

## Equality Impact Assessment

Name of Project	Housing Support Transformation Framework	Cabinet meeting date <i>If applicable</i>	March 2017
Service area responsible	Housing Strategy & Commissioning		
Name of completing officer	Gill Taylor	Date EqIA created	11/12/2016
Approved by Director / Assistant Director	Dan Hawthorn	Date of approval	

The Equality Act 2010 places a ‘**General Duty**’ on all public bodies to have ‘**due regard**’ to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity between those with ‘protected characteristics’ and those without them
- Fostering good relations between those with ‘protected characteristics’ and those without them.

In addition the Council complies with the Marriage (same sex couples) Act 2013.

Haringey Council also has a ‘**Specific Duty**’ to publish information about people affected by our policies and practices.

**All assessments must be published on the Haringey equalities web pages. All Cabinet papers MUST include a link to the web page where this assessment will be published.**

This Equality Impact Assessment provides evidence for meeting the Council’s commitment to equality and the responsibilities outlined above, for more information about the Councils commitment to equality; please visit the Council’s website.

Stage 1 – Names of those involved in preparing the EqIA	
1. Project Lead - Gill Taylor	5.
2. Equalities / HR - Paul Green	6.
3. Legal Advisor (where necessary) – Michelle Williams	7.
4. Trade union – N/A	8.

**Stage 2 - Description of proposal including the relevance of the proposal to the general equality duties and protected groups. Also carry out your preliminary screening** (Use the questions in the Step by Step Guide (The screening process) and document your reasoning for deciding whether or not a full EqIA is required. If a full EqIA is required move on to Stage 3.

A Cabinet report is being brought forward to members for decision. Members are being asked to approve the outcome of the one-year Supported Housing Review, which culminates in the Housing Support Transformation Framework. The key aspects of the framework are;

:

- A comprehensive *Needs & Gaps Analysis* of supported housing in Haringey
- A *Vision* for the future of supported housing and housing support
- Four *Strategic Principles* to drive forward the commissioning and remodelling of housing support and supported housing over the next five years
- Four priority client groups where transformation will take place imminently, with others identified for future change

This report relates to the Council's approach to commissioning housing support for vulnerable adults in Haringey, many of whom share one or more protected characteristics and these are often significant to their requiring housing support in the first instance. It is therefore of high relevance to the Council's Equality Duty.

The Housing Support Transformation Framework provides a strategic guide to the commissioning and remodelling of housing support services in Haringey with a particular focus on prevention and early intervention, aligned with both the Corporate Plan and the Housing Strategy. It highlights where current services are not meeting the need of vulnerable residents and articulates how this can be addressed by improving community-based options, widening choice and improving physical environments in line with the needs of service users and best practice standards.

The framework recognises the challenges of supporting a growing population in need with finite, and in real terms reducing, resources. The intention of the transformation of housing support is to improve the housing support available to vulnerable people whilst also realising efficiencies identified through the process of the Supported Housing Review.

The four key principles of the Housing Support Transformation are as follows;

- **Cross-cutting Prevention;** the transformation programme will create a genuinely preventative housing support offer, proactively supporting at-risk groups & reducing the social & financial cost of homelessness and housing crisis. Using the Prevention Pyramid model defined in the framework document, housing support services will offer multiple preventative interventions at individual and community levels; reducing demand on supported housing, preventing escalation of need and offering viable alternatives to residential care.
- **Community Inclusion;** housing support should reduce social exclusion, isolation, stigma and multiple disadvantage by securing housing, work and wellbeing opportunities that bring diverse people and services together. Encouraging supported housing services to work together to create volunteering, employment and relationship-building opportunities that will outlast someone's stay in supported housing, building resilience in our communities and fostering good relationships between Haringey's diverse cultures, identities and experiences.
- **Integrating Support & Care;** integrating commissioning resources and functions will create broader pathways of housing support & care that reduce dependence and increase independence in a safe, personalised and holistic way. The vital preventative function of housing-related support will be integrated but preserved as discrete service provision.
- **Commissioning for the Future;** maximising the reach of revenue funding and capital assets to meet the changing demographics and support needs of Haringey residents. Commissioning will deliver improved value for money, work more collaboratively to achieve innovation and create a housing support sector that is responsive to the changing political and economic landscape.

