

Homelessness EINA, LBRuT

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BRIEF OUTLINE FOR CHOICE OF REVIEW AREA (see pages 13-14 of toolkit) Homelessness is a critical service for clients, so the potential impact on equalities is vast.
PROJECT DEFINITION: scope and focus of EINA (see page 14 of toolkit) Impact of current practices and procedures on homeless clients
PROJECT OBJECTIVES To establish the impact on equalities and develop an action plan to analyse and if necessary redress any anomalies or adverse effects.
DATA SOURCES (see page 15 of toolkit) Mapping of existing data sources and gaps; any need for additional data? Good information in place on ethnic profile of service users, more work needed on other areas. Age is included, but difficult to get reports from Saffron by age grouping. Question on sexuality is asked on the form, but no analysis has yet been done. Forms need adapting for question on religion. Detailed information available on health of clients, but disability is not 'Key Stage' in accessing service – physical/mental vulnerability is. Can this be used instead?
CONSULTATION MAPPING AND REQUIREMENTS (as outlined on page 2 above) Current consultation via Homelessness Forum, Homelessness Strategy Working Group (2002/03) is not sufficient. Best Value review 2002 included questionnaires, phone interviews (with vulnerable Resettlement clients) and focus groups, but more up to date information is required. Focus groups planned and questionnaires being drafted.
PROGRESS (IF ANY) ON KEY QUESTIONS AND RELATED QUESTIONS (see page 15 of toolkit) See below for progress on race. BC, Ken, Tayo met 15 Feb 2005 to discuss non-race equalities issues. Draft questionnaire to be ready March 14th. Survey findings will inform how best to manage focus group(s).
INITIAL FINDINGS (if any at this stage) The following have been assessed on ethnic grounds, with the findings attached.

The council has a statutory duty to provide a service to homeless people, and a key component of this is the assessment of homeless applications and the decision regarding which households the council has a duty to rehouse. In the test period from April 2003-July 2004, there were 913 homeless applications in Richmond and of these 391 were 'accepted' as the council owing a rehousing duty.

The ethnic breakdown was:

	white	%	african/caribbean	ind/pak/bangla	other ethnic			
acceptance	256	40	25	43	34	47	76	57
negative	390	60	33	57	39	53	57	43
total approaches	646		58		73		133	
bme customers make up 30% of applicants but 35% of acceptances								

1. If the combined totals of African/Caribbean, India/Pakistan/ Bangladeshi and 'other ethnic' are assumed to be BME then BME households make up 30% of the total homeless applicants, and 35% of the homeless acceptances.

Overall, 42.8% of homeless applications resulted in the council accepting a duty to rehouse. The ethnic breakdown of this success rate is: White 40%, African/Caribbean 43%, Indian/Pakistani /Bangladeshi 47%, other 57%. Therefore it would appear that the council is accepting a higher proportion of applicants from the ethnic category of 'Other'. In Richmond, the majority of 'ex asylum seekers' or refugees come from Kosovo, Albania and Afghanistan, and most of these clients refer to themselves as being in the 'Other' ethnic group. Homeless applications from refugees are not typical. Over a third of all homeless applications are refused because the applicants are not in 'priority need' of rehousing, but for refugees this figure again is less. Most refugees who applied as homeless in the test period had either been supported by the council as asylum seekers until granted leave to remain by the Home Office (and were by definition destitute) or were supported as homeless applicants and awaiting a Home Office decision. Because of the different process for refugee homeless cases and the increased likelihood of a statutory duty, they skew the 'other' category to appear more likely to be rehoused.

2. Assessment of impact of policies and procedures:

(a) Referrals and acceptances to the Resettlement team from April 03-July 04 were as follows:

	White	Afr/Carib	Ind/Pak/Bangla	Other	Total
Referrals	117	13	1	21	152
Accepted	108	12	1	15	136

Overwhelmingly (>95%) the clients of the Resettlement team are homeless, single and vulnerable through physical/mental health or because they are under 18 years of age. About 20% of referrals to the service are households of BME origin.

BME Resettlement clients make up 21% of the acceptances (clients provided with a service). On the face of it, this represents a service that does not capture many BME households. A closer look revealed a different picture.

BME households make up 27% of the total single person households who are accepted as homeless and 46% of the family-sized households accepted as homeless. As very few families receive a resettlement service, and BME households in Richmond are less likely to be old and frail, they are less in need of a Resettlement service.

