Appendix 4



HILLINGDON
LONDON

# Equality and Human Rights Impact Assessment

# Homelessness and Rough Sleeping Strategy

**STEP A) Description of what is to be assessed and its relevance to equality**

**What is being assessed?**

Review of a service ☐     Staff restructure ☐     Decommissioning a service ☐

Changing a policy  Tendering for a new service ☐   A strategy or plan ✓

Under the Homelessness Act 2002, it is a legal requirement for Hillingdon Council to publish a new homelessness strategy every five years, after completing a review into homelessness and rough sleeping within the borough.

This assessment considers the proposed new Homelessness and Rough Sleeping Strategy 2026-2030 from an equality and human rights impact perspective. The draft Hillingdon Homelessness and Rough Sleeping Strategy 2026-2030 sets out the priorities for tackling homelessness and rough sleeping in the borough over the next five years. The findings of the homelessness and rough sleeping review have been used to shape the strategy, which outlines the main challenges and causes of homelessness and rough sleeping and provides a strategic plan to respond to these issues in Hillingdon.

Who is accountable? E.g. Head of Service or Corporate Director

Dan Kennedy, Corporate Director Residents Services

Date assessment completed and approved by accountable person

4 March 2026

Names and job titles of people carrying out the assessment

Debby Weller – Head of Housing Strategy and Policy
Sachin Patel – Housing Policy and Strategy Officer
Vicky Trott - Inclusion and Wellbeing Manager

A.1) What are the main aims and intended benefits of what you are assessing?

The strategy aims to intervene earlier, addressing the most common causes of homelessness such as private rented evictions, family/friend exclusions and loss of Home Office accommodation. This includes strengthening advice, targeted support for high-risk groups, enhancing joint working, and expanding upstream prevention tools.

Intended benefits:

- Reduced number of households becoming homeless.
- Faster and more sustainable resolutions at the prevention stage.
- Improved stability for vulnerable groups (care experienced, survivors of domestic abuse, people with complex needs).

The strategy seeks to significantly increase housing supply—both temporary and settled via property acquisitions, new council development, working with private landlords, and maximising existing stock. It also aims to reduce reliance on costly nightly-paid temporary accommodation and increase the availability of long-term, good-quality alternatives.

Intended benefits:

- More residents quickly placed into settled, good-quality homes.
- Reduced financial pressure on the council.
- Better health, educational and wellbeing outcomes for people in accommodation.

A core priority is ensuring residents are treated with dignity, empathy and respect, and can easily understand their rights and responsibilities.
The strategy commits to improving resident experience, communication, complaints handling, and service accessibility, while strengthening staff training and professional standards.

Intended benefits:

- More consistent, high-quality interactions with residents.
- Improved resident satisfaction and trust in services.
- Staff enabled to provide empathetic, effective support.

The strategy intends to ensure rough sleeping is rare, brief and non-recurring. It strengthens housing pathways, increases supported accommodation (e.g., Trinity Shared Housing, Olympic House, SHAP), improves partnerships with health, voluntary and community services, and expands support for people with complex needs.

Intended benefits:

- Rapid support off the streets into safe accommodation.
- Enhanced outcomes for people with mental health, substance misuse or multiple disadvantages.
- More sustainable move-on options, including shared housing and Housing First models.

The strategy embeds better use of data, predictive analytics and real-time performance monitoring to improve decision-making, target resources effectively, and enhance transparency.

Intended benefits:

- More efficient services that focus on prevention rather than crisis.
- Better forecasting of demand and improved planning.
- Increased value for money for residents and the council.

The overarching purpose of the strategy is to create a borough where homelessness is rare, brief and non-recurring, ensuring every resident receives compassionate, timely and effective support, and has access to suitable accommodation and opportunities to rebuild their lives.

A.2) Who are the service users or staff affected by what you are assessing? What is their equality profile?

Anyone in Hillingdon could become homeless so all residents are potentially directly affected by the strategy.

The Homelessness Review provides considerable analysis of households recently impacted by homelessness and provides a guide to understanding the types of households most likely to be affected in future. This Review is attached as Appendix 2 to the Cabinet Report.

