Integrated Impact Assessment (IIA)

This Integrated Impact Assessment considers the duties and requirements of the following legislation in order to inform and ensure effective decision making and compliance:

- Equality Act 2010
- Welsh Language Standards (No.1) Regulations 2015
- Well-being of Future Generations (Wales) Act 2015
- Environment (Wales) Act 2016

Version Control

Version	Author	Job title	Date		
Version 1	Ann Cornelius	Strategic Housing Officer	September 2022		

1. Details of the initiative

	Title of the Initiative: Neath Port Talbot Rapid Rehousing Transition Plan
1a	Service Area: Housing & Homelessness
1b	Directorate: Social Services, Health and Housing
1c	Summary of the initiative: This report sets out the Rapid Rehousing Plan for Neath Port Talbot required by Welsh Government to comply with their "Ending Homelessness – High Level Action Plan 2021-26".
1d	Who will be directly affected by this initiative?
	People who present as homeless, or are threatened with homelessness.
1e	When and how were people consulted?
	Key stakeholders were consulted during the development of the plan – housing associations, third sector support providers, and NPT's Youth Homelessness Group will be consulted on their lived experience of homelessness. The consultation process will continue throughout the life of this plan with the aim of developing effective operational relationships e.g., with Health, Police and Regional partners to ensure the transition plan continues to deliver its objectives.

1f What were the outcomes of the consultation?

Task groups have been set up to continue with this engagement throughout the life of the plan. These will provide information, feedback and expertise in order to deliver the Priority Actions of the plan.

2. Evidence

What evidence was used in assessing the initiative?

Section 1a - Homelessness prevention	Most recent financial year
Total number of open section 66 cases as at 31 March 2021	0
Total number of section 66 outcomes between April 2021 and end of March 2022	389
Total number of open section 66 cases as at 1 April 2022	0
Total prevention caseload 2021/22	389
Total number of successful cases discharged between April 2021 and end of March 2022.	236
prevention rate (%)	60.67
able to remain in home	40
re-housed in social - LA	0
re-housed in social - RSL	130
re-housed in PRS	58
Total number of negative discharged cases between April 2021 and end of March 2022.	57
Total number of neutral discharges between April 2021 and end of March 2022 (and move to section 73)	96
Average length a section 66 case is open in number of days	88
successful case	138
negative	117
unsuccessful	135

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Section 1b - Homelessness relief	Most recent financial year
Total number of open section 73 cases as at 31 March 2021	95
Total number of section 73 outcomes between April 2021 and end of March 2022	467
Total number of open section 73 cases as at 1 April 2022	112
Total relief caseload 2020/21	450
Total number of successful cases discharged between April 2021 and end of March 2022.	178
success rate	39.56
re-housed in social - LA	0
re-housed in social - RSL	102
re-housed in PRS	37
Total number of negative discharged cases between April 2021 and end of March 2022.	80
Total number of neutral discharges between April 2021 and end of March 2022 (ie, assessed for section 75 duty).	209
Average length a section 73 case is open (in number of days)	86
successful case	80
negative	62
unsuccessful	171
Total number of open section 75 cases as at 31 Match 2021	138
Total number of section 75 outcomes between April 2021 and end of March 2022.	157
Total number of open section 75 cases as at 1 April 2022	110
Total final duty caseload 2021/22	185
Total number of successful section 75 cases discharged between April 2021 and end of March 2022.	76
success rate	41.08
re-housed in social - LA	0

	
re-housed in social - RSL	56
re-housed in PRS	20
Total number of negative discharged section 75 cases between April 2021 and end of March 2022.	81
Number of unique individuals placed in temporary accommodation between April 2021 and end of March 2022:	
Single people	410
Couples	15
Households with dependents	63
Total	488
Annual estimated demand (calculated from 3 randomly selected months during 2021/22)	388
Annual number of unique individuals who either left voluntarily or were evicted from temporary accommodation between April 2021 and end of March 2022	68
Total number of rough sleepers as at 1 April 2022	0
Total number of unique rough sleepers between April 2021 and end of March 2022.	3

