

# **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 regard<sup>1</sup> 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](mailto: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.

<sup>1</sup> [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	<b>Camden Adult Pathway Procurement of four contracts, which will provide six services delivering supported accommodation to homeless adults.</b>
Officer accountable for the EqlA (e.g. director or project sponsor)	
Full name:	Glendine Shepherd
Position:	Director of Housing Solutions
Directorate:	Supporting Communities
Email:	Glendine.Shepherd@camden.gov.uk
Lead person completing the EqlA (author)	
Full name:	Barry Gavan
Position:	Strategy & Commissioning Manager
Directorate:	Supporting Communities
Email:	Barry.Gavan@camden.gob
Person reviewing the EqlA (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	

## 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 Council commissions a range of housing related support services (mainly hostels and supported housing) for single homeless people with support needs, people rough sleeping, people with mental health and/or substance misuse problems, those with experience of the criminal justice system and women escaping domestic violence and abuse. The Council refers to these services collectively as the Adult Pathway. The Adult Pathway comprises 15 accommodation-based support services which deliver high to medium support and 24/ cover, one lower support service and two floating support services.

The Homelessness Reduction Act placed new duties on local authorities in 2018. The Adult Pathway plays a key role in the Council meeting statutory duties for single homeless people with support needs. These services will also play a key role in delivering the Council's Rough Sleeping and Homeless Strategy.

Adult Pathway services are trauma-informed and deliver to the PIE (Psychologically Informed Environments) model. Services work in partnership with statutory and non-statutory agencies to support residents in a way that works for them, with the aim of moving on to, and sustaining settled accommodation.

Four current Adult Pathway contracts, providing supported accommodation to 335 homeless adults across six sites are due to expire on 31<sup>st</sup> March 2026 or 30<sup>th</sup> September 2026 with no provision to extend further.

The most recent Adult Pathway demographic data shows that

- 75% are male. 25% are female and less than 1% are transgender.
- The average age of female service users is 40, lower than their male counterpart at age 44.
- The proportion of pathway residents aged 60 or over is 11.2%
- Ethnic minority groups comprise 38% of the adult pathway residents,
- The largest single religion amongst believing service users is Christianity, followed by Islam.
- The majority of service users define themselves as heterosexual, 6 % define themselves as LGBTQ+.
- 43% of the Pathway residents are considered to be disabled.

## 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.

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The Commissioning Team collects quarterly and annual monitoring data. An annual data exercise 'Review Refresh' collects detailed snapshot data, including protected characteristics, on all the homeless adults resident in the Pathway. The data is provided directly by commissioned services. This report primarily draws on Review Refresh data collected 31<sup>st</sup> March 2025.

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

- ☐ Age
- ☐ Disability, including family carers<sup>2</sup>
- ☐ Gender reassignment<sup>3</sup>
- ☐ Marriage and civil partnership
- ☐ Pregnancy and maternity
- ☐ Race
- ☐ Religion or belief
- ☐ Sex
- ☐ Sexual orientation

<sup>2</sup> 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.

<sup>3</sup> 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

The average age of a female service user (39) is lower than their male counterpart (45). The proportion of Pathway residents aged 60 or over is 12.3%. Homeless adults aged 18 and over are eligible for referral into the Pathway. There is no upper age limit.

## Disability, including family carers

43% of Pathway residents are considered to be disabled. The most common disability is a mental health condition which accounts for nearly half of this percentage. Of these, about 50% have an additional need of alcohol/substance misuse. Adult Pathway services have partnership arrangements in place with statutory Mental Health and Substance Misuse services in Camden.

15% have some type of mobility need, with 2% having high mobility needs. There are 14 wheelchair accessible units across the Pathway.

## Gender reassignment

Under 1% of Pathway residents are recorded as being trans-gender.

The Government Equalities Office estimate that around 0.3 - 0.8% of the UK population are transgender.

People who identify as transgender have higher rates of mental health complications than those in the general population due to stigma and discrimination.

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

The Adult Pathway provides supported accommodation for single people who are vulnerable. Due to limitations in accommodation facilities, it is not possible to accommodate couples within the Pathway in double rooms. However, couples can be accommodated, separately and assisted to find independent accommodation together

80% of service users define themselves as single.

