Camden Council Equality Impact Assessment Form

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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
Draft Homelessness and Rough Sleeping Strategy 2025 – 2030 for public consultation

Officer accountable for the EqIA (e.g. director or project sponsor)	
Full name: Position: Directorate: Email:	**Osian Jones** **Director of Strategy, Design and Insight** **Corporate Services** **Osian.jones@camden.gov.uk**
Lead person completing the EqIA (author)	
Full name: Position: Directorate: Email:	Osian Jones Director of Strategy, Design and Insight Corporate Services Osian.jones@camden.gov.uk
Person reviewing the EqIA (reviewer)	
Full name: Position: Directorate: Email:	Hugh Smith Corporate Strategy Portfolio Lead Corporate Strategy Hugh.smith@camden.gov.uk
Version number and date of update	
1 – 6 June 2025	

Step 1: Clarifying aims

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

- [ ] New
- [X] Under review
- [ ] Being changed

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

- [X] Staff
- [X] Residents
- [X] Contractors
- [ ] Other (please detail):

1.c Which Directorate does the activity fall under:

- [X] Adults and Health
- [X] Supporting Communities
- [X] 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 Homelessness Reduction Act 2017 reinforced the requirement for councils to have a Homelessness and Rough Sleeping Strategy. This EQIA was prepared alongside the proposed draft Strategy which is going for public consultation and feedback with the intention that the revised Strategy is presented to Cabinet for agreement later in 2025.

Camden previously published a Homelessness and Rough Sleeping Strategy in 2019 following a public consultation in 2018.

Camden, like many London boroughs, is experiencing a significant increase in the number of households presenting as homeless to council services and is also seeing an increase in the number of people rough sleeping in the borough. There is a number of strategic and complex challenges underlying the challenge of homelessness and rough sleeping in the borough:

- A wider London and national housing crisis that is creating a lack of affordable homes;

- Demand for social housing, including larger family homes, increasing at a pace beyond which Camden can build or buy;

- Increasing numbers of households in temporary accommodation for longer; and

- The impact of welfare reforms on households, and the impact of the cost-of-living crisis on poverty.

To respond to these changing and complex challenges the Council has developed a new Homelessness and Rough Sleeping Strategy focusing on four key priorities:

1. Prevent homelessness and rough sleeping

2. Provide joined-up housing, health and social care support that reduces harm and improves health and wellbeing

3. Secure more housing for people that is accessible, affordable and long-term

4. Campaign for change nationally and share our learning

The new Homelessness and Rough Sleeping Strategy provides an overarching strategic framework that incorporates previous review, reflection and recommendation-making work including the Homelessness System Transformation programme, which was co-designed with people with lived experience and partners, the Rough Sleeping Review and the Homelessness Scrutiny Panel. It seeks to understand and respond to areas of challenge within the existing system and outline how the Council will review its own services and work with partners to support people in the borough.

We are seeking a Single Member Decision to go to public consultation with the draft Strategy following review by council services so that we can benefit from feedback and insight from citizens, partners, community leaders, those with expertise and lived experience of homelessness.

This EQIA represents a summary of data and insight to date and will be updated with information, insight and data further to the final Strategy agreement later in 2025.

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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 carers[2]

■ Gender reassignment[3]

☐ 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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We are seeing significant increases in homelessness and rough sleeping across Camden over the last few years. 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. We have also seen a significant increase in people seen rough sleeping in Camden over the last few years including an increase between 2022/23 and 2023/24 from 719 people to 903 people. Like most London boroughs, Camden has seen large increases in households in temporary accommodation. In March 2025 numbers reached 1,018 households.

We know that the risk of homelessness in Camden is increasing for a range of households – but that not everyone is equally at risk, and that different groups have different experiences of homelessness. We know from our own data and from national data and research that there are groups that are particularly at risk of homelessness including Black, Gypsy and Traveller and other ethnic minority people, women, single households and single parents with children, younger people and people with poor mental health and people who have experience of drug and alcohol abuse.

AGE

We know that young people and younger adults are at increased risk of homelessness – and equally that an experience of homelessness in childhood, or adverse childhood experiences can increase someone's risk of becoming homeless.

In 2023/24 there was a disproportionately high number of people owed a prevention or relief housing 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 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 was asylum accommodation.