(b) Rent Deposit Scheme

The aim of the Scheme is to assist low to medium income households who do not have resources to use as deposits to rent in the private sector. Clients of the Scheme have the deposit (of up to one month's rent) guaranteed by the Scheme against any damages to the property, and one month's advance rent is usually paid to the property owner. Clients agree to repay this advance to the Scheme either in monthly instalments if they are employed, or from the first Housing Benefit cheque(s) paid on their behalf. Properties may be found by clients themselves, and in order to prevent contrived arrangements, the Worker ensures that a properly formatted tenancy agreement is signed, and that the rent sought is fair and reasonable, by means of submitting a Pre Tenancy Determination to the (independent) Rent Service, in all cases. The Worker also visits properties prior to paying any advances, to ensure that they comply to required basic standards.

The Scheme also works with property owners and Lettings Agents in order to locate suitable properties on behalf of clients. The Worker meets and interviews clients, in order to ensure that they fully understand the implications and responsibilities of signing a Tenancy. Clients should have a local connection with Richmond, as defined under homeless legislation.

The Scheme is currently administered by a SPEAR employee, funded by LBRuT, and part subsidised by the ODPM homelessness grant. The Worker reports to, and is located at the premises of, both organizations. There is likely to be further reliance upon placing clients in the private rented sector as central government increases pressure upon local authorities to reduce homeless acceptances.

Many approaches to the Scheme are speculative, with few client details emerging, and so monitoring at this stage is difficult. It is only if an approach is found to be from a client eligible for assistance from the Scheme that further details can be gathered. In the test period 01.04.03 – 31.07.04, 27% of approaches were found to be eligible, and many of these did not follow the process through to the stage of being housed. 46 households were assisted into tenancies. 8 of these were joint Tenancies, so there were 54 tenancy signatories.

(i) Gender Analysis:

Of the 54 signatories: 29 were female, 25 were male.

(ii) Age Analysis:

under 18s cannot have tenancy conditions enforced against them and so are excluded from the scheme.

under 18yrs:	0
18-25 yrs:	8
25-50 yrs:	35
50-60 yrs:	10
over 60:	1

16 – 17 year olds are entitled to many Council services, some of which are costly, such as supported accommodation, it may be worth considering Social Services or Housing acting as guarantors in order to avoid homelessness. Currently, all 16 –17 year olds who are homeless ‘unintentionally’ are legally entitled to be rehoused, and are placed in Hostels (often placing stress upon communal arrangements for other clients), and then placed in independent flats as temporary accommodation. The latter is cost effective, although intensive monitoring and support is required. If expected reductions in Housing Benefit subsidies for temporary accommodation occur, it may be prudent to explore alternative means of providing services for this age group.

Another figure which appears as being disproportionate in the above stats is the sole client over 60 years old. This person was eligible for Council assistance as homeless due to vulnerability on grounds of age and health, but chose not to avail themselves of that provision, electing to rent privately, maintaining their independence. Other people in this age category can be reluctant to take on what is effectively a repayable loan (albeit interest free), in order to secure accommodation for rent.

Also, the lives of many people in this age band will have stabilised. They will have accessed social housing already if in need, or will be owner occupiers if they are (or were) better off. Older people do rent in the private sector, but are more likely to be in longer term, more stable arrangements, and to be less at risk of behaviour liable to jeopardise their future housing. Over 60s constitute about 2% of Scheme clients during the test period, compared to 0.9% of the homeless applications. So some thought could be given to extending uptake within this category, perhaps by stressing the advantages of autonomy and independence in housing to clients.

(iii) – Ethnic analysis of Scheme clients during the test period (Tenancy signatories only).

White UK:	26
Black UK:	4
Black African:	1
Irish:	7
Scottish:	4
EU:	3
Asian:	1
Afghan:	4
Iraqi:	1
Chinese:	1
Belarus:	1
White Other:	1

These ethnic categories differ from those identified in LBRuT’s standard

forms (based on census groupings). If it is assumed that EU, Belarus, Scots & Irish clients are white, 12 out of the 54 Tenancy signatories are non-white, 22% as compared with 35% for BME homeless acceptances.

In Richmond, the percentage of non white households in the Scheme is less than the homeless figure The BME demographic in the borough is 9%, but that takes no account of the need for a service. It may be speculated that a paradigm figure for BME access to the Scheme could fall between the 9% whole Borough component, and the 35% homeless acceptances.

It is known that clients unable to provide a reference are less able to access the private rented sector generally, which is where an introduction to a property owner from the Scheme can assist, and BME households report that they feel the sector is less likely to treat them fairly, but there is no hard data on this issue.