## Pregnancy and maternity

The Adult Pathway has one service, the refuge service, which is suitable for a small number of women with a child feeling Domestic Violence and Abuse.

Female service users in other Pathway services who become pregnant are supported to access relevant services and move to appropriate alternative accommodation. Other than the Refuge service, the Adult Pathway does not accommodate children.

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## Race

The representation of Global Majority Background groups in the Pathway is 42%, similar to the overall borough demographic.

## Religion or belief

45% of clients are reported as having no faith or none known Overall, the largest single religion amongst believing service users was Christianity (29%) followed by Muslim (17%)

Some women, for religious or cultural reasons, or reasons related to other beliefs, may consider themselves unable to use some mixed-sex facilities. The Pathway has two women-only services, and in addition women only clusters where deliverable in other services.

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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.

In the Adult Pathway snapshot 31<sup>st</sup> March 2025, 183 service users (27%) were women. Of these, 124 (68%) have support needs relating to sexual exploitation, domestic violence or abuse. The Pathway has two women-only services, and in addition women only clusters where deliverable in other services. Services work in partnership Camden's Women's Navigator service, Camden Safety Net, and voluntary sector organisation supporting Women.

## Sexual orientation

The majority of residents are defined as heterosexual (86%), 6% as gay, lesbian or bisexual. These numbers may be slightly higher, with 8% reported as not known/ not disclosed.

2021 Census data for Camden shows that: 82.6% of residents identify as straight/ heterosexual 3.7% of residents identify as gay/ lesbian 2.5% of residents identify as bisexual 10.5% of residents chose not to disclose their sexual orientation 0.7% of residents identified as "other".

There has been little focus on the needs of LGBTQ+ population and their access, experience and outcomes from the Adult Pathway. The LGBTQ+ population are more likely to experience mental ill health and have specific risks around homelessness, (Source: Stonewall) meaning supported accommodation is a vital intervention. There is research that shows such settings can be, or feel, physically and psychologically unsafe for LGBTQ+ people, which needs to be explored.

## Intersectional Groups

See 2.C

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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

### Foster carers

Not applicable

### Looked after children/care leavers

There are no looked after children in the Adult Pathway as the service is for adults aged 18+. The number of people with care experience is not currently recorded within the Adult Pathway. Care leavers who are homeless or at risk of homelessness are usually accommodated in the separately commissioned Young Person's Pathway, although they are eligible for Adult Pathway services if required.

The experiences of the likely very small number of care leavers in the Adult Pathway is a matter for future consideration.

### Low-income households

Of the 133 local neighbourhoods in Camden, 32 are among the 20% most income-deprived in England, while 21 are in the 20% most affluent. This demonstrates that we have some of the UK's richest and poorest people living in our borough.

Adult Pathway Service users remain overwhelmingly dependent on benefits. About 4% are in some form of paid work, including in-work benefits. 70 % are in receipt of Universal Credit.

### 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

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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 2023/24<sup>1</sup>. A large proportion of referrals into the adult pathway services come from statutory homelessness presentations.

Data on refugees living in the pathway is not collected. This will be looked at in future data collection exercises. Homeless adults eligible for public funds can be referred into the Adult Pathway. The separately commissioned Routes off the Street team work with homeless adults who have no recourse to public funds (NRPF), including reconnection support. Asylum Seekers are not able to enter the Adult Pathway, but Refugees can do so.

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

With the exception of the refuge service, children are not accommodated in the Adult Pathway. The Council provides accommodation for homeless families through other routes.

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<sup>1</sup> [Q4 ILI Performance Report 2023/24](#)

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## People who are homeless

All residents within the Adult Pathway are homeless. Please see section 1:D.

## 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.

## Single parent households

Not applicable.

## Social housing tenants

Residents in the hostel pathway may become social housing tenants when they move on to independent living. Nearly 30 residents moved out of the pathway hostels into social housing in 2023/24. Residents moving from the pathway into social housing in Camden are offered up to 1 year's resettlement and floating support from the Floating Support Service.

