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**To:** Supporting People Commissioning Body 26 January 2012

**Subject:** Kent Supporting People Reconnection Policy 2012/13

**Classification:** Unrestricted

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## **Summary**

This report presents a revised Kent Reconnection Policy which is based on a review which was requested by the Commissioning Body. The original policy was agreed by the Commissioning Body in 2007. The Policy adheres to the grant conditions that were prescribed by the Communities and Local Government Department in relation to short term accommodation based supported housing which ensures that a local connection is not applied to these services. It is proposed that three client groups can access services from outside Kent. This is because these client groups may have a particular need to leave their areas of origin. These client groups are rough sleepers, people escaping domestic abuse and offenders. The revised Policy also endorses the vital role played by service providers in reconnecting service users from one part of Kent back to another part of Kent where appropriate. This will involve providers resettling service users who move on from supported accommodation into the private or social rented sector.

## **1. Introduction**

(1) Short term supported housing is not distributed equitably across Kent. There are no districts/boroughs that have services within their boundaries that include all 21 client groups within the Programme. This is why there is a need to retain a policy which does not preclude service users within Kent from accessing the supported housing they need wherever it happens to be within Kent. However, it is critical that districts and boroughs that host these services do not end up having to facilitate access to private or social rented housing in their area. Some districts/boroughs have more supported housing than others and would be placed under considerable pressure to meet the housing needs of people who are moving on from supported accommodation. Equally there are districts/boroughs that do not have a concentration of resources in their area and would be placed under considerable pressure to try and assist vulnerable people who ideally require supported housing but could not access it in their area due to a lack of supply.

(2) The Joint Policy and Planning Board for Housing developed the original Reconnection Policy in cooperation with the Programme. The Policy was developed within the spirit of the CLG grant conditions which applied to all

Administering Authorities. Kent's Policy was first adopted in December 2007. The CLG grant conditions were also incorporated into the Kent Eligibility Policy 2008 (this is the subject of another paper which is being presented to this meeting as a draft eligibility policy 2012/13).

## **2. Revised Kent Reconnection Policy 2012/13**

(1) The main amendments are as follows:

- Removal of all references to Supporting People Grant Conditions/funding regime
- Re-affirmation of commitment to continue enabling open access to short term accommodation based services irrespective of local connections within Kent. Three client groups are explicitly named as potentially accessing resources from outside of Kent because of very particular reasons: rough sleepers, people escaping domestic abuse and offenders.
- Emphasis on the role of the Rough Sleeper service and other providers in reconnecting individuals back to their areas of origin where this is appropriate.
- The role of providers of short term accommodation based services in resettling service users moving on from supported housing into social or private rented accommodation.

(2) With the exception of women fleeing domestic abuse, short term accommodation based supported housing in certain areas of Thanet (Cliftonville West and Margate Central) are exempt from the provision of free access irrespective of applicants' having a local connection. Every short term and long term supported housing scheme funded by the Programme with the exception of two services are situated within these wards. The Programme has asked all providers of services within these two wards to prioritise individuals from these two wards and where this is not possible to prioritise individuals from the Thanet District Council area. This is because these two wards have been identified as areas that contain a concentration of vulnerable people in two of the most deprived wards in the county/country. The Commissioning Body has previously received a presentation/report relating to this. The Programme is also in the process of recommissioning where possible services outside of the two wards and will continue to do this. The Programme will also ensure that any new commissioning of services is outside of the two wards.

## **3. Consultation and Communication**

(1) The Supporting People Programme consulted with districts and boroughs as the key partners in this Policy. Service users were consulted as part of the strategic review of access to short term accommodation based services and during development of the Supporting People Strategy 2010-2015.

(2) Stakeholders agreed that there should be retention of the commitment to open and fair access to short term accommodation based services for vulnerable people within Kent.

#### **4. Risk and Business Continuity Management**

(1) The Supporting People Programme will continue to work closely with districts/boroughs to monitor the impact of the Policy and ensure that the needs of vulnerable people are met. The Programme continues to analyse need in order to ensure that there is an adequate supply of housing related support services.

#### **5. Financial Implications**

(1) There is no anticipated financial impact

#### **6. Legal implications**

(1) An Equality Impact Assessment has been undertaken which is attached in draft form.

