

Equality and Safety Impact Assessment

The **Public Sector Equality Duty** (Section 149 of the Equality Act) requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people carrying out their activities.

The Equality Duty supports good decision making – it encourages public bodies to be more efficient and effective by understanding how different people will be affected by their activities, so that their policies and services are appropriate and accessible to all and meet different people's needs. The Council's Equality and Safety Impact Assessment (ESIA) includes an assessment of the community safety impact assessment to comply with Section 17 of the Crime and Disorder Act and will enable the Council to better understand the potential impact of proposals and consider mitigating action.

Name or Brief
Description of
Proposal

Private Sector Leasing (PSL) Scheme

The PSL Scheme is where the Council will lease properties directly from the property owners or letting agencies and use them as form of temporary accommodation for households who are homeless, rough sleeping or already in expensive emergency accommodation sourced and funded by the Council.

Brief Service Profile (including number of customers)

To develop a Private Sector Leasing Scheme for the provision of temporary accommodation for homeless households.

The Council has a duty under the Housing Act 1996 (as amended) and the Homelessness Reduction Act 2017 to secure temporary accommodation for homeless households in certain circumstances, for example, whilst homelessness enquiries are undertaken or until suitable accommodation can be found under the main housing duty.

To date, there are a total of 202 households in nightly paid accommodations such as hotels and B&Bs, which is the highest that it has ever been. Out of this total, 123 are households with children and expectant mothers and 79 are singles/couples.

As per the Homelessness (Suitability of Accommodation) Order 2003, it is unlawful for councils to accommodate families (including single pregnant women) in B&B / Hotel accommodation that is not self-contained for over a period of 6 weeks. However, the difficulties in accessing longer term accommodation are lengthening the time families spend in emergency accommodation currently.

Although, placing households in hotels and B&Bs is only a temporary measure to relief homelessness, there is a great physical, mental and social impact on households, specifically vulnerable adults, children and expectant mothers when the Council isn't able source a stable, move on accommodation within reasonable timeframes.

Through the PSL scheme, the Council will increase temporary housing options and will be able to support the most vulnerable to move on from hotels and B&Bs into more suitable accommodation for their needs. Not only this will increase the quality of their living

conditions and improve their overall wellbeing, but it will also significantly reduce the Council's spending on emergency accommodations.

Supported Housing - Hostels

Southampton City Council commission a Housing Related Support Framework consisting of intensive, life skills, high/medium and medium/low levels of support for individuals who are rough sleeping and experiencing homelessness. There is often a lot of demand for services but move on from the service can prove difficult, with a reduction in the number of affordable properties available to rent. Via the PSL scheme, it is hoped that through the development of more move on accommodation options it will provide increased access into our existing silted services, addressing our numbers of individuals rough sleeping in Southampton.

To date, there are total of 359 individuals in hostels and out of this total, 177 are in hostels with medium/low support needs which indicates that they are ready to move on from supported housing and become more independent.

Hostels are intended to fulfil an emergency or temporary function and as an emergency solution, it provides immediate relief from life on the streets. However, the lack of move on housing options prevent the hostels to fulfil their intended emergency and temporary functions and forces them to operate as longer-term which is an unsustainable solution to street homelessness.

Delivering the PSL scheme will generate more properties available to support the homeless pathway and provide a move on accommodation. Through the development of more accommodation for individuals within the pathway to move on, it will provide increased access into our existing services

Summary of Impact and Issues

Since 2019-2020, the number of homeless households approaching the council has surged by 64%, with a further 14% rise in the past 12 months. This escalation, compounded by economic disruptions, has resulted in a 61% increase in households requiring emergency accommodation. The **"Everyone In" campaign** was a government initiative implemented in the UK during the COVID-19 pandemic to address homelessness. The goal was to provide temporary accommodation for all individuals who were sleeping rough or at risk of homelessness, helping to protect them from the virus and reduce its spread. This initiative involved local authorities working together to identify and house those experiencing homelessness, often using hotels or other temporary accommodation. While the campaign was successful in providing immediate shelter to many, it also highlighted the ongoing challenges of homelessness and the need for long-term solutions.

The current demand for housing in the city far exceeds the available supply. This heightened demand shows no sign of slowing, significantly impacting the council's ability to prevent homelessness, and, where it cannot be prevented, making it a rare, brief, and non-recurrent experience. This has led to the current operating model at SCC becoming unsustainable.

A PSL scheme, where the local authority acts as intermediaries between landlords and tenants, can offer a valuable solution which benefit both the local authority and the landlord. The benefits to a landlord of choosing to let their property through a PSL scheme include a guaranteed monthly rent for the terms of the lease, even if the property is empty.