The four client groups identified as a priority for transformation are as follows;

- Older People (the eligibility for supported housing in this category is people over 55 years old)
- Young People (people aged between 16 and 25 years old)
- Mental Health
- Learning Disability

**Stage 3 – Scoping Exercise - Employee data used in this Equality Impact Assessment**

Identify the main sources of the evidence, both quantitative and qualitative, that supports your analysis. This could include for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of recent relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national.

<b>Data Source (include link where published)</b>	<b>What does this data include?</b>
EqIA Profile on Harinet	Age, gender, ethnicity, disability information – for the Council and the Borough

**Stage 4 – Scoping Exercise - Service data used in this Equality Impact Assessment**


This section to be completed where there is a change to the service provided

<b>Data Source (include link where published)</b>	<b>What does this data include?</b>
Haringey JSNA 2012 <a href="http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment-jsna">[http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment-jsna]</a>	Specific age, gender, ethnicity, disability information about health and social care
Census 2011 <a href="https://www.ons.gov.uk/census/2011census/2011censusdata">[https://www.ons.gov.uk/census/2011census/2011censusdata]</a>	Population data and projections for the borough
SPOCC Net – web-based contract monitoring system [internal report]	Performance data about utilisation, void and move-on supported housing services commissioned by the housing-related support team in Haringey
MOSAIC – Adult Social Care Monitoring System [internal report – Feb and Sept 2016]	Data about specific individuals receiving social care packages living in supported housing in Haringey
Snapshot demographic data from individual housing support providers [internal report- data for 2015/16]	Snapshot data about the demographics of people receiving supported housing and housing support in Haringey during the period under review
HfH Sheltered Housing Needs Analysis & Demographic Report 2016 [internal report]	Specific data about the demographics and needs of older people living in HfH sheltered housing
Presentations at Housing Options and Vulnerable Adults [internal report 'HW0125 – Advice & Options and VAT Call List']	Specific demographic data about the households who have presented for assistance to HfH's Vulnerable Adults and Housing Options services
Homeless Young Parents [internal report 'TA0181 – Households in TA']	Understanding the number and demographics of parents aged 19 years old and under currently residing in temporary accommodation.
Haringey Housing Strategy 2017-2022	Specific data about the housing needs, projections and commitments


<a href="http://www.haringey.gov.uk/sites/haringeygovuk/files/draft_housing_strategy_2017-2022.pdf">http://www.haringey.gov.uk/sites/haringeygovuk/files/draft_housing_strategy_2017-2022.pdf</a>	in Haringey
<a href="#">POPPI</a> and <a href="#">PANSI</a>	National and local data about instances of a range of disabilities and long-term conditions affecting the groups and services within scope of this review – particularly adults with learning disabilities, mental health conditions and vulnerabilities related to age.
‘Gender Variance in the UK’ <a href="https://www.gires.org.uk/assets/Medpro-Assets/GenderVarianceUK-report.pdf">https://www.gires.org.uk/assets/Medpro-Assets/GenderVarianceUK-report.pdf</a>	Estimates about the prevalence and incidence of transgenderism in the UK.
‘Still being failed but striving to survive’ – Crisis UK <a href="http://www.crisis.org.uk/pages/homeless-diff-groups.html">http://www.crisis.org.uk/pages/homeless-diff-groups.html</a>	Survey of the needs, experiences and demographics of homeless women in the UK.
The Grove Substance Use Treatment Service [internal report – ‘NFA Report 2015/16]	Information about the demographics, support needs and treatment outcomes of adults using The Grove service who were assessed as homeless or of no fixed abode in their initial assessment.
Care Programme Approach – Housing Status [internal report - November 2015; BEH / Haringey; NMHLDDS data]	Information about the housing status of adults with mental health conditions who are under the care of CPA in the Barnet, Enfield, Haringey Mental Health Trust

**Stage 5a – Considering the above information, what impact will this proposal have on the following groups in terms of impact on residents and service delivery:**


