

# Equality Analysis

## Birmingham City Council Analysis Report

<b>EA Name</b>	Review Of Housing Advice Centres
<b>Directorate</b>	People
<b>Service Area</b>	Adults - Meeting Housing Needs
<b>Type</b>	Amended Function
<b>EA Summary</b>	This EA evaluates the proposed centralisation of Housing Advice Services from 4 sites at which services at which this service is delivered to a proposed 1 site 'Centre of Excellence' Model to be provided from Newtown Housing Advice Centre
<b>Reference Number</b>	EA000673
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### Introduction

The report records the information that has been submitted for this equality analysis in the following format.

### Overall Purpose

This section identifies the purpose of the Policy and which types of individual it affects. It also identifies which equality strands are affected by either a positive or negative differential impact.

### Relevant Protected Characteristics

For each of the identified relevant protected characteristics there are three sections which will have been completed.

- Impact
- Consultation
- Additional Work

If the assessment has raised any issues to be addressed there will also be an action planning section.

The following pages record the answers to the assessment questions with optional comments included by the assessor to clarify or explain any of the answers given or relevant issues.

## 1. Activity Type

The activity has been identified as an Amended Function.

## 2. Overall Purpose

### 2.1. What the Activity is for

<b>What is the purpose of this Function and expected outcomes?</b>	<p>The Homeless &amp; Pre Tenancy function (H&amp;PTS) encompasses the management of the council's housing register (a statutory obligation under Housing Act 196 Part VI) and the provision of the statutory homeless function (under Housing Act 1996 Part VII) including the provision of temporary accommodation when required. The Homeless &amp; Pre Tenancy service also encompasses the Prevention of Homelessness Function undertaken in line with government guidance (P1E Guidance: Homelessness Prevention and Relief, DCLG, 2008).</p> <p>The service also provides general guidance to citizens seeking to secure housing in the private rented sector or the RSL (Registered Social Landlord) sector as well as providing housing advice to ensure households, where practicable, can remain in their current accommodation. In the execution of this function Housing Advice also provides 'Housing Options' information.</p> <p>The Homeless &amp; Pre Tenancy service is presently based within 4 'Customer Service Centres' which sit within the Place Directorates 'Neighbourhood Advice &amp; Information Service' (NAIS). These centres are at Sparkbrook, Northfield, Newtown and Erdington. In addition to this the service works in partnership with St Basils and CYPF (Children, Young People &amp; Families) to provide the Youth Hub. The Hub deals with all housing needs of single people and childless couples aged 16-25. The Youth Hub is not affected by this proposal however it should be noted that this group of customers are required to travel from anywhere in the city, or beyond, to one centralised office for housing advice. The Hub is recognised as a national centre of excellence by DCLG (Department for Communities &amp; Local Government).</p> <p>The proposal resulting in this Equality Analysis (EA) is to decommission 3 of the existing Housing Advice Centres (HAC's) and transfer their functions to a new Housing Advice Centre of Excellence (HACOE) based within the existing Housing Advice Centre at Newtown. The expected outcome is to provide a single, consistent point for citizens to access Housing Advice and all its associated functions. It should be noted that currently the Newtown office does not provide an emergency service and only deals with pre-booked interviews. The reason for this reduction in service was due to the NAIS service reducing the number of advisors to 10 FTE and the fact that this was deemed an inadequate level of staffing to provide the front-end prevention services on behalf of the H&amp;PTS.</p> <p>This proposal arises as a result of proposed further reductions in staffing levels within the Neighbourhood Advice Service (which co-habit the locations at which all 4 Housing Advice Centres are based).</p> <p>Presently all Front Office functions are undertaken by NAIS staff who also undertake '1st response' Housing Advice work and refer Housing Advice clients/appointments through to the service. If a customer approaches a HAC in housing need the original structure meant that they were initially seen by a NAIS member of staff and would be triaged in order to ascertain the presenting issue. Once this issue was identified the NAIS staff would offer to seek to prevent the homelessness, wherever possible, and to refer the case to a member of the H&amp;PTS in order to complete a homeless application if the customer wished to do so.</p> <p>The Neighbourhood Advice Service has undertaken a restructure of its resources and is unable to continue to undertake this function on behalf of our service. The restructure within NAIS has resulted in neighbourhood offices reducing from 32 to the current number of 11 with proposals to reduce further.</p> <p>The staffing levels at the NAIS Offices, which were historically in excess of 200, will reduce to approximately 50 staff</p>
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**Comment**

What is the purpose of this Function and expected outcomes? (Continued):

In order to maintain a welfare advice service for the citizens of Birmingham the NAIS service are no longer able to commit significant resources to assisting the homeless & pre-tenancy service. The H&PTS is not resourced adequately to deliver the work of the NAIS officers across all 4 locations and therefore the only viable long term model is to provide the service from one centre of excellence. This model does include the NAIS service providing 8 officers to be located in this office in order to provide specialist welfare advice to households in housing need in order to complement the housing advice function.

With the above in mind, the continued operation of 4 Housing Advice Centres in the present financial climate is unlikely to be sustainable and thus a necessity exists change the service to meet future needs.

**Glossary of Terms**

- BCC Birmingham City Council
- CCTV Closed Circuit Television
- CYPF Children, Young People & Families
- DCLG Department for Communities & Local Government
- EA Equality Analysis
- FTE Full Time Equivalent
- H&PTS Homeless & Pre-Tenancy Service
- HAC Housing Advice Centre
- HACOEE Housing Advice Centre of Excellence
- IMD Index of Multiple Deprivations
- KPI Key Performance Indicator
- NAIS Neighbourhood Advice & Information Service
- Part VI Housing Register/Application
- Part VII Homeless Application
- RSL Registered Social Landlord

**For each strategy, please decide whether it is going to be significantly aided by the Function.**

<b>Public Service Excellence</b>	Yes
<b>Comment</b> <p>The development of a 'Centre Of Excellence' for Housing Advice aims to build upon best practice from the 4 existing Housing Advice Centres to develop a fit for purpose model that can be delivered to citizens while meeting the financial obligation to make savings in the current financial climate.</p> <p>The amalgamation of staff from 4 existing sites to one will provide a larger staff base in one location and will allow this team to deliver some functions that were previously delivered by NAIS officers.</p> <p>This approach will remove inconsistencies and will ensure that the service to customers is streamlined</p>	
<b>A Fair City</b>	Yes
<b>Comment</b> <p>The new approach will ensure that a consistent service delivered by specialist housing advice staff rather than customers receiving a different service based on geographical location.</p> <p>The centre of excellence will be the key office to ensure that vulnerable customers are assisted to navigate the requirement to apply for council housing through an on-line form within the new allocations policy. The development of best practice and training requirements within the centre of excellence will ensure that those in need receive the appropriate level of support and thus fairly allocate Housing Resources.</p>	
<b>A Prosperous City</b>	No
<b>A Democratic City</b>	No

## 2.2. Individuals affected by the policy

Will the policy have an impact on service users/stakeholders?	Yes
<p><b>Comment</b></p> <p>Other stakeholders impacted upon include partner agencies such as West Midlands Police (who often come into contact with homeless and roofless households and families and will seek advice from HAC's as well as bringing clients to the centres).</p> <p>Neighbourhood Advice will be exiting the Newtown HAC and as such they are a stakeholder. Their exit from the HAC is part of a separate programme of work outside the scope of this project. However, there is a dependency on this exit occurring on time. Withdrawal of NAIS staff will not be complete as 8 NAIS advisors will remain specifically to work with the H&amp;PT Service. These officers will continue to provide welfare/debt advice to applicants as part of the Housing Advice interviews that will take place.</p> <p>The group of service users and stakeholders likely to be affected by the proposed change is significant, with the largest group of these being Service Users accessing Housing Advice Services at any of the existing 4 Housing Advice Centres across the city. This includes users of the Newtown HAC (the proposed location of the COE) as Newtown HAC only presently offers appointment based interviews for persons accessing Homelessness Services. This results in users local to Newtown being referred to other HAC's across the city in cases of rooflessness where they require immediate assistance to secure temporary accommodation. The future model will see both appointments and provide a walk in service from Newtown HAC.</p> <p>Data from the 'Northgate' IT system which is presently used to manage Housing Applications and allocations gives a breakdown of persons accessing both Homelessness Services (Part VII) and visiting regarding Council Housing applications (Part VI) across the 4 HAC's. For the purposes of this EA a period of 1 year was used for comparison (01/01/2014 - 31/12/2014). During this time 4768 Homeless Applications were taken across the 4 HAC's. Sparkbrook took the largest share with 1371 (29%). Newtown took the second largest number of these with 1304 (27%). Erdington took 1080 of these homeless applications (23%), with Northfield taking 1013 (21%). It should be noted that a large number of Homeless Applicants were from outside of the city. It therefore follows that the impact on these persons is likely to be less significant.</p> <p>During the same period we received 13,805 Housing Application Forms were received from customers for the Council Housing Register (Part VI). It should be noted that this isn't the number of people who are accepted onto the councils housing register but the number of forms received from customers and therefore there will be an element of double counting. In respect of these assessments Sparkbrook took the largest number of applications with 4341 (31%), Northfield was statistically the second busiest HAC taking 3931 Housing Applications (28%). Newtown took 3031 (23%) and Erdington took 2502 Part VI applications (18%). These statistics do not include persons who visited HAC's with general Housing Enquiries or to place bids on the councils choice based lettings scheme. The Youth Hub facility is also excluded from these statistics as it is not within the scope of the proposed function change.</p> <p>The data available shows that a total of 18573 Applications (Part VI or VII) were taken across the 4 HAC's between 01/01/2014 and 31/12/2014. From conversations with HAC staff during a mapping exercise, an assumption may be made that many customers complete their part VI applications by utilising the 'Sit and Wait' service provided on an alternate date to their Homeless Interview. It is also noteworthy that most applications (save for single persons) refer to a household rather than an individual. Data provided by NAIS shows 8817 customers accessing Housing Advice in the 9 month period 04/13-12/13. During that time 4220 Homeless applicants were also taken. This indicates both validity of the data shown for 2014 and a consistent demand for the service.</p>	