There is evidence that there is an increasing number of older people experiencing homelessness nationally as a result of wider trends in the cost of private rented sector housing. 2023 data has shown a national increase of 13% in older people who are homeless or threatened with homelessness. In 2023/24 statutory data shows that there were 32 people identifying as "retired" who requested support with housing.

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

DISABILITY (INCLUDING FAMILY CARERS)

Data and evidence suggest that disabled people in Camden experience risk factors for homelessness at a higher rate than non-disabled people. We know that homelessness often results in poorer physical and mental health - but also that poor mental and physical health can be a cause of homelessness as it restricts people's ability to access support, services and income to protect people from financial and housing instability. Within this population, 31% define their health as bad or very bad, compared to 1% of the non-disabled population, and only 33% of disabled people say their health is good or very good, compared to 94% of non-disabled people. In the UK, 78% of homeless people report having a physical health condition this is compared to 37% for the general population[2].

The same research also indicates that 44% of homeless people have a mental health diagnosis, in comparison with 23% of the general population. 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).

In 2023/24, 42% of people seen sleeping in rough reported a mental health support need, and a further 37% of people reported having a support need combining mental health or drug and alcohol needs.

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) has 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 third highest diagnosed prevalence of serious mental illness in the country and the eighth highest diagnosed prevalence of depression in London.

Housing tenure also differs substantially across these groups, with 61% of disabled people being social renters and 20% being homeowners, whereas in the non-disabled population, 27% are social renters and 33% are homeowners. 27% of disabled people were employed on Census day 2021 compared to 53% of the non-disabled population, and 64% were economically inactive, meaning they were not employed nor actively seeking employment, compared with 26% of the population[3]. These factors may increase people's likelihood of experiencing homelessness as a result of a reliance on welfare benefits for income, and particularly where people are also in private rented accommodation.

We know that poor physical health can also be a risk factor for homelessness. The 2021 Census asked people to assess their general health on a five-point scale, between 'very good' to 'very bad'. 43% of people aged 65 and over in Camden reported their health as not good. Across ethnic groups, there are differences in the share of over 65s reporting poor health, with 40% of White people over 65 reporting their health as not good, but 50% of Black people,

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[2] **Health Needs Audit, 2016 - Homeless Link**

[3] Ibid

Other ethnicities, and 53% of Asian people[4]. There is often a particular risk point for homelessness at the point of hospital discharge and the Council works closely with health and community partners to support effective hospital discharge for people to safe accommodation.

There is limited data on the representation of carers in our homelessness system – however research by the Learning and Work Institute indicates that there are 272,000 young adult carers in the UK who are three times as likely to be not in education, employment or training and as a result are more likely to experience homelessness[5].

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 identified 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 point[6]. 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.

PREGNANCY AND MATERNITY

The data on women who are pregnant approaching council services between 2021 and 2023/24 shows limited numbers of between one and four each year. However, national research from Wellbeing of Women, in partnership with the Royal College of Midwives and the 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 period.[7] National 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.

Camden does not have data available on women with children under five in temporary accommodation – the national statutory data returns does not separate data on children in temporary accommodation between for example babies, children under five and teenagers. The Centre for Homelessness Impact in 2025 undertook research on data relating to children under five in temporary accommodation, which indicates that there are approximately 19,000 households in London with children under five in September 2024[8].

RACE

Over 25% of those owed a homelessness duty in Camden in 2023/24 identified as Black, African, Caribbean or Black British, despite the national census indicating that only 9% of Camden's population identify this way - meaning Black residents are disproportionately at risk

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[4] Ibid
[5] https://quakersocialaction.org.uk/sites/default/files/uploads/We-Still-Care-Report-1.pdf
[6] https://www.crisis.org.uk/ending-homelessness/about-homelessness/about-lgbtqplus-homelessness/
[7] https://www.wellbeingofwomen.org.uk/what-we-do/research/research-projects/improving-maternity-care-for-pregnant-women-experiencing-homelessness/
[8] https://www.homelessnessimpact.org/news/katharine-swindells-orwell-prize

of homelessness.

Our 2023/24 CHAIN data report for people seen rough sleeping in Camden indicates that of the 903 people seen rough sleeping during the period:

- 26.8% of people are White British;
- 23.8% of people are Black or Black British;
- 13% of people are White – other; and
- 12% of people are White – Roma.