**Positive and negative impacts identified will need to form part of your action plan.**

	Positive	Negative	Details	None – why?
<b>Sex</b>			<p><b>[Priority Group 2 – Mental Health]</b> A 10-unit supported housing service for women with multiple and complex needs particularly where mental health, trauma and repeat homelessness are a factor, is proposed as part of the existing Mental Health Housing Support Pathway. We anticipate this would accommodate 100% of the known demand from this specific cohort. Women with other support needs are able to access all services across the housing support portfolio.</p> <p>Homeless women are particularly vulnerable and typically experience multiple and complex issues related to their gender that result in or perpetuate housing and health crisis. Research conducted by Crisis suggests that 26% of people accessing homelessness services are women, and 12% of rough sleepers are women. The Homeless Link Health Audit identifies homeless women as more likely to have mental health conditions &amp; to have used heroin or crack cocaine in the last month than their male counterparts.</p> <p>In Haringey, The Grove substance use treatment service identified that 16% of adults who were homeless when they presented for treatment were women. Their support needs were typically more complex and chaotic than male counterparts and their treatment outcomes considerably poorer. Of those who started treatment in 2015, 53% of this cohort were current or former sex-workers, 40% had experienced recent domestic abuse and 87% were poly-drug users. There was a 6% treatment success rate in this cohort, compared with 18% for the comparative male cohort.</p> <p>Men are over-represented in supported housing services in nearly all client groups, for example 56% of people in supported living for learning disabled adults are men and men make up 70% of St Mungo's Mental Health Pathway</p>	

			<p>service users. This for a number of reasons including likelihood of homelessness due to being in prison, violent behaviour in interpersonal relationships and diagnosis of severe mental health conditions. The majority of housing support provision is designed and delivered with these needs in mind which is why specific services to meet the needs of vulnerable women are identified and proposed.</p> <p><b>[Priority Group 4 – Young People]</b> As part of the redesigned Young People's Pathway a specific service for young women fleeing violence or at risk of violence is proposed. This service will provide housing-related support that addresses the interconnected issues that young women face when they become homeless due to violence or threats of violence.</p>	
<b>Gender Reassignment</b>			<p>Borough-specific information on gender reassignment is not available, however GIREs, the Gender Identity Research and Education Society estimate that between 1-5% of the population is transgender or gender non-conforming. In Haringey this could equate to upwards of 2600 people, although this also includes people with non-binary gender identities who are not protected under the Equalities duties.</p> <p><b>[Priority Group 4 – Young People]</b> Young transgender people are at increased risk of homeless due to prevailing attitudes and prejudices towards gender identity. It is estimated that 25% of homeless young people are LGBT. In recognition of this, Haringey commission a 12-unit supported housing service for LGBT young people is and this continues as there is clear evidence of demand/need. The service is a tri-borough initiative between Haringey, Islington and Hackney and has recently been expanded from 6-units per borough to absorb emerging unmet need.</p> <p><b>[Priority Group 1 – Older People]</b> Evidence from Homes for Haringey suggests either a significant under-representation of transgender older people or inadequate data collection practices.</p> <p>The plans to remodel the support available in older people's supported housing should create improved data collection and assessment processes</p>	


			<p>which will aim to capture, amongst other characteristics, gender identity. Using best practice from existing providers, Homes for Haringey will begin to collect data on gender identity as part of a move to create LGBT positive supported housing environments, akin to the Pink Passkey approach identified in 'Building Safe Choices' by Stonewall Housing.</p>	
Age			<p><b>[Priority Group 1 – Older People]</b> There are almost 2200 older people living in supported housing (including Extra Care) in Haringey. The highest proportion of these (1333 residents) live in Homes for Haringey managed Sheltered Housing or Community Good Neighbour Schemes. These schemes utilise council housing stock across the borough in 54 schemes.</p> <p>Plans to rebalance supported housing in line with available data on need, demographic and population will improve the availability of housing support for older people and the framework specifically intends to reduce the vulnerabilities that older people face; social exclusion, poor health and isolation. This will specifically address the needs of an ageing older population with increased social care needs who are currently left with no alternative than to move into residential care placements at a loss to their independence and social inclusion.</p> <p><b>[Priority Group 4 - Young People]</b> There are currently about 180 young people living in supported housing placements, either as a result of homelessness or the cessation of a period in local authority care. Besides specific provision for LGBT young people there is no specific supported housing provision commissioned to address young people's needs, experiences or risks around disability, gender, offending and parenthood</p> <p><b>[Priority Group 3 – Learning Disability]</b> There are currently no specific supported housing services that support older people with learning disabilities despite the evidence of a growing population in need. The Housing Support Transformation Framework proposes to develop hub services for older people which will be well equipped to deliver the additional support that older people with learning disabilities may need to live independently.</p>	





