

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	Chelé Zandra Howard	Interim Head of Housing & Communities	26.06.23

1. Details of the initiative

	Title of the Initiative: Permission to Consult on the Daft Housing and Homelessness Strategic Plan 2023-26
1a	Service Area: Social Services, Health & Housing
1b	Directorate: Housing & Communities
1c	Summary of the initiative: This three year Plan sets out the actions required to help prevent people from becoming homeless, ensure that those that do become homeless are able to quickly access suitable permanent housing and to increase availability of affordable housing in the borough.
1d	Is this a 'strategic decision'? Yes
1e	Who will be directly affected by this initiative? The intended outcome is that the Plan will improve homelessness services and produce more strategic planning in relation to housing, which will have an impact on people that require affordable housing, have a social care need or are facing or experiencing homelessness.

1f	<p>When and how were people consulted?</p> <p>The draft Plan is informed by consultation exercises such as the consultation in 2022 as part of the development of the Housing Support Grant Strategy.</p> <p>It is requested that a 90 day public consultation takes place in relation to the draft Plan</p>
1g	<p>What were the outcomes of the consultation?</p> <p>The outcome of the consultation undertaken in 2022 can be found at https://democracy.npt.gov.uk/documents/s81641/Appendix%204%20-%20HSG%20Strategy%20Consultation%20Report.pdf</p>

2. Evidence

What evidence was used in assessing the initiative?									
<p>The below equalities information relates to those that were open to Housing Options as at 15/05/23. The provision of equalities information by those that require a service is not mandatory and so consideration in this impact assessment has taken this into account and looked at the potential impact on a person with a protected characteristic rather than whether we currently support people with a particular characteristic.</p>									
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ETHNICITY									
White	517								
Mixed/Multiple Ethnic Group	2								
Asian/Asian British	1								

Other Ethnic Group	11
Ethnic Origin Not Known	18

AGE	
16-17	2
18-25	76
26-35	155
36-45	146
46-55	100
56-65	42
65+	33

HOUSEHOLD MAKEUP	
Single, No Children	316
Single, Baby Due/Pregnant	8
Single, One Child	75
Single, Two Children	44
Single, Three Children	25
Single, Four Children	3
Single, Five Children	5
Single with 1 Elderly Parent	1
Cohabitants No Children	9
Cohabitants, Baby Due/Pregnant	2
Cohabitants One Children	9
Cohabitants Two Children	8
Cohabitants Three Children	2
Cohabitants Four Children	2
Cohabitants Five Children	9
Married, No Children	5
Married, One Child	8
Married, Two Children	10
Married, Three Children	4

Married, Four Children	2
Married, Five Children	1
Elderly Single	4
Elderly Couple	2
Tenant and One Lodger	1

2021 Census information <https://www.ons.gov.uk/releases/initialfindingsfromthe2021censusinenglandandwales>

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

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

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

Neath Port Talbot Housing Support Programme Strategy April 2022 – March 2026
<https://democracy.npt.gov.uk/documents/s81638/Appendix%201%20-%20HSG%20Strategy.pdf>

Neath Port Talbot Housing Support Grant Annual Update 2022
<https://democracy.npt.gov.uk/documents/s87160/HSG%20Annual%20Update%202023.pdf>

Rapid Rehousing Plan <https://democracy.npt.gov.uk/documents/s81738/RRH%20PLAN%20Sept%202022.pdf>

Local Market Needs Assessment [Appendix 1 NPT MSR.pdf](#)

3. Equalities

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

Protected Characteristic	+	-	+/-	Why will it have this impact?
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Age	x		<p>Housing Options provide services to adults across all age groups, the age range most represented according to our data was 26-35. Local housing allowance for most people aged under 35 is set at the shared accommodation rate, which can make it more challenging for single people in this age category to obtain affordable housing and may be a factor in the higher than average presentation by this age group.</p> <p>Although Housing Options supports adults, we are seeing increasing numbers of people with children become homeless and so the Plan will also support children by ensuring that children benefit from secure housing.</p> <p>The Plan will look to encourage development of affordable and specialist housing in line with population needs and trends, for example specialist accommodation for care leavers and older persons accommodation such as bungalows. In addition, having a range of affordable housing will help to prevent population migration of working age people.</p> <p>Public consultation will help to identify any unintended consequences of implementing the draft Plan.</p>
Disability	x		<p>Although there is no reliable information regarding the disability status of people presenting to Housing Options, data in relation to people receiving a Housing Support Grant funded service suggests that a notable proportion of people at risk or experiencing homelessness in NPT also have a disability.</p> <p>Data from our annual Housing Support Grant review highlights that a significant number of people facing or experiencing homelessness have mental ill health.</p> <p>Homeless Link report that research undertaken by UCL and Kensington and Chelsea Learning Disability Service in 2018 suggested that “adults with autism are overrepresented among those experiencing homelessness and that autism is a likely</p>