This is mirroring London and national data, where the Single Homelessness Project (SHP) found that Black people are three times more likely to be homeless than white people in England and five times more likely in London. SHP found that 1 in 23 black households in England will become, or are, homeless compared to 1 in 83 for all other ethnic groups[9].

Overcrowded housing is when there are fewer bedrooms than needed for the number of people living in the household (depending on age and household composition). In Camden, overcrowded households make up almost 10% of all households, but that differs substantially across ethnic groups, with 24% of Black households overcrowded and 17% of Asian households, whereas across White households only 5% are overcrowded[10].

Housing tenure is also different across ethnic groups in Camden. Across all households, 30% own their home, 36% rent privately and 34% are social renters. The highest share of social renters is among Black households in Camden, of whom 76% are social renters, then Mixed households with 49% social renters. The highest rate of ownership was for households with three or more ethnic groups, where 40% owned their home, and then White households with 36%, and the lowest rates were for Black households with 7% ownership and Mixed households, with 19% ownership[11].

Mental health is a risk factor for homelessness. Rates of mental illness for people from Black, Asian and Minority Ethnic backgrounds are sometimes greater than for white people. Compared to white people:

- Black women are more likely to experience a common mental illness such as anxiety disorder or depression;
- Older South Asian women are an at-risk group for suicide;
- Black men are more likely to experience psychosis; and
- Black people are four more times likely to be detained under the Mental Health Act.

But more white people receive treatment for mental health issues than people from Black, Asian and Minority Ethnic backgrounds and they have better outcomes. Some of the reasons why there are different rates of mental illness for people from Black, Asian and Minority Ethnic backgrounds are due to:

- Inequalities in wealth and living standards,
- Bias, discrimination and racism,
- Stigma about mental health, and
- More likelihood to have mental health issues identified in the criminal justice system

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[9] Single Homelessness Project 2025
[10] Camden State of the Borough 2024
[11] Ibid

People from Black, Asian and Minority Ethnic backgrounds are more likely to be living in poverty than white people. And people living in poverty are more likely to develop and experience mental health issues. For these multi-factorial reasons, we recognise the disproportionate impact of homelessness as a result of race.

We are aware of disproportionalities in homelessness and rough sleeping for the Gypsy, Traveller and Roma communities in Camden. People from the Roma community are over-represented in rough sleeping statistics with 12% of people seen rough sleeping in 2023/24 identifying as "White-Roma" despite this accounting for 0.5% of the population in the 2021 census.

The Council has a responsibility through national planning policy to assess and plan for the housing needs of all residents, including the Gypsy and Traveller community. There is an established community of travellers in Camden that has lived in the borough for over thirty years, and which we recognise has longstanding connections with local social networks and services. The Council currently provides four traveller pitches (three at Carol Street and one at Castlehaven Road). There is also a private site for travelling showpeople (the North Fairground Site at the Vale of Health). We also know there are a number of Gypsy and Traveller households currently living in overcrowded conditions in Camden. The Council is currently undertaking further work to identify sites to meet the needs of Gypsies and Travellers in Camden[12].

The Trust for London and Hackney Council in 2021 completed research into the homelessness experiences of young Gypsies and Travellers in the community. Of those surveyed who were homeless, for the majority this was because of overcrowding in the family home, or the pitch on site, parents suffering financially, or fleeing domestic abuse[13].

SEX

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 the issues they face.

Research by Crisis indicates that the risk factors for women experiencing homelessness are physical or mental health problems and leaving violent relationships. For men, the risk factors

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[12] Camden Local Plan 2025, Accommodation for Travellers, Page 221
[13] https://tfl.ams3.cdn.digitaloceanspaces.com/media/documents/LGT_Hackney_homeless_report_21Sept23_web.pdf

were relationship breakdown, substance misuse and leaving an institution (such as prison, care and hospital).

Research from Single Homelessness Project suggests an over-representation of women in temporary accommodation – in 2022 65% of homeless adults in temporary accommodation were women. These figures are part of a growing trend. The number of women in temporary accommodation has almost doubled in the last decade. They also indicated that 64% of women experiencing homelessness also face mental health issues. One in 38 lone mothers in England are homeless[14].

