

Camden Council Equality Impact Assessment Form

Camden Council Equality Impact Assessment Form

Before beginning this equality impact assessment (EqIA) form, you should use the [EqIA screening tool](#) to decide whether you need to complete an EqIA for your activity and read the [EqIA guidance](#).

The term “activities” is used by the Council to mean a range of things, such as policies, projects, functions, services, staff restructures, major developments or planning applications.

Most significant activities that affect Council stakeholders will require an EqIA when they are in the planning stage. Many will also require an EqIA to monitor their impact on equality over time or if there is a significant change that prompts a review, such as in local demographics.

EqIAs help the Council to fulfil its legal obligations under the Equality Act’s public sector equality duty. The duty requires the Council to have due regard¹ to the need to:

- eliminate unlawful behaviour, such as discrimination, harassment and victimisation;
- promote equality of opportunity between those who share a protected characteristic and those who don’t; and
- promote good relations between people who share a protected characteristic and those who don’t.

The way that we demonstrate that we have due regard for these three aims, and therefore that we are complying with the public sector equality duty, is by undertaking an EqIA.

EqIAs will almost certainly be required when a new activity affecting people who share the protected characteristics is being developed and when reviewing or changing such activities.

They will also be likely required before and during any staff re-organisations.

An EqIA should be started at the beginning of a new activity and developed in parallel with it. Activities such as services and projects should also be regularly reviewed for their impact.

An EqIA should be revisited and updated to determine whether any planned positive impacts have been achieved and whether any identified negative impacts have been mitigated. You can indicate the version of the EqIA below.

For more complex enquiries on EqIAs, in the first instance please contact equalities@camden.gov.uk where you will be able to receive dedicated support.

EqIAs should be signed off by the relevant sponsor, director or Head of Service.

¹ [Due regard](#) is a legal requirement and means that decision makers have to consider the equality implications of a proposal before a commissioning or policy decision has been made that may affect people who share each of the protected characteristics. Paying ‘due regard’ means giving a proportionate amount of resource to this analytical exercise relevant to the potential impact on equality.

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| Title of the activity | |
|---|---|
| of | Camden Adult Pathway Procurement of four contracts, which will provide six services delivering supported accommodation to homeless adults. |
| Officer accountable for the EqIA (e.g. director or project sponsor) | |
| Full name: | Glendine Shepherd |
| Position: | Director of Housing Solutions |
| Directorate: | Supporting Communities |
| Email: | Simone.Melia@camden.gov.uk |
| Lead person completing the EqIA (author) | |
| Full name: | Mike Fill |
| Position: | Single Homeless Strategic Commissioner |
| Directorate: | Supporting Communities |
| Email: | Michael.Fill@camden.gov.uk |
| Person reviewing the EqIA (reviewer) | |
| Full name: | Simone Melia |
| Position: | Head of Housing Solutions |
| Directorate: | Supporting Communities |
| Email: | Simone.Melia@camden.gov.uk |
| Version number and date of update | |
| V1 04/06/2025 | |

Step 1: Clarifying aims

1.a Is it a new activity or one that is under review or being changed?

- ☐ New
☐ Under review
☒ Being changed

1.b. Which groups are affected by this activity?

- ☒ Staff
☒ Residents
☐ Contractors
☐ Other (please detail):

1.c Which Directorate does the activity fall under:

- ☒ Supporting People
☒ Supporting Communities
☐ Corporate Services
☐ More than one Directorate. Please specify:

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1.d Outline the aims/objectives/scope of the activity. (You should aim for a summary, rather than copying large amounts of text from elsewhere.)

The London Borough of Camden is undertaking a recommissioning of the Camden Outreach Service currently known as Routes Off the Street (RTS) service. The service is delivered through two primary elements – a multi-agency hub and an assertive street outreach model. The primary aims are to find people rough sleeping in Camden, undertake appropriate assessments to determine housing and support options, and coordinate multi-agency responses to help people access and maintain accommodation. The ultimate objectives are to help safeguard people while they are rough sleeping and reduce rough sleeping in Camden.

The service will meet the needs of people experiencing multiple disadvantage and social exclusion. This means it will support people who experience intersecting and mutually reinforcing inequalities such as homelessness, mental and physical ill health, adverse childhood experiences, trauma, substance use, contact with the criminal justice system, domestic abuse and gender-based abuse.