Section 1c - Rehousing	Most recent financial year
Total number of lets to people receiving support under the Housing (Wales) Act 2014 (2021/22):	
Section 66 - social sector - LA	0
Section 66 - social sector - RSL	130
Section 66 - PRS	58
Section 73 - social sector - LA	0
Section 73 - social sector - RSL	102
Section 73 - PRS	37
Section 75 - social sector - LA	0
Section 75 - social sector - RSL	56

Section 75 - PRS	20
Other lets - social sector - LA	0
Other lets - social sector - RSL	20
Other lets - PRS	0
Total	423
Total of all lets from social sector - LA (21/22)	0
Proportion of all social lets that are let people receiving support under the Housing (Wales) Act 2014 - LA	#DIV/0!
Total of all lets from social sector - RSL (21/22)	833
Proportion of all social lets that are let people receiving support under the Housing (Wales) Act 2014 - RSL	37%
Supply (all current lets to people being supported under the Housing (Wales) Act 2014)	423
Average length of stay in Temporary Accommodation (weeks)	Most recent financial year
Social - LA	0
Social - RSL	0
Temporary - direct access/triage centre - LA managed	0
Temporary - direct access/triage centre - RSL/third sector managed	0
Temporary - direct access/triage centre - other	0
Temporary - Housing Support Grant - LA managed	42
Temporary - Housing Support Grant - RSL/third sector managed	200
Temporary - Housing Support Grant - other	0
Bed and breakfast/hotel	42
Domestic abuse refuge	43
Private sector lease (on short-term contract)	0
Other	1

Section 3 - Estimated current and future support needs	% of current homeless cases (within temporary accommodation as at 1 April 2022) following needs assessment exercise	Number of current homeless cases (in temporary accommodation as at 1st April 2022) following needs assessment exercise
Low needs - proportion of current homeless cases with no/low support requirements who will easily move into mainstream, settled housing with little to no need for specific support other than sign-posting and low level support.	40%	64
Medium needs - proportion of current homeless cases with medium support needs, who can be supported into settled accommodation, but may include professional services where appropriate.	34%	53
High needs - proportion of current homeless cases with persistent complex needs and/or a history of repeat rough sleeping and who would should be offered, by default, a form of intensive housing-led support such as Housing First.	20%	31
Intensive Needs - proportion of current homeless cases who are unable to live independently, perhaps due to concerns around risk to self or other or even choice. Total %	6% 1 00%	10 158

	Female applicant				Male applic	Male applicant			
	Age 17	16-	Age 18-24	Age 25+	Age 16-17	Age 18-24	Age 25+	Total	Of which single persons
Total applications for assistance which resulted in a s62 assessment	4		108	367	7	81	370	937	586

Length of ti	me in TA x	household t	ype 2021-2	22				
	Couple with dependent	Single parent h		Single perso	n household	All other household	Total	Of which are: Families with
	child(ren)	Male applicant			Female applicant	groups		children
Under 6								
months	2	2 0	6	66	30	6	110	8
6 to 12								
months		0	0	21	5	0	28	2
Over 1 year		1	0	15	5	0	21	1
Total	1	1	6	102	40	6	159	11

Ethnicity data:

4	3.1% 0.2% 2.0% 4.4%
4	0.2%
74	3.1%
2	0.1%
8	0.3%
	•

Physical and Mental health as priority need reason (out of 2406):
Physical 70
Mental Health and Learning Disabilities 141

2011 Census information (2021 information not yet published in full) https://www.nomisweb.co.uk/

National Social Care Data for Wales https://www.socialcaredata.wales/

Welsh Government Statistics https://gov.wales/sexual-orientation-2019

Neath Port Talbot County Borough Councils Homelessness Strategy 2018-2022 http://moderngov.neath-porttalbot.gov.uk/documents/s42835/Appendix%201%20-%20NPT%20Homelessness%20Strategy%202018-22%20-%2016.11.18.pdf

Neath Port Talbot County Borough Councils Homelessness Review http://moderngov.neath-porttalbot.gov.uk/documents/s42838/Appendix%202%20-%20NPT%20Homelessness%20Review%202018%20-%2016.11.18.pdf

Neath Port Talbot County Borough Council Homeless Strategy 2018-2022 Consultation Report http://moderngov.neath-porttalbot.gov.uk/documents/s42840/Appendix%204%20-
%20NPT%20Homelessness%20Strategy%20Consultation%20Report%20-%2016.11.18.pdf