			<p>risk factor for becoming homeless.” https://homeless.org.uk/news/neurodiversity-and-homelessness/</p> <p>By increasing the range of affordable housing and models to rapidly elevate homelessness, there will be a benefit to people with this protected characteristic as evidence suggests that a significant proportion of people experiencing or at risk of homelessness have a disability.</p> <p>The Plan will look to encourage development of specialist housing for those with a disability or social care need, such as specialist Extracare and supported living.</p> <p>Public consultation will help to identify any unintended consequences of implementing the draft Plan.</p>
Gender reassignment	x		<p>We do not have any data in relation to people with this protected characteristic in relation to the homelessness services we provide. According to the 2021 Census 93.37% of residents stated that the gender they identify with is the same as their sex registered at birth.</p> <p>Crisis reports that 25% of transgender people experience homelessness as some point https://www.crisis.org.uk/ending-homelessness/about-lgbtqplus-homelessness/</p> <p>By increasing the range of affordable housing and models to rapidly elevate homelessness, there will be a benefit to people with this protected characteristic as evidence suggests that transgender people are at higher risk of becoming homeless.</p> <p>Public consultation will help to identify any unintended consequences of implementing the draft Plan.</p>

Marriage & civil partnership	x		<p>The data we have indicates that around 30 households presenting to Housing Options were married.</p> <p>By increasing the range of affordable housing and models to rapidly elevate homelessness, there will be a benefit to all people that may face or experience homelessness, including people with this particular characteristic.</p> <p>Public consultation will help to identify any unintended consequences of implementing the draft Plan.</p>
Pregnancy and maternity	x		<p>The data we have indicates that around 10 households presenting to Housing Options were pregnant at time of presentation.</p> <p>By increasing the range of affordable housing and models to rapidly elevate homelessness, there will be a benefit to all people that may face or experience homelessness, including people with this particular characteristic.</p> <p>Public consultation will help to identify any unintended consequences of implementing the draft Plan.</p>
Race	x		<p>Data in relation to those that Housing Options have worked with, indicate that the percentage of BAME people that face or become homeless in NPT is in line with NPT's BAME population percentage in the 2021 census. This may indicate that the BAME community are not at higher risk of becoming or experiencing homelessness in NPT. However there is a need to be mindful that national reviews indicate that across the UK:</p> <ul style="list-style-type: none"> • “Black and minoritised ethnic communities in the UK do experience homelessness to a disproportionate degree • There are significant geographical variations in the extent and nature of homelessness risk for different racial and ethnic groups across the UK. • There are evidenced links between experiences of racial or ethnic discrimination and exposure to homelessness • Race, ethnicity and discrimination-related factors affect homelessness risks both directly and indirectly”

			<p>https://homeless.org.uk/news/new-research-homelessness-and-black-minoritised-ethnic-communities-in-the-uk/</p> <p>By increasing the range of affordable housing and models to rapidly elevate homelessness, there will be a benefit to all people that may face or experience homelessness, including people with this particular characteristic.</p> <p>Public consultation will help to identify any unintended consequences of implementing the draft Plan.</p>
Religion or belief		x	<p>We do not have any data in relation to this protected characteristic.</p> <p>By increasing the range of affordable housing and models to rapidly elevate homelessness, there will be a benefit to all people that may face or experience homelessness, including people with this particular characteristic.</p> <p>Public consultation will help to identify any unintended consequences of implementing the draft Plan.</p>
Sex	x		<p>The percentage of women and men presenting to Housing Options is roughly in line with the population split in NPT according to the 2021 Census. This indicates that there is not one sex that is at higher risk of becoming homeless in NPT.</p> <p>Females that present to Housing Options are more likely than males to have dependent children and so the work of the strategic housing and homelessness team in relation to preventing families from becoming homeless and being placed in B&Bs will have a positive impact on females. Conversely, a higher number of single households are male and work to increase access to one bed properties will support this group.</p>

			<p>By increasing the range of affordable housing and models to rapidly elevate homelessness, there will be a benefit to all people that may face or experience homelessness, including people with this particular characteristic.</p> <p>Public consultation will help to identify any unintended consequences of implementing the draft Plan.</p>
Sexual orientation	x		<p>We do not have any data in relation to people with this protected characteristic in relation to the homelessness services we provide.</p> <p>Stonewall reports that almost 1 in 5 LGBT people have experienced homelessness. https://www.stonewall.org.uk/system/files/lgbt_in_britain_-_trans_report_final.pdf</p> <p>By increasing the range of affordable housing and models to rapidly elevate homelessness, there will be a benefit to people with this protected characteristic as evidence suggests that LGBT people are at higher risk of becoming homeless.</p> <p>Public consultation will help to identify any unintended consequences of implementing the draft Plan.</p>

What action will be taken to improve positive or mitigate negative impacts?