Will the policy have an impact on Employees	Yes																																				
<b>Comment</b> There are approximately 18 staff (Grades 2-5) at Newtown HAC, approximately 16 staff (grades 2-5) at Northfield HAC, 16 staff (grades 2-5) at Sparkbrook HAC and 16 staff (Grades 2-5) at Erdington HAC. This provides an approximate total of 66 staff who will be affected (approximations are due to staffing fluctuations and internal moves within the H&PT Service). It must be noted that a large percentage of these staff work across both a HAC office and a back office of either Lifford House or Sutton New Road depending on the location of their current HAC. In addition to this there are 8 members of staff from the Neighbourhood Advice Service who will be based in the new COE. A total of 74 staff will be affected directly. Staff already based at Newtown HAC (including Neighbourhood Advice staff) will not be affected in terms of travel time/distance however will be affected by the new ways of working within the COE. 48 remaining BCC staff within the HAC's will be affected by a geographic change of location. A breakdown of this staff group is shown below.																																					
	<table><tr><td></td><td>GR5</td><td>GR4</td><td>GR3</td><td>GR2</td><td>Total</td></tr><tr><td>Erdington</td><td>1</td><td>6</td><td>7</td><td>2</td><td>16</td></tr><tr><td>Newtown</td><td>1</td><td>7</td><td>7</td><td>3</td><td>18</td></tr><tr><td>Northfield</td><td>0*</td><td>6</td><td>8</td><td>2</td><td>16</td></tr><tr><td>Sparkbrook</td><td>1</td><td>6</td><td>7</td><td>2</td><td>16</td></tr><tr><td>Total</td><td>3</td><td>27</td><td>30</td><td>10</td><td>70</td></tr></table>		GR5	GR4	GR3	GR2	Total	Erdington	1	6	7	2	16	Newtown	1	7	7	3	18	Northfield	0*	6	8	2	16	Sparkbrook	1	6	7	2	16	Total	3	27	30	10	70
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* Indicates a vacant post where a decision to advertise has not been made																																					
Will the policy have an impact on the wider community	Yes																																				
<b>Comment</b> Newtown is situated in the Aston Ward within the Ladywood district. The Early Help needs analysis (BCC, 2014, Pg. 50) Shows that overall, Aston is one of the worst performing areas of the city in terms of social deprivation. 83% of the area falls within the Index of Multiple Deprivation (IMD) 2010 KPI (areas in City within 10% most deprived areas of England). It is therefore safe to conclude that the Newtown site is situated in an area of particularly high deprivation. Newtown is also identified as a Priority Area for crime reduction.  The April 2009 Strategic Assessment of the neighbourhood of Newtown, Hockley & St Georges identified the following key strategic issues:  Worklessness was identified as the biggest challenge for this neighbourhood, as it had one of the highest levels of worklessness out of the priority neighbourhoods. Both the rate of serious violent crime and violence against a person were considerably higher than the overall citywide rates. Gun crime rate in the neighbourhood was double that of the city.  Residents were less satisfied with their local area and public sector bodies than in other areas of the city. The neighbourhood performed poorly when compared to the rest of the city on Community Cohesion and Community Engagement indicators. Levels of trust with regards to people or institutions in the local area were considerably lower than the citywide totals and may indicate potential for intergenerational tensions contributed to by the neighbourhoods younger age profile than other areas may add to this (however it should be noted that this data relates to 2009 and more up to date information is not available).  However, it is also recognised that financial restrictions preclude the development of a new site for the COE. Furthermore the Newtown site is one of the most modern of the four HAC's and by some margin the most central, being only a short distance from the city centre. It is therefore still considered that this site is the most logical choice for the development of the COE. This is further demonstrated by Aston being one of the 5 areas of highest demand in terms of the geographical location of homeless applicants during 2013/14.  Mitigation such as on site security, CCTV and close cooperation with local police are considered appropriate to reduce any risk to staff and visitors.  It is also considered that excluding or withdrawing the provision of services from a deprived area, particularly one Where demand for service is amongst the highest in the city, just because it is a deprived area, only acts to further deprive such areas and is not in keeping with BCC commitments to assist the most vulnerable members of society.  With the above considered the decision to locate the HACOE at the Newtown site is determined to have a positive effect on the local community by providing an increased service in an area of high demand for that same service.																																					

### 2.3. Analysis on Initial Assessment

The proposed change to the Housing Advice Centre function has been determined to have potential impact on all customers and staff. Therefore appropriate mitigation is being implemented to minimise, in so far as is reasonably practicable, these generic impacts caused by the relocation of the Housing Advice Service. This includes:

Customers:

The future allocations scheme makes available an 'Online Application' for registration on the councils housing register (Part VI) which will enable persons wishing to make a fresh application for housing (non-homelessness) to do so from their home, library, Neighbourhood Advice Centre or any other council building with Public WiFi (Under development)

It is presently planned that customers will be able to upload proofs (ID/Income etc) direct to their housing application to reduce the need for repeat visits to verify documents/sit and wait service (in development)

Specialised Housing Advice to be available via the telephone (in development), this is to ensure people don't make wasted journeys across the city.

Visiting Officers will be available to undertake home visits or see customers at alternate locations (in the most serious of cases).

A range of specific appointment times will be made available to ensure that customers can reach the centre around commitments such as 'school runs' rather than just providing a drop-in service.

Advice and assistance made available through Birmingham Housing Options Website at [www.birminghamhousingoptions.org.uk/](http://www.birminghamhousingoptions.org.uk/) (in delivery)

Staff:

A Back Office function will be available.

Staff who can demonstrate that they are unable to travel to Newtown HAC for any reason can request to work from an alternative location (should one remain available) or perform 'Back Office' functions (requests to be assessed on a case by case basis as this will be available to limited numbers of staff).

The provision of Homeworking is presently being considered and may be developed.

Other staff will be subject to Birmingham Contract requirements to work from locations within the city.

In reference to day to day service provision it is important to consider that, in the existing model; a full service is not provided at all existing HAC's. Newtown presently only sees Part VII Clients by appointment. Due to staffing levels, Northfield HAC sees no pre booked appointments and therefore clients who are not roofless on the day of presenting must be referred for an appointment elsewhere. Therefore there already exists a requirement for customers, in many cases, to travel cross city to access the service already provided.

Only the centres at Sparkbrook and Erdington offer a full range of both pre booked and roofless services and both of these presently have a waiting list of over 1 month for pre-booked appointments (correct at 24/03/2015). Presently none of the 4 sites offers a full 0845-1715 daily service and all close half day once per week.

The primary reason for the present structure at HAC's is due to staffing. Due to financial constraints no new staff to bolster the service are likely to be forthcoming and it is likely that further reductions will be required in the future.

It is therefore clear that the service cannot continue in its present format. The service must change both to resolve current demands on staffing and to 'future proof' the service against further reductions in the future. The economies of scale identified within the proposed model would serve to assist in this service improvement and 'future proofing'.

Public Safety consideration has been given in respect of young people who may be involved in Gang Activity. Newtown and Aston have experienced issues with gangs and gang violence and as such presents two possible problems.

1) The safety of vulnerable persons travelling to an unfamiliar area to access services, particularly those whom would be easily identifiable.

Consideration has been given to this however and security is to be provided at the centre as a form of mitigation. Close links with the Police will assist in ensuring the safety of visitors. Concerns were raised regarding the perception of large numbers of customers making their way on foot across the estate to the proposed HACOES carrying their belongings. This was determined to not accurately reflect the majority of customers to the centre who will attend by appointment and not as roofless. Further mitigation will be provided for these rare cases such as the provision of transport from the centre at which they first present (as this is more likely to be at an alternate location). Geography also assists as the centre sits directly outside a bus stop on a main approach to the city centre. Thus should such cases occur the walking time from the stop to the centre is approximately 2 mins only.

2) Concern was raised for persons who are/were gang affiliated fleeing such gang violence who may be unwilling to attend the centre due to perceived gang boundaries.

Often defined by a postcode, territory has become increasingly important for many gangs and defending this geographical territory has become part of the gangs *raison d'être*, an integral part of their identity. This has led to territorial conflict.

Although not linked to any one particular protected characteristic, this is obviously a significant concern as it would put at risk some customers, exclude other customers and could result in detriment to the quality of life for residents and further damage the reputation of the area.