The current contract for service delivery expires on March 31st 2026. A procurement strategy is being designed and put forward for Cabinet approval in July 2025. This EQIA forms part of the strategy. Subject to satisfactory approval and undertaking, the procurement process aims to ensure a new contract in place from April 1st 2026.

Step 2: Data and evidence

What data do you have about the people affected by the activity, for example those who use a service? Where did you get that data from (existing data gathered generally) or have you gone out and got it and what does it say about the protected characteristics and the other characteristics about which the council is interested? Is there currently any evidence of discrimination or disadvantage to the groups? What will the impact of the changes be?

You should try to identify any data and/or evidence about people who have a **combination, or intersection, of two or more characteristics**. For example, homeless women, older disabled people or young Black men.

2.a Consider any relevant data and evidence in relation to all Equality Act protected characteristics:

- ☐ Age
- ☐ Disability, including family carers²
- ☐ Gender reassignment³
- ☐ Marriage and civil partnership
- ☐ Pregnancy and maternity
- ☐ Race
- ☐ Religion or belief
- ☐ Sex
- ☐ Sexual orientation

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2 This is the legal term in the Equality Act. In practice there are specific legal protections for a diverse range of people who have physical, mental and sensory impairments, long-term health conditions and/or neurodivergence, as well as carers who provide unpaid care for a friend or family member who cannot function without their support. Census and local datasets use the Equality Act definition and will include people who may not use the language of disability to describe themselves.

3 This is the legal term in the Equality Act. In practice there are specific legal protections for anyone whose gender identity does not match the sex they were assigned at birth. This means, for example, that people who are trans and people who are non-binary or gender fluid are considered a specific protected group under the Equality Act.

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Age

Camden is a relatively young borough, with its large population of students and young people living in the area: 43% of residents are aged under 30, and two-thirds are aged under 45. The average age in Camden is 37.2 years, compared to 37.5 in London and 41.2 nationally.

As recorded on the Combined Homelessness Information Network (CHAIN) pan-London case management system, the demographic information relating to age for people who rough slept in Camden in 2023/24 is as follows:

| Age (Years) | Number | % |
|-------------|--------|-------|
| Under 18 | 1 | 0.1% |
| 18 – 25 | 134 | 14.8% |
| 26 – 35 | 281 | 31.1% |
| 36 – 45 | 236 | 26.1% |
| 46 – 55 | 158 | 17.5% |
| Over 55 | 93 | 10.3% |

The 72.1% of people are aged under 45, which is slightly higher than the borough's overall population.

Annual data for 2024/25 is due to be published on June 30th 2025. The figures for Q4 2024/25 are:

| Age (Years) | Number | % |
|-------------|--------|-------|
| Under 18 | 1 | 0.1% |
| 18 – 25 | 36 | 10.6% |
| 26 – 35 | 86 | 25.4% |
| 36 – 45 | 118 | 34.8% |
| 46 – 55 | 61 | 18.0% |
| Over 55 | 37 | 10.9% |

A notable challenge concerns people under the age of 35 without exemption from the Shared Accommodation Local Housing Allowance rate. There are increasingly limited housing options for this group due to a complex set of legislative and regulatory factors.

In 2023/24 there was a disproportionately high number of people owed a prevention or relief duty aged between 18-24 (13.2%) and 25-34 (34.1%) - meaning younger people are more at risk of homelessness than other age groups.

In addition to this, in 2024 Camden participated in the first Young People's Rough Sleeping Census Pilot (as well as Bromley and Lambeth)¹. Key findings included that:

- More young people could be sleeping rough than official statistics suggest – as more than a quarter of those surveyed (28%) had slept rough in London but were not recorded in official data.
- Nearly half (44 per cent) of young people across the three boroughs reported they had slept rough for more than 30 nights during the three months of this year (between April – July 2024).
- 80% of respondents identified as non-White, with Black African being the most common ethnicity represented.
- Six young people disclosed that they had been younger than 18 when they first experienced rough sleeping.
- The most common type of housing young people had left before becoming homeless

¹ [Young People's Rough Sleeping Census Pilot 2024](#)

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was asylum accommodation

Disability, including family carers

15.2% of the Camden population reported being disabled under the definition of the Equality Act (2010), meaning that they assessed their day-to-day activities as limited by long-term physical or mental health conditions or illnesses. An estimated one-in-seven adults in Camden (about 30,600) have been diagnosed in primary care with one or more mental health conditions, including common mental health disorders such as anxiety and depression (28,397), serious mental illness (3,668 people) such as schizophrenia, bi-polar disorder and dementia (1,071). Camden has the 3rd highest diagnosed prevalence of serious mental illness in the country and the 8th highest diagnosed prevalence of depression in London.