The equality data for Hillingdon borough residents taken from the Census 2021 is presented below:

## Age

| | |
|---|---|
| Aged 14 years and under | 19.7% |
| Aged 15 to 24 years | 12.5% |
| Aged 25 to 34 years | 14.5% |
| Aged 35 to 44 years | 15.8% |
| Aged 45 to 54 years | 13.1% |
| Aged 55 to 64 years | 10.8% |
| Aged 65 to 74 years | 7.2% |
| Aged 75 years and over | 6.2% |

## Household Composition

| | |
|---|---|
| One-person household: Aged 66 years and over | 10.2% |
| One-person household: Other | 14.2% |
| Single family household: All aged 66 years and over | 6.0% |
| Single family household: Married or civil partnership couple: No children | 8.4% |
| Single family household: Married or civil partnership couple: Dependent children | 20.3% |
| Single family household: Married or civil partnership couple: all children non-dependent | 7.5% |
| Single family household: Cohabiting couple family: No children | 4.1% |
| Single family household: Cohabiting couple family: With dependent children | 3.1% |
| Single family household: Cohabiting couple family: All children non-dependent | 0.7% |
| Single family household: Lone parent family: With dependent children | 7.3% |
| Single family household: Lone parent family: All children non-dependent | 5.4% |
| Other household types: Other related household: Other family composition | 1.2% |
| Other household types: With dependent children | 6.1% |
| Other household types: Other, including all full-time students and all aged 66 years and over | 5.5% |

## Household size

| | |
|---|---|
| 1 person in household | 24.4% |
| 2 people in household | 27.1% |
| 3 people in household | 18.8% |
| 4 people in household | 17.3% |
| 5 people in household | 7.6% |
| 6 people in household | 3.0% |
| 7 people in household | 1.1% |
| 8 or more people in household | 0.9% |

## Sex

| | |
|---|---|
| Female | 50.6% |

| Male | 49.4% |
|---|---|

Ethnic Group

| Asian, Asian British or Asian Welsh | 33.3% |
|---|---|
| Black, Black British, Black Welsh, Caribbean or African | 7.8% |
| Mixed or Multiple ethnic groups | 4.4% |
| White | 48.2% |
| Other ethnic group | 6.3% |

Religion

| No religion | 19.4% |
|---|---|
| Christian | 39.0% |
| Buddhist | 0.9% |
| Hindu | 10.8% |
| Jewish | 0.5% |
| Muslim | 14.4% |
| Sikh | 8.6% |
| Other religion | 0.9% |
| Not answered | 5.6% |

Sexual orientation

| Straight or Heterosexual | 88.91% |
|---|---|
| Gay or Lesbian | 0.90% |
| Bisexual | 0.96% |
| All other sexual orientations | 0.36% |
| Not answered | 8.87% |

Disability

| Disabled under the Equality Act: Day-to-day activities limited a lot | 6.5% |
|---|---|
| Disabled under the Equality Act: Day-to-day activities limited a lot | 8.2% |
| Not disabled under the Equality Act | 85.3% |

The table below shows the ethnic background of **Homelessness Applicants** during the year 2024/25

| Ethnicity of homeless applicants | Q1 | | Q2 | | Q3 | | Q4 | | Total | |
|---|---|---|---|---|---|---|---|---|---|---|
| White | 105 | 28.2% | 113 | 27.6% | 169 | 25.1% | 122 | 19.6% | 509 | 25.1% |
| Black / African / Caribbean / Black British | 74 | 19.9% | 95 | 23.2% | 170 | 25.3% | 193 | 30.9% | 532 | 24.8% |
| Asian / Asian British | 83 | 22.3% | 91 | 22.2% | 174 | 25.9% | 144 | 23.1% | 492 | 23.4% |
| Mixed / Multiple ethnic groups | 25 | 6.7% | 15 | 3.7% | 28 | 4.2% | 23 | 3.7% | 91 | 4.6% |
| Other ethnic groups | 64 | 17.2% | 79 | 19.3% | 105 | 15.6% | 113 | 18.1% | 361 | 17.6% |

| Not known | 21 | 5.6% | 16 | 3.9% | 27 | 4.0% | 29 | 4.6% | 93 | 4.6% |
|---|---|---|---|---|---|---|---|---|---|---|