However, in considering this the following was noted:

Research found gang members were typically aged between 12 and 25, that Gang membership is largely a male preserve (98 per cent of gang members identified by TGAP were male), that overall, the ethnicity of gang members tends to reflect the ethnicity of the population living in that area and the majority of gang members either self-excluded (truanted) or were officially excluded from school.

In noting the above it was identified that the majority clients meeting the above criteria would not normally be dealt with by HAC's in any case and would instead be referred to the Youth Hub, located in Digbeth, which falls outside the scope of this reorganisation. In the rare cases that persons outside of this criteria require service then existing mitigation including on site security, liaison with the police and even, where necessary, interview at an alternate location would be sufficient.

In 2014 only 134 of 2,617 priority homeless decisions were due to violence or harassment (non-domestic) accounting for only 5% of all such decisions. It is considered that gang violence presents only a very small fraction of these 134 cases thus indicating that sufficient countermeasures will not be overstretched in these cases.

Victims of domestic violence were also considered as a particular risk group as they account for nearly 24% of the 2,617 Priority Homeless Decisions made in 2014 (636 decisions). Concerns were raised regarding the availability of a single walk in centre for such victims due to the possibility of alleged abusers/offenders attending the location. A full break down of 2014 Homeless Priority Decisions (by Homelessness Reason) is included at Appendix 3A of this EA.

However it is considered that this risk was sufficiently mitigated against through existing channels. Anecdotal evidence states that most reporting victims of DV presently already attend their local HAC where possible rather than traveling cross city to an alternate location thus presenting the same problem in the existing system. There are presently numerous locations where victims of DV can present themselves and begin the rehousing process safely (Police Stations, Neighbourhood Advice Centres and the Birmingham & Solihull Women's Aid hub). From any of these locations the HACOES will be accessible via telephone and secure transport to the HACOES can be arranged (where necessary). Visiting officers can also be utilised in extreme cases to undertake homelessness assessments at alternate locations. On site security at the proposed HACOES will assist in ensuring the safety of victims and the provision of secure and separate waiting areas is being considered for use on a case by case basis.

West Midlands Police and Birmingham & Solihull Women's Aid will be contacted for comment during the reorganisation process to ensure that any concerns can be addressed before the completion of this change process.

In addition to the above generic and specialist considerations which it is felt are sufficiently mitigated, it is concluded that there is potential for specific impact in on the following characteristics (of both customers/service users & staff):

- Age
- Disability
- Pregnancy & Maternity

The primary focus of this impact is travel. With particular regard to customers making Part VII Applications, it is necessary for the customer to undertake physical interaction with Housing staff, usually via a visit to a Housing Advice Centre. The closure of Northfield, Erdington and Sparkbrook for this purpose will result in a requirement for significant additional travel across the city to access the Newtown HACO.

The additional distance between these centres that customers may be expected to travel is outlined below:

Erdington (B23 6RE) HAC to Newtown HAC (B19 2SW): 4.1 miles

Northfield HAC (B31 1PG) to Newtown HAC (B19 2SW): 7.7 miles

Sparkbrook HAC (B11 1LU) to Newtown HAC (B19 2SW): 3.3 Miles

Data detailing Homeless Applicants for Jan-Dec 2014 was not available at the time of preparing this EA. However data was available for April 2013-March 2014 and is included here as Appendix 3C to this EA. This data shows that Citizens making homeless applications across the city of Birmingham varies highly when mapped by home address rather than the HAC to which they are presenting. As previously stated a full service is not offered at all HAC's and thus the data in Appendix 3C is contended to be a more reliable indicator of demand.

It should be noted that this data does not include out of city applicants. In 2014 this totalled 600 households and thus it is reasonable to conclude a similar number for this period.

This data clearly shows less demand for service in the far north of the city with the 4 wards of the Sutton district accounting for only 2% of applications (95 out of 4,856 in city applicants during the 2013/14 period).

Demand is more consistent in the far south of the city with the southernmost 4 wards (Longbridge, Kings Norton, Brandwood and Northfield) representing 10% of the overall demand (490 out of 4,856 in city applicants applicants).

The data shows the areas of greatest demand to be across the eastern, west & central areas of the city with 9 of the 10 areas of highest demand situated within this corridor.

The Aston ward (where the present Newtown HAC is situated) featured as the 4th highest demand area for Homeless Applicants in the city. 2 more of top 5 areas directly adjoined the Aston Ward including the area of highest demand, this being the Nechells ward.

The Sparkbrook ward, where a current HAC is already located, was the second highest demand area of the city. However as this building is, for reasons outside of the services control, no longer available for occupation, this data lends additional weight to the decision to choose Newtown as the site for the future HACO.

Although Appendix 3C demonstrates that the areas of greatest need are concentrated in the East/West & Central areas of the city relocation of the service may, in some cases, still be an issue and may be even more so for those living in the North or South of the city.

It is considered that this additional distance may, in some cases, prove problematic for those who are less able to travel distance due to age, disability or pregnancy. While capability to travel is assumed and it is anticipated that the vast majority of customers will, even those less able to travel distance, will not be unduly affected due to the extensive public transport infrastructure in the city. It is also considered that there may be rare cases where this network is insufficient and thus additional full analysis of these categories is required.

### 3.1. Age

#### 3.1.1. Age –Differential Impact

Age	Relevant
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#### 3.1.2. Age – Impact

<b>Describe how the Function meets the needs of Individuals of different ages?</b>	<p>Housing Advice Centres presently offer services to people of all ages either as an applicant for some form of housing or as a member of household currently receiving assistance from the service. The reorganised service will continue to do this from a single location in contrast to the four sites presently in use (not including the Youth Hub).</p> <p>Although there are concerns regarding the ability of older persons (living within the catchment area of HAC's to be decommissioned) to travel to the new centre, Evidence shows that older persons traditionally use the existing HAC Services infrequently in the first instance. Homelessness applications from people aged over 55 account for only 5% of all homeless applications and within that group, those over 65 account for only 2% of all homeless applicants.</p> <p>Households over 55 accounted for only 13% of Part VI applicants in 2014 and those over 65 only 6%. Although presenting a larger cohort, the majority of these Part VI would likely have been seeking sheltered or age restricted nonemergency housing which is accessible in Birmingham. In the future operating model the Part VI application will be undertaken online thus allowing these applicants to apply from home or utilise on site IT provided at remaining Neighbourhood Advice Centres, libraries and any other buildings with this facility close to their homes.</p> <p>It is considered that, in most cases, inability to travel just due to age should not be assumed. Many older people enjoy active lifestyles including travel far in excess of cross city. Only in extreme cases is such an inability likely. Therefore, given the small percentage of an already small customer base, the existing mitigation such as visiting officers, phone advice/assistance, online tools and provision of bus tickets (or emergency taxi's) should prove more than sufficient.</p> <p>Staff aged over 45 represent 50% of the HAC workforce. Analysis was undertaken in relation to the distance from home addresses to current workplace as well as the Newtown HAC site. this analysis showed that, on average, staff aged 55-64 will experience a decrease in their daily commute and staff aged 45-54 will experience only a slight increase in theirs well below the average for all staff</p>
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<b>Do you have evidence to support the assessment?</b>	Yes
<p><b>Comment</b></p> <p>A full demographic breakdown of all customers by (protected characteristics) accessing Housing Advice for the purposes of making a Part VII (Homelessness) or Part VI (Council Housing Waiting List) Application can be found at Appendix 3A of this EA and was considered in its preparation.</p> <p>The staff cohort falling within this category is outlined in section 5 of Appendix 3B to this EA which was considered in its preparation. This data shows that a primarily older workforce that is statistically likely to be impacted less than the staff group as a whole in terms of distance.</p> <p>However it is accepted that some members of staff may experience problems reaching the proposed HACO site due to age for the same reasons as the members of the public outlined here.</p> <p>These members of staff will be identified through the staff briefing process and appropriate measures can be put in place on a case by case basis, these include:</p> <ul style="list-style-type: none"> <li>• Applications for and consideration of Flexible working arrangements</li> <li>• Applications for Home Working (following assessment of appropriateness)</li> <li>• Access to Work</li> <li>• Requests for Reasonable adjustments</li> <li>• Working from alternate locations through the possible retention of back office function at Lifford House and/or Sutton New Road (although the size of the back office function is yet to be defined and may not be available to all potential applicants from the staff cohort)</li> <li>• Consideration of redeployment</li> <li>• Mobility Clause (grades 2, 3 &amp; 4) as outlined in the Birmingham Contract of Employment</li> </ul>	

Please record the type of evidence and where it is from?	Records from the Northgate IT system show demographic data for customers completing Part VII and Part VI applications. For the purposes of this EA the period 01/01/2014 to 31/12/2014 (1 calendar year) was analysed. The data gathered is shown below:					
	* ED=Erdington HAC NT=Newtown HAC NF=Northfield HAC SB=Sparkbrook HAC GT=Grand Total					
	Part VII Applicants 01/01/2014-31/12/2014:					
		ED	NT	NF	SB	GT
	16-17:	1	2	3	3	9
	18-24:	244	195	230	200	869
	25-34:	423	549	413	572	1957
	35-44:	241	356	216	379	1192
	45:54:	114	130	102	138	484
	55-64:	38	51	30	49	168
	65+:	19	20	19	30	88
	Total:	1080	1304	1013	1371	4768
	Part VI Applicants 01/01/2014-31/12/2014:					
		ED	NT	NF	SB	GT
	16-17:	10	3	9	38	60
	18-24:	412	377	800	778	2367
	25-34:	786	1067	1236	1380	4469
	35-44:	515	784	740	987	3026
	45:54:	384	439	559	620	2002
	55-64:	202	207	294	297	1000
65+:	192	152	292	240	876	
Total:	2502	3031	3931	4341	13805	