As recorded on the Combined Homelessness Information Network (CHAIN) pan-London case management system, the demographic information relating to support needs which may be classified as a disability for people who rough slept in Camden in 2023/24 is as follows:

| Category | % |
|----------------------------|-----|
| Mental Health | 42% |
| Substance Use | 33% |
| Alcohol Use | 25% |
| More Than One of the above | 32% |
| None of the above | 37% |

Annual data for 2024/25 is due to be published on June 30th 2025. The figures for Q4 2024/25 are:

| Category | % |
|----------------------------|-----|
| Mental Health | 50% |
| Substance Use | 46% |
| Alcohol Use | 24% |
| More Than One of the above | 40% |
| None of the above | 31% |

Poor mental health is both a cause and consequence of homelessness, with the onset of mental illness triggering or being part of a series of events that can lead to homelessness. Housing insecurity and homelessness is stressful and traumatic and can cause mental health problems. 45% of people experiencing homelessness have been diagnosed with a mental health issue, rising to 8 out of 10 people who are sleeping rough (Crisis, 2023).

Additionally, a recently published report by the Transformation Partnership in Health and Care cited evidence that suggests 12.3% of people experiencing homelessness are autistic compared with 1-2% of the general population. Additionally, an evaluation of the T1000 Change Communication Speech and Language therapy service working with people with long histories of rough sleeping and exclusion in London outlined data which showed that 19% of referrals to their project were known or suspected to be autistic.

Family carers – no specific data is known of.

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Gender reassignment

The Government Equalities Office estimate that around 0.3 - 0.8% of the UK population are transgender. In Camden, this would equate to between 700 - 2000 people. In 2023/24, 1% of residents in mental health supported living accommodation identify as transgender. There is limited data on people who are transgender in our homelessness and rough sleeping services.

National data from Crisis indicates that 25% of trans people have experienced homelessness at some point². National data also shows that people who identify as transgender have higher rates of mental health conditions than those in the general population. In addition to a higher prevalence of mental health issues, transgender people typically experience barriers to healthcare, such as refusal of care, violence, and a lack of provider knowledge.

Marriage and civil partnership

There is no data or evidence to suggest that people who are in marriages are affected differently by homelessness or rough sleeping than people who are in civil partnerships.

National data from MHCLG indicates that most people identified as homeless have never been married or in a civil partnership – 82% have never been married³.

Pregnancy and maternity

The data on women who are pregnant approaching the Council services between 2021 and 2023/24 shows limited numbers of between 1 and 4 each year. However research from Wellbeing of Women, in partnership with Royal College of Midwives and Burdett Trust for Nursing, has indicated that more than 99% of midwives nationally have said they have seen a pregnant woman who was homeless in a six-month period⁴. Research shows that pregnant women who are homeless face increased barriers to accessing maternity care, and there are increased challenges around issues like nutrition whilst in temporary accommodation, and access to space for cots and baby facilities.

Race

Camden's population is ethnically diverse. In 2021, 40% of Camden residents were from Black, Asian or other ethnic groups (up from 34% in 2011), compared to 46% in London and 19% across England.

CHAIN data from the 2023/24 Annual Report indicates that people seen rough sleeping were from the following ethnic backgrounds:

| Ethnicity | No. | % |
|--|-----|-------|
| Asian (incl. Chinese) | 44 | 4.9% |
| Black | 261 | 28.9% |
| Mixed | 25 | 2.8% |
| White (incl. Gypsy/Irish Traveller/Roma) | 507 | 56.1% |

² <https://www.crisis.org.uk/ending-homelessness/about-homelessness/about-lgbtqplus-homelessness/>

³

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/peopleexperiencinghomelessnessenglandandwales/census2021>

⁴ <https://www.wellbeingofwomen.org.uk/what-we-do/research/research-projects/improving-maternity-care-for-pregnant-women-experiencing-homelessness/>

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| | | |
|-----------------|------------|---------------|
| Arab/Other | 54 | 6.0% |
| Missing/Refused | 12 | 1.3% |
| Total | 903 | 100.0% |

This data suggests that a slightly higher percentage than the borough average where from minority ethnic backgrounds (44%). The percentage of people from the Roma community rough sleeping was 12.0%.