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 see rough sleeping in Camden. In 2023/24, 82.1% of people seen rough sleeping were men, and 17.8% were 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 (…) but that many homeless women have been homeless on multiple occasions and had move in and out of homeless services over prolonged periods[15]"

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.

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

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[14] https://www.shp.org.uk/homelessness-explained/womens-homelessness-the-stats/
[15] https://www.engender.org.uk/content/publications/GENDER-HOUSING-AND-HOMELESSNESS---A-LITERATURE-REVIEW.pdf

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 family[16].

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.

Religion and Belief

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

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 married[17].

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[16] https://blog.ukdataservice.ac.uk/lgbtq-homelessness/

[17] https://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/peopleexperiencinghomelessnessenglandandwales/census2021

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 (ten individuals) – 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 this 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.

Our housing allocations scheme gives care leavers who can manage a tenancy the ability to bid for a one-bedroom flat in Camden. Once secured, they are supported to move and settle into their new home, with provisions made to ensure they're happy, safe and able to sustain the tenancy.

Camden has made significant investment to ensure that we are supporting care leavers and people with care experience to obtain support – including making it a protected characteristic locally. We have recognised the importance of working with partners in the criminal justice system, housing, education, and employment colleagues if we want to make a change for care-experienced young people in Camden. We are undertaking work to support care leavers (and young people in complex situations) aged 16-25 into secure accommodation (and this work is reflected in the current draft Strategy).

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%.

Fair4All Finance estimates that there are 85,000 financially vulnerable adults in Camden - 37% of the population. This is a lower total proportion of financially vulnerable adults than in neighbouring boroughs. However, Camden's proportion of those in the most destitute cohorts is much higher than comparable boroughs.

The Fair4All Finance cohorts and the estimates of how many adults within Camden sit within each cohort is included below - it is estimated that a number of households within temporary accommodation are in the "forgotten families" cohort[18].

Segments	Definitions	# adults in Camden	Implications for our services
Forgotten Families	Lowest incomes of any segment (under £20k, many under £10k). No savings, mostly working minimal hours or not at all. Social tenants. Many not just in poverty, but destitution, meaning they have very little access to formal credit, meaning their debts are in the form of CT, rent and energy arrears.	38,444	We would prioritise this group for intensive support, particularly taking a corporate approach to debt collection as they likely owe rent, council tax and social care. This group also benefits from welfare rights support and money management. We need to consider how we use enforcement agents with this cohort as unlikely to net revenue for us, rather just create more system costs for us in long run.
Credit Crisis Families	Similar to Forgotten Families but with slightly higher incomes (though mostly still under £25k). Incomes mean they do have access to credit but are struggling to manage these debts. Many have debts across 5+ providers.	22,540	We would prioritise this group for intensive support. This is the group that most likely needs accredited debt advice, from us or more likely from Advice partners, as well as the support offered to Forgotten Families
Squeezed and sliding	Getting by but squeezed. 25-44. Reasonable household incomes (£30 - £50k), but also using savings as income as costs rise. High credit card usage.	13,536	We would not necessarily prioritise this group for direct support, but signpost to money management advice. They are likely to be digitally confident and able to access national services.
Ungolden years	This group are mostly over 45s, with many in retirement. They have low but quite stable incomes, with limited ability to earn more. Some are homeowners. They have the highest savings and lowest debts of any group, but are still struggling with rising costs. Less likely to use credit, so get by on less as costs rise.	8,900	Relatively high priority, particularly where they are paying for social care. This group needs support building confidence to use affordable credit (and sometimes equity release schemes) to avoid poverty; and help avoiding fraud and scams.
Difficult Debts	This group are generally working age (35-44) and have highest incomes of any segment (£35k - £50k+), but also have some of the highest debts. These are people who have always been comfortable using credit, but debt has spiralled as costs and interest rates have risen. This is the group you might uncharitably call "wont pay" when it comes to council tax arrears.	1,251	Not high priority given the very low numbers in Camden. This group needs to be supported to access independent debt advice, but should be able to meet their priority bills (likely to be Council Tax debt) with the right independent support.
Unsteady Starters	This is the youngest segment (18 - 34). They are most likely to be on zero-hours contracts, and are privately renting or staying with family. Around half have children. They tend to use BNPL, overdrafts and credit cards, and it takes effort to keep on top of them all. Not high debts now but at risk of spiralling.	809	Not high priority, given the very low numbers in Camden. However the subset who are not in work are key to our young people mission. This group needs support with money management, employment and skills and low level debt advice.