	<p>Staff data (Appendix 3A) is gathered from information held by HR within the SAP IT System. The staff breakdown is detailed within Appendix 3A and summarised below:</p> <p>25-34 Years: 22%</p> <p>35-44 Years: 28%</p> <p>45-54 Years: 41%</p> <p>55-64 Years: 09%</p>
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<b>Have you received any other feedback about the Function in meeting the needs of Individuals of different ages?</b>	No
<b>You may have evidence from more than one source. If so, does it present a consistent view?</b>	Yes
<p><b><u>Comment</u></b></p> <p>For the period 2012/2013 Shelter (The Housing Charity) produced a summary of Households accepted as homeless by age. These figures (for the West Midlands) show that 86% of all homeless applicants were aged 16-44 with 10% aged 45-59 and only 3% aged 60+ thus indicating regional alignment to Birmingham's statistical data</p>	
<b>Is there anything about the Function and the way it affects Individuals of different ages which needs highlighting?</b>	No
<p><b><u>Comment</u></b></p> <p>The Birmingham population is predominantly younger and thus likely to be more mobile than the population as a whole.</p>	

### 3.1.3 Age – Consultation

Have you obtained the views of Individuals of different ages on the impact of the Function?	Yes
If so, How did you obtain these views?	<p>Consultation on proposals to restructure the Housing Advice Service, including the statutory homeless service, from its present 4 location delivery model (excluding the Youth Hub); to a single centre model based at Newtown Customer Service Centre opened on 04<sup>th</sup> December 2015 and ran for 7 weeks before closing on 21st January 2016.</p> <p>Consultation involved three main tools,</p> <p>Consultation A: A paper based questionnaire that was handed out to Housing Advice Centre (HAC) users (between 07th December 2015 and 15th January 2016),</p> <p>Consultation B: An online consultation through the councils Be Heard online consultation site</p> <p>Consultation C: 4 face to face sessions across the city open to professionals and members of the public.</p> <p>All of these consultations were open to members of the public of all ages.</p> <p>Consultation A focused on HAC users with all customers being provided with a copy of the questionnaire and encouraged to complete it. This was undertaken to ensure sampling from as broad a section of the customer demographic as possible, this included customers of all ages and in the same proportions that persons of all ages visited HACs. 490+ responses were gathered.</p> <p>Consultation B was undertaken through the Corporate Be Heard Consultation Website offering existing HAC customers, concerned citizens and professional's opportunity to comment and respond to the proposed changes regardless of age. 63 responses were gathered.</p> <p>Consultation C involved 4 public meetings, across the 4 quadrants of the city so to be as accessible as possible. Citizens &amp; professionals were invited to book in advance or attend on the day and face to face questions and answers were provided to identify and address any concerns raised.</p>

#### **Comment**

Consultations B & C were advertised and promoted through a variety of means including leaflets, posters and communications to third parties to reach as wide a group of people of all ages as possible.

Specific data as to the ages of respondents in Consultations A & C was not recorded for reasons outlined within the produced Consultation report. However, as previously stated, all HAC customers for the prescribed period were given opportunity to complete a questionnaire so the potential response base would match that of HAC user demographics for that period.

Although the age of individuals was not specifically recorded, during consultation A 49 out of 490 respondents identified their age as being a characteristic that would impact upon their ability to travel to Newtown.

Data on Age was gathered within Consultation B (online survey). Consultation B gathered far fewer customer/public responses than Consultation A however, in terms of customers and 'Birmingham Residents, but non users of services' responses, data shows a broad spread of respondents of all ages (detailed below):

Unanswered: 7

20-24: 2

25-29: 3

30-34: 6

35-39: 3

40-44: 6

45-49: 3

50-54: 2

55-59: 3

60-64: 0

70-74: 1

Further information regarding consultation can be found within the Report "Housing Advice Service - Citizen Consultation Feedback Report", Feb 2016, A Clarke, Birmingham City Council.

**Have you obtained the views of relevant stakeholders on the impact of the Function on Individuals of different ages?**

Yes

**If so, how did you obtain these views?**

Consultation B (Online Survey) included specific sections directed at obtaining the views of stakeholders. This was advertised and promoted through a variety of means including to reach a wide a group of stakeholders people of all ages.

Many Stakeholders (including partner agencies, voluntary groups, elected members and faith/community groups) were specifically notified of the consultations by letter/email/phone and invited to take part through whatever means they felt to be appropriate.

Some success in this endeavour is evidenced by the presence of Stakeholder responses in Consultation B (Be Heard) as well as predominantly stakeholder attendance in Consultation C (Public meetings). Several written representations were also received from stakeholders and have been noted.

Specific data as to the ages of respondents in Consultations A & C was not recorded for reasons outlined within the produced Consultation report.

However this data was gathered within Consultation B (Online Survey). Consultation B gathered fewer stakeholder responses than Consultation C however, the data shows a broad spread of respondents of all ages (detailed below):

Unanswered: 5

20-24: 1

25-29: 1

30-34: 3

35-39: 3

40-44: 2

45-49: 3

50-54: 6

55-59: 3

60-64: 1

70-74: 0

	Further information regarding consultation can be found within the Report Housing Advice Service - Citizen Consultation Feedback Report, Feb 2016, A Clarke, Birmingham City Council.
<p><b>Comment</b></p> <p>Formal consultation with Housing Advice Centre staff ran from 4 January 2016 through to 4th March 2016. The consultation process involved regular meetings with Unions, Staff briefings, individual 1:2:1s with Managers and a dedicated email account was set up for questions and responses. Regular reminders were sent out to staff to allow them to express their views.</p> <p>Additionally a staff working group was set up which met (and continues to meet) moving towards the implementation of the proposal (subject to Cabinet decision).</p> <p>The entire staff group were invited to take part in the consultation which includes employees across a variety of ages (outlined in appendix 3B to this EA). There are concerns around the capacity of a single HAC to deal with volume traffic, safety concerns around the single HAC approach, Concerns about increased travel time and lack of staff car parking.</p> <p>No specific issues were noted in relation to any potential impact on staff due to age. However, for further review, a full copy of the staff consultation report can be found as an Appendix 2 to the cabinet report for which this EA also serves.</p> <p>It is noted that a number of members of HAC staff also participated in the Online Consultation (Consultation B) as part of the public consultation process. Their responses can be found at Appendix 1 to the cabinet report for which this EA also serves.</p>	
<b>Is there anything about the Function and the way it affects Individuals of different ages which needs highlighting?</b>	No

### 3.1.4. Age – Additional Work

<b>Do you need any more information to complete the assessment?</b>	No
<b>Please explain how individuals may be impacted.</b>	The development of an HACO E will ensure that a more consistent service is provided to all customers, including those sharing this protected characteristic. This will aid in ensuring that any unfair or inappropriate practice, however unintentional it may be, is removed from the service.
<b>Is there any more work you feel is necessary to complete the assessment?</b>	No
<b>Do you think that the Function has a role in preventing Individuals of different ages being treated differently, in an unfair or inappropriate way, just because of their age?</b>	Yes
<b>Do you think that the Function could help foster good relations between persons who share the relevant protected characteristic and persons who do not share it?</b>	No
<b><u>Comment</u></b> This function will not directly affect the fostering of good relations between persons who share the relevant protected characteristic and persons who do not share it. However by ensuring that those sharing the relevant characteristic receive the highest quality service this function will promote a more inclusive, safer and prosperous Birmingham for all citizens.	

## 3.2 Disability

### 3.2.1 Disability - Differential Impact

Disability	Relevant
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### 3.2.2 Disability – Impact

Describe how the Function meets the needs of Individuals with a disability?	<p>Housing Advice Centres presently offer services to people of all abilities &amp; disabilities either as an applicant for some form of housing or as a member of a household currently receiving assistance from the service. The reorganised service will continue to do so from a single location in contrast to the four sites presently in use.</p> <p>There are concerns regarding the ability of disabled persons (living within the catchment area of HAC's to be decommissioned) to travel to the new centre, Evidence shows that disabled homelessness applicants with any form of disability accounted for 13% of all homeless applicants during 2014.</p> <p>It is considered that those with a disability should not be automatically assumed to lack capability to travel and that further exploration of the type of self-defined disabilities reported is undertaken.</p> <p>360 of these applicants (61% of all disabled applicants) were defined as being disabled due to mental health issues. It is considered that in cases of mental health, ability to travel should be assumed and it is proposed that the large majority of these individuals would be able to utilise public transport or other transport to reach the HACOE.</p> <p>Those with visual impairment may struggle to travel more so than other disabled persons. However this cohort account for only 0.2% of Part VII applicants. Thus it is considered that existing mitigation such as visiting officers, telephone advice/assistance, online tools, public transport (tickets) and (emergency) taxis are adequate to provide service to this client group.</p> <p>Those with mobility problems or 'multiple disabilities' (non-defined however may include mobility) are viewed as potentially excluded however only account for 5% of Part VII applicants (237). It is assumed that many of those with 'Multiple Disabilities' may not have a mobility problem and may be able to travel thus reducing this figure further. Even with the higher figure assumed it is still considered that the existing mitigations will be sufficient to ensure that this group can access the service. Other disabilities will also be considered on a case by case basis.</p>
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**Comment**

A full breakdown of Staff by this characteristic can be found at Appendix 3B of this EA. Summary details are as follows:

**Staff:**

Data shows that only 3 employees within the HAC staff cohort are listed as being disabled. The nature of the disability in question is not specified within the information provided however one is already employed at the Newtown site and as such impact is likely to be minimal.