Religion or belief

There is no data or evidence to suggest that people of different religious beliefs are affected differently by homelessness or rough sleeping

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Sex

The Borough of Camden has a slightly higher percentage of females (52.6%) than males (47.4%)

We know that women experience homelessness differently to men – and require a different approach to outreach and engagement, and to support. Women with multiple disadvantages experience a combination of complex and overlapping problems including homelessness, substance misuse, mental ill health, poverty, and contact with the criminal justice system, but women often find themselves bounced between services or excluded because of the complexity of issues they face.

Our most recent annual CHAIN data report (the data reflecting information about people who rough sleep in Camden) indicates a significant gender disproportionality in those people seen rough sleeping in Camden. In 2023/24, 82.1% of people seen rough sleeping are men, and 17.8% are women. Research analysing a range of research into sex, gender and homelessness indicated that:

“Much of the available research suggests that women tend to have shorter episodes of “absolute homelessness” than men... in part because they take additional, extreme measures to avoid street sleeping, as explored in the next section - but that many homeless women have been homeless on multiple occasions and had move in and out of homeless services over prolonged periods⁵”

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 and to have used heroin or crack cocaine in the last month than their male counterparts.

In 2023, Camden worked with researchers from the University of York, Fulfilling Lives in Islington and Camden and Single Homelessness Project to undertake research into women’s homelessness in Camden. Key findings include that:

- Women’s experiences of rough sleeping tend to be hidden, transient and intermittent, and that both the locations and the ways in which women sleep rough frequently fall outside of the Government definition of rough sleeping. This means that they are highly likely to be missed in the current snapshot counts used to enumerate rough sleeping
- A significant number of women who took part in the 2023 census reported that they had been experiencing homelessness in another form prior to rough sleeping, and a third (33.4%) of women reported that they had been in some form of homelessness accommodation prior to rough sleeping.

Crisis research has indicated that:

“Homeless people are more likely to die young, with an average age of death of 47 years old and even lower for homeless women at 43, compared to 77 for the general population, 74 for men and 80 for women. It is important to note that this is not life expectancy; it is the average age of death of those who die on the streets or while

⁵ <https://www.engender.org.uk/content/publications/GENDER-HOUSING-AND-HOMELESSNESS---A-LITERATURE-REVIEW.pdf>

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resident in homeless accommodation.⁶

Camden participates in the annual Women's Rough Sleeping Census, which uses innovative methodologies including participant surveys and local service intelligence to understand the extent of women's rough sleeping in local authority areas across London. While the methodology differs to that of Autumn Snapshot and CHAIN reporting, making direct comparison challenging, the results of the 2024 census indicates that far more women are rough sleeping than the other data sets indicate.

Sexual orientation

[Research from Stonewall](#) shows that almost one in five LGBT people have experienced homelessness at some point in their lives. Other research shows that potentially only a third of LGBTQ people experiencing homelessness would be willing to engage with the Local Authority (for instance, by making a homelessness application) if they did become homeless – they were much more likely to seek help from friends and/or family⁷.

There are data gaps in relation to those households who might not approach the Council to address their homelessness - this is more likely to include young people, women involved in prostitution, and people from the LGBT community. For example, the Albert Kennedy Trust estimates that around 24 per cent of homeless young people identify as LGBT and 77 per cent of them believe coming out to their parents was the main cause of their homelessness. As part of the development and implementation of this Strategy, the Council is seeking to improve our data collection and understanding of the groups that do not approach the Council for support and ensure that we are providing an accessible and visible service for them.