The Local Authority carries out regular inspections and undertakes the tenancy management of the property. At the end of the lease the property will be returned in a similar condition as at the start of the lease (less fair wear and tear).

The council will sublet the properties to homeless households. The Homelessness team will manage all aspects of tenancy management, including rent accounts, housing management, and regular property inspections. This will reduce the council's risk as we will work closely with the households to maintain their tenancies and help them transition to permanent housing.

Potential Positive Impacts

There are potential benefits for individuals and households who are homeless, at risk of being homeless or in an emergency accommodation that could be realised pending the successful delivery of the PSL scheme:

- Individuals and families will have better and more secure access to private rented accommodation and have the same housing options and opportunities as everyone else looking to rent in private rented sector.
- Families with children will have more secure and safe environment as opposed to staying in B&Bs or Hotels.
- The scheme will support singles and couples through the homelessness pathway to move on which will increase access into our existing silted services.
- It provides an opportunity for all to become more independent and learn to manage tenancy and pay their bills
- The scheme aligns with key deliverables set out in the Homelessness and Rough Sleeping Strategy 2024-2029.
- The scheme directly links with the Council's Transformation Programme and it is likely to help achieve the saving target the Council has for 2025/26

Responsible Service Manager	Maria Byrne
Date	07/11/2024
Approved by Senior Manager	Jamie Brenchley
Date	07/11/2024

Potential Impact

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	None Identified	This policy does not exclude any groups from being offered a temporary accommodation under the PSL Scheme
		Although, the scheme doesn't discriminate or disadvantage anyone due to their age, it will

Impact Assessment	Details of Impact	Possible Solutions &
Assessment		Mitigating Actions
		be recommended that when placing applicants in a shared house, ages of potential tenants to be considered due to differences of lifestyle between younger and older residents.
Disability	Properties offered to the Council on the PSL scheme may not meet the suitability needs of people with disabilities.	We accept that in some cases it may be difficult to find a suitable accommodation for households with disabilities. For e.g. if anyone within the household have accessibility needs or require special adaptions within the property. It is possible to engage with the landlord and with their permission, the Council can carry out all the necessary adaptions, however, as these properties will be occupied on temporary basis only and will be returned back to the landlord once the Lease comes to an end, it will not be reasonable or cost affective for both, Landlord and the Council to make any adaptions to properties under the PSL scheme. Instead, The Council will work to find suitable accommodation which is, potentially, already adapted for households with disabilities and accessibility needs.
Gender Reassignment	None identified	This policy does not exclude any groups from being offered a temporary accommodation under the PSL Scheme
Care Experienced	None Identified	This policy does not exclude any groups from being offered a temporary accommodation under the PSL Scheme
Marriage and Civil Partnership	None identified	N/A
Pregnancy and Maternity	None Identified	This policy does not exclude any groups from being offered a temporary accommodation under the PSL Scheme

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
		However, it is unlawful for the Council to keep homeless households in emergency accommodation for longer than six weeks, especially, pregnant women and families with children. Therefore, this group are likely to be prioritised for temporary accommodation under the PSL scheme compared to other homeless households accommodated in hotels and B&B
Race	None identified	This policy does not exclude any groups from being offered a temporary accommodation under the PSL Scheme
Religion or Belief	None identified	This policy does not exclude any groups from being offered a temporary accommodation under the PSL Scheme
Sex	Survivors of Domestic Abuse	This policy does not exclude any groups from being offered a temporary accommodation under the PSL Scheme. However, survivors of domestic abuse may have limited options to which areas they can live safely and what type of properties will be suitable form them. For example, if it's a shared property considerations should be given to who the other occupiers are and whether it is safe for them reside there. Through joint working with domestic abuse services and other supporting agencies, the Council can determine the suitability and source properties in approved and secure areas (unless such property is already available) whilst taking into consideration that the applicant would need access to support services, family and community so that the applicant is safe, has the

