

# Fairness and Equalities Impact Assessment (FEIA)

Version 3.6 May 2017

The purpose of this assessment is to provide balanced information to support decision making and to promote better ways of working in line with equalities (Equalities Act 2010), Welsh language promotion (The Welsh Language (Wales) Measure 2011), sustainable development (Wellbeing of Future Generations (Wales) Act 2015), and the four parameters of debate about fairness identified by the Newport Fairness Commission (NFC Full Report to Council 2013).

**Completed by:** Natalie Thompson      **Role:** Housing Needs Manager

**Head of Service:** Tracey Brooks      **Date:** 02/11/2020

**I confirm that the above Head of Service has agreed the content of this assessment**

**Yes / ~~No~~**

**When you complete this FEIA, it is your responsibility to submit it to**  
impact.assessments@newport.gov.uk

## **1. Name and description of the policy / proposal being assessed. Outline the policy's purpose.**

At the start of the COVID-19 pandemic, Welsh Government introduced additional regulations, which extended local authorities' homelessness duties in order to ensure the most vulnerable citizens were provided with accommodation that allowed them to remain safe, housed, and minimised the spread of the virus.

This extension made provision for people who, under normal circumstances, would not necessarily be considered for council accommodation, including for example those with no recourse to public funds, and rough sleepers.

Changes to legislation also meant that local authorities were granted emergency powers, which extended permitted development rights, enabling them to undertake certain developments outside of standard processes for fixed periods of time.

Both changes to legislation remain in place as part of the ongoing response to COVID-19.

The significant health crisis, and changes in regulations, meant that work to support the city's homeless population was taken forward at pace, and a range of emergency housing measures implemented across the city, including the establishment of 15 'pods' for rough sleepers, sited at Mission Court in Pillgwenlly from the 14<sup>th</sup> of May.

The pods consist of a single bed, wardrobe/shelving unit, table, heater, fridge, toilet, sink and shower and are accessed by steps. Each unit has a lockable front door and a utility/office unit provides office space, toilet and hand basin, 2 washer/dryers and a fridge.

This FEIA considers the fairness and equality impacts associated with Mission Court.

**2. Outline how you have/will consult with stakeholders who will be affected by the policy/proposal. Please refer specifically to FEIA guidance in relation to relevant Welsh language duties.**

Due to demanding timescales, limited consultation with stakeholders was feasible, however the council engaged with a range of third sector and statutory partners around Mission Court's development. Officers from a multi-disciplined project group carefully considered a range of options in terms of site location according to identified priorities, including the placement of critical services that residents would need to regularly access, and its proximity to services and support.

**3. What information/evidence do you have on stakeholders? E.g. views, needs, service usage etc. Please include all the evidence you consider relevant.**

The local authority worked closely with partners to identify households in need of accommodation, information from the support needs assessments of those accessing services at Mission Court, as well as demographic information held about them, has been used to inform this impact assessment.

Over 50 rough sleepers were identified as in need of emergency housing provision, and all apart from 5 were successfully moved away from the streets and accommodated in a range of temporary housing, including units at Mission Court.

Many residents at Mission Court had firmly entrenched rough sleeping lifestyles, coupled with high levels of complex needs including drug and alcohol misuse and mental ill health. These complex needs necessitated a site that was close to available support services in order to ensure people could access these without significant movement across the city.

A multi-agency team were engaged to provide holistic interventions both on-site and through local provision, as well as supporting residents with the transition to more permanent housing, which has been achieved in a number of cases.

The site has a 24-hour security team in place, and a multi-agency meeting meets on a regular basis to discuss any issues associated with the site. Feedback from this group to date suggests that there have been good levels of engagement with residents of Mission Court and a number of positive outcomes, for example, an increase in those accessing and keeping mental health appointments, many accessing drug treatment programmes, sexual health treatment, a decrease in risk of exploitation and a number of households who have now moved to more permanent accommodation.

Welsh Government have extended their emergency hardship funding which has been utilised to support the development of Mission Court, however the site is not a permanent housing solution, and the provision forms part of a longer term strategy to address homelessness in the city and provide sustainable solutions.

Since the development of Mission Court, concerns have been raised about its location, and the impact that this will have on residents of Pillgwenlly. Feedback has been received through a variety of routes, including local ward members, and the recently established Pill Community Steering Group.