Of the remaining 2 travel is considered to be the primary impact factor. The data shows that disabled staff at Erdington will experience a decrease in daily commute exceeding that of the mean average for other staff at Erdington.

Disabled Staff at Sparkbrook will experience an increased journey exceeding the average for other Sparkbrook staff.

Any issues arising for these staff and the identification of any issues for staff with a previously undisclosed disability will be identified through the staff briefing process and appropriate measures can be put in place on a case by case basis, these include:

- Applications for and consideration of Family Flexible working arrangements
- Applications for Home Working (following assessment of appropriateness)
- Access to Work
- Requests for Reasonable adjustments
- Working from alternate locations through the possible retention of back office function at Lifford House and/or Sutton New Road (although the size of the back office function is yet to be defined and may not be available to all potential applicants from the staff cohort)
- Consideration of redeployment
- Mobility Clause (grades 2, 3 & 4) as outlined in the Birmingham Contract of Employment

**Do you have evidence to support the assessment?**

Yes

**Comment**

A full demographic breakdown of all customers by (protected characteristics) accessing Housing Advice for the purposes of making a Part VII (Homelessness) or Part VI (Council Housing Waiting List) Application can be found at Appendix 3A of this EA and was considered in its preparation.

**Please record the type of evidence and where it is from?**

Records from the Northgate IT system show demographic data for customers completing Part VII and Part VI application by disabilities. For the purposes of this EA the period 01/01/2014 to 31/12/2014 (1 calendar year) was analysed. Summary data is shown below and a full detailed breakdown can be found at Appendix 3A of this EA.

HAC Totals:  
Hearing: 25  
Visual: 11  
Learning: 41  
Mental Health: 409  
Mobility: 106  
Multiple Disabilities: 139  
Other Disability: 204  
None/Unknown: 4176

**Have you received any other feedback about the Function in meeting the needs of Individuals with a disability?**

No

**You may have evidence from more than one source. If so, does it present a consistent view?**

Yes

**Comment**

Of the Part VI Housing Applicants 18% had suffered from some form of disability. However from these, 722 identified that they had Mental Health Issues which are less likely to affect ability to travel (70% of all disabled applicants). 8.4% of applicants fell into the defined higher risk disabled group (visual, mobility or multiple disabilities).

Although presenting a larger cohort, in the future operating model the Part VI application will be undertaken online thus allowing these applicants to apply from home or utilise on site IT provided at Neighbourhood Advice Centres, libraries and other public buildings offering access to computers, WiFi and other IT equipment close to their homes.

<b>Is there anything about the Function and the way it affects Individuals with a disability which needs highlighting?</b>	No
<p><b><u>Comment</u></b></p> <p>The choice of Newtown as the site for the proposed HACO E is also relevant to access for disabled persons. Existing sites such as Sparkbrook and Erdington are both non ground floor locations accessed via a lift. While these are legislation compliant due to the lift they can be inaccessible in the event of a failure and thus less desirable than the Newtown site. The Newtown site is a modern building which is completely accessible from the ground floor and thus likely to be fully legislation compliant.</p>	

### 3.2.3. Disability – Consultation

Have you obtained the views of Individuals with a disability on the impact of the Function?	Yes
If so, how did you obtain these views?	<p>Consultation on proposals to restructure the Housing Advice Service, including the statutory homeless service, from its present 4 location delivery model (excluding the Youth Hub); to a single centre model based at Newtown Customer Service Centre opened on 04<sup>th</sup> December 2015 and ran for 7 weeks before closing on 21st January 2016.</p> <p>Consultation involved three main tools,</p> <p>Consultation A: A paper based questionnaire that was handed out to Housing Advice Centre (HAC) users (between 07th December 2015 and 15th January 2016),</p> <p>Consultation B: An online consultation through the councils Be Heard online consultation site</p> <p>Consultation C: 4 face to face sessions across the city open to professionals and members of the public.</p> <p>All of these consultations were open to members of the public of all abilities and disabilities.</p> <p>Consultation A focused on HAC users with all customers being provided with a copy of the questionnaire and encouraged to complete it. This was undertaken to ensure sampling from as broad a section of the customer demographic as possible, this included customers of all abilities and disabilities and those with a disability would have been surveyed in the same proportions that disabled persons visited HACs. 490+ responses were gathered.</p> <p>Consultation B was undertaken through the Corporate Be Heard Consultation Website offering existing HAC customers, concerned citizens and professionals opportunity to comment and respond to the proposed changes regardless of age. 63 responses were gathered.</p> <p>Consultation C involved 4 public meetings, across the 4 quadrants of the city so to be as accessible as possible. Citizens &amp; professionals were invited to book in advance or attend on the day and face to face questions and answers were provided to identify and address any concerns raised.</p>
<p><b>Comment</b></p> <p>Consultations B &amp; C were advertised and promoted through a variety of means including leaflets, posters and communications to third parties to reach as wide a group of people of all abilities and disabilities as possible. Accessible locations were booked and promotional material (posters and flyers) were designed in 'Easy Read' to ensure accessibility for persons with a learning disability.</p> <p>Specific data as to the disabilities of respondents in Consultations A &amp; C was not recorded for reasons outlined within the produced Consultation report. However, as previously stated, all HAC customers for the prescribed period were given opportunity to complete a questionnaire so the potential response base would match that of HAC user demographics for that period, including disability.</p> <p>Although the disabilities of individuals was not specifically recorded, during consultation A, 74 out of 490 respondents identified</p>	

their a disability as being a characteristic that would impact upon their ability to travel to Newtown.

Data on disability was gathered within Consultation B (online survey). Consultation B gathered far fewer customer/public responses than Consultation A however, in terms of customers and 'Birmingham Residents, but non users of services' responses, data shows a broad spread of respondents of with disabilities (detailed below):

Unanswered: 8  
Not disabled: 20  
Disabled: 8

Of these declared disabled persons 2 preferred not to declare the nature of their disability, 2 suffered from Mental Health disabilities, 1 respondents disability related to stamina/breathing/fatigue, 1 cited chronic ongoing pain and 2 declared multiple disabilities.

Further information regarding consultation can be found within the Report "Housing Advice Service – Citizen Consultation Feedback Report", Feb 2016, A Clarke, Birmingham City Council.

**Have you obtained the views of relevant stakeholders on the impact of the Function on Individuals with a disability?**

Yes

**If so, how did you obtain these views?**

Consultation B (Online Survey) included specific sections directed at obtaining the views of stakeholders. This was advertised and promoted through a variety of means including to reach a wide a group of stakeholders people of all abilities and disabilities.

Many Stakeholders (including partner agencies, voluntary groups, elected members and faith/community groups) were specifically notified of the consultations by letter/email/phone and invited to take part through whatever means they felt to be appropriate.

Some success in this endeavour is evidenced by the presence of Stakeholder responses in Consultation B (Be Heard) as well as predominantly stakeholder attendance in Consultation C (Public meetings). Several written representations were also received from stakeholders and have been noted.

Specific data as to the disabilities of respondents in Consultations A & C was not recorded for reasons outlined within the produced Consultation report.

However this data was gathered within Consultation B (Online Survey). Consultation B gathered fewer stakeholder responses than Consultation C however, the data shows responses from respondents with a disability (detailed below):

Not Disabled: 24  
Disabled: 2

Of these 2 respondents 1 cited multiple disabilities and another cited Ulcerative Colitis as the nature of their disability.

Further information regarding consultation can be found within the Report Housing Advice Service - Citizen Consultation Feedback Report, Feb 2016, A Clarke, Birmingham City Council.

**Comment**

Formal consultation with Housing Advice Centre staff ran from 4 January 2016 through to 4th March 2016. The consultation process involved regular meetings with Unions, Staff briefings, individual 1:2:1s with Managers and a dedicated email account was set up for questions and responses. Regular reminders were sent out to staff to allow them to express their views.

Additionally a staff working group was set up which met (and continues to meet) moving towards the implementation of the proposal (subject to Cabinet decision).

The entire staff group were invited to take part in the consultation which includes employees both able bodied and staff identifying as having a disability. The staff cohort known to be disabled is listed as 3 employees however this group is known to be larger as there is no requirement for staff to declare any disability. Further details regarding this are outlined in appendix 3B to this EA. Staff consultation identified that there are concerns around the capacity of a single HAC to deal with volume traffic, safety concerns around the single HAC approach, Concerns about increased travel time and lack of staff car parking.

No specific issues were noted in relation to any potential impact on disabled staff. However the potential for impact based on increased travel staff due to disability was identified and assessed at an early stage in this EA. This is explored further within Appendix 3B to this EA.

A full copy of the staff consultation report, along with relevant appendices can be found as an Appendix 2 to the cabinet report for which this EA also serves.