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 2023, there were almost 1 in 5 (19.0%) living in relative poverty, slightly down from 19.9% in 2022.[19]

When housing costs are factored in, Camden has one of the highest rates of child poverty in

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[18] Debt Transformation and Income Maximisation Update, Resources and Corporate Performance Strategy, February 2025

[19] https://www.gov.uk/government/statistics/children-in-low-income-families-local-area-statistics-2014-to-2023

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 London.[20] One of the driving forces behind this is the borough's high housing costs, with house prices and rents exceeding the national average. The ONS census indicates that there were 11,853 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 people 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 2023/24.[21]

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. Centrepoint reports that 14% of the young people that visit their services are refugees who have often been granted asylum but do not have further accommodation following this 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)

Camden has seen a significant increase in households in temporary accommodation - from 498 in 2019 to over 1000 in March 2025. Many of these are families with children. 70% of those 1000 households are in expensive nightly-paid accommodation like hotels – because of the lack of affordable housing in Camden – and we know that this is often very disruptive and challenging particularly for families with children. We are actively working as part of our temporary accommodation taskforce to improve conditions for people in temporary accommodation.

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[20] 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%2B2015-2023_Local%2BAuthorities%2Band%2BConstituencies.xlsx%3Fv%3D1716657555000&wdOrigin=BROWSELINK

[21] Q4 ILI Performance Report 2023/24

Our overarching ambition is to ensure residents are better served by the system. As households remain in temporary accommodation for longer, the task group will oversee work to review the support offer for those in temporary accommodation, the adequate supply and blockages around the single adult's pathway, options to discharge our statutory duty and the impact of the allocations policy alongside prevention activity to reduce numbers entering temporary accommodation in the first place.

Currently, residents in TA are able to access support on their housing benefit and repairs. Those in hostels also have staff available on site. Given the increasing numbers of placements and the lack of suitable accommodation we are shifting this model due to increasing demand. The Housing restructure which is now completing enables families in TA to access floating support services.

We are also improving facilities in hostels – for example improving play equipment available and drawing further on support from the voluntary sector, for example the Doorstep Families Homelessness Project is co-located at Abbots & Levine hostel in partnership with Caris.

We are also putting support in place around those families in hubs, linking up with Early Help, focusing on ensuring continuity of school attendance and helping the family maintain support networks, building on the model we provided to refugee hotels following the 2021 Afghan airlift.

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People who are homeless

The focus of the Strategy is to support people who have experience of homelessness and rough sleeping, or are at risk of doing so.

Private rental tenants in deprived areas

The end of private rented sector tenancies remains the main reason why households approach the Council for support with homelessness - and this is expected to continue.

There has been a 41% reduction across London in private rented accommodation advertised for rent since the outset of the pandemic in 2020, and a 20% increase in average rental costs. By 2022-23 only 2.3% of properties across London are affordable within Local Housing Allowance (LHA) limits – down from 18% at the outset of the pandemic. None of these are in Camden. This means that anyone facing a private rented sector eviction or seeking to move out from a family home for example, and who is reliant on benefits, cannot find a private home in the borough. This has led to an increasing number of households joining the waiting list for social housing and placed in temporary accommodation.

Private renters are more likely than any other tenure to live in a poor-quality home. The Private Sector Housing Service receives on average 750 complaints a year from private renters concerning their home, which is a small percentage of the 35,000 households in this sector. Private rented households in London are more likely to be overcrowded than the rest of England, with 9% of households being overcrowded, compared to 4% to 6% across the rest of England.

Single parent households

National statistics demonstrate that lone-parent households are more likely to experience homelessness. A survey by Shelter in 2024 found that one in seven lone parents who rent privately – more than 74,000 people – and their children were at risk of homelessness, and one-parent families were more likely to fall behind on their rent and face eviction. This is disproportionately women single parent households – and they are often homeless as a result of domestic abuse alongside poverty and financial hardship.

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 places like in Camden where the cost of housing is significant.