Intersectional Groups

See 2.C

○

⁶ [Homelessness Kills: An analysis of the mortality of homeless people in early twenty-first century England, 2022](#)

⁷ <https://blog.ukdataservice.ac.uk/lgbtq-homelessness/>

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2.b Consider evidence in relation to the additional characteristics that the Council is concerned about:

- ☐ Foster carers
- ☒ Looked after children/care leavers
- ☐ Low-income households
- ☐ Refugees and asylum seekers
- ☒ Parents (of any gender, with children aged under 18)
- ☒ People who are homeless
- ☐ Private rental tenants in deprived areas
- ☐ Single parent households
- ☐ Social housing tenants
- ☐ Any other, please specify

Looked after children/care leavers

Camden has relatively low levels of care leavers owed a duty - with just over 1% of approaches (10 individuals) being from people with an experience of care – however that data might not reflect the full experience. National data from the BBC shows that young care leavers are increasingly facing homelessness. Care leavers are 15 times more likely to face homelessness than other young people aged 18 to 24, and the situation is getting worse. The number of young people leaving care and facing homelessness has increased by 54%, from 2,790 in 2018–19 to 4,300 in 2023–24.

CHAIN data for 2023/24 shows that 8% of people rough sleeping had been in care at some point in their lives. In Q4 2024/25 this figure was 10%. Many people may not have immediately or recently left care and these figures may also apply to countries other than the UK. There do however, seem to be links between experience of care and rough sleeping.

Low-income households

We know that financial hardship, debt and income constraints are a significant driver of the risk of homelessness. As of October 2024, there are 7,815 people in receipt of Universal Credit in Camden. Around 7,300 people aged 16 and over in Camden were unemployed in the year ending December 2023. This is a rate of 4.9%. This was an increase compared with the year ending December 2022 when the unemployment rate was 3.9%.

Over the last decade, the rates of child poverty have increased across the United Kingdom. A large proportion of children in Camden are growing up in relative poverty. In 2023⁸, there were almost 1 in 5 (19.0%) living in relative poverty, slightly down from 19.9% in 2022. When housing costs are factored in, Camden has one of the highest rates of child poverty in the country. Nearly 15,691 children—almost 2 in 5 (39%)—are living in poverty after housing costs, making Camden the borough with the fourth-highest rate in London⁹. One of the driving forces behind this is the borough's

⁸ <https://www.gov.uk/government/statistics/children-in-low-income-families-local-area-statistics-2014-to-2023>

⁹ <https://endchildpoverty.org.uk/child-poverty-2024/>

<https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Faaf1a18515da0e792f78-c27fdabe952dfc357fe25ebf5c8897ee.ssl.cf5.rackcdn.com%2F2010%2FChid%2Bpoverty%2BAHC%2B2015->

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high housing costs, with house prices and rents exceeding the national average. The ONS census indicates that there were 11853 households with dependent children with some level of deprivation in Camden in 2021.

Refugees and asylum seekers

In 2024, around 300 asylum seekers were staying in contingency hotels in Camden, provided by the Home Office. Due to a national push to “clear the backlog and end asylum hotels”, the Home Office began fast-tracking decisions (known as the ‘Streamlined Application Process’ or SAP) for asylum seekers. Those granted Indefinite Leave to Remain (ILR) in the UK are then required to make their own housing arrangements and can also approach local authorities to apply as homeless. Accordingly, there has been an increase in the number of homelessness presentations for those receiving positive asylum decisions.

Camden has seen a 44% increase in statutory homelessness presentations between 2022/23 to 2023/24 with an increase from 2,458 to 3,548. Of these, there was a steep increase in applications from refugees leaving asylum seeker accommodation from 74 (2%) in 2022/23 to 360 (9%) in 2023/24¹⁰.

Camden’s 2023/24 CHAIN report indicated that 24% of people seen for the first time rough sleeping had most recently left asylum accommodation – the most common last settled base for new rough sleepers. This was in the significant majority as a result of a positive asylum decision.

We have seen a three-fold increase in people leaving national asylum support (NASS) accommodation resulting in high levels of homelessness and rough sleeping demand in Camden. For the year 2023/24, only 41% of rough sleepers seen in Camden were UK nationals, with 27% of people seen rough sleeping being from Europe, and the next largest group being from Africa (22.1%).

Parents (of any gender, with children aged under 18)

There is no available data on people rough sleeping Camden who are also parents. The legislative frameworks in England mean a household with a child would always be accommodated and therefore parents rough sleeping with children is not a significant concern.

Due to the multiple disadvantages and challenges that some people who rough sleep face, they may have had children removed from their care. Others may have limited contact rights. The removal of children can contribute to the traumatic experiences of people rough sleeping.

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People who are homeless

The focus of the service is to support people who are rough sleeping.