The table below shows the sex of Housing Register Applicants and those on the Housing Register who are homeless as at 31 March 2025

| Housing Register Applicants by sex | | |
|---|---|---|
|  | **Whole register** | **Homeless** |
| Male | 1016 (32%) | 328 (37%) |
| Female | 2173 (68%) | 564 (63%) |
| Unknown/other | 5 (less than 1%) | 3 (less than 1%) |
| Total | 3194 | 895 |

The table below shows the ethnic background of Housing Register Applicants and those on the Housing Register who are homeless as at 31 March 2025

| Ethnicity of Homeless Applicants | | |
|---|---|---|
|  | **Whole register** | **Homeless** |
| White | 1090 (34%) | 166 (19%) |
| Black/ African/ Caribbean/ Black British | 543 (17%) | 117 (13%) |
| Asian/ Asian British | 453 (14%) | 127 (14%) |
| Mixed/ Multiple Ethnic groups | 91 (3%) | 19 (2%) |
| Other Ethnic groups | 193 (6%) | 65 (7%) |
| Not Known | 824 (26%) | 401 (45%) |
| Total | 3194 (100%) | 895 (100%) |

The table below shows the sex, nationality and age of **Rough Sleepers** at the annual count in November 2025 compared to November 2024. The information of those rough sleeping at Heathrow airport is included in the total figures.

| Annual Hillingdon Rough Sleepers Count | | Nov-2024 Totals | Nov-2024 % | Nov-2025 Totals | Nov-2025 % |
|---|---|---|---|---|---|
| Total | | 37 | | 40 | |
| Sex | Female | 6 | 16.22% | 7 | 17.50% |
|  | Male | 31 | 83.78% | 33 | 82.50% |
| Nationality | UK | 15 | 40.54% | 9 | 22.50% |
|  | EU | 4 | 10.81% | 6 | 15.00% |
|  | Other non-UK | 13 | 35.14% | 24 | 60.00% |
|  | Not known | 5 | 13.51% | 1 | 2.50% |
| Age | Under 18 | 0 | 0.00% | 0 | 0.00% |
|  | 18 to 25 | 4 | 10.81% | 7 | 17.50% |
|  | Over 25 | 26 | 70.27% | 32 | 80.00% |
|  | Not known | 7 | 18.92% | 1 | 2.50% |

**Data on vulnerabilities and support needs**

Local data
During 2024/25 there were 187 rough sleepers seen bedded down in Hillingdon borough (excluding

Heathrow) with a mental health support need, 106 with a drugs related support need and 96 with alcohol related support need. There were 49 rough sleepers with more than one support need and 121 with no alcohol, drugs or mental health support needs. (CHAIN data)

The corresponding figures for Heathrow were: 128 rough sleepers at Heathrow with a mental health support need, 49 with an alcohol related support need and 49 drugs. There were 106 rough sleepers with more than one support need and 168 with no alcohol, drugs or mental health support needs.

The proportion of female rough sleepers is much higher at Heathrow accounting for between 23% and 29% each year since 2020/21.

Of the rough sleepers in Hillingdon borough in 2024/25 there were 9 people previously in the armed forces, 86 in prison and 21 care leavers. The corresponding numbers for Heathrow were 8 previously in the armed forces, 43 prison and 9 care leavers.

We have a growing cohort of people facing homelessness and rough sleeping after being moved on from Home Office accommodation. Hillingdon has the highest concentration of asylum seekers in contingency hotel accommodation in any London borough. A growing number are becoming street homeless.

Bailiff warrants for private sector evictions are by far the most prominent reason for bookings into nightly paid accommodation, accounting for 42% of all bookings in 2024/25. This rises to 58% of bookings for families requiring 3 bedrooms and 82% of bookings for those requiring 4 bedrooms or more.

Other prominent reasons for bookings are domestic abuse (13%), ending of Home Office accommodation (11%), and friends and family evictions (9%).