It is also known that a fair proportion (no hard figures) of private sector property owners locally are from Indian / Pakistani / Bangladeshi communities, yet in the test period only 1 Scheme client was classed as being "Asian" (although 4 were Afghan). These figures compare with 12% Indian / Pakistani / Bangladeshi households in the total homeless acceptances. A female homeless client reported being upset when placed in a property owned by a person from the same ethnic background, (but not via the Scheme).

There appears to be under-representation among this ethnic group, and the reason(s) for this need to be examined. It should be noted that most approaches to the Scheme from these groupings were not eligible for assistance, on the grounds of not having local connection.

(c) Furniture Scheme

	White	Afr/Carib	Ind/Pak/Bangla	Other	Total
Approaches	95	16	2	55	168
Accepted	33	4	0	9	46

14 out of 23 (61%) of clients who use the furniture storage and removal service are 'white' households, 7 (30.4%) are from BME households, and 2 (8%) are of 'not known' ethnic origin. As 35% of households accepted as homeless are from BME origin and the numbers involved are small, it suggests the procedures have little or no differing effect on household by ethnic background.

(d) Numbers found intentionally homeless:

	White	Afr/Carib	Ind/Pak/Bangla	Other	Total
IH	22	3	2	1	28
IH C&F	6	0	1	5	12

6 out of 28 (21%) of households found intentionally homeless are BME backgrounds which suggests that there is a slight tendency towards white households being found Intentionally Homeless more than ethnic minorities. There are two possible explanations (at least), but unfortunately they cannot be backed by statistical analysis:

- (i) Experience shows that refugees (who are nearly all likely to refer to themselves as non-white or 'other') are less likely to behave badly in temporary accommodation and (if only because their numbers are so small) less likely to be evicted for rent arrears by local RSLs.
- (ii) Many of the white households found intentionally homeless seem to know other families who are intentionally homeless, and this association may reinforce their anti-social behaviour by adopting the same unfortunate behaviour and 'values'. There are a number of local families (white and having lived in the borough for several generations) who have had more than one family member found intentionally homeless.

(e) Numbers placed outside the borough:

	White	Afr/Carib	Ind/Pak/Bangla	Other	Total
Out of borough placements	194	33	46	18	291

The first thing that should be stated is that STL properties (used as temporary accommodation for homeless households) are not of a lower standard outside the borough – some of our best are in Slough. Amongst much of our client group, properties within the borough are more in demand because of links to family, schools, health service, etc.

The statistics show that white families make up 66.7% of placements in STLs outside the borough and 65% of 'accepted' homeless households.

There seems to be no apparent difference in the treatment regarding placement in or out of the borough between the BME and White groupings, but a first look suggests that Indian/Pakistani/Bangladeshi group are over-represented in out-of-borough placements. Given the expectation that many refugees do not have local ties in the borough, one might have expected 'others' to have had more out-of-borough placements, and perhaps 'white' households to have had slightly less as a %. More analysis can be done on this.

(f) Complaints

Of the complaints at various stages (here recorded as at the highest stage only to avoid double counting) about the homeless service from April 2003 to August 2004, the breakdown is as follows:

Stage 1

- 7 complaints from White British clients
- 1 complaint from BME client

Stage 2

- 1 complaint from White British client
- 1 complaint from BME client

Both of the complainants at Stage 2 include an element of complaint about discrimination. In the case of the BME client, the complaint is extremely long and the racial element was investigated by a black officer from a team outside Housing Needs, and was the subject of a meeting with Hounslow Race Equality Council and Richmond's equalities manager. No evidence of discrimination has been found, and it is not something that has been pursued by the client's solicitors (who are currently pursuing a judicial review on the case).

Given that 30% of homeless applicants in Richmond are from BME households, with two out of ten complainants being BME clients, I do not think there is any evidence here of a system having an adverse effect on BME households.

(g) S202 Reviews

These are legal appeals against the council's negative homelessness decisions that all clients can ask for (every homeless decision letter explains this appeals process).

