs and/or where there is a risk to health/life such as in times of severe weather or public health emergencies.

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- **How will you monitor for adverse impact in the future?**
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**Demographic data** - this is collected as standard and will be reviewed against prior data sets and rough sleeping population data.

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31/07/2023

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**X** Selina Ma

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Completing Officer  
Signed by: Ma, Selina

Lead Officer  
Signed by: Ma, Selina