The most common booking reason for those needing a single bedroom was domestic abuse, accounting for 18% of bookings, followed by hospital discharge (14%) and bailiff warrant/PRS eviction, medical and, ending of Home Office accommodation (all 13%)

National data

According to the homeless charity Crisis, research from Stonewall shows that one in five LGBT people have experienced homelessness at some point in their lives. Rates are even higher amongst trans people, with 25% having experienced homelessness at some point. 77% of LGBTQ+ young people gave, 'family rejection, abuse or being asked to leave home' as a cause of their homelessness. LGBTQ+ and Homelessness - Statistics and Support | Crisis UK

According to the UK firm Cordis Bright, there is evidence to suggest that the prevalence of neurodivergence (in particular autism/autistic traits) is high among people experiencing homelessness. For example, two small-scale studies suggest that between 12% and 18% of people accessing homelessness services may be autistic, compared to about 1% of the general population in the UK. Post | Cordis Bright

A.3) Who are the stakeholders in this assessment and what is their interest in it?

| Stakeholders | Interest |
|---|---|
| Hillingdon residents, those who are homeless, or those at risk of homelessness | To ensure that they have access to affordable, secure, suitable and appropriate housing that meets their needs, in particular those households with vulnerable adults and/or children.<br><br>To ensure that they live in a borough where homelessness is rare, brief and non-recurring.<br><br>To ensure that they receive compassionate, timely and effective support.<br><br>To ensure that they have access to suitable accommodation; are treated with dignity, empathy and respect; and can easily understand their rights and responsibilities.<br><br>To ensure that the Homelessness Strategy and any subsequent policies are robust, fair and transparent.<br><br>To ensure that the council is meeting its statutory duties including but not limited to those under the Housing Act 1985; Housing Act 1986; Homelessness Act 2002; Homeless Reduction Act 2017; Housing and Regeneration Act 2008. |
| Corporate Management Team | To ensure that Hillingdon residents have access to affordable, secure, suitable and appropriate housing that meets their needs, in particular those households with vulnerable adults and/or children.<br><br>To ensure that Hillingdon residents live in a borough where homelessness is rare, brief and non-recurring.<br><br>To ensure that Hillingdon residents receive compassionate, timely and effective support.<br><br>To ensure that Hillingdon residents have access to suitable accommodation; are treated with dignity, empathy and respect; and can easily understand their rights and responsibilities.<br><br>To ensure that the Homelessness Strategy and any subsequent policies are robust, fair and transparent. |

| | To ensure that the council is meeting its statutory duties including but not limited to those under the Housing Act 1985; Housing Act 1986; Homelessness Act 2002; Homeless Reduction Act 2017; Housing and Regeneration Act 2008.<br><br>To ensure value for money in service delivery. |
|---|---|
| Leader of the Council and Cabinet Members | To ensure that Hillingdon residents have access to affordable, secure, suitable and appropriate housing that meets their needs, in particular those households with vulnerable adults and/or children.<br><br>To ensure that Hillingdon residents live in a borough where homelessness is rare, brief and non-recurring.<br><br>To ensure that Hillingdon residents receive compassionate, timely and effective support.<br><br>To ensure that Hillingdon residents have access to suitable accommodation; are treated with dignity, empathy and respect; and can easily understand their rights and responsibilities.<br><br>To ensure that the Homelessness Strategy and any subsequent policies are robust, fair and transparent.<br><br>To ensure that the council is meeting its statutory duties including but not limited to those under the Housing Act 1985; Housing Act 1986; Homelessness Act 2002; Homeless Reduction Act 2017; Housing and Regeneration Act 2008.<br><br>To ensure value for money in service delivery. |
| Voluntary, Community and other Public Sector Partners with an interest in homelessness | To ensure that Hillingdon residents have access to affordable, secure, suitable and appropriate housing that meets their needs, in particular those households with vulnerable adults and/or children.<br><br>To ensure that Hillingdon residents live in a borough where homelessness is rare, brief and non-recurring.<br><br>To ensure that Hillingdon residents receive compassionate, timely and effective support.<br><br>To ensure that Hillingdon residents have access to |

| | | | |
|---|---|---|---|
| | suitable accommodation; are treated with dignity, empathy and respect; and can easily understand their rights and responsibilities.<br><br>To ensure that the Homelessness Strategy and any subsequent policies are robust, fair and transparent.<br><br>To ensure that the council is meeting its statutory duties including but not limited to those under the Housing Act 1985; Housing Act 1986; Homelessness Act 2002; Homeless Reduction Act 2017; Housing and Regeneration Act 2008. | | |