			<p>In 2016, the majority of learning disabled supported housing users (58%) are aged between 25-49 years old, which remains a relatively stable proportion of the total cohort in the snapshot data. However, 36 residents are over the age of 50, representing 28.24% of the client group this year, a growing population both in number and proportion every year since 2012. Those aged 18-24 years old are a decreasing cohort within the supported living population.</p> <p>The median age at death for people with learning disabilities is about 24 years (30%) younger than for those who do not have learning disabilities<sup>1</sup>. However, people with learning disabilities are living longer and it is increasingly likely that they will outlive their parents. This shows a need for housing support to respond to the needs of older people with learning disabilities.</p>	
<b>Disability</b>			<p><b>[Priority Group 3 – Learning Disability]</b></p> <p>There are 193 people living in specified learning disability supported housing. The majority of these (128 people) live in spot purchase supported living placements commissioned by Adults Social Care. People with learning disabilities are also supported in other types of provision e.g. 3.5% of the sheltered housing population are recorded as having a learning disability.</p> <p>Besides the LBH Shared Lives scheme, which is akin to adult foster care, the supported housing portfolio for people with learning disabilities is provided from 24-hour staffed sites with single occupancy rooms, shared facilities and communal spaces. There are currently very limited opportunities for adults with learning disabilities to live independently and no floating or tenancy support service to encourage this is in place.</p> <p>A transformation of the current portfolio of housing support services for adults with learning disabilities is proposed. This will include rebalancing the provision available to meet the needs of adults who are able to live independently in the community, and for those who need supported housing as an alternative to residential care. This will help to reduce the social</p>	

<sup>1</sup> People with Learning Disabilities in England 2012 Eric Emerson, Chris Hatton, Janet Robertson, Susannah Baines, Anna Christie and Gyles Glover

			<p>inequalities faced by people with learning disabilities by embedding more opportunities for social inclusion and independence.</p> <p><b>[Priority Group 2 – Mental Health]</b> Adult Social Care &amp; the Housing-Related Support Team currently commission 273 supported housing placements for adults with mental health needs, through a combination of a 123 unit short-term supported housing pathway and 154 units of long-term supported living accommodation. 12 units of sheltered accommodation are allocated as short-term step-down accommodation for people with mental health needs being discharged from hospital.</p> <p>In addition to specialist accommodation, people with mental health needs are supported in all types of provision. For example 16% of the sheltered housing population are recorded to experience a mental health need, the true figure is expected to be much higher.</p> <p>Demand for current provision is high and increasing, with many people in need of support being discharged following an unplanned in-patient stay in hospital or after losing their tenancy due to their mental health condition.</p> <p>The Housing Support Transformation Framework attempts to create more preventative housing support offer. For people with mental health conditions this means increasing the amount of Housing First provision available in the borough which has proven successful in reducing support and care need, hospital admissions and evictions during the one-year pilot commissioned by the borough in 2015.</p> <p>Additionally, it is proposed that the framework will act as a driver for more joined up work between housing, social care and health for people with mental health conditions, building on the work to pool budgets and responsibilities between Barnet, Enfield and Haringey Mental Health Trust (BEHMT) and the Council. The anticipated result of this work will be a jointly commissioned floating support service for adults with mental health conditions identified as at-risk of homelessness. People will be able to access preventative brief-interventions that prevent homelessness and health crisis</p>	
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			such as; tenancy management, medication support, landlord or parent/carer negotiation, support to address repairs and rent arrears and linking into to local services and support networks.	
<b>Race &amp; Ethnicity</b>			<p>People in mental health supported living are disproportionately from Black African and Caribbean backgrounds, making up 52% of the cohort compared with only 18.7% of the borough population, with people of Jamaican heritage particularly over-represented. HRS mental health services show a similar but less marked over-representation (40.2% of the cohort) of people from Black African and Caribbean backgrounds. This over-representation is nationally observed; with Black men aged between 25-49 years old most likely to be diagnosed with severe psychotic disorders such as schizophrenia. People of Asian and Mixed backgrounds are significantly under-represented in mental health diagnosis locally and nationally.</p> <p>People in supported living are disproportionately from non-white backgrounds, with particular over-representation from all black backgrounds, which make up 32% of the learning disabled cohort in supported living or 41 people. This is 16% higher than the same population in Haringey as a whole which indicates the interconnected issues faced by black people with disabilities.</p> <p>Already the borough with the 5<sup>th</sup> most ethnically diverse older population in London, this is set to diversify further by 2030. By 2030 older people from BAME groups will make up almost 43% of the over-50 population in Haringey. BAME groups currently represent 44.7% of the older supported housing population, with people from black backgrounds significantly over-represented in both supported living and housing-related support schemes.</p> <p>The data available about young people in supported housing uses very broad ethnic groups which does not accurately reflect the diversity of ethnic and cultural backgrounds and needs. However, young people from Black African and Caribbean communities are vastly over-represented in the young people's pathway (40.5% of the cohort). Further, whilst the 'Mixed*' category is non-specific, provider feedback suggests that the majority of these young</p>	