Social housing tenants whose tenancies are at risk can be referred into the adult pathway if appropriate and there are processes in place for this (eg. tenants who have become victims of cuckooing).

## Any other, please specify

**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.**

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Intersectional factors exist across a number of protected groups including but not limited to women, people from Global Majority backgrounds who are likely to face racism and structural difficulties accessing services social and housing deprivation, 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. 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 characteristics of 'multiple disadvantage'.

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 & to have used heroin or crack cocaine in the last month than their male counterparts. 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. (Please see Section 1.a regarding meeting the needs of homeless women in the Adult Pathway).

Almost all service users in the Adult Pathway have experienced trauma to varying degrees, including, the experience of becoming homeless (including rough sleeping) gender-based violence and abuse and adverse childhood experiences. Over 60% have a mental health need which often intersects with alcohol and substance misuse needs.

Services are commissioned to have trauma & Psychologically Informed Environment approaches which recognise these experiences and needs and place an emphasis on building supportive relationships with people who have often experienced trauma and have a mistrust of services.

The Adult Pathway cannot support homeless people with no recourse to public funds, due to the requirements around rent costs.



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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	
Disability including carers	No	
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	

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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

Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Age	Yes	<p>The services provide accommodation and support to homeless adults aged 18+. There is no upper age limit.</p> <p>People aged under 35 achieve exemption from the shared accommodation HB rate after 3 months residency, improving their options for further accommodation</p> <p>The services support access for people of an older age who might not otherwise be able to easily access health services. Homeless people experience age related illnesses much earlier than in the general population. Where appropriate, older residents are supported to move-on to Sheltered Accommodation and in some instances care provision. Younger people are supported to access community-based services specific to their age.</p>
Disability including carers	Yes	<p>The services support access to mental health services, in many instances homeless people have been unable to access these services for long periods. Service staff will be trauma informed and PIE trained.</p> <p>There are, albeit limited, units of wheelchair accessible accommodation in the Pathway.</p>
Gender reassignment	Yes	<p>The Adult Pathway is open to all genders, and residents that identify as trans will be supported in an appropriate service for their needs. Referrals in such cases will be considered in a person-centred and trauma informed way, case by case.</p>
Marriage/civil partnership	Yes	<p>The Adult Pathway is open to all regardless of marital status. Although couples cannot be housed together in the single room provision, arrangements can be made to have separate rooms within the same service.</p>

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Pregnancy/ maternity	Yes	Pregnant homeless women are eligible for Adult Pathway services. Support is provided to access perinatal services and to secure alternative appropriate accommodation.
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Protected Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
Race	Yes	The services will provide support to all the borough's diverse ethnic communities. Monitoring systems to understand and triangulate differentials in access, experiences and outcomes achieved across key protected groups in order to take action to mitigate such disparities. Compliance with Workforce Race Equality Standards.
Religion or belief	Yes	Services will be required to make reasonable adjustments to enable clients to express and observe their religion and beliefs, examples include but not limited to observance of dietary requirements (kosher/halal), flexible appointment around religious festivities/events (Ramadan/Diwali) and celebrating religious events to raise awareness and understanding.
Sex	Yes	Within the Adult Pathway there is a Women's Safe Space role, plus a psychotherapist offering a flexible service to women. The Women's Safe Space role delivers training, advocacy and specialist advice to all Adult Pathway services, particularly to women experiencing multiple disadvantage.
Sexual orientation	Yes	Service staff will promote access to specialist support services and refer people when required.

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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	
Looked after children/care leavers	No	
Low-income households	No	
Refugees and asylum seekers	No	
Parents (of any gender, with children aged under 18)	Yes	Children (Under 18s) are not able to visit Pathway services for safety and safeguarding reasons.