Western Bay Area Planning Board Commissioning Plan 2014-2019

https://democracy.swansea.gov.uk/documents/s17766/12%20b%203%20of%205%20-%20Appendix%202%20-%20Development%20of%20the%20Regional%20Western%20Bay%20Arrangements%20for%20the%20Substance%20.pd f

Western Bay Population Needs Assessment http://www.westernbaypopulationassessment.org/en/home/

Neath Port Talbot Housing Support Programme Strategy April 2022 – March 2026 http://modgov.npt.gov.uk/documents/s77433/App%201%20- %20Neath%20Port%20Talbot%20Housing%20Support%20Programme%20Strategy.pdf

Neath Port Talbot Supporting People Local Commissioning Plan Annual Update 2021 http://modgov.npt.gov.uk/documents/s68688/App%201%20- %20Annual%20Update%20on%20the%20Supporting%20People%20Local%20Commissioning%20Plan.pdf">%20Annual%20Update%20on%20the%20Supporting%20People%20Local%20Commissioning%20Plan.pdf

Neath Port Talbot Social Housing Grant Prospectus 2021 App 1 - Social Housing Grant Prospectus 2021.pdf (npt.gov.uk)

Summary of Local Housing Market for Neath Port Talbot 2019 <u>Summary of Local Housing Market for Neath Port Talbot</u> 2019 (npt.gov.uk)

Stats Wales Homelessness and lettings data https://statswales.gov.wales/Catalogue/Housing/Homelessness

3. Equalities

a) How does the initiative impact on people who share a **protected characteristic**?

Protected Characteristic	+	-	+/-	Why will it have this impact?
Age	x		+/-	Data shows that people over the age of 25 are more likely to present as homeless, although current trends post Covid are indicating that a greater number of younger people are presenting as homeless. There is a well developed early intervention and prevention pathway service funded by WG. A Youth Homelessness coordinator is aimed at ensuring young people at risk of becoming homeless are identified and preventive action is put in place for people aged 11-18yrs, focusing on under 16s. There is also a Youth Homelessness Group led by NPT teams. Both the prevention service and the accommodation service are delivered to adults from a wide range of age groups. Some services are age specific groups, such as young people supported accommodation and extra care for people aged over 55, and others are universal, such as the Prevention and Wellbeing Service. The Plan is designed to ensure that the Council and its strategic partners are best placed to support individuals with housing related support needs and provides high level priorities in order to further strengthen the Council's approaches to homelessness and homelessness prevention. As actions to take forward the priorities within the Plan are progressed, individual impact assessments will be undertaken.

Disability	x		Data shows that of the 2,406 people accessing the service, 9% reported that they had some form of disability. This is a comparatively low number, as the 2011 Census indicated that 28% of the population reported as having a long term limiting illness. In addition to specific Housing Support Grant funded support services, people with a disability will have equal access to universal services such as the Prevention and Wellbeing Service. The Plan is designed to ensure that the Council and its strategic partners are best placed to support individuals with housing related support needs and provides high level priorities in order to further strengthen the Council's approaches to homelessness and homelessness prevention. As actions to take forward the priorities within the Plan are progressed, individual impact assessments will be undertaken
Gender reassignment		х	The Council has no data detailing how many people accessing homelessness services may have a gender that is different to that ascribed at birth. There are no services specifically for people that have gender reassignment. However, having this protected characteristic does not prevent a person from having equal access to the services they are assessed as requiring.
Marriage & civil partnership		x	The Council has no data detailing how many people accessing the Housing Options Team are married or in a civil partnership. There are no services specifically for people that are married or in a civil partnership. However, having this protected characteristic does not prevent a person from having equal access to the services they are assessed as requiring.
Pregnancy and maternity		x	The Council has no data detailing how many people accessing Housing Options Team have a protected characteristic due to their pregnancy/maternity status.