			<p>people are mixed white and black Caribbean, further adding to the over-representation of young people from different ethnic communities in supported housing.</p> <p>The Housing Support Transformation Framework does not intend to create specific services for people from non-white or migrant backgrounds. However, data and intelligence from the Needs and Gaps Analysis will inform the service specifications for all new support models to a) improve demographic monitoring and b) provide housing-support that makes the connection between ethnicity and housing and health crisis, specifically the impact of mental health conditions on young black men.</p>	
<b>Sexual Orientation</b>			<p><b>[Priority Group 4 – Young People]</b> Young LGBT people are at increased risk of homeless due to prevailing attitudes and prejudices towards sexuality. It is estimated that 25% of all homeless young people are LGBT. A 12-unit supported housing service for LGBT young people is currently in operation and it is recommended that this continues. The service is a tri-borough initiative between Haringey, Islington and Hackney and has recently been expanded to absorb unmet need.</p> <p><b>[Priority Group 1 – Older People]</b> The plans to remodel the support available in older people's supported housing should create improved data collection and assessment processes which will aim to capture, amongst other characteristics, sexual orientation. Using best practice from existing providers, Homes for Haringey will begin to collect data on gender identity as part of a move to create LGBT positive supported housing environments, akin to the Pink Passkey approach identified in 'Building Safe Choices' by Stonewall Housing.</p>	
<b>Religion or Belief (or No Belief)</b>			<p>Information on religion is not available. However, the 2011 Census reports that 45% of residents were Christian, 14% were Muslim and 3% Jewish. There were low numbers of Hindu (1.8%) and Sikh (0.3%) residents. A quarter of Haringey residents stated that they did not have a religion.</p> <p>The framework is not anticipated to have a disproportionate impact on this</p>	

			protected group and the focus on prevention and community-based support will enable people to access housing support in their locality, thereby enabling them to remain engaged with family and social networks, places of worship and other community resources which may be attached to their religious beliefs.	
<b>Pregnancy &amp; Maternity</b>			<p><b>[Priority Group 4; Young People]</b> A specific supported housing service for homeless young parents is proposed as part of the changes to housing support for young people.</p> <p>Information on the number of people who become pregnant whilst in receipt of housing support or were referred for housing support due to pregnancy is not available.</p> <p>However, around 2% of all homeless households are pregnant at any time. Of these approximately ** are young mothers or pregnant women aged 16-21 years old.</p>	
<b>Marriage and Civil Partnership (note this only applies in relation to eliminating unlawful discrimination (limb 1))</b>			<p>There is no information on marriage/civil partnership status but the Census in 2011 found 50% were single, 34% were married or in a civil partnership, and 16% were separated, divorced or widowed.</p> <p>There is no element of the framework that will disproportionately affect people who are married or in civil partnerships from accessing housing support interventions.</p>	

**Stage 5b – For your employees and considering the above information, what impact will this proposal have on the following groups: Positive and negative impacts identified will need to form part of your action plan.**