It is noted that a number of members of HAC staff also participated in the Online Consultation (Consultation B) as part of the public consultation process. 2 professional respondents of 28 in this consultation identified themselves as disabled however it is not known if they were among the responses originating from members of staff. Consultation B responses can be found at Appendix 1 to the cabinet report for which this EA also serves.

<b>Is there anything about the Function and the way it affects Individuals with a disability which needs highlighting?</b>	No
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### 3.2.4 Disability - Additional Work

<b>Do you need any more information to complete the assessment?</b>	No
<b>Please explain how individuals may be impacted.</b>	The development of an HACOE will ensure that a more consistent service is provided to all customers, including those sharing this protected characteristic. This will aid in ensuring that any unfair or inappropriate practice, however unintentional it may be, is removed from the service.
<b>Is there any more work you feel is necessary to complete the assessment?</b>	No
<b>Do you think that the Function has a role in preventing Individuals with a disability being treated differently, in an unfair or inappropriate way, just because of their disability?</b>	Yes
<b>Do you think that the Function could help foster good relations between persons who share the relevant protected characteristic and persons who do not share it?</b>	No
<b>Comment</b> This function will not directly affect the fostering of good relations between persons who share the relevant protected characteristic and persons who do not share it. However by ensuring that those sharing the relevant characteristic receive the highest quality service this function will promote a more inclusive, safer and prosperous Birmingham for all citizens.	
<b>Do you think that the Function will take account of disabilities even if it means treating Individuals with a disability more favourably?</b>	No
<b>Do you think that the Function could assist Individuals with a disability to participate more?</b>	No
<b>Do you think that the Function could assist in promoting positive attitudes to Individuals with a disability?</b>	No

### 3.3. Pregnancy And Maternity

#### 3.3.1. Pregnancy And Maternity - Differential Impact

Pregnancy & Maternity	Relevant
<b>Comment</b> The closure of 3 out of the 4 existing HAC's in order to develop the COE at Newtown could potentially impact upon the characteristic of Pregnancy and Maternity. Although the same level of service will be offered, there may be additional demands upon pregnant women in terms of travel. This may be particular evident in cases where a woman may reside in the south of the city and would have to travel to north/central (Newtown) to access a homeless interview. Therefore this will be explored in greater detail.	

#### 3.3.2. Pregnancy And Maternity – Impact

<b>Describe how the Function meets the needs of Pregnant women or those who are on maternity leave?</b>	<p>Housing Advice Centres presently offer services to people of all ages either as an applicant for some form of housing or as a member of household currently receiving assistance from the service. The reorganised service will continue to do so from a single location in contract to the four sites presently in use.</p> <p>Data regarding pregnancy and maternity is held within Northgate however, this was not provided at the time of completing this assessment. Therefore information cannot be provided regarding the number of users of Housing Advice Centres by pregnancy/maternity.</p> <p>It is considered that, except in later stages of maternity, capability to travel should be assumed unless otherwise known. Therefore the number of customers who would experience unassailable difficulty accessing the HACOE by normal means such as public transport is likely to be small and therefore subject to sufficient mitigation through existing measures and those under development. This will include visiting officers, Bus tickets and taxi's (in emergencies); telephone/online advice and assistance (including Part VI Online) and flexible appointments around school commitments.</p>
<b>Comment</b> Staff:  This group is identified as a potentially affected group within the HAC Staff cohort. It is acknowledged that this particular group is, unlike other groups, fluid and persons falling within this cohort can change more frequently than others. Therefore, data provided by HR may not be reliable or up to date.  Therefore, to get the most up to date information, a request was sent to service managers within all 4 HAC's dated 08/04/2015. This requested confirmation of any staff within the service, known to be currently pregnant or subject to maternity arrangements. At the time of preparing this analysis only one pregnant employee and one recently returning from maternity leave had been identified.	

It is also considered, due to the small number of staff involved, existing mitigation to protect this group is sufficient to address any issues that may arise during the period of transference. This includes (but is not limited to):

- Flexible use of maternity leave
- Extended maternity leave requests
- Interchangeable paternity and maternity leave
- Applications for and consideration of Family Flexible working arrangements
- Applications for Home Working (following assessment of appropriateness)
- Access to Work
- Risk Assessment for pregnant workers
- Requests for Reasonable adjustments
- Working from alternate locations through the possible retention of back office function at Lifford House and/or Sutton New Road (although the size of the back office function is yet to be defined and may not be available to all potential applicants from the staff cohort)
- Consideration of redeployment
- Mobility Clause (grades 2, 3 & 4) as outlined in the Birmingham Contract of Employment

**Do you have evidence to support the assessment?**

Yes

**Comment**

A full demographic breakdown of all customers by (protected characteristics) accessing Housing Advice for the purposes of making a Part VII (Homelessness) or Part VI (Council Housing Waiting List) Application can be found at Appendix 3A of this EA and was considered in its preparation.

Data within Appendix 3B shows that female staff will, on average, experience an increase of 0.88 miles to their daily (one way) commute as a result of the redesign. When this data was limited to females aged 18-45 (most likely to fall within the protected staff cohort), the average daily commute increased to 1.04 extra miles per day (one way). This was very slightly higher than the average increase for male staff (0.9 miles) and the average for all staff (0.085). It is not felt that the additional 0.14 miles presents less preferential treatment to this group.

**Please record the type of evidence and where it is from?**

The staff cohort falling within this category is outlined at Appendix 3B of this EA. At the time of preparation only 2 staff are known to fall within this cohort and it is believed that a likely maximum of 5 may exist including missing data or any unknown persons.

**Have you received any other feedback about the Function in meeting the needs of Pregnant women or those who are on maternity leave?**

No

**You may have evidence from more than one source. If so, does it present a consistent view?**

Not applicable

**Is there anything about the Function and the way it affects Pregnant women or those who are on maternity leave which needs highlighting?**

No

### 3.3.3 Pregnancy And Maternity – Consultation

Have you obtained the views of Pregnant women or those who are on maternity leave on the impact of the Function?	Yes
If so, how did you obtain these views?	<p>Consultation on proposals to restructure the Housing Advice Service, including the statutory homeless service, from its present 4 location delivery model (excluding the Youth Hub); to a single centre model based at Newtown Customer Service Centre opened on 04<sup>th</sup> December 2015 and ran for 7 weeks before closing on 21st January 2016.</p> <p>Consultation involved three main tools,</p> <p>Consultation A: A paper based questionnaire that was handed out to Housing Advice Centre (HAC) users (between 07th December 2015 and 15th January 2016),</p> <p>Consultation B: An online consultation through the councils Be Heard online consultation site</p> <p>Consultation C: 4 face to face sessions across the city open to professionals and members of the public.</p> <p>All of these consultations were open to members of the public, including those who were pregnant and those on maternity leave. The number of different consultative channels increased accessibility to all individuals.</p> <p>Consultation A focused on HAC users with all customers being provided with a copy of the questionnaire and encouraged to complete it. This was undertaken to ensure sampling from as broad a section of the customer demographic as possible, this included pregnant customers and in the same proportions that persons of all ages visited HACs. 490+ responses were gathered.</p> <p>Consultation B was undertaken through the Corporate Be Heard Consultation Website offering existing HAC customers, concerned citizens and professionals opportunity to comment and respond to the proposed changes regardless of pregnancy or maternity status. 63 responses were gathered.</p> <p>Consultation C involved 4 public meetings, across the 4 quadrants of the city so to be as accessible as possible. Citizens &amp; professionals were invited to book in advance or attend on the day and face to face questions and answers were provided to identify and address any concerns raised.</p>
<p><b>Comment</b></p> <p>Consultations B &amp; C were advertised and promoted through a variety of means including leaflets, posters and communications to third parties to reach as wide a group of people of all ages as possible.</p> <p>Specific data as to the Pregnancy/Maternity status of respondents in Consultations A &amp; C was not recorded for reasons outlined within the produced Consultation report. However, as previously stated, all HAC customers for the prescribed period were given opportunity to complete a questionnaire so the potential response base would match that of HAC user demographics for that period.</p>	

Although the pregnancy/maternity status of individuals was not specifically recorded, during consultation A, 28 out of 490 respondents identified pregnancy as being a characteristic that would impact upon their ability to travel to Newtown.

Data on pregnancy was gathered within Consultation B (online survey). Consultation B gathered far fewer customer/public responses than Consultation A and the survey used question logic, as such only respondents identifying themselves as female were asked this question. In terms of customers and 'Birmingham Residents, but non users of services' responses, data shows 20 women were not pregnant, 1 respondent was pregnant respondent and a further that declined to say.

Further information regarding consultation can be found within the Report "Housing Advice Service – Citizen Consultation Feedback Report", Feb 2016, A Clarke, Birmingham City Council.

**Have you obtained the views of relevant stakeholders on the impact of the Function on Pregnant women or those who are on maternity leave?**

Yes

**If so, how did you obtain these views?**

Consultation B (Online Survey) included specific sections directed at obtaining the views of stakeholders. This was advertised and promoted through a variety of means including to reach a wide a group of stakeholders including those who were pregnant.

Many Stakeholders (including partner agencies, voluntary groups, elected members and faith/community groups) were specifically notified of the consultations by letter/email/phone and invited to take part through whatever means they felt to be appropriate.