The breakdown of reviews requested, those upheld and those overturned (i.e. where the client has 'won' the appeal), is shown below:

	White	Afr/ Caribb	Ind/Pak/ Bangla	Other	Not Known	Total
Nos. S202 Reviews	63	6	7	8	6	90
Nos. Decisions Upheld	55	5	5	5	7	77
Nos. Decisions Overturned	7	0	2	3	0	12
Nos. Decisions still Outstanding	1	0	0	0	0	1
* review requested outside test period						

As BME households make up 30% of total homeless applicants and 35% of homeless acceptances, a purely numerical assumption might be that there would be slightly more review requests from white or non-BME groups than the 65% figure for homeless acceptances. In fact, 70% of requests for reviews come from white clients with a fairly even spread coming from Afr/Caribb, India/Pak/Bangla, Other and Not Known. Perhaps the only statistical anomaly seems to be the 'other ethnic' group which represents 20.6% of total homeless approaches, but only 9% of total requests for reviews. I think the answer to the difference lies quite simply in the fact that the 'other ethnic' group had the highest ratio of homeless cases accepted, (57% against 42.8% average for all applications).

Therefore, it appears that the message about the right to appeal is getting across and is being taken up evenly across ethnic groups.

The total 'success' rate for S202 reviews for clients (where the decision is overturned) is 13%.

The total success rate for the ethnic groups is:

- White	11%
- Afri/Caribb	0%
- India/Pak/Bang	28%
- Other	37%
- Not Known	0%

The small number of reviews makes it difficult to come to conclusions, and the high success rate for the India/Pak/Bang and Other ethnic groupings probably shouldn't be cause for concern. The zero out of six score for Afri/Caribb case reviews however does warrant a closer look. Out of the six half were represented by CAB or a solicitor, which effectively means that if the council got its review decision wrong it is likely the council would have been taken to a judicial review. This did not happen. Of the other three, one was represented by a councillor, and one by SPEAR. Only one Afri/Caribb review case had no representation on their behalf, and this case was effectively an ex criminal from outside the borough who fairly clearly had no vulnerability issues. From this I think we can assume that the review decisions made for the Afri/Caribb cases were probably robust and correct in law. This does not show that all cases have been treated equally however, it is possible that the cases from other ethnic groups have been treated on average more leniently, although the other findings so far in the EINA would suggest that this is unlikely. It is also possible that for whatever reasons homeless households from Afri/Caribb backgrounds have been on average subject to more chaotic circumstances which could lead to relative weak cases being put forward, (where more stable lifestyle might cause people to quality check, or perhaps access good advice earlier). Given the disparity in success rates it is best to extend the control period for s202 reviews to include the period from August 2004 to March 2005, to see if the pattern changed.

QUESTIONNAIRE

A postal survey of 324 homeless households occupying temporary accommodation was carried out in late 2005, and 59 completed questionnaires were returned. The full analysis runs to 31 pages.

The main findings and recommendations were:

General comments

All the positive comments made (nine in all) centred on the levels of customer care received and the helpfulness of the staff.

Although there were a couple of negative comments about customer care and the dignity of the assessment process, the bulk of the criticism centred on the suitability and location of temporary accommodation and the time spent within it.

The only comment that made direct reference to alleged discrimination concerned the placement of a household in temporary accommodation at some distance from the faith (Catholic) primary school that the applicant's daughter attended and the alleged lack of sympathy expressed by staff when the allocation was questioned.

Potential areas of differential impact (reporting by exception only)

Due to the small sample involved it is difficult to make inferences based on the findings of this survey, but the following variations were apparent.

White groups (at 88%) are more aware of the homelessness service than other ethnic categories (69%) (see 6.3).

Young people (aged 16 to 24) were more likely to report not been offered help in completing forms (see 6.16).

Three (60%) of BME African respondents said that the points system had not been explained to them.

25% (12) of female respondents had made a complaint, compared to 9% (1) male.

White British respondents were more likely to have complained (27%) than ethnic minority groups (18%), when the latter was grouped together. That said, the highest incidence of complaints was amongst Black African and Other White respondents at 33% (two from six in each case).

92% of White respondents rated the service as good or better, whereas the rate amongst other ethnic groups was 73%. Asian Other and Mixed (White & African) giving the lowest approval ratings.

Only 50% of men were happy with the property offered, as opposed to 81% of women.

Both the disabled respondents felt that they had been unfairly treated (as opposed to 13% of those without disabilities).

There was some variation in terms of different groups' views on their overall experience. Both the disabled respondents rated the service as poor. Muslims had lower satisfaction ratings, with 29% (2) rating the service as poor.

In terms of adverse impacts and acknowledging the limitations of the survey, it appears that the equality areas with there may be some indicators of differential outcomes are disability, ethnic origin and religion (in that order). There was less indication of differential outcomes around gender and age and no evidence of adverse impacts around sexual orientation.