Impact	Details of Impact	Possible Solutions &
Assessment	•	Mitigating Actions
		support network and doesn't feel isolated.
Sexual	None identified	This policy does not exclude
Orientation		any groups from being offered
		a temporary accommodation
Community	Individuals with history of mental	under the PSL Scheme The Council works closely
Safety	health, substance misuse and	with Community Mental
	offending will be extremely vulnerable	Health and Substance Misuse
	to be housed in certain	Services. Everyone who is
	accommodations, such as, shared houses and in certain areas of the city	receiving support from these
	Thouses and in certain areas of the city	services have an allocated
		support worker and can work
		jointly with the Council to
		provide ongoing support to
		people to overcome their
		issues and challenges.
		Although, the initial decision
		on temporary accommodation
		offer is made by the Council,
		in some cases, we will liaise
		with relevant agencies
		supporting our applicants and
		seek their professional advice
		to determine the suitability of
		the property before making the final decision.
		the illial decision.
		The Council also works with
		the Police and the Probation
		Services when assisting ex-
		offenders with housing.
		Before anyone in this group is
		considered to be for a
		temporary housing offer, the
		Council will carry out a
		throughout assessment and
		engage with Probation Services and the Police.
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		Probation Services will do an
		assessment which includes
		the checks on the proposed
		property, area and the
		surroundings, whether the
		property is self-contained and

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
		if it is shared, who the other residents are going to be.
		If the accommodation isn't recommended by the police or approved by the probation services, the Council will look to find another accommodation which approved and confirmed to be suitable and safer for the applicant and the community.
Poverty	Cost of living crisis my affect household budgets, and they may be unable to pay households bills.	Singles/Couples being housed in shared accommodations will not be liable to pay utility bills as this will be included in their rent.
		However, singles, couples and families placed is self-contained accommodations, such as, studios, 1, 2, 3 and 4 bed properties, will be liable to pay council tax and utility bills on top of their monthly rent.
		The Council will support to ensure that all individuals and families have access to appropriate benefits that could increase their income to manage their household expenses. Other support options can also be explored, such as assistance with adjusting their household budget.
		PSL Scheme gives Council the option to choose which properties and in which areas to accept on a scheme. This means that it will allow the Council to access accommodation in areas where it may be more affordable.

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Health & Wellbeing	Applicants with mental health concerns, substance misuse or exoffenders Households with children who have been staying in emergency accommodation for longer than needed	Although, the PSL scheme will have a positive impact through providing better housing options for people, it should be noted that some of our applicants may need some extra support settling into their new home.
		There may be cases where an applicant may not have successfully held a tenancy before or have been in and out of hostels or prison approved premises, where onsite support was provided.
		They may find it difficult to navigate through living alone and becoming more independent when they're offered a temporary accommodation under the PSL scheme and without any support from services may affect their health and wellbeing.
		As already addressed in Community Safety the Council works closely with external organisations such as Mental Health Services, Substance Misuse Services, Probation Services and the Police.
		As well as the Council carrying out their own assessments to determine the readiness of people moving on from supported accommodations (hostels, probation approved premises etc.), the Council will engage and closely work with relevant organisations and only consider an offer of temporary accommodation to those with medium or low support needs.
		Support from relevant services doesn't automatically end once the applicants are

Impact	Details of Impact	Possible Solutions &
Assessment		Mitigating Actions
		housed. It can continue for as long as it's needed.
		Households with children in Hotels or B&Bs, especially for a long period of time, are likely to be affected by unstable living conditions with their children's education and emotional wellbeing also highly impacted. They can experience isolation and lack of support if the emergency accommodation they've been placed is out of the area from where their school, essential support services, or the community is.
		When offering a temporary accommodation through the PSL scheme to families with children, we will ensure to consider properties in the areas which are close to children's schools, any essential healthcare/support services or the community.
		Although, the PSL scheme will improve their housing situation, it is important to note that there may be cases where households might find it difficult to adapt living in property, which is likely to be larger compared to hotels/B&Bs they lived in before.
		This can be quite stressful transition, and, having already gone through the period of not having a secure home, the uncertainty of their housing situation and possibly being separated from their support network, school and essential services, they're likely to need support to make their move to a new home as easy and stress-free as possible. We will ensure that right support is provided from the moment they are offered a temporary

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
		accommodation until they are fully settled in and enjoying their home.
		LLO will be visiting all of our tenants housed in temporary accommodation on regular basis to ensure that everyone is doing well, properties are well maintained and offer support or signpost to relevant services if any other follow-up support is required.
Other Significant Impacts	People with no local connections	Individuals who are rough sleeping in the city but are not from here and have no local connection, will not be eligible for a temporary accommodation offer under the PSL Scheme.
		The Council will engage with these individuals to gather information and find out where their connection might be.
		Section 198 of the Housing Act 1996 allows a housing authority to refer a homeless applicant to another authority if the applicant doesn't have a local connection to their district.
		This does <u>not</u> apply to domestic abuse survivors who have fled from the violent and came to Southampton. In these cases, the Council will will comply with the Domestic Abuse and Homelessness Legislation to assist the survivor with housing