			There are no services specifically for people that have a protected characteristic due to their pregnancy/maternity status. However having this protected characteristic does not prevent a person from having equal access to the services they are assessed as requiring.
Race	x		94% of people that accessed homelessness services whose race is known described themselves as White British. This is lower than the 2011 census, where it was reported the population in Neath Port Talbot is predominantly white (98.0%), with non-white minorities representing the remaining 2.0% of the population. Asian people were the largest minority group in Neath Port Talbot accounting for 1.0% of the population. We do not fund services specifically for other groups of people that have a protected characteristic due to their race. However, having this protected characteristic does not prevent a person from having equal access to the services they are assessed as requiring.
Religion or belief		x	The Council has no data detailing the religion and beliefs of people accessing homelessness services. There are no services specifically for people that have a protected characteristic due to their religion/belief. However, having this protected characteristic does not prevent a person from having equal access to the services they are assessed as requiring.
Sex	x		According to mid-year population estimates published by the ONS in 2019, males account for 49.3% of Neath Port Talbot's 144,386 population, while females made up 50.7% of the total. The gender split of people presenting as homeless is consistent with this, with 49% being male, and 51% being female. Some services funded by the Housing Support Grant are delivered to specific genders such as our male domestic abuse outreach worker and the work Thrive undertake to support women who are sex working. Other services are accessible to all genders, such as the Community Independence Service.

Sexual orientation		x	The Council has no data detailing the sexual orientation of people accessing homelessness services. There are no services specifically for people that have a protected characteristic due to their sexuality. However having this protected characteristic does not prevent a person from having equal access to the services they are assessed as requiring.

The Corporate Directors Group will monitor the implementation of this plan, and this should help to identify if the implementation is having a negative impact on people due to their protected characteristics. Furthermore, the Rapid Rehousing Group are required to implement monitoring systems, which should also help to identify if the implementation of this Plan is having a negative impact on people due to their protected characteristics.

The Plan will be reviewed every year, which will involve feedback and consultation with stakeholders, and this should help to identify if the implementation of this Plan is having a negative impact on people due to their protected characteristics.

b) How will the initiative assist or inhibit the ability to meet the Public Sector Equality Duty?

Public Sector Equality Duty (PSED)	+	-	+/-	Why will it have this impact?
To eliminate discrimination, harassment and victimisation	x			The Plan is aimed at ensuring that everyone has safe and secure accommodation, and that the stigma of being homeless is avoided. The Plan aims to ensure that everyone who is homeless has a package of support to prevent homelessness from reoccurring, with specialist agencies working in partnership with the Council to develop and offer "robust responses for those threatened with, or experiencing

		homelessness, including high risk clients, such as young people, ex-offenders, those with mental health issues and other complex needs" (Housing Support Grant) and the Priority Action to "Increase the number of lettings to homeless people" supports this.
To advance equality of opportunity between different groups	x	Supporting people to overcome challenges in keeping their tenancies and help prevent homelessness, one of the key outcome areas for the Housing Options Service and Housing Support Grant. This ensures that there is equality of opportunity for people to have their own home. The Housing Support Grant is also used to provide specific support to groups of people that can be marginalised such as women who undertake sex work and members of the Gypsy & Traveller communities. The priorities within the plan such as 'We will ensure all staff are appropriately trained to deliver a high quality trauma informed service that that is person centred and takes into account the specific needs and strengths of the clients' supports this objective.
To foster good relations between different groups	x	Services funded through the Housing Support Grant will be used to support homeless people to overcome challenges in keeping their tenancies (for example help reduce a person's ASB) and help prevent homelessness. One of the key outcome areas for HSG funded services is reducing social exclusion and reducing isolation. The Priority Action "Review of support commissioned for homeless services" supports this objective.

The Corporate Directors Group will monitor the implementation of this plan on PSED, and this should help to identify if the implementation is having a negative impact on people due to their protected characteristics. Furthermore, the Rapid Rehousing Group are required to implement monitoring systems, which should also help to identify if the implementation of this Plan is having a negative impact on PSED.

The Plan will be reviewed every year, which will involve feedback and consultation with stakeholders, and this should help to identify if the implementation of this Plan is having a negative impact on PSED.