A.4) Which protected characteristics or community issues are relevant to the assessment? ✓ in the box.

| Age | ✓ | Sex | ✓ |
|---|---|---|---|
| Disability | ✓ | Sexual Orientation | ✓ |
| Gender reassignment | ✓ | Socio-economic status | |
| Marriage or civil partnership | | Carers | |
| Pregnancy or maternity | | Community Cohesion | |
| Race/Ethnicity | ✓ | Community Safety | |
| Religion or belief | | Human Rights | ✓ |

# STEP B) Consideration of information; data, research, consultation, engagement

B.1) Consideration of information and data - what have you got and what is it telling you?

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**Ethnicity**
In 2024/25, the ethnic profile of homeless applicants in Hillingdon shows notable disparities when compared to the borough's overall population based on the 2021 Census[1].

Those who identify as White make up around 48.2% of Hillingdon's population but accounted for only 25.1% of homeless applicants.

Conversely, Black / African / Caribbean / Black British individuals represented 24.8% of homeless applicants, despite comprising just 7.8% of the general population. This highlights a significant overrepresentation.

Asian / Asian British residents were also underrepresented, making up 23.4% of homeless applicants compared to 33.3% of the population.

Other ethnic groups were overrepresented at 17.6% of applicants versus 6.3% of the population.

Mixed / multiple ethnic groups were proportionally represented, with 4.6% of applicants compared to 4.4% of the population.

These figures suggest that homelessness in Hillingdon disproportionately affects those from Black and Other ethnic communities.

It is not possible to draw any significant conclusions from the ethnicity data of those who are homeless on the Housing Register as 45% of this data is unknown however those from a Black background are more likely to be homeless on the register compared to the borough profile as a whole.

Rough sleepers are more likely to be from Non-UK backgrounds.

**Sex**
As with the housing register as whole, homeless families are more likely to have been registered with a female applicant.

Rough sleepers in Hillingdon are more likely to be male.

**Disability**
The data shows that rough sleepers in Hillingdon are more likely to have mental health and/or drug and/or alcohol misuse support needs.

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[1] How life has changed in Hillingdon: Census 2021

National data suggests that those who are neurodiverse are more likely to experience homelessness.

**Sexual orientation**
National data suggests that those from LGBTQ+ communities are more likely to experience homelessness.

# Consultation

B.2) Did you carry out any consultation or engagement as part of this assessment?

Please tick ✓        NO ☐                        YES ✓

The draft strategy has undergone a 6-week consultation process involving a wide range of staff, partner organisations and Hillingdon residents including some with lived experience of homelessness and rough sleeping. The survey methodology included an online survey, use of social media to promote the survey, workshops with staff and partners and a homelessness forum. Full details of the consultation are included in appendix 3 of the Cabinet Report and a short summary is provided below.

A total of 52 survey responses were received alongside extensive qualitative feedback from staff, partners, and residents. Overall residents showed majority support for all five strategic priorities, with particularly strong endorsement for:
**Priority 3** – Access to safe, suitable and sustainable accommodation: 75% agreed or strongly agreed, making it the most supported priority.
**Priority 2**– Resident focused homelessness service: (now reordered as priority 1 in the revised draft): 71% agreed or strongly agreed.
**Priority 1**– Prevention (now reordered as priority 2 in the revised draft): 62% agreed or strongly agreed.

Support was slightly lower for:
**Priority 4** – Targeted pathways for single homeless and rough sleepers: Agreement and disagreement were more balance, reflecting mixed views.
**Priority 5** – Modern, data-led and cost-effective services: 58% felt the priority aligned with their expectations.

Overall, the consultation shows:
- Broad support for the direction of the strategy.
- Strongly articulated concerns about temporary accommodation pressures, system coordination, fairness and communication.
- A clear need for enhanced multi-agency working, data-led improvement, and more proactive, preventative pathways.
- Community and partner anxiety about national policy pressures – particularly migration and Private Rented Sector instability – and their impact on local services.