- Undertake individual impact assessments and consultation for specific programmes of work
- Monitor complaints
- Monitor externally commissioned services
- Public consultation on the draft Plan

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			<p>This Plan will build on and further develop strategic partnerships with agencies to help develop and implement 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. Examples include our action to <i>'Close the Gaps - We recognise the link between unstable housing, including cycles of homelessness, and a person's wider vulnerabilities, such as mental health, neurodiversity and learning difficulties. There are a number of people that would not fit the usual eligibility criteria for statutory social care services but still require additional support in order to enable them to gain and maintain the skills required to live safely and prevent an escalation of their vulnerabilities. By working in partnership with Social Services, we will develop a range of supported specialist accommodation for people that need additional support to live independently. This will include Move On accommodation, in which people will be supported to develop their daily living skills in order for them to progress into general needs housing and Step Up/Step Down accommodation where people will receive targeted levels of support in line with their fluctuating needs.'</i></p>
To advance equality of opportunity between different groups	x			<p>The Plan supports this duty as one of its key outcomes is to support people to overcome challenges in keeping their tenancies and help prevent homelessness. This ensures that there is equality of opportunity for people to have secure and safe accommodation. Examples include our action to <i>'continue to progress our development programme to provide suitable housing that allows people with complex social care needs to live as independently as possible and supports them to achieve the personal outcomes that matter to them. These models will include specialist Extracare, Core and Cluster, Supported Living and independent living flats that incorporate assistive technology and smart solutions. To achieve our aims, we will work with the West Glamorgan Partnership to maximise our allocation of the Housing with Care Fund.'</i></p>

To foster good relations between different groups	x		<p>The Plan supports this duty as it will help support those that have found it difficult to retain a tenancy (for example by helping to reduce a person’s ASB) and helps to prevent homelessness. Actions to increase the range and type of accommodation for people with social care needs will help to reduce social exclusion and isolation. It will also help to support cohesive communities and support implementation of the place making charter commitments. Examples of this include our action ‘<i>Housing First Service - We will develop and implement a Housing First model for homeless people who have multiple and complex needs. Those that are referred into the service will be provided with intensive person-centred support to ensure that they are able to maintain a long term tenancy and prevent them from being caught up in cycles of homelessness. The move towards Housing First can only be achieved through strong partnership working between the Housing Options, RSLs, specialist providers of housing support services and other statutory organisations such as the NHS and Social Services. By building on our strong partnerships and commissioning the right models of support, we will establish a number of Housing First units and reduce episodes of repeat homelessness for our most vulnerable and complex residents.</i></p>
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<p>What action will be taken to improve positive or mitigate negative impacts?</p>
<ul style="list-style-type: none"> • Undertake individual impact assessments and consultation for specific programmes of work • Monitor complaints • Monitor externally commissioned services • Public consultation on the draft Plan

4. Socio Economic Duty

Impact	Details of the impact/advantage/disadvantage
Positive/Advantage	This Plan aims to support people and communities that are classed as experiencing some of the highest levels of socio-economic disadvantage. This includes giving people the tools and

	support to break cycles of homelessness, reduce Adverse Childhood Experiences and increase access to sustainable affordable housing. A high number of the actions within the Plan support this objective, including <i>'Specialist Complex Needs Services – We will implement a more person centred approach to ensure that those with complex and multiple needs are given the right types of interventions to enable them to break cycles of homelessness and achieve secure long term housing. This will be achieved through measures such as the strengthening of the Housing Options Team and the establishment of triage centres. People with more complex needs will also be supported through the establishment of more targeted housing support services that are person-centred and focused on helping them to maintain their tenancies.'</i>
Negative/Disadvantage	
Neutral	

What action will be taken to reduce inequality of outcome

- Undertake individual impact assessments and consultation for specific programmes of work
- Monitor complaints
- Monitor externally commissioned services
- Public consultation on the draft Plan