It is recognised that there are a range of existing community safety concerns relating to the area, including high levels of crime and anti-social behaviour, adult exploitation and drug activity. Pillgwenlly has also been disproportionately affected by the COVID-19 pandemic, with the highest number of COVID-19 related deaths across the city, and compounding of existing disadvantages such as high levels of poverty.

There are concerns around the general characteristics of the area and how this impacts on local businesses, and also that services for vulnerable people are disproportionately located in Pillgwenlly, affecting the quality of life of residents.

Detailed information on the population of Pillgwenlly can be found in the council's [wellbeing profile](#) which highlights key demographic information, including:

- 44.8% of people living in Pillgwenlly are of Black, Asian or other minority ethnic background
- Pillgwenlly has the highest percentage of 16 to 24 year olds of all the wards in Newport
- Pillgwenlly has the second highest percentage of under 16 year olds of all the wards in Newport
- The percentage of people that were born outside the UK is 24.1%, the highest of all the wards in Newport
- A high percentage of people in Pillgwenlly state their religion as Muslim at 24.9% (Newport average of 4.7%)
- Pillgwenlly is one of the most deprived areas in Newport, with more severe localised pockets of deprivation within the 10% most deprived areas in Wales (based on the Wales Index of Multiple Deprivation 2019 which measures levels of deprivation based on overlapping patterns of income, employment, health, education, housing and physical environment deprivation)

## 4. Equalities and Welsh language impact

Protected characteristic	Impact:			Provide further details about the nature of the impact in the section below. Does it: 1. Promote equal opportunity 2. Promote community cohesion 3. Help eliminate unlawful discrimination/ harassment/ victimisation?
	Positive	Negative	Neither	
<b>Age</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The age profile of the people accessing temporary accommodation through this provision is shown below:</p> <p><b>18 – 24 – 9%</b>  <b>25 – 34 – 26%</b>  <b>35 – 44 – 51%</b>  <b>45 – 54 – 9%</b>  <b>55 – 64 – 5%</b>  <b>65-74 - 0</b>  <b>75+ - 0</b></p> <p>Evidence shows that people tend to be middle aged with the majority of residents in the 35 – 44 age range. Recent research by Audit Wales found that the average life expectancy for people sleeping rough in Wales is 47 years for men and 43 years for women. In Newport as a whole, life expectancy for men is 77 and 82 for women.</p> <p>Assisting homeless households into settled accommodation and supporting them in maintaining that accommodation will significantly reduce the number of early deaths amongst this group.</p> <p>As Pillgwenlly has a younger age population profile than other areas of Newport, any negative impacts associated with Mission Court are likely to have a disproportionate impact on younger people; however, there is no available evidence of this at present. Seeking further community feedback may serve to better understand any issues.</p>
<b>Disability</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The most common reported disability amongst this group related to mental health, with just over a quarter of people stating that they had a mental illness. Accessing stable accommodation will allow these individuals to receive proper support and make it easier to engage with services.</p>

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				<p>Mission Court is located near several support services that provide drug and alcohol support services and treatment, mental health support and outreach services for rough sleepers.</p> <p>Whilst reported rates of physical disability are low, it is recognised that rough sleeping has a significant impact on physical health. If people are able to access accommodation, it is likely to stop the development of physical health conditions and allow them to access treatment for existing conditions. The GP surgeries designated to support people rough sleeping are close to the Mission Court site as well as several local pharmacies, GDAS and the needle exchange.</p> <p>Whilst there are no accessible units at present, work is ongoing to consider this need.</p>
<b>Gender reassignment/transgender</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>It is recognised that there are higher instances of homelessness for LGBTQ+ people, for example, because of family breakdown or domestic abuse. People who identify as Trans or non-binary are also at a higher risk of sexual or physical assault in public spaces, leaving rough sleepers particularly vulnerable.</p> <p>The provision of an alternative to rough sleeping has a potential positive impact on people who identify as Trans or non-binary. The Council's housing and homelessness teams thoroughly assess the need of individuals who present as homeless in order to place them in the most suitable accommodation, and any vulnerability or risk associated with gender identity would be identified as part of this process.</p>
<b>Marriage or civil partnership</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>84% of people identified in need of support are single, with 5% living as a couple. Where people are living as couple and wish to be rehoused together this is facilitated as far as possible, with a number of pods suitable for 2 people.</p>