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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		

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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	Not applicable	
Looked after children/care leavers	Yes	There are separately commissioned services for care-experienced people, the Young Peoples Pathway. Where a care-experienced person has needed to be placed in the Adult Pathway there is route to referral to the Youngs Person Pathway, and services work in partnership with the Leaving Care team and voluntary organisations.
Low-income households	Yes	As little as 4% of Adult Pathway residents are in employment. Services will promote ETE opportunities to service users and support access. Services will also ensure that residents are in full receipt of welfare benefits entitlements. People under 35 will be able to claim full Local Housing Allowance rates after moving on from supported housing to increase affordability of private rented sector accommodation.
Refugees and asylum seekers	Yes	Homeless adults with recourse to public funds are eligible for Adult Pathway services
Parents (of any gender, with children aged under 18)	Yes	The services will work closely with ASC Children and Family teams where a hostel resident has child under the care of this team.

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Characteristic	Is there potential positive impact? (Yes or No)	Explain the potential positive impact
People who are homeless	Yes	The services core activity is the provision of accommodation and support to homeless adults. Please see further information in Section 1.
Private rental tenants in deprived areas	Yes	The services will deliver pre-tenancy training, including for residents preparing to move-on to a private rented tenancy, to support tenancy sustainment.
Single parent households	Not applicable	
Social housing tenants	Yes	Social Housing victims of cuckooing or at risk for other reasons, can, where appropriate be referred for accommodation and support in Adult Pathway services.
Any other, please specify		

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**3.e Consider intersectionality.**<sup>4</sup> 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.

There will be a continuing emphasis on trauma informed practice and the skillset of the workforce, as well as closer working between Mental Health and Substance Misuse treatment services, adult social care and Pathway providers. This includes the person-centred TAM (Team Around Me) model and introduction of the Personal Passport, which has been co-produced by people with lived experience.

Appropriate measures will be in place to improve service accessibility and mitigate any potential impact on trans women once the Equality and Human Rights Commission (EHRC) publish updated guidance and Code of Practice.

<sup>4</sup> 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? <sup>5</sup>	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?
<p>The Adult Pathway Community of Practice (Providers forum)</p> <p>The Adult Pathway Referrals, Access and Move-on meeting ( multi-agency)</p>	<p>These forums raised similar themes to those contained in this report including intersectionality around support needs and protected characteristics; homeless women especially.</p>
<p>Commissioning Officers are holding on-site stakeholder engagement groups for residents of the five services in July.</p>	<p>The needs and views of residents relating to protected characteristics, including multiple of intersecting impacts, will be incorporated into the activity.</p>
<p>Service user conversations during visits to each of the 16-accommodation based pathway services around safeguarding and their experiences of the service.</p>	<p>Feedback from service users underlined how much value they placed on being provided with flexible and trauma informed support in a way that works for them.</p>

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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.**

Market Engagement 2<sup>nd</sup> June 2025  
Children and Young People's Pathway – November 2024  
Improving the Pathway Adult Pathway event – December 2024  
Women's Homelessness 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 EqlAs this will be box 1). Remember to review this and consider any additional evidence from the operation of the activity.

<b>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.</b>	
<b>2. Continue the work as it is because no potential negative impacts have been found</b>	This option is recommended.  We will however ensure that service user feedback is particularly sought and reviewed by groups, and intersectionality between cohorts, who are known to experience poorer outcomes.
<b>3. Justify and continue the work despite negative impacts (please provide justification – this must be a proportionate means of achieving a legitimate aim)</b>	

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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
Appropriate measures will be in place to improve service accessibility and mitigate any potential impact on trans women once the Equality and Human Rights Commission (EHRC) publish updated guidance and Code of Practice.	September 2025	Barry Gavan
Positive steps will include:  Working with services and residents to understand the experiences of LBGQTQ+ residents in the Pathway.  Expanding data capture arrangements to understand number of refugees in the Pathway and understand how needs are being met and any gaps.  Expanding data capture arrangements to understand the prevalence on neuro diversity in the Pathway and access to related services.	2025	Barry Gavan

## Step 7: EqIA Advisor

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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](mailto:equalities@camden.gov.uk)

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## Step 8: Sign-off

<b>EqlA author</b>	Name: Barry Gavan Job title: Commissioning Manager
<b>EqlA advisor / reviewer</b>	Name: Simone Melia Job title Head of Housing Solutions
<b>Senior accountable officer</b>	Name Glendine Shepherd Director of Housing