Private rental tenants in deprived areas

Pathway residents ready to move to settled accommodation are referred to the Council's Pathway Move-On Team (PMOT) for move-on advice and support. Where the Council's Allocations Scheme precludes an achievable move to social housing, the PMOT team and colleagues source private rented tenancies. Camden's private rental market is one of the most expensive in London, meaning that private rented move-on opportunities are out-of-borough, sometimes significantly so. Data is not available on how many PMOT supported private rental moves are to other LA areas defined as deprived,

A frequent concern raised by Pathway residents is that, for some, their only realistic move-on option is out Camden.

CHAIN data for 2023/24 notes that 10.6% of people new to rough sleeping in Camden had Private Rented Sector accommodation as their last settled base. For people returning to rough sleeping, that figure rises to 16%.

Single parent households

See above section on Parents

Social housing tenants

Whilst people currently in our social housing are less likely to experience homelessness, they are still subject to pressures and challenges that can lead to homelessness. In 2021, Camden's assessments indicated that 9,056 households are currently living in unsuitable housing and are unable to afford their own housing. Of these households, 5,417 currently occupy affordable housing that does not meet the current householders' needs, mainly due to overcrowding. Overcrowding is a risk for homelessness, particularly for young adults, and in circumstances like in Camden where the cost of housing is significant.

CHAIN data for 2023/24 shows 6.7% of people new to rough sleeping recorded Council Tenancy or Housing Association/RSL Accommodation as last settled base. For people returning to rough sleeping, this figure was 2.5%. These figures are noticeably lower than the comparative figures for Private Rented Sector housing above.

Any other, please specify

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2.c Have you found any data or evidence about intersectionality. This could be statistically significant data on disproportionality or evidence of disadvantage or discrimination for people who have a combination, or intersection, of two or more characteristics.

Intersectional factors exist across a number of protected groups including but not limited to women, people from Black, Asian and Minority who are likely to face racism and structural difficulties accessing services social and housing deprivation, disabled people, people with long-term health conditions, LGBTQ+ people, and young people, on low income or experience higher levels of unemployment, conditions exacerbated by the cost-of-living crisis as well as prevalence of mental ill health. An estimated 31% of disabled people in Camden have poor health, 61% are social renters and 64% are economically inactive. They are also likely to experience poor access to services and disproportionately impacted by the cost-of-living crisis.

Multiple disadvantage is prevalent in the homeless population in Camden. 20% of Adult Pathway residents meet the four criteria for multiple disadvantage. CHAIN data for 2023/24 indicates a high level of multiple disadvantage across people who rough sleep.

Multiple Disadvantage is defined, as an individual having all four of the following characteristics:

- Homelessness
- Substance misuse needs
- Mental health needs, and
- Offending related needs.

It is accepted that support needs related to sexual exploitation, domestic violence and abuse are other characteristic of 'multiple disadvantage'.

The Camden Outreach Service will support people experiencing multiple disadvantage through in several ways. These include close integrated working with specialist health, health health, substance use and adult social care services. The team will have specific approaches and lead workers for groups including people who have left NASS, young people and women and these approaches will necessarily intersect. Access and referral requirements will be low threshold to enable as many people to engage with support as needed.

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Step 3: Impact

Given the evidence listed in step 2, consider and describe what potential **positive and negative impacts** this work could have on people, related to their **protected characteristics** and the **other characteristics** about which the Council is interested.

Make sure you think about all three aims of the public sector equality duty. Have you identified any actual or potential discrimination against one or more groups? How could you have a positive impact on advancing equality of opportunity for a particular group? Are there opportunities within the activity to promote “good relations” – a better understanding or relationship between people who share a protected characteristic and others?

3.a Potential negative impact on protected characteristics

| Protected Characteristic | Is there potential negative impact? (Yes or No) | Explain the potential negative impact |
|-----------------------------|---|--|
| Age | No | It is not anticipated that there will be any negative impact on this protected group |
| Disability including carers | No | It is not anticipated that there will be any negative impact on this protected group |
| Gender reassignment | Yes | The recent High Court ruling on biological sex may impact access to specialist worker roles and protected women only spaces for people who are transgender. |
| Marriage/civil partnership | No | It is not anticipated that there will be any negative impact on this protected group |
| Pregnancy/ maternity | No | It is not anticipated that there will be any negative impact on this protected group |
| Race | No | It is not anticipated that there will be any negative impact on this protected group |
| Religion or belief | No | It is not anticipated that there will be any negative impact on this protected group |
| Sex | Yes | Street outreach services typically reach/engage fewer women who are rough sleeping than men. Mitigations have been built into the service design (see below) |
| Sexual orientation | No | It is not anticipated that there will be any negative impact on this protected group |