Results broken down by different households characteristics are shown below:

**Priority 1** – "To what extent do you agree with priority one?"
**Overall narrative**
Responses to Priority 1 showed the widest spread of views and the lowest levels of agreement compared with all other priorities in the consultation. Many respondents—especially those expressing concerns about migration, local housing allocation, or fairness—used Priority 1 to articulate broader scepticism about current approaches.
Demographically:
**Sex**
- Female respondents displayed notably higher agreement, with 23 agreeing or strongly agreeing, compared with only 7 males.
- Males showed more disagreement, indicating a more critical stance toward the first priority.

**Age**
- Strongest agreement came from older respondents (55–64 and 65+), who consistently supported prevention focused priorities.
- Respondents aged 25–34 showed mixed support, often aligning their views with personal housing challenges or frustrations with the current system.

**Ethnicity**
- Black and Asian respondents demonstrated higher agreement rates compared to White respondents.
- White respondents expressed the widest range of disagreement, sometimes linked to concerns about asylum seekers or perceived competition for housing.

**Interpretation**
Priority 1—often centred on early intervention and prevention—elicits differing beliefs about who should be prioritised, what fairness means, and how prevention should be delivered.
Agreement is strongest among older and minority ethnic respondents, while disagreement clusters around residents expressing frustration with resource allocation or lived experience of homelessness.

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**Priority 2** – "To what extent do you agree with priority two?"
**Overall narrative**
Priority 2 shows substantially stronger support across almost every demographic group. It is one of the most widely supported priorities.
**Sex**
- Female agreement rises to 28, compared with 7 males, continuing a clear gender pattern of stronger female support.
- All gender groups show increased support compared with Priority 1.

**Age**
- 55–64 and 65+ groups strongly support Priority 2, with consistent agreement across these age brackets.
- Younger groups (25–34) continue to be mixed but show slightly higher agreement than for Priority 1.

**Ethnicity**
- Black and Asian respondents continue to show strong endorsement.
- White respondents show higher agreement here than in Priority 1, suggesting that this priority resonates more broadly.

**Interpretation**
Priority 2 is perceived as practical, deliverable, and aligned with real community needs, especially regarding partnership working and system improvements. The strong support indicates broad confidence in this area of the strategy, with relatively little pushback compared with Priority 1.

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**Priority 3 – "To what extent do you agree with priority three?"**
**Overall narrative**
Priority 3 receives one of the highest levels of support across all demographics.
**Sex**
- Female agreement peaks at 28, and male agreement also increases to 8, showing more alignment across genders.
- "Prefer not to say" respondents also increase to **3**, reflecting broader support.

**Age**
- Older residents again show very high endorsement.
- Younger groups express strong support where the priority relates to vulnerability, tailored support, or service quality.

**Ethnicity**
- Black respondents give especially strong agreement, reflecting the priority's relevance to groups disproportionately affected by homelessness.
- Asian and mixed ethnicity respondents also show consistent support.

**Interpretation**
Respondents appear to strongly endorse the idea of targeted, needs based support for specific at-risk groups (e.g., those with complex needs, domestic abuse survivors, rough sleepers).
This priority resonates because it is seen as compassionate, equitable, and addressing real gaps in current provision.

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**Priority 4 – "To what extent do you agree with priority four?"**
**Overall narrative**
Agreement remains high, though slightly lower than Priority 3.
**Sex**
- Female agreement (23) outpaces male support (6), maintaining the core gender trend.
- Priority 4 shows slightly more scepticism than P2–P3 but remains broadly supported.

**Age**
- Older age groups strongly support this priority, maintaining the highest endorsement levels.
- Younger respondents show more variability, often linking their agreement or disagreement to individual housing experiences.

**Ethnicity**
- Strong support across Black and Asian groups continues.
- White respondents show higher disagreement than other groups, reflecting concerns expressed in comments about fairness, competition for resources, and asylum policies.

**Interpretation**
Priority 4—often linked to quality, accountability, or partnership structures—is still well supported but can trigger concerns regarding fairness, resource allocation, or

implementation challenges.
Nonetheless, the majority still express confidence in the value of this priority.

**Priority 5 – "To what extent do you agree with priority five?"**
**Overall narrative**
Priority 5 shows strong endorsement but slightly lower agreement rates than P2 and P3.
**Sex**
- Female agreement (21) remains significantly higher than male (7).
- This priority **sees the largest gender gap, reinforcing** the overall trend of stronger female alignment with strategic direction.