Any other, please specify

Camden is also aware of the number of "boat dwellers" currently in Camden (with its large number of canals and waterways) and also the limited data on their housing and support needs. The Canal and River Trust national boat survey in 2022 indicates that there are 4,370 boaters in the London and Southeast region. Of these, the Canal and Boat Trust indicates that boat dwellers experience challenges in:

- Accessing health services – 31.7%
- Employment and work – 21.7%
- Disability or a long-term health condition – 17.5%
- Accessing financial services – 16.5%[22]

The support needs of boat dwellers, and potential housing support needs, is an emerging area which we will continue to review and seek further data to understand.

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 ethnic minority groups who are likely to face racism and structural difficulties accessing services as well as social and housing deprivation, disabled people, people with long-term health conditions, LGBTQ+ people, and young people.

The section above notes specifically that there is evidence of increased risk of homelessness among:
- People with migrant status
- Young LGBTQ+ people
- People in private rented sector accommodation who are on low incomes, or reliant on welfare benefits
- Black and Asian women and women from other ethnic minority groups
- Black and Asian disabled people and disabled people from other ethnic minorities

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[22]

https://canalrivertrust.org.uk/media/document/WmkAT98oEDN8qjfr81Jwvw/Reh4I3FffyOrd6212VYZMMmllmfhtr1NBmX0F3ijziw/aHR0cHM6Ly9jcnRwcm9kY21zdWtzMDEuYmxvYi5jb3JlLndpbmRvd3MubmV0L2RvY3VtZW50Lw/0189bc2f-daff-7304-b426-1b54175b32ff.pdf

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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	
Disability including carers	No	
Gender reassignment	No	
Marriage/civil partnership	No	

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Protected Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
Pregnancy/ maternity	No	.
Race	No	.
Religion or belief	No	
Sex	No	
Sexual orientation	No	

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3.b Potential positive impact on protected characteristics

The overall approach of the current draft Homelessness and Rough Sleeping Strategy is to take a person-centred approach. We believe our homelessness and rough sleeping services should be specific to people's experience and should provide people with a way-in to access other important services. As explained by the Centre for Homelessness Impact (SHARE), person-centred care supports people to develop the knowledge, skills and confidence they need to more effectively manage and make informed decisions about their own housing, health and health care. It is coordinated and tailored to the needs of the individual. Crucially, it ensures that people are always treated with dignity, compassion and respect

One of our key principles in our approach is that our services should champion equity. We recognise and advocate for groups and communities that experience homelessness disproportionately, and ensure our services address these inequalities, including for (but not limited to) Black and minority ethnic people, disabled and LGBTQ+ people, women, care leavers and people with experience of domestic abuse or the criminal justice system.

We believe the Strategy and the activity highlighted or supported by the Strategy is focused on supporting people with protected characteristics experiencing homelessness, and more clearly address and respond to the vulnerabilities that increase their risk.

This is a draft Strategy and we plan to update and refine this EQIA with further information following the public consultation period and engagement with stakeholders and partners and people with lived experience of homelessness and rough sleeping.

Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Age	Yes	The draft Strategy proposes to responding to the findings of the pilot Young Person's Rough Sleeping Census and reviewing support offer for young people leaving care.
Disability including carers	Yes	The draft Strategy proposes to incorporate findings from the Homeless System Transformation work which includes reflection on how to provide services to people experiencing homelessness that respond to someone's homelessness and their wider needs driving homelessness including disability and mental and physical health.

Gender reassignment		Not known at this stage – we will look to continue to identify insight, data and evidence relating to this protected characteristic as part of the draft Strategy consultation.
Marriage/civil partnership	No	
Pregnancy/ maternity	Yes	The draft Strategy proposes activity to support households in temporary accommodation which is where the majority of households who include pregnant women or young children are currently within our homeless system. As part of our Tackling Poverty work we are also undertaking activity to support pregnant women access financial support and this pilot will inform the finalisation of the Strategy.