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3.b Potential positive impact on protected characteristics

| Protected Characteristic | Is there potential positive impact? (Yes or No) | Explain the potential positive impact |
|-----------------------------|---|--|
| Age | Yes | The service will be open to all adults over 18. There will be targeted support for younger people to access appropriate housing solutions. |
| Disability including carers | Yes | The service will support people with disabilities to access appropriate housing options as well as support from Adult Social Care, physical health services, mental health services, and others as appropriate. The service also offers the opportunity for services to co-locate at the hub and on outreach, to ensure flexibility in delivering service to people who may otherwise experience barriers to access. Specific approaches for people with autism and neurodiversity will be required through the service specification. |
| Gender reassignment | Yes | The service will support those who identify with any gender. |
| Marriage/civil partnership | N/A | Potentially limited positive impact but the service will support couples who rough sleep together, some of whom may be married or in civil partnerships. "Couples" homelessness is a complex area of work but also one where Camden has recently commissioned specialist Housing First services to help meet the need. |
| Pregnancy/ maternity | Yes | Women who rough sleep and are pregnant will be in immediate priority need. The outreach service will be well placed to support them into interim / emergency accommodation. |
| Race | Yes | The service specification will require specific approaches to supporting members of the Roma community which takes an appropriately culturally informed approach. |
| Religion or belief | N/A | The outreach service will be open to anyone regardless of religion or belief |
| Sex | Yes | The Hub provides a known location for women rough sleeping to engage with support. Women only spaces will be created within the Hub. Verification will not be required for local service access. The provider will be asked to provide approaches towards gender informed support for people who rough sleep. |
| Sexual orientation | Yes | The service will be open to those of any sexual orientation. |

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3.c Potential negative impact on other characteristics

| Characteristic | Is there potential negative impact? (Yes or No) | Explain the potential negative impact |
|--|---|--|
| Foster carers | No | It is not anticipated that there will be any negative impact on this group |
| Looked after children/care leavers | No | It is not anticipated that there will be any negative impact on this group |
| Low-income households | No | It is not anticipated that there will be any negative impact on this group |
| Refugees and asylum seekers | No | It is not anticipated that there will be any negative impact on this group |
| Parents (of any gender, with children aged under 18) | No | It is not anticipated that there will be any negative impact on this group |
| People who are homeless | No | It is not anticipated that there will be any negative impact on this group |
| Private rental tenants in deprived areas | No | It is not anticipated that there will be any negative impact on this group |
| Single parent households | No | It is not anticipated that there will be any negative impact on this group |
| Social housing tenants | No | It is not anticipated that there will be any negative impact on this group |
| Any other, please specify | No | N/A |

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3.d Potential positive impact on other characteristics

| Characteristic | Is there potential positive impact? (Yes or No) | Explain the potential positive impact |
|--|---|---|
| Foster carers | No | N/A |
| Looked after children/care leavers | Yes | As many people who rough sleep are care experienced, the service will need to ensure appropriate training with regard to trauma-informed approaches. This may include supporting young adults who are still under the care of social services to re-engage with appropriate support, both within Camden and externally. |
| Low-income households | Yes | Many people who rough sleep will be financially supported through the welfare system. Others will have No Recourse to Public funds. The service will support through provision of essential services like food, showers and laundry and well as with access to benefit claims. |
| Refugees and asylum seekers | Yes | The service will have specific lead workers and approaches for people who have left national asylum seeker accommodation with both positive and negative decisions. |
| Parents (of any gender, with children aged under 18) | No | N/A |
| People who are homeless | Yes | The services core activity is to support people who are rough sleeping |
| Private rental tenants in deprived areas | No | N/A |
| Single parent households | No | N/A |
| Social housing tenants | Yes | Some people may have abandoned existing tenancies and the service will support them to return to these with appropriate support in place. |
| Any other, please specify | No | N/A |

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3.e Consider intersectionality.⁴ Given the evidence listed in step 2, consider and describe any potential **positive and negative impacts** this activity could have on people who have a **combination, or intersection, of two or more characteristics**. For example, people who are young, trans and homeless, disabled people on low incomes, or Asian women.