**Age**
- Again, older groups (55–64 and 65+) show strong support.
- Younger residents (25–34) show mixed but generally positive sentiment.

**Ethnicity**
- Black and Asian respondents maintain high levels of agreement.
- White ethnic groups display a mixed range of responses, often influenced by comments around resource pressures or housing eligibility.

**Interpretation**
Priority 5—often framed around delivery, performance, or systems change—is broadly supported but may feel more technical or operational to some respondents. Those with direct experience of homelessness services tended to agree more strongly, recognising the need for better resourcing, staffing, and coordinated delivery.

**Summary Across All Five Priorities by equality characteristics**
**Sex**
- Females consistently agree more than males across every priority.
- Male respondents are more likely to express disagreement or scepticism.

**Age**
- Support strengthens with age, with the 55–64 and 65+ groups showing the highest agreement across all priorities.

**Ethnicity**
- Black and Asian respondents show the strongest overall support.
- White respondents show the most variation and highest disagreement levels, often connected to themes around fairness and migration.

**General Trend**
- Priorities 2 and 3 received the strongest support.
- Priority 1 received the most disagreement.
- Overall, the strategy is strongly supported by most respondents—particularly older adults, women, and global majority ethnic groups.

B.3) Provide any other information to consider as part of the assessment

Legal context
The council has a public duty to pay due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations (Equality Act 2010)

The council also has a number of statutory duties with regards to homelessness that are incorporated in the following:

- Housing Act 1985
- Housing Act 1986
- Homelessness Act 2002
- Homeless Reduction Act 2017
- Housing and Regeneration Act 2008
- Localism Act 2011
- Armed Forces Act 2006
- Asylum and Immigration Act 1996
- Immigration and Asylum Act 1999
- Children Act 2004
- Data Protection Act 2018
- European Union (Withdrawal Agreement) Act 2020
- Homeless Code of Guidance for Local Authorities 2018 last updated June 2024
- The London Housing Strategy
- Tenancy Strategy
- Housing Strategy
- Allocation of Housing and Homelessness (Eligibility) (England) Regulations 2006
- Allocation of Accommodation: Code of Guidance for Housing Authorities June 2012, last updated June 2024
- Providing social housing for local people, December 2013
- Right to Move and social housing allocations, March 2015
- Improving access to social housing for victims of domestic abuse, November 2018
- Improving access to social housing for members of the armed forces, June 2020
- The regulatory standard for registered providers of social housing in England
- National Plan to End Homelessness, MHCLG, Dec 2025

Financial context

The General Fund budget for the Homelessness Prevention & Lettings service meets the costs of the Council's statutory duties in this area, and has a budgeted gross cost of £19,206k in 2025/26.

A £6,854k temporary accommodation (TA) pressure was reported against client groups included in the MTFS TA model (General Needs, Rough Sleepers and other cohorts) in M9- 2025-26.

The risk of further overspend in 2025/26 against homelessness costs remains high given the rising levels of homeless presentations and the challenges in securing suitable alternative accommodation to prevent homelessness, particularly in the private rented sector.

# C) Assessment and conclusions

The strategy introduces positive measures to prevent homelessness, increase housing supply, support staff well-being, treat residents with respect and empathy and introduce improvements to working processes.

These changes are intended to have positive impacts for all groups especially those who have been identified as part of this assessment who may be over-represented in the homeless cohort. These groups include those who identify as Black, vulnerable families, those who have mental health and/or drug and/or alcohol support needs, those experiencing domestic abuse, those from the LGBTQ+ community and those who are neurodiverse.

Although the consultation results show differences in the extent to which respondents agree with the priorities in the strategy overall, the strategy is strongly supported by most respondents. This is particularly so for older adults, women, and those from global majority groups.

We will continue to monitor the impacts of the strategy, especially for those with protected characteristics. Additional equality impact assessments will be completed as necessary for significant initiatives/policies developed as part of implementing the homelessness strategy.

**Signed and dated:**………4 March 2026

**Name and position**:………Debby Weller Head of Housing Strategy and Policy
Sachin Patel Housing Policy and Strategy Officer
Vicky Trott, Inclusion and Wellbeing Manager