4. Community Cohesion/Social Exclusion/Poverty

	+	-	+/-	Why will it have this impact?
Community Cohesion	X			Priorities within the plan such as "We will continue to improve the quality and integration of our homelessness, social care, health and other support services to maximise tenancy sustainment, optimise housing options, and prevent homelessness occurring wherever possible" will support this objective.
Social Exclusion	X			A key element of the plan will be to develop a service which by housing vulnerable people, we will reduce social exclusion and isolation. "We will develop a pathway of accommodation options for homeless households to reflect their support needs, the opportunity to move on from temporary housing or supported housing, their choice of where they want to live, and to offer settled accommodation as soon as possible" supports this objective.

Poverty	x		A key related outcome of the plan will help tackle poverty and deprivation that is associated with poor housing. "We will work with housing association partners to increase the supply of housing, keeping the needs of homeless people at the heart of our strategic housing planning" will support this objective.

The Corporate Directors Group will monitor the implementation of this plan, and this should help to identify if the implementation is having a negative impact on people due to their protected characteristics. Furthermore, the Rapid Rehousing Group are required to implement monitoring systems, which should also help to identify if the implementation of this Plan is having a negative impact on people due to their protected characteristics.

The Plan will be reviewed every year, which will involve feedback and consultation with stakeholders, and this should help to identify if the implementation of this Plan is having a negative impact on people due to their protected characteristics

5. Welsh

	+	-	+/-	Why will it have this effect?
What effect does the initiative have on:				The Plan will be available in Welsh, and services will be delivered in both Welsh and English.
 people's opportunities to use the Welsh language 				

 treating the Welsh and English languages 		The Plan will be available in Welsh, and services will be delivered in both Welsh and English.	
equally			

The Corporate Directors Group will monitor the implementation of this plan, and this should help to identify if the implementation is having a negative impact on the Welsh Language. Furthermore, the Rapid Rehousing Group is required to implement monitoring systems, which should also help to identify if the implementation of this Plan is having a negative impact on the Welsh Language.

The Plan will be reviewed every year, which will involve feedback and consultation with stakeholders, and this should help to identify if the implementation of this Plan is having a negative impact on the Welsh Language.

6. Biodiversity

How will the initiative assist or inhibit the ability to meet the **Biodiversity Duty**?

Biodiversity Duty	+	-	+/-	Why will it have this impact?
To maintain and enhance biodiversity			x	NA - It is not expected that the strategy will have any adverse effect on biodiversity or ecosystem resilience

To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.		х	NA - It is not expected that the strategy will have any adverse effect on biodiversity or ecosystem resilience	
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What action will be taken to improve positive or mitigate negative impacts?								
N/A								

7. Well-being of Future Generations

How have the five ways of working been applied in the development of the initiative?

W	ays of Working	Details
i.	Long term – looking at least 10 years (and up to 25 years) ahead	A key aim of the Plan is to ensure that people to have long term sustainable housing and to reduce repeat episodes of homelessness. The Rapid Rehousing Plan will help this wellbeing objective as it intends to provide stable housing with multi-agency support to prevent repeat episodes of homelessness and reduce the need for temporary accommodation. The reduction of the use of temporary accommodation will have positive impacts on the individuals concerned.

problems occurring or getting worse iii. Collaboration – working with other services internal or external iv. Involvement – involving		The wellbeing objective of prevention underpins the Plan. The intention of the strategy is to prevent homelessness wherever possible. A key priority within the strategy is strengthening approaches to early intervention and prevention, which includes the targeting of preventative services to high risk groups and shifting resources from crisis interventions to prevention.
		Working in partnership is a key priority within the Plan, including building on the Council's strategic partnerships and developing new task groups to implement robust responses for those threatened with or experiencing homelessness.
		An action within the plan is for the Council to work with service users and stakeholders to implement mechanisms for co-production and engagement to inform the development of services.
v. Integration – making connections to maximise contribution to: Council's well-being objectives		These services are underpinned by the values and principles of the Housing Support Grant, strategic housing objectives, the Well-Being of Future Generations Act 2015 and the Council's wellbeing objectives.
		To improve the well-being of all adults who live in the county borough by delivering services that prevent homelessness, improve independence and help those experiencing homelessness.
Other public bodies objectives		Street Vulnerable Multi Agency Rick Assessment Committee, Area Planning Board, Community Safety Partnership, Homelessness review & strategy, VAWDASV strategy and leadership group.