Recommendations

- Explore how the various stages of the service can be made clearer to

- BME applicants, (initially), through the client Focus group
- Investigate why women have lower satisfaction levels with the service (initially), through the client Focus group.
- Ensure that points system is explained to all applicants
- Raise awareness of capacity to provide translation and interpreter services to all households that might need them
- Investigate policies and practice and impact on disabled people
- Consider and investigate possible reasons for lower satisfaction amongst Muslim households
- Review how allocation of temporary accommodation takes into account particular needs of households

FOCUS GROUP 29 June 2006

Twenty clients invited, four attended.

Participant 1, a Turkish woman – notes say she spoke little English and that we apologised and promised to arrange a meeting with an interpreter.

Main Themes

All clients were fairly complimentary about the homelessness service. Main areas of dissatisfaction:

- length of time in temporary accommodation
- not knowing when a permanent offer would come
- location of temporary accommodation outside borough (one person)
- personal nature of questions in application
- one client disliked quarterly visits, another said they were very helpful

Main positives:

- fairness
- staff supportive: AM, AL, LF mentioned by name

An EINA focus group was held on 29/06/06. There were 4 participants. One of whom was a Turkish woman who did not have English as a first language. She left the meeting early as she did not understand all the discussion.

We apologised and agreed to see her again.

A meeting was arranged for 01/05/07 to meet the Turkish client and an interpreter was arranged.

The same questions were posed again. the respondent expressed satisfaction with the service, did not feel discriminated against, and was happy with the condition of her Temporary Accommodation.

She is a Muslim woman and victim of Domestic Violence. A new discussion was opened as to whether she felt safe in the borough and whether the service had been sensitive to her as a victim of DV. She said she was happy with the service.

We also asked about her faith. She did not wear the hijab. She said this was through choice not through fear of being abused. She said she had a number of female friends, some wore the hijab and some did not. They did not receive any abuse because of this but when they went as a group they sometimes got some funny looks from people.

EINA Conclusions

The EINA went into great detail to try to measure the impact of policies and procedures, and as a result took much longer than anticipated. The fact that four staff left the Housing Strategy team in quick succession contributed to the delays, but it could be argued that the EINA over-reached itself, and certainly there must be doubts about the capacity to carry out future EINAs in such depth.

On most measures and elements of the service there was little evidence of differentiated impacts on the grounds of race. There is concern that BME clients appeared to be more likely to feel that the process (particularly the points system) had not been explained properly at the outset. This may be due in some part to the fact that many of the White British clients come from families of ex council properties and perhaps have more knowledge of the 'system' before they set foot in the Civic Centre. More care needs to be taken to explain the system (maybe several times), if BME clients do not appear absolutely clued-in to what is going on. That said, although the lack of understanding or clarity for a client about what is happening involves a negative experience, there is no evidence to show that lack of 'savviness' of the system results in a worse outcome in terms of housing.

The dissatisfaction level amongst disabled clients is a concern. We know that clients who require adapted homes tend to suffer in temporary accommodation because we cannot make landlords accept physical alterations to their properties, and if we could, there would be an issue about spending, say, £10-20,000 on an adaptation that got ripped out after a year or two when the client moved out.

The need for specialist accommodation at the permanent rehousing level has similar problems in that it is harder to locate a suitable home, and then there is a 6-month wait with the DFG process. We may need to sit down with disabled clients and see if there are any practical solutions, and use our networks in other boroughs to see if anyone has a better system for handling homeless clients with disabilities. Clients with learning disabilities were not captured by the EINA, but since the EINA started a lot of work has been done to help PLD clients access the private sector and to increase the quota of RSL properties available.

The lower level of satisfaction amongst Muslim homeless clients is a concern, although statistically the numbers were small. One may imagine Muslim clients perhaps being more unhappy than some of the other groups at having

to share cooking or washing facilities (which exist in some of our temporary accommodation). The Turkish woman from the Focus Group was happy with the service she received, but she may not be wholly representative, and again we may need to sit down and talk to more Muslim clients about the reasons for their lack of satisfaction, and any issues which may be more important to them than some other clients.

The length of time taken for the EINA inevitably means that the data is out of date, (some areas like rent deposits have expanded dramatically), and the council will in any case have to set out a programme of Equality Impact Assessments to include all six equalities groups. The next EINA will need to be wider, but may be less detailed if it is to be delivered by frontline staff within any sensible timeframe.

B. Castle Dec 2007