#### **7. Sustainability Implications**

(1) The Supporting People Programme will work with its partners to ensure that the Policy remains sustainable despite the pressures within the social and private rented sectors. The Programme will monitor the Policy to ensure that reconnections continue to be made to the area of origin.

#### **8. Conclusion**

(1) The proposed revised Reconnection Policy 2012/13 is based on a review of the current Reconnection Policy which was agreed in December 2007. The revised Reconnection Policy reaffirms the principle of fair and open access to accommodation based services within Kent based on need rather than on having a local connection to the district or borough in which short-term supported accommodation is located. In addition, the Policy will facilitate service users who accessed supported housing from out of area to be supported to reconnect to their area of origin and thus, ease pressure on move-on resources in the host Districts and Boroughs.

(2) It is accepted that vulnerable individuals who are escaping domestic abuse, offenders or rough sleepers may have particular reasons for leaving their areas of origin outside of Kent and may need to access Kent services.

#### **Recommendations**

The Commissioning Body of the Kent Supporting People Programme is asked to;

1) **Agree** the Kent Supporting People Reconnection Policy 2012/13

## **Background Documents**

Kent Reconnection Policy 2007  
Grant Conditions for Excellent Authorities 2007/08  
Kent Eligibility Policy September 2008  
Draft Kent Eligibility Policy 2012/13

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**Appendix One:** Draft Kent Supporting People Reconnection Policy 2012/13  
**Appendix Two:** Equality Impact Assessment - Kent Supporting People  
Reconnection Policy 2012/13

## **APPENDIX ONE - DRAFT KENT RECONNECTION POLICY**

### **Joint Agreement between Kent Supporting People and Kent Districts and Boroughs**

The Policy has been developed in partnership between the Supporting People Team and the Kent Joint Policy and Planning Board (Housing).

#### **1.0 Background**

- 1.1 The local Reconnection Policy has been developed to improve access to Supporting People funded services for vulnerable and homeless individuals and support those without local connection wishing to seek accommodation in the area where they consider themselves to have such connections. The Policy also ensures that Supporting People funded services meet the conditions the Kent Eligibility Policy as agreed to by the Commissioning Body.
- 1.2 Providers of Supporting People funded services should promote equal access to services in line with the Quality Assessment Framework Objective C 1.6: 'Fair access, diversity and inclusion'. Service providers must not restrict services to those meeting statutory eligibility criteria for service provision or impose blanket exclusions on groups of people without local connection to access short-term services that are eligible to receive Supporting People grant.
- 1.3 In keeping with the former Supporting People Grant Conditions, short – term services (up to two years of duration) should not operate a Local Connection Policy that excludes people who come from outside Kent who are people escaping domestic abuse, offenders, and rough sleepers or vulnerable people from a different district or borough council within Kent.
- 1.4 Former Grant Conditions clearly identified that local connection considerations are not to be applied as those given in Section 199 of the Housing Act 1996 which defines 'local connection' thus: a person normally resident in a district of a Local Authority and that residence is or was the person's own choice, a person employed there, a person has family there, or there are special circumstances.
- 1.5 Whilst Local Authorities endeavour to meet local needs in support services available in their own areas, due to lack of resources this is not always possible. Short and long term supported housing is not equitably distributed across the county and therefore restrictions in access could lead to under capacity in some areas and over capacity in some others.
- 1.6 However, providing equal access under the provisions described above has implications for move-on opportunities for individuals in Supporting People services not normally resident in the district where the service is delivered. Offering permanent move-on irrespective of a local connection is unsustainable in the face of local demand exceeding supply for social housing. In order to prevent Supporting People funded schemes becoming 'silted up', joint agreements for, or a process of move-on, need to be in place for accepted service users. The Joint Policy and Planning Board (Housing) has an agreed Move On Strategy which is monitored.

- 1.7 The fundamental principles underlying this Policy are that: 1) It is undesirable and unsafe for newly homeless individuals to sleep rough, putting themselves in immediate danger of significant harm, and in the longer term at risk of entrenchment in a street homelessness life with all its damaging consequences. 2) It is desirable to limit individuals' experience of social dislocation by constructively linking them back to, or supporting them in, areas where they had sustained attachment to a local community because social networks increase opportunities for people to move away from homelessness.
- 1.8 The Kent Rough Sleepers service and providers of other Supporting People services will play a crucial key role in the relocation processes.
- 1.9 Equalities and diversity will be monitored through the Client Record Form and the monitoring of this Policy.