8. Monitoring Arrangements

Provide information on the monitoring arrangements to:

Monitor the impact of the initiative on Equalities, Community Cohesion, the Welsh Measure, Biodiversity Duty and the Wellbeing Objectives.

The Corporate Directors Group will monitor the delivery of the services, with the NPT Rapid Rehousing Group (comprising NPT staff) reporting outcomes against agreed targets and deliverables. This should help to identify if the implementation of this Plan is having a negative impact on the five ways of working. There is an expectation that this Plan will be fully reviewed annually with a progress report and any recommendations for changes to objectives or targets highlighted for agreement.

9. Assessment Conclusions

Please provide details of the conclusions reached in relation to each element of the assessment:

	Conclusion		
Equalities	The indication is that the Plan will have a positive impact; however, processes are in place to review whether the Plan is delivering the intended outcomes and is not creating any unintended negative consequences for people with a protected characteristic.		
Community Cohesion/ Social Exclusion/Poverty	ty whether the Plan is delivering the intended outcomes and not creating any unintended negative consequences for people in regards to social economic disadvantages, community cohesion, so exclusion and/or poverty.		
Welsh	The indication is that the Plan will have a positive impact, however processes are in place to review whether the Plan is delivering the intended outcomes and not creating any unintended negative consequences for people in regards to their use of the Welsh Language.		
Biodiversity	N/A		

Well-being of Future Generations	The indication is that the Plan will have a positive impact, however processes are in place to review whether the Plan is delivering the intended outcomes and not creating any unintended negative consequences for people in regards to the five ways of working.
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Overall Conclusion

Please indicate the conclusion reached:	
Continue - as planned as no problems and all opportunities have been maximised	Х
 Make adjustments - as potential problems/missed opportunities/negative impacts have been identified along with mitigating actions 	
• Justification - for continuing with the initiative even though there is a potential for negative impacts or missed opportu	unities 🗌
STOP - redraft the initiative as actual or potential unlawful discrimination has been identified	
Please provide details of the overall conclusion reached in relation to the initiative	
No negative impacts identified at this stage and the indication is that the impact will be positive.	
Processes are in place to monitor the impact for any unintended negative consequences.	

10. Actions

What actions are required in relation to obtaining further data/information, to reduce or remove negative impacts or improve positive impacts?

Action	Who will be responsible for seeing it is done?	When will it be done by?	How will we know we have achieved our objective?
Increase the number of lettings to homeless people	Head of Housing; Housing Options Manager	June 2023	Monitoring Reports
Introduce a Housing First service	Head of Housing; Rapid Rehousing Project Officer; Principal Officer Commissioning.	Begin setting up project team December 2022	Project management timescales and budget; commissioning contract; monitoring reports
Housing Allocations – ensure policy reflects Rapid Rehousing principles	Head of Housing; Rapid Rehousing Project Officer.	Open discussions Q4 2022-23	Review of current policy completed
Review of support commissioned for homeless services	Principal Officer Commissioning; Rapid Rehousing Project Officer.	2022-23	Contracts in place
Review of service delivery and staff support and training	Head of Housing; Housing Options Manager; Head of HR	2022-23	Staff satisfaction monitoring; line management to assess effectiveness of training and support
Review Housing Prevention Services	Housing Options Manager; Rapid Rehousing Project Officer	2022-27	Monitoring and target setting
Review software platform for service users to improve access; Homelessness monitoring and reporting software package	Housing Options Manager; Rapid Rehousing Project Officer; IT project team	2022 onwards	Software in place with user satisfaction signed off
Housing development - Reviewing development plans with RSLs to ensure units are delivered of the type (one bedroom) and location required	Head of Housing; Housing Options Manager; Rapid Rehousing Project Officer; RSLs.	2022 onwards	PDP monitoring
Empty homes - Re-commence the work to bring empty homes back into use	Head of Housing; Head of Planning and Public Protection	2022 onwards	Monitoring reports

Private Sector Leasing scheme	Head of Housing;	2022 onwards	
- Mobilise the Private Sector	Housing Options Manager; Rapid		
Leasing Scheme	Rehousing Project Officer.		

11. Sign off

	Name	Position	Signature	Date
Completed by	Ann Cornelius	Strategic Housing Officer		
Signed off by	Angela Thomas	Head of Service/Director		