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<b>Pregnancy or maternity</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No women accommodated at Mission Court have declared a pregnancy. The sexual health clinic is situated one street away from the site and easily accessible if needed.
<b>Race</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>People from a range of ethnic backgrounds have been accommodated at Mission Court and this is likely to be the case in the future due to the demographics of the area with 14% identifying as BAME. Culturally appropriate community facilities and shops are well situated around Mission Court.</p> <p>The Government's Race Disparity Audit (2017) highlights that:</p> <ul style="list-style-type: none"> <li>• One in three homeless households aren't white, compared to around one in seven in the general population</li> <li>• In the last five years, there was a 22% increase in statutory homelessness. Among white households, it rose 9%, whereas homelessness among Black, Asian and minority ethnic households rose 48%.</li> <li>• Homelessness among Black households rose by 42%, Chinese and others by 35% and mixed-race households by 33%</li> <li>• Homelessness among Asian households rose by 71%</li> </ul> <p>The impact of COVID-19 has also disproportionately affected BAME communities in Newport, with BAME people more likely to experience higher levels of unemployment and poverty because of the pandemic. It is likely that these impacts will have long lasting effects, including a potential rise in homelessness for BAME people.</p> <p>As Pillgwenlly has a significant BAME population (44.8%) any negative impacts associated with Mission Court are likely to have a disproportionate impact on BAME people. Whilst there is no available evidence of this at present,</p>

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				<p>community feedback has indicated concerns in relation to the development of Mission Court and its impact on the perception and decline of the area.</p> <p>BAME people living in Pillgwenlly are already disproportionately affected by issues affecting the area, including poverty, drug activity and high levels of crime and anti-social behaviour. Whilst there is no current evidence available to suggest that these issues have been compounded by the development of Mission Court, seeking further community feedback and engaging with partners around this may serve to better understand any issues.</p>																																																																						
<b>Religion or Belief or non-belief</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Those accommodated at Mission Court have stated religious beliefs as Christianity (12%), Islamic (2%) and 86% as having another/ no religion or have not stated their belief. Census data for Pillgwenlly and Newport is also included below:</p> <table border="1"> <thead> <tr> <th></th> <th>Pillgwenlly</th> <th>%</th> <th>Newport</th> <th>%</th> <th>Wales</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Christian</td> <td>3,096</td> <td>42.3</td> <td>82,858</td> <td>56.9</td> <td>1,763,299</td> <td>57.6</td> </tr> <tr> <td>Buddhist</td> <td>18</td> <td>0.2</td> <td>360</td> <td>0.2</td> <td>9,117</td> <td>0.3</td> </tr> <tr> <td>Hindu</td> <td>27</td> <td>0.4</td> <td>685</td> <td>0.5</td> <td>10,434</td> <td>0.3</td> </tr> <tr> <td>Jewish</td> <td>3</td> <td>0.0</td> <td>99</td> <td>0.1</td> <td>2,064</td> <td>0.1</td> </tr> <tr> <td>Muslim</td> <td>1,825</td> <td>24.9</td> <td>6,859</td> <td>4.7</td> <td>45,950</td> <td>1.5</td> </tr> <tr> <td>Sikh</td> <td>18</td> <td>0.2</td> <td>141</td> <td>0.1</td> <td>2,962</td> <td>0.1</td> </tr> <tr> <td>Other religions</td> <td>31</td> <td>0.4</td> <td>463</td> <td>0.3</td> <td>12,705</td> <td>0.4</td> </tr> <tr> <td>No religion</td> <td>1,739</td> <td>23.8</td> <td>43,336</td> <td>29.7</td> <td>982,997</td> <td>32.1</td> </tr> <tr> <td>Religion not stated</td> <td>561</td> <td>7.7</td> <td>10,935</td> <td>7.5</td> <td>233,928</td> <td>7.6</td> </tr> </tbody> </table> <p>There are both churches and mosques in the area surrounding Mission Court should residents wish to access them.</p> <p>As Pillgwenlly has a significant Muslim population, any negative impacts associated with Mission Court are likely to have a disproportionate impact on these communities; however, there is no available evidence of this at present. Seeking further community feedback may serve to better understand any issues.</p>		Pillgwenlly	%	Newport	%	Wales	%	Christian	3,096	42.3	82,858	56.9	1,763,299	57.6	Buddhist	18	0.2	360	0.2	9,117	0.3	Hindu	27	0.4	685	0.5	10,434	0.3	Jewish	3	0.0	99	0.1	2,064	0.1	Muslim	1,825	24.9	6,859	4.7	45,950	1.5	Sikh	18	0.2	141	0.1	2,962	0.1	Other religions	31	0.4	463	0.3	12,705	0.4	No religion	1,739	23.8	43,336	29.7	982,997	32.1	Religion not stated	561	7.7	10,935	7.5	233,928	7.6
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	Positive	Negative	Neither	
<b>Sex</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	72% of this group are men. Of the women accommodated, several are exploited adults or victims of domestic abuse. Having settled accommodation is allowing these women to be supported by appropriate agencies and removed from potential harm.
<b>Sexual Orientation</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	81% of those accommodated have declared their sexual orientation with 79% stating they are heterosexual. It is recognised that there are higher instances of homelessness for LGBTQ+ people, for example, because of family breakdown or domestic abuse. People who identify lesbian, bisexual or gay are also at a higher risk of sexual or physical assault in public spaces, leaving rough sleepers particularly vulnerable.  The provision of an alternative to rough sleeping has a potential positive impact on people who identify as lesbian, bisexual or gay. The Council's housing and homelessness teams thoroughly assess the need of individuals who present as homeless in order to place them in the most suitable accommodation, and any vulnerability or risk associated with a person's sexual orientation would be identified as part of this process.
<b>Welsh Language</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	None of this group have reported that they speak Welsh or would like to receive services in Welsh. If this were requested, it would be facilitated in line with council policy on the Welsh language.