	<b>Positive</b>	<b>Negative</b>	<b>Details</b>	<b>None – why?</b>
<b>Sex</b>	Not applicable	Not applicable	Not applicable	The framework does not relate to council staff
<b>Gender Reassignment</b>	Not applicable	Not applicable	Not applicable	The framework does not relate to council staff
<b>Age</b>	Not applicable	Not applicable	Not applicable	The framework does not relate to council staff
<b>Disability</b>	Not applicable	Not applicable	Not applicable	The framework does not relate to council staff
<b>Race &amp; Ethnicity</b>	Not applicable	Not applicable	Not applicable	The framework does not relate to council staff
<b>Sexual Orientation</b>	Not applicable	Not applicable	Not applicable	The framework does not relate to council staff
<b>Religion or Belief (or No Belief)</b>	Not applicable	Not applicable	Not applicable	The framework does not relate to council staff
<b>Pregnancy &amp; Maternity</b>	Not applicable	Not applicable	Not applicable	The framework does not relate to council staff
<b>Marriage and Civil Partnership (note this only applies in relation to eliminating unlawful discrimination (limb 1))</b>	Not applicable	Not applicable	Not applicable	The framework does not relate to council staff

<b>Stage 6 - Initial Impact analysis</b>	<b>Actions to mitigate, advance equality or fill gaps in information</b>
Initial impact analysis demonstrates that the housing support transformation framework seeks to advance equality of access and engagement for individuals with protected characteristics in need of housing support. However, for each individual change a specific EqIA should be completed where appropriate, to adequately capture the individual and specific effects of change on protected groups.	

There is a lack of data available about adults who are vulnerable due to their sexuality, particularly where those people are also vulnerable due to older age.	Immediate work has been undertaken to include supported housing tenants in the Council's work with Stonewall. Additionally, a new recording and reporting framework will be set up which records demographic information for those being assessed for housing support through supported housing pathways. Issues relating to training, stigma and confidence will be addressed with assessment staff to ensure that LGBT people are not denied access or inhibited from the most suitable support due to poor assessment practice.
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<b>Stage 7 - Consultation and follow up data from actions set above</b>	
<b>Data Source (include link where published)</b>	<b>What does this data include?</b>
Supported Housing Review Engagement Survey	100 responses from current residents of Supported Housing who shared their views on their priorities, things that they were unhappy with and things they felt could be improved about the service they receive from housing support providers.
Service User Focus Groups	<p>Targetted engagement events were held with the following groups of people who live in supported housing;</p> <ul style="list-style-type: none"> <li>- women (Feb &amp; Oct 2016) – 12 attendees</li> <li>- homeless young people – (Oct 2016) – 17 attendees</li> <li>- adults with learning disabilities – 5 attendees</li> <li>- older people – 70 attendees</li> </ul> <p>Participants shared their specific insights about the support they receive and the type of support that they felt would improve the housing and health outcomes for themselves and their peers. We discussed what was most important in the housing support available &amp; how this could be achieved given limited resources.</p> <p>The outcome of these sessions informed the four key principles of the framework.</p>
Stakeholder Focus Groups	A group of 30 stakeholders met quarterly for the duration of the review to discuss emerging findings, recommendations and options. The

	<p>group was made of internal and external professionals and included the involvement of parent carers of disabled adults living in supported housing. Break-out groups from the larger group met separately a total of 12 times throughout the review period.</p> <p>The outcome of these sessions was the inclusion of technical expertise and best practice in project documents, as well as ensuring a close alignment between the Supported Housing Review and other strategies and workstreams throughout the project period.</p>
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## Stage 8 - Final impact analysis

The provision of housing support, excluding for those people where housing is part of a social care package, is not a statutory requirement of the local authority. However, it is an important aspect of the council's housing and homelessness prevention work, supporting people who find themselves vulnerable due to incident, illness or disability to secure housing, support and care appropriate to their need or circumstance. The provision of supported housing and housing support is therefore in itself a contribution to the council's duties under the Equality Act 2010.

The Housing Support Transformation Framework will bring about change in housing support services that reflects what is known about the current and future population in need. It pays particular attention to groups where gaps in the current provision have been identified for people with particular protected characteristics (age, disability, sex) for whom housing support is provided. Additionally, the transformation work makes recommendations to address limitations to the availability and quality of data of some characteristics, particularly gender reassignment and sexual orientation.



### Stage 9 - Equality Impact Assessment Review Log

Review approved by Director / Assistant Director

Date of review

Review approved by Director / Assistant Director

Date of review

### Stage 10 – Publication

Ensure the completed EqIA is published in accordance with the Council's policy.