5. Community Cohesion/Social Exclusion/Poverty

	+	-	+/-	Why will it have this impact?
Community Cohesion	x			By supporting the implementation of the place making charter commitments. There is a specific community cohesion action within the Plan – <i>'We will work to involve local communities and Elected Members in the delivery of our plans and to ensure that we carefully consider and balance local needs when taking forward our</i>

			<i>priorities. This will include appropriate and timely communication, so that local intelligence informs our strategic planning and that there is a unified NPT approach to housing and homelessness. It will also include improved consideration of how new proposals interact with existing communities.'</i>
Social Exclusion	x		<i>By helping people to either retain their tenancies or continue living within their local community by providing affordable housing. An example is the action 'Tenancy Sustainment – We will establish a tenancy sustainment panel with RSLs in order to ensure that residents who might be struggling with their tenancy receive early interventions. By working in partnership across organisations to identify at risk households, this multi-agency approach will ensure that focused work takes place with a household before issues escalate and their tenancy is placed at risk, thereby reducing the number of households that become homeless due to tenancy failure.'</i>
Poverty	x		<i>By encouraging the development of affordable housing and delivering more energy efficient homes. One example is our action 'Nominations for New Builds – We will work with RSLs to increase the number of accommodation units to be allocated to support those that are homeless into permanent housing, whilst ensuring that we achieve balanced communities. Through the development of local letting agreements for new developments and ensuring that new housing is aligned to demand in terms of type, location and bedroom size, we will work collaboratively with RSLs to ensure that available housing is prioritised to those that are most in need of affordable housing. This will be done whilst maintaining community cohesion through a more person centred approach to the allocation of housing and offering more tailored services for those with ongoing housing support needs. Community cohesion will also be strengthened through closer partnership working with RSLs through the design and development process.'</i>

What action will be taken to improve positive or mitigate negative impacts?

- Undertake individual impact assessments and consultation for specific programmes of work
- Monitor complaints
- Monitor externally commissioned services
- Public consultation on the draft plan

6. Welsh

	+	-	+/-	Why will it have this effect?
What effect does the initiative have on: – people’s opportunities to use the Welsh language			x	A Welsh Translation of the Plan will be developed. Services will be delivered in line with the Councils Welsh Language Policy.
– treating the Welsh and English languages equally			x	A Welsh Translation of the Plan will be developed. Services will be delivered in line with the Councils Welsh Language Policy.

What action will be taken to improve positive or mitigate negative impacts?

- Undertake individual impact assessments and consultation for specific programmes of work
- Monitor complaints
- Monitor externally commissioned services
- Public consultation on the draft Plan

7. 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			The plan will support implementation of the Councils place making principles and will encourage the delivery of decarbonisation objectives. There is a specific action within the Plan to support the environment – <i>'We will ensure that the Councils wider environmental objectives are supported through our work plan, both in terms of ensuring environmental considerations are embedded within our planning and by putting in place measures to encourage more energy efficient and environmentally friendly housing. These measures will include requesting evidence of how developments support the lowering of carbon emissions and reduction of energy consumption as part of the SHG application process and promoting specific decarbonisation programmes, such as the ECO4 Flex Scheme.'</i>
To promote the resilience of ecosystems, i.e. supporting protection of the wider environment, such as air quality, flood alleviation, etc.	x			

What action will be taken to improve positive or mitigate negative impacts?

- Undertake individual impact assessments and consultation for specific programmes of work
- Monitor complaints
- Monitor externally commissioned services
- Public consultation on the draft Plan

8. Well-being of Future Generations

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

Ways of Working	Details
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<p>i. Long term – looking at least 10 years (and up to 25 years) ahead</p>	<p>A key aim of the Plan is to ensure that people have access to long term sustainable housing and to reduce repeat episodes of homelessness. Priorities within the Plan, such as taking forward Rapid Rehousing 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, which will have a long term positive impact.</p>
<p>ii. Prevention – preventing problems occurring or getting worse</p>	<p>A significant focus of the Plan is the prevention of people from becoming homeless and preventing cycles of homelessness. Actions to prevent homelessness from occurring include establishing a tenancy sustainment panel with RSLs in order to ensure that residents who might be struggling with their tenancy receive early interventions.</p>
<p>iii. Collaboration – working with other services internal or external</p>	<p>Working collaboratively is a key priority within the Plan, including building on the Council’s strategic partnerships to implement robust responses for those threatened with or experiencing homelessness. A key action in the Plan is <i>‘Enhanced Partnership Working and Multi-Agency Approaches – We will strengthen our partnership working with key stakeholders including RSLs, private developers and private landlords, as well as ensuring more joined up working with other Council departments such as the Environment and Regeneration department and Social Services, so that there is a shared approach to meeting our housing needs. This will include operating the Strategic Housing Partnership Forum, market management events, RSL engagement and regular partnership meetings with the Council’s Planning, Environmental Health and Regeneration Teams. It will also involve working more closely with service providers and other partnership groups such as the Area Planning Board, VAWDASV Leadership Group and the Community Safety Partnership, to ensure the establishment of holistic interventions for those we support.’</i></p>
<p>iv. Involvement – involving people, ensuring they reflect the diversity of the population</p>	<p>The Plan aims to fill known gaps in provision that has been identified through engagement with key partners, such as Registered Social Landlords and support providers. One action in the plan that supports this objective is <i>‘Strategic Approach to Development - We will provide a more joined up strategic approach to working with our partners to facilitate the development of the right interventions, weather that be more specialised accommodation or the commissioning of targeted homeless prevention services. This will include the development and strategic implementation of specific strategies and plans, such as young care leavers, older people and homeless families. It will also include better strategic planning of our available resources such as the establishment of a SHG panel to assess applications for grant funding to ensure that the proposals are viable and in line with Neath Port Talbots requirements.’</i></p>