Intersectionality of needs and characteristics are prevalent amongst homeless people in Camden. Section 2 of this EQIA lays out how services respond to these needs.

The service will also be expected to utilise the Team Around Me model of multi-disciplinary working and the Personal Passports to help facilitate service access and engagement.

⁴ Intersectionality refers to the interconnected nature of social categorisations such as race, class, and gender as they apply to a given individual or group, regarded as creating overlapping and interdependent systems of discrimination or disadvantage.

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Step 4: Engagement - co-production, involvement or consultation with those affected

4.a How have the opinions of people potentially affected by the activity, or those of organisations representing them, informed your work?

| List the groups you intend to engage and reference any previous relevant activities, including relevant formal consultation? ⁵ | If engagement has taken place, what issues were raised in relation to one or more of the protected characteristics or the other characteristics about which the Council takes an interest, including multiple or intersecting impacts for people who have two or more of the relevant characteristics? |
|---|--|
| Online survey open to anyone to submit responses on current service model | Multiple ideas feedback and included in an appendix for the Cabinet report |
| Engagement session held with service working in Camden via the Rough Sleeping Forum in April 2025 | |
| Engagement session held with female service users at Women at the Well | Would like to see more female only spaces / provision at the Hub |
| Discussions with Commissioning Managers responsible for Autism services | |
| Planned sessions to be held with people currently rough sleeping at the RTs Hub. | |

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5 This could include our staff networks, advisory groups and local community groups, advice agencies and charities.

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4.b. Where relevant, record any engagement you have had with other teams or directorates within the Council and/or with external partners or suppliers that you are working with to deliver this activity. This is essential where the mitigations for any potential negative impacts rely on the delivery of work by other teams.

See above 4.a

Step 5: Informed decision-making

5. Having assessed the potential positive and/or negative impact of the activity, what do you propose to do next?

Please select one of the options below and provide a rationale (for most EqlAs this will be box 1). Remember to review this and consider any additional evidence from the operation of the activity.

| | |
|--|--|
| 1. Change the activity to mitigate potential negative impacts identified and/or to include additional positive impacts that can address disproportionality or otherwise promote equality or good relations. | Service can continue to operate as majority of impact is highly positive. Appropriate mitigations will be in place to improve service accessibility and approaches for women and to mitigate potential impact on trans women once the Equality and Human Rights Commission (EHRC) publish updated guidance and Code of Practice. |
| 2. Continue the work as it is because no potential negative impacts have been found | |
| 3. Justify and continue the work despite negative impacts (please provide justification – this must be a proportionate means of achieving a legitimate aim) | |

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**4. Stop the work because
discrimination is unjustifiable
and there is no obvious way to
mitigate the negative impact**

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Step 6: Action planning

6. You must address any negative impacts identified in steps 3 and/or 4. Please demonstrate how you will do this or record any actions already taken to do this.

Please remember to add any positive actions you can take that further any potential or actual positive impacts identified in step 3 and 4.

Make sure you consult with or inform others who will need to deliver actions.

| Action | Due | Owner |
|---|-----------|---|
| Ensure service specification includes appropriate requirements to improve access for women. | July 2025 | Mike Fill, Single Homelessness Strategic Commissioner |
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Step 7: EqlA Advisor

Ask a colleague, preferably in another team or directorate, to 'sense check' your approach to the EqlA and ask them to review the EqlA form before completing it.

They should be able to clearly understand from what you have recorded here the process you have undertaken to assess the equality impacts, what your analysis tells you about positive and negative actual or potential impact, and what decisions you have made and actions you have identified as a result.

They may make suggestions for evidence or impacts that you have not identified. If this happens, you should consider revising the EqlA form before completing this version and setting a date for its review.

If you feel you could benefit from further advice, please contact the Equalities service at equalities@camden.gov.uk

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Step 8: Sign-off

| | |
|-----------------------------------|---|
| EqlA author | Name: Mike Fill Job title Strategy and Commissioning Manager |
| EqlA advisor / reviewer | Name Simone Melia Head of Housing Solutions |
| Senior accountable officer | Name Glendine Shepherd Director of Housing |