## How has your proposal embedded and prioritised the sustainable development principle in its development?

Sustainable Development Principle	Does your proposal demonstrate you have met this principle? Describe how.
 <p>Long Term</p> <p>Balancing short term need with long term needs</p>	<p>These units are intended for short-term accommodation that will assist people in securing long-term accommodation. They will provide an important stepping-stone that allows for assessing need and addressing issues that will affect someone’s ability to hold an independent tenancy in the future. The units allow people to have a safe place to stay whilst preparing them for tenancy living, many having spent years on the streets, losing essential life skills.</p>
 <p>Collaboration</p> <p>Working together to deliver objectives</p>	<p>The development and operation of Mission Court is a partnership between Newport City Council, our housing association partners and the third sector organisations that work with homeless people in Newport. The Mission Court site is well situated to allow access to services essential to the client group, including GDAS (Gwent Drug and Alcohol Service) the Needle Exchange, the Olive Branch, Eden Gate, the Wallich, Pobl, Tredegar Sexual Health Clinic, RGH (Royal Gwent Hospital), several GPs and Dentists.</p>
 <p>Involvement</p> <p>Involving those with an interest and seeking their views</p>	<p>Due to the demanding timescales, limited consultation with stakeholders was feasible, however the council engaged with a range of third sector and statutory partners around Mission Court’s development.</p>
 <p>Prevention</p> <p>Putting resources into preventing problems occurring or getting worse</p>	<p>Providing this type of accommodation will help break the cycle of rough sleeping that many people fall into. It is an important first step in identifying and addressing issues that will allow people to access and sustain secure, permanent accommodation. The support put in place once people are in the pods helps to prevent people going back to rough sleeping. The provision has also minimised the impact of rough sleeping on city, removing unsafe encampments that were frequently occurring throughout the city centre. Improved living conditions and increased chances of a successful long-term tenancy will also contribute to better health outcomes, reducing demand on health and social care services.</p>



Considering impact on all wellbeing goals together and on other bodies

- A prosperous Wales

Enabling people to access secure, settled accommodation will allow people to develop their skills. The pods themselves were provided by a Newport based company who were looking at business closure due to COVID-19, but who now have a sustainable product.

- A resilient Wales

Pods are a low impact development that do not involve intensive groundworks. Pods can be removed and the land they are sited on returned to its original use.

- A healthier Wales

Providing secure, safe accommodation will have significant benefits for the people that live there. The health and wellbeing of people living on site will be supported through partnership working with specialist providers who will help to prevent the behaviours that contributed to homelessness reoccurring.

- A more equal Wales

The provision of this type of accommodation will help us to address inequalities. Predominant amongst these is substantially shorter life expectancy for rough sleepers compared to the general population.