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Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Race	Yes	Our homelessness and rough sleeping services will provide support to the borough's diverse communities and the diversity of those experiencing homelessness. The draft Strategy proposes a strong commitment to equity and to reviewing data and insight to enable focused support that is reflective of the different risks and experiences of homeless people in Camden.
Religion or belief	N/A	
Sex	Yes	The proposed draft Strategy incorporates insight from the Council's pilot Women's Homelessness Census and to scoping and designing services that respond to the different experiences of women in homelessness and the differential experience of multiple disadvantage.
Sexual orientation		Not known at this stage – we will look to continue to identify insight, data and evidence relating to this protected characteristic as part of the draft Strategy consultation.

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	
Looked after children/care leavers	No	
Low-income households	No	
Refugees and asylum seek-ers	No	
Parents (of any gender, with children aged under 18)	No	

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Characteristic	Is there potential negative impact? (Yes or No)	Explain the potential negative impact
People who are homeless	No	
Private rental tenants in deprived areas	No	
Single parent households	No	
Social housing tenants	No	
Any other, please specify	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	N/A	
Looked after children/care leavers	Yes	Camden is committed to providing support to people with care experience and to providing them with the stability, care and resources they need to heal from past trauma, develop independence and build fulfilling lives. The draft Strategy proposes actions around scoping further work for young care leavers accommodation.
Low-income households	Yes	The proposed draft Strategy proposes further closer working between our homelessness and tackling poverty teams to support people on low incomes access support early to prevent homelessness.
Refugees and asylum seekers	Yes	The proposed draft Strategy suggests actions around the Council working to support people earlier who might be at risk of homelessness following an asylum decision.
Parents (of any gender, with children aged under 18)	Yes	

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Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
People who are homeless	Yes	The draft Strategy is focused on supporting people at risk of or experiencing homelessness and rough sleeping.
Private rental tenants in deprived areas	Yes	The proposed draft Strategy proposes further closer working between our homelessness and tackling poverty teams to support people on in private rented accommodation access support early to prevent homelessness.
Single parent households	Yes	The draft Strategy proposes activity to support households in temporary accommodation which is where the majority of households who include single parent households are currently within our homeless system. As part of our Tackling Poverty work, we are also undertaking activity to support pregnant women access financial support and this pilot will inform the finalisation of the Strategy.
Social housing tenants	Yes	The draft Strategy proposes activity to review our current Housing Allocations policy to ensure that this is effective in supporting our current social housing tenant population and also provide support to those on our housing waiting list.
Any other, please specify	N/a	

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.

Intersectional factors exist across a number of protected groups including but not limited to women, people from Black, Asian and ethnic minority groups who are likely to face racism and structural difficulties accessing services as well as social and housing deprivation, disabled people, people with long-term health conditions, LGBTQ+ people, and young

people. Our draft Strategy commits the Council to trauma-informed and data led practice that seeks to reflect and respond to intersectionality and increased risk of homelessness through appropriate support.

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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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?
Co-Producers Research	We have undertaken co-producers research with a range of people with lived experience of homelessness and rough sleeping and this has shaped the proposed recommendations and actions. The draft consultation will platform the co-producers work and we will encourage their feedback and suggestions.
Homelessness System Transformation	We have engaged as part of the Homelessness System Transformation with partners and stakeholders in the development of the draft Strategy and will as part of the consultation.
Homelessness Partnership Forum	We have engaged as part of the Homelessness Partner Forum with partners and stakeholders in the development of the draft Strategy and will do as part of the consultation.

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

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.

As per our ambition to recognise the broad impact and experience of homelessness and rough sleeping across the council, we have engaged with various teams and directorates within the council as well as external partners.

Council teams:
- Adult Social Care Team
- Public Health Team
- Corporate Services Team
- Inclusive Economy Team
- Housing Team
- Commissioning Team

External partner meetings and engagement:
- Homelessness partner forum

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 EqIAs 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.	
2. Continue the work as it is because no potential negative impacts have been found	No negative impacts found.

3. Justify and continue the work despite negative impacts (please provide justification – this must be a proportionate means of achieving a legitimate aim)	
4. Stop the work because discrimination is unjustifiable and there is no obvious way to mitigate the negative impact	

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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

Step 7: EqIA Advisor

Ask a colleague, preferably in another team or directorate, to 'sense check' your approach to the EqIA and ask them to review the EqIA 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 EqIA 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

Camden Council Equality Impact Assessment Form

EqIA author	Osian Jones
EqIA advisor / reviewer	Hugh Smith
Senior accountable officer	Osian Jones