Some success in this endeavour is evidenced by the presence of Stakeholder responses in Consultation B (Be Heard) as well as predominantly stakeholder attendance in Consultation C (Public meetings). Several written representations were also received from stakeholders and have been noted.

Specific data as to the Pregnancy & maternity status of respondents in Consultations A & C was not recorded for reasons outlined within the produced Consultation report.

However this data was gathered within Consultation B (Online Survey). Consultation B gathered fewer stakeholder responses than Consultation C, and the survey used question logic, as such only respondents identifying themselves as female were asked this question. No stakeholders/professionals identified themselves within this category however one did decline to say.

Further information regarding consultation can be found within the Report Housing Advice Service - Citizen Consultation Feedback Report, Feb 2016, A Clarke, Birmingham City Council.

**Comment**

Formal consultation with Housing Advice Centre staff ran from 4 January 2016 through to 4th March 2016. The consultation process involved regular meetings with Unions, Staff briefings, individual 1:2:1s with Managers and a dedicated email account was set up for questions and responses. Regular reminders were sent out to staff to allow them to express their views.

Additionally a staff working group was set up which met (and continues to meet) moving towards the implementation of the proposal (subject to Cabinet decision).

The entire staff group were invited to take part in the consultation which includes employees any staff who are pregnant or presently exercising maternity rights. Further details regarding this are outlined in appendix 3B to this EA.

Staff consultation identified that there are concerns around the capacity of a single HAC to deal with volume traffic, safety concerns around the single HAC approach, Concerns about increased travel time and lack of staff car parking.

No specific issues were noted in relation to any potential impact on pregnant staff or those exercising maternity rights. However the potential for impact on staff falling within this protected characteristic was identified and assessed at an early stage in this EA. This is explored further within Appendix 3B to this EA.

A full copy of the staff consultation report, along with relevant appendices can be found as an Appendix 2 to the cabinet report for which this EA also serves.

It is noted that a number of members of HAC staff also participated in the Online Consultation (Consultation B) as part of the public consultation process however none identified as identifying with the pregnancy or maternity characteristic. Consultation B responses can be found at Appendix 1 to the cabinet report for which this EA also serves.

**Is there anything about the Function and the way it affects Pregnant women or those who are on maternity leave which needs highlighting?**

No

### 3.3.4. Pregnancy And Maternity - Additional Work

Do you need any more information to complete the assessment?	No
Please explain how individuals may be impacted.	The development of an HACOE will ensure that a more consistent service is provided to all customers, including those sharing this protected characteristic. This will aid in ensuring that any unfair or inappropriate practice, however unintentional it may be, is removed from the service.
Is there any more work you feel is necessary to complete the assessment?	No
Do you think that the Function has a role in preventing Pregnant women or those who are on maternity leave being treated differently, in an unfair or inappropriate way, just because of their pregnancy and maternity?	Yes
Do you think that the Function could help foster good relations between persons who share the relevant protected characteristic and persons who do not share it?	No
<b>Comment</b> This function will not directly affect the fostering of good relations between persons who share the relevant protected characteristic and persons who do not share it. However by ensuring that those sharing the relevant characteristic receive the highest quality service this function will promote a more inclusive, safer and prosperous Birmingham for all citizens.	

### 3.4. Race

#### 3.4.1. Race - Differential Impact

Race	Relevant
<p><b>Comment</b></p> <p>Although there will be an impact on all customers, upon assessment it is not foreseen that the proposed change in function to the Housing Advice Service will unduly or negatively impact any person based on race. The service provided are non-race specific and persons accessing the service will be able to do so the same way regardless of their race/ethnicity.</p> <p>There are potential issues identified that relate to the wider community that are related to race however these will be explored further throughout this EA.</p> <p>Should any issues relating to race be identified following implementation of the redesigned service, this EA can be reviewed to ensure they are adequately addressed.</p>	

#### 3.4.2. Race – Impact

<p><b>Describe how the Function meets the needs of Individuals from different ethnic backgrounds?</b></p>	<p>Housing Advice Centres presently offer services to people of all ages either as an applicant for some form of housing or as a member of household currently receiving assistance from the service. The reorganised service will continue to do so from a single location in contrast to the four sites presently in use.</p> <p>The primary impact identified in this case is the small but realistic risk of perceived favourable treatment by other communities against the local community where the HACOE is to be located.</p> <p>Newtown is a significantly deprived community with high social deprivation, low educational attainment, high unemployment, low community cohesion and significant issues with crime and disorder. Its population is predominantly BME.</p> <p>This therefore presents a risk that other communities losing their local HAC and being required to travel up to 9 miles to access the service may perceive the local Newtown population as being afforded more preferential treatment based on race or circumstance rather than choice of the centre due to its central location and more modern facilities.</p>
<p><b>Do you have evidence to support the assessment?</b></p>	<p>No</p>
<p><b>Comment</b></p> <p>There is no evidence for this assessment. This has been identified as a risk only. At present the only possible mitigation is via information.</p> <p>It should be considered that, when communicating with the public/members or media the reasons for the closure of the other 3 HAC's, the rationale in selecting the Newtown site for the future service be clearly explained. Beyond this no other mitigation is suggested and the risk should be accepted.</p>	
<p><b>Do you plan to collect any evidence?</b></p>	<p>No</p>
<p><b>Have you received any other feedback about the Function in meeting the needs of Individuals from different ethnic backgrounds?</b></p>	<p>No</p>
<p><b>You may have evidence from more than one source. If so, does it present a consistent view?</b></p>	<p>Not Applicable</p>
<p><b>Is there anything about the Function and the way it affects Individuals from different ethnic backgrounds which needs highlighting?</b></p>	<p>No</p>

### 3.4.3. Race – Consultation

Have you obtained the views of Individuals from different ethnic backgrounds on the impact of the Function?	Yes
If so, how did you obtain these views?	<p>Consultation on proposals to restructure the Housing Advice Service, including the statutory homeless service, from its present 4 location delivery model (excluding the Youth Hub); to a single centre model based at Newtown Customer Service Centre opened on 04<sup>th</sup> December 2015 and ran for 7 weeks before closing on 21st January 2016.</p> <p>Consultation involved three main tools,</p> <p>Consultation A: A paper based questionnaire that was handed out to Housing Advice Centre (HAC) users (between 07th December 2015 and 15th January 2016),</p> <p>Consultation B: An online consultation through the councils Be Heard online consultation site Consultation C: 4 face to face sessions across the city open to professionals and members of the public. All of these consultations were open to members of the public of all races and ethnicities.</p> <p>Consultation A focused on HAC users with all customers being provided with a copy of the questionnaire and encouraged to complete it. This was undertaken to ensure sampling from as broad a section of the customer demographic as possible, this included customers of all races and ethnicities and in the same proportions that persons of all races and ethnicities visited HACs. 490+ responses were gathered.</p> <p>Consultation B was undertaken through the Corporate Be Heard Consultation Website offering existing HAC customers, concerned citizens and professionals opportunity to comment and respond to the proposed changes regardless of race or ethnicity. 63 responses were gathered.</p> <p>Consultation C involved 4 public meetings, across the 4 quadrants of the city so to be as accessible as possible. Citizens &amp; professionals were invited to book in advance or attend on the day and face to face questions and answers were provided to identify and address any concerns raised.</p>
<p><b>Comment</b></p> <p>Consultations B &amp; C were advertised and promoted through a variety of means including leaflets, posters and communications to third parties to reach as wide a group of people of all races and ethnicities as possible.</p> <p>Specific data as to the race or ethnicity of respondents in Consultations A &amp; C was not recorded for reasons outlined within the produced Consultation report. However, as previously stated, all HAC customers for the prescribed period were given opportunity to complete a questionnaire so the potential response base would match that of HAC user demographics for that period.</p> <p>Although the race/ethnicity of individuals was not specifically recorded, during consultation A, 23 out of 490 respondents identified their race as being a characteristic that would impact upon their ability to travel to Newtown.</p> <p>Data on race &amp; ethnicity was gathered within Consultation B (online survey). Consultation B gathered far fewer customer/public responses than Consultation A however, in terms of customers and 'Birmingham Residents, but non users of services' responses, data shows a broad spread of respondents of all races (detailed below):</p>	

Unanswered: 11  
 Asian British: 1  
 Sikh/Indian: 1  
 Black Caribbean: 2  
 Black African: 1  
 White British: 15  
 White Irish: 2

Further information regarding consultation can be found within the Report "Housing Advice Service - Citizen Consultation Feedback Report", Feb 2016, A Clarke, Birmingham City Council

**Have you obtained the views of relevant stakeholders on the impact of the Function on Individuals from different ethnic backgrounds?**

Yes

**If so, How did you obtain these views?**

Consultation B (Online Survey) included specific sections directed at obtaining the views of stakeholders. This was advertised and promoted through a variety of means including to reach a wide a group of stakeholders people of all races and ethnicities.

Many Stakeholders (including partner agencies, voluntary groups, elected members and faith/community groups) were specifically notified of the consultations by letter/email/phone and invited to take part through whatever means they felt to be appropriate.

Some success in this endeavour is evidenced by the presence of Stakeholder responses in Consultation B (Be Heard) as well as predominantly stakeholder attendance in Consultation C (Public meetings). Several written representations were also received from stakeholders and have been noted.