<p>v. Integration – making connections to maximise contribution to:</p>	<p>As noted in the collaboration and involvement sections this is a key aspect of the Plan.</p>
<p>Council’s well-being objectives</p>	<p>Well-being Objective 1: All children have the best start in life – by preventing families that become homeless from being placed in B&Bs and delivering affordable housing for families. In addition, by developing more supported accommodation options for young care leavers and reducing youth homelessness.</p> <p>Well-being Objective 2: All our communities will be thriving and sustainable – by preventing homelessness, supporting vulnerable people that are most at risk of homelessness, developing specialist accommodation for those with care and support needs and by increasing the availability of affordable housing.</p> <p>Well-being Objective 3: Our local environment, culture and heritage can be enjoyed by future generations – by implementing place making principles in our strategic planning and by supporting decarbonisation.</p> <p>Well-being Objective 4: There are more green, secure and well-paid jobs and skills across the area are improved –by stimulating housing development, encouraging environmentally friendly developments and by helping to support the development of housing that enables those that work in NPT to also live in NPT.</p>
<p>Other public bodies objectives</p>	<p>Supports delivery of the Rapid Rehousing Plan.</p>

9. 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.

- Monitor complaints and safeguarding referrals
- Monitor externally commissioned services
- Department KPIs
- Consultation on the draft Plan

10. Assessment Conclusions

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

	Conclusion
Equalities	It is intended that the Plan will have a positive impact on people that have a protected characteristic.
Socio Economic Disadvantage	It is intended that the Plan will have a positive socio-economic impact on people and communities.
Community Cohesion/ Social Exclusion/Poverty	It is intended that the Plan will have a positive PSED impact on people and communities.
Welsh	It is intended that the Plan will have a neutral impact on Welsh Language.
Biodiversity	It is intended that the Plan will have a positive impact on biodiversity.
Well-being of Future Generations	It is intended that the Plan will support the Council in achieving the five ways of working.

Overall Conclusion

Please indicate the conclusion reached:

- **Continue** - as planned as no problems and all opportunities have been maximised

Please provide details of the overall conclusion reached in relation to the initiative

The Plan will have a positive impact on people that are experiencing or at risk of homelessness as well as those that require affordable housing or social care services, as it aims to proactively address the housing challenges impacting our communities.

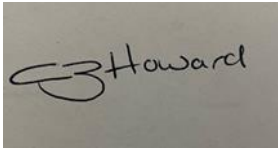
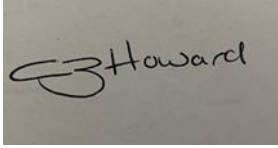
11. Actions

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?
Undertake individual impact assessments and consultation for specific programmes of work	Interim Head of Housing & Communities	Before any decision is made	Impact assessments and consultation documents completed.
Monitor complaints and safeguarding referrals	Interim Head of Housing & Communities	As needed	Monitoring and outcome reports
Monitor externally commissioned services	Interim Head of Housing & Communities	Annually	Monitoring reports
Monitor Directorate KPIs	Interim Head of Housing & Communities	Quarterly	KPI Reports
Undertake 90 day consultation on the draft Plan	Interim Head of Housing & Communities	Autumn 2023	Consultation response document

12. Sign off

	Name	Position	Signature	Date

Completed by	Chelé Zandra Howard	Interim Head of Housing & Communities		26/06/23
Signed off by	Chelé Zandra Howard	Interim Head of Housing & Communities		26/06/23