It is recognised that the location of Mission Court is in an area that is already socially disadvantaged. Consideration should be given to whether there is any evidence to suggest that the site serves to widen these inequalities

- A Wales of more cohesive communities

Providing this sort of accommodation respects, the community people have built up for themselves whilst providing them with the opportunity to participate in the wider community. It allows people to form networks and relationships that will help keep them safe in the future.

It is recognised that the location of Mission Court has caused some local tensions, and that communities are concerned about the impact that the site will have on surrounding areas and residents. Any issues will be reviewed through current support provision on site and by an existing multi-agency group to address anti-social behaviour and any other negative impact on the surrounding area.

- A Wales of vibrant culture and thriving Welsh Language

Assisting people into settled accommodation will allow them to access and engage with their own and other cultures.

<b>Sustainable Development Principle</b>	<b>Does your proposal demonstrate you have met this principle? Describe how.</b>
	<ul style="list-style-type: none"> <li>• A globally responsible Wales</li> </ul> <p>Pods are a low impact development that can be reused across different sites. The council will investigate ways to make the pods as sustainable as possible and ensure resources are used efficiently.</p> <p><b>Newport City Council Well-being Goals</b></p> <p>The provision of temporary accommodation will contribute directly to the local authority’s wellbeing goals to:</p> <ul style="list-style-type: none"> <li>• To enable people to be healthy, independent and resilient</li> <li>• To build cohesive and sustainable communities</li> </ul> <p>Providing accommodation for rough sleepers and other households facing homelessness will address health inequalities these groups face. It is the first step in allowing them to build resilience and live independent lives. This in turn will allow them to engage with the wider community in Newport and benefit from the opportunities that provides.</p>

## **5 Will the proposal/policy have a disproportionate impact on a specific geographical area of Newport?**

The pods are currently located on Mission Court in Pillgwenlly. Mission Court is not a residential area, and many of the surrounding businesses are operating at reduced capacity due to COVID-19. The potential impact on local businesses should, however, be considered.

Newport City Council manages the site with support from partners and 24-hour security in place. The primary factor in locating the development here was to ensure ease of access to services, which are all based in the locality, in order to support people effectively and remove the clear health risk presented by rough sleepers continuing to move throughout the city.

Reference has been made throughout this impact assessment to some of the existing challenges that persist in the Pillgwenlly area, as well as concerns raised by communities, and around the specific demography of the area.

## **7 How does the proposal/policy relate to the parameters of debate about Fairness identified by the Newport Fairness Commission**

This assessment describes the inequalities experienced by many homeless people, including poorer health outcomes and social and economic exclusion, disadvantages exacerbated by the COVID19 pandemic. Rough sleepers are being supported to keep themselves safe in the same way that people in secure accommodation are able to, and the pods are a vital step in both preventative health care and virus control.

## 8. Equality Impacts and Actions

Please complete the below action plan which sets out steps that will/will not be taken in order to mitigate any negative impacts that your assessment has identified.

Impact identified	Who does it affect?	What will you do to mitigate the impact? If you plan to take no action, please justify your rationale	Who is responsible?
Potential for negative impact on residents in Pillgwenlly	Pill residents	<p>Further consultation is needed with residents to understand the real/perceived impact of Mission Court. This will be undertaken via:</p> <ul style="list-style-type: none"> <li>• Engagement with ward members</li> <li>• Engagement with partners</li> <li>• Engagement with the Safer Pill Group and its Community Steering Group</li> </ul>	Head of Service: Regeneration, Investment and Housing
Potential for negative impact on local businesses in Pillgwenlly	Local businesses	<p>Further consultation is needed with local businesses to understand the real/perceived impact of Mission Court. This will be undertaken via:</p> <ul style="list-style-type: none"> <li>• Engagement with ward members</li> <li>• Engagement with partners</li> <li>• Engagement with the Safer Pill Group and its Community Steering Group</li> </ul>	Head of Service: Regeneration, Investment and Housing

## 9. Monitoring, evaluating and reviewing

How and when will the impact of the proposal/ policy be monitored and reported on?

We will continue to monitor and assess the impact of Mission Court via existing community networks, forums and meetings

## 10. Involvement

How will people be advised of the changes and of the FEIA?

We will publish this and any updated version of this FEIA on the council's website