Specific data as to the race of respondents in Consultations A & C was not recorded for reasons outlined within the produced Consultation report.

However this data was gathered within Consultation B (Online Survey). Consultation B gathered fewer stakeholder responses than Consultation A, however, the data shows a broad spread of respondents of all races (detailed below):

Unanswered: 7  
 Asian Bangladeshi: 1  
 Asian Indian Other: 2  
 Sikh/Indian: 3  
 Black Caribbean: 1  
 Black African: 1  
 White British: 13

Further information regarding consultation can be found within the Report Housing Advice Service - Citizen Consultation Feedback Report, Feb 2016, A Clarke, Birmingham City Council.

**Comment**

Formal consultation with Housing Advice Centre staff ran from 4 January 2016 through to 4th March 2016. The consultation process involved regular meetings with Unions, Staff briefings, individual 1:2:1s with Managers and a dedicated email account was set up for questions and responses. Regular reminders were sent out to staff to allow them to express their views.

Additionally a staff working group was set up which met (and continues to meet) moving towards the implementation of the proposal (subject to Cabinet decision).

The entire staff group were invited to take part in the consultation which includes staff of all races. Further details regarding this are outlined in appendix 3B to this EA.

Staff consultation identified that there are concerns around the capacity of a single HAC to deal with volume traffic, safety concerns around the single HAC approach, Concerns about increased travel time and lack of staff car parking.

No specific issues were noted in relation to any potential impact on staff due to race. Impact in relation to race was identified and assessed at an early stage in this EA. However this impact was customer and wider community specific and did not impact on staff.

A full copy of the staff consultation report, along with relevant appendices can be found as an Appendix 2 to the cabinet report for which this EA also serves.

It is noted that a number of members of HAC staff also participated in the Online Consultation (Consultation B) as part of the public consultation process. Consultation B responses can be found at Appendix 1 to the cabinet report for which this EA also serves.

**Is there anything about the Function and the way it affects Individuals from different ethnic backgrounds which needs highlighting?**

No

#### 3.4.4. Race - Additional Work

<b>Do you need any more information to complete the assessment?</b>	No
<b>Please explain how individuals may be impacted.</b>	<p>The development of an HACOE will ensure that a more consistent service is provided to all customers, including those sharing this protected characteristic. This will aid in ensuring that any unfair or inappropriate practice, however unintentional it may be, is removed from the service.</p> <p>The selection of the Newtown site will also provide an improved service to a predominantly deprived BME community.</p>
<b>Is there any more work you feel is necessary to complete the assessment?</b>	No
<b>Do you think that the Function has a role in preventing Individuals from different ethnic backgrounds being treated differently, in an unfair or inappropriate way, just because of their ethnicity?</b>	Yes
<b>Do you think that the Function could help foster good relations between persons who share the relevant protected characteristic and persons who do not share it?</b>	No
<b>Comment</b> <p>This function will not directly affect the fostering of good relations between persons who share the relevant protected characteristic and persons who do not share it. However by ensuring that those sharing the relevant characteristic receive the highest quality service this function will promote a more inclusive, safer and prosperous Birmingham for all citizens.</p>	

### 3.5. Concluding Statement on Full Assessment

An Equality Impact Session took place on 25/03/2015 which was attended by members of Pre Tenancy and Homelessness Service with representatives from Business Change team. During this session all protected characteristics were discussed, potential impacts were explored and mitigation/countermeasures agreed.

The protected characteristics explored in the full analysis are the ones deemed to be most likely to experience any additional impact from the proposed change in function. The majority of these impacts relate to the distance they may be expected to travel to access the proposed HACO E.

It is considered that the mitigation and countermeasures outlined in this EA will be sufficient to account for the small number of customers who will experience any additional detrimental impact exceeding that of a normal member of the public.

The majority of customers will experience some impact due to having to travel further to access the service. However it is considered that it will be negligible and not disproportionately impactful for users of public transport.

The additional distance from existing HAC's to the proposed HACO E site is shown below along with route options for a member of the public accessing the HACO E via public transport from former sites:

**Erdington (B23 6RE) HAC to Newtown HAC (B19 2SW), 4.1 miles (estimated 9 mins driving).**

Bus 115: 30-33 Mins - Total walking time 15 mins, Total Bus time 15 mins.

Bus 905 & Bus 33: 28 Mins - Total walking time 7 mins, Total bus time 14 mins.

Nearest Rail: Erdington, 6mins from Erdington HAC. Rail requires change in B'Ham New Street and transfer from New Street to Snow Hill for a second train. Final stop in Jewellery Quarter Rail Station, 26 Mins walk from Newtown HACO E.

**Northfield HAC (B31 1PG) to Newtown HAC (B19 2SW), 7.7 miles (estimated 16 mins driving)**

Bus 63 & 51: 52 Mins - Total walking time 14 mins, Total bus time 38mins

Bus 61 & 886: 45 Mins - Total walking time 7 mins, Total bus time 33 mins

Nearest Rail: Northfield 20 mins walk from HAC. One train journey which stops at Jewellery Quarter Rail Station, 26 Mins from Newtown HAC.

**Sparkbrook HAC (B11 1LU) to Newtown HAC (B19 2SW), 3.3 Miles (estimated 9 mins driving)**

Bus 8C: 54 Mins - Total walking time 13 mins, Total bus time 41mins

Bus 6 & 33: 37 Mins - Total walking time 12 mins, Total bus time 20mins

Nearest Rail: Small Heath, 14 mins walk from HAC, Final stop at Jewellery Quarter Rail Station, 26 Mins from Newtown HAC.

All options are viable for an older person with good mobility. Bus options remain viable for older persons with some mobility limitations.

For those with severe mobility limitations further mitigation is in place and will remain available. This includes the use of visiting officers to undertake assessments at alternate locations, Part VI applications available on line, provision of bus tickets in occasional cases where persons are unable to reach the HACO E and in extreme cases the service will consider the use of taxi's and other non-public transport.

In considering the limited numbers of older adults approaching the existing service a reasonable level of mobility is assumed and the ability to use public transport should prove sufficient for most, many of whom will have access to a free bus pass.

It is therefore considered that the mitigation in place for the remaining small minority will be both sufficient and not place an unmanageable financial, resource or logistical burden on the service.

However, in view of the potential impacts additional analysis of accessibility at a ward and district level has been undertaken, including analysis of emergency & crisis customer transport arrangements. This document can be found at Appendix 3D to this document.

Extensive consultation has taken place with customers, citizens and stakeholders regarding the potential impacts of the proposed reorganisation. This included discussion on and study of protected characteristics.

From consultation A (which attracted 490 responses from HAC customers) 340 do not feel any of the protected characteristics impacted upon their ability to travel to Newtown. Of the remaining respondents 4 characteristics attracted over 20 responses from customers who felt that one or more of these would impact upon their ability to travel to Newtown. These 'Top 4' responses support the content of this EA, matching the groups which have been identified, discussed and mitigated. These being age, Pregnancy, Disability and Race.

Respondents were invited to select multiple characteristics if they deemed them relevant and from this, other trends were noted.

Nearly half of those identifying pregnancy as an equality issue also identify with Disability as an equality issue with accessing Newtown (12 of 26).

Nearly half of those identifying Gender as an equality issue also identify with Pregnancy as an equality issue with accessing Newtown (7 out of 14).

Nearly half of those identifying Race as an equality issue also identify with Disability as an equality issue with accessing Newtown (10 out of 23).

From responses within all consultations the distance that will be required for some customers to travel was highlighted as excessive due to their disability or age. Several customers identified this directly within their responses and other cases were highlighted on their behalf by stakeholder professionals.

Further information regarding consultation responses can be found within the document Housing Advice Service - Citizen Consultation Feedback Report, Feb 2016, A Clarke, Birmingham City Council.

Staff subject to the transfer to the HACOE will also be impacted. The requirement to work from alternate locations within the city forms part of the Birmingham Contract and thus there is an expectation that the majority of staff will be able to do so. However it is also accepted that a small number of staff falling within the same protected groups identified for customers may also experience difficulties with the distance to Newtown. These staff will be identified and adjustments will be considered on a case by case basis.

A full copy of the staff consultation report can be found as an Appendix 2 to the cabinet report for which this EA also serves. No direct equality issues were noted in relation to concerns raised during the staff consultation however during review of this document. However further review of this document is recommended when considering this EA. Appendix 2A (Union Q&A) did identify an issue potentially relating to gender stating "Car parking is an issue at Newtown. Having to park on the main road can present potential safety risks. 72% of affected staff are female" However it is not considered that such risk is exclusive to female staff and it is not felt appropriate to prioritise car parking with preference to gender. The service has responded to this issue stating that "We will be ensuring that we secure as many parking spaces for our staff as possible if the proposal is accepted. We will work with staff to ensure this is distributed fairly and in particular for any staff who are working late but of course we will also need to consider disabilities and where people have a parking space as a reasonable adjustment. Although I accept this is a concern for staff and we will ensure safety wherever possible staff across locations park in the street and walk to their office location".

In the event of any equality issue developing that has not been accounted for within this assessment then a review can be conducted in order to identify appropriate steps to resolve it.

A full review will take place approximately one year from implementation to ensure that the relevant issues have been captured and addressed within this EA.