## **2.0 Definition of 'Reconnection'**

Under this Policy, there are two key elements to the meaning of 'Reconnection':

- Tackling the marginalisation and social exclusion of vulnerable homeless people from mainstream society. Social exclusion is a multi-dimensional and longitudinal process by which people become marginalised and excluded from social networks such as family, neighbourhood and community, and opportunities, choices and life chances available to the majority of people in communities.
- Encouraging and supporting vulnerable homeless people, to physically relocate to communities in areas where they have built up sustained attachments. Many vulnerable homeless people access supported accommodation in areas that are not local to them.

2.1 'Local area' is not necessarily where a person originates from but where they have most recently had sustained attachments to a local community. For example, where they had stable accommodation or employment, where they have been claiming benefits or where they have been engaged with Health, Probation or Social Services, or where they have social networks such as family or friends.

2.2 Support activities related to both understandings of 'reconnection' are part of housing-related support activities funded under Supporting People. It is the responsibility of service providers to provide support to facilitate service users to connect and reconnect to social networks and to access resources such as health, education, training, employment, volunteering and peer support.

## **3.0 Aims of the Reconnection Policy**

- 3.1 Tackle and prevent homelessness in general and meet the support needs of vulnerable people.
- 3.2 Operation of a uniform policy across Kent to maximise resources when dealing with homeless and vulnerable individuals accessing Supporting People services in other but their local areas, and allow them to return in a planned way to an area where they have a social support network or some other connection.

- 3.3 Enable such homeless and vulnerable individuals to have equal access to short term accommodation–based services. But longer term services should be sought back in the area where their social networks exist if that is what individuals want (where possible).
- 3.4 Encourage local housing authorities to take a long-term view to assisting applicants by giving consideration to how a household placed in supported accommodation will be housed once their short-term housing comes to an end. In doing so the Policy will help prevent ‘silting up’ by enabling a larger number of Local Housing Authorities to share the responsibility of moving households on from the limited numbers of supported accommodation spaces.
- 3.5 Where individuals have no definable connection within any Kent district or are unable to return there due to special circumstances, they should have access to local services in the district/borough they present to. This affects three client groups in particular: people escaping domestic abuse, rough sleepers and offenders.
- 3.6 As from April 2012 short and long term supported housing providers will be expected to resettle vulnerable people who are moving on from their accommodation into a social or private rented property for a period of three months with possible extension to six months where this is required.

#### **4.0 Situations where the Policy Applies**

- 4.1 Authorities are expected to provide for the needs of all service users ordinarily resident in their areas but some need to be provided with supported housing outside the area.
- 4.2 Cross authority arrangements might apply where:
- Need is not sufficient to require provision in every authority, and authorities have agreed on a historical basis to share the development of provision in a particular district or borough. An example might be specialist services for people with Mental Health problems.
  - Support services may be concentrated in a particular district for historical reasons but despite there being a need in other districts support services do not exist. In such circumstances, individuals are forced to access support services in another local authority area because of a lack of provision in their own area.
  - Sometimes individuals may wish to move to another part of the county to be close to a community of people from their background. The importance of informal support from family, friends and community groups must be recognised and those moves should be facilitated.

#### **5.0 Putting the Policy into Practice**

- 5.1 The Policy will not prevent vulnerable people from accessing short–term Supporting People funded accommodation – based services as long as they meet the eligibility criteria of such a service. However, the eligibility criteria must not apply blanket exclusions to individuals being referred / referring themselves to

the service from out of area. (see paragraphs above).

- 5.2 Whilst it is expected that the supported accommodation needs of the districts' and boroughs' own communities should be prioritised it is expected that as far as is appropriate and possible supported housing services should be able to provide access to service users from other districts and boroughs, and from outside Kent, (see paragraph above) For example, where there are several applicants to a service, applicants with greatest need should have priority. Where need is equal, local applicants will be accorded priority.
- 5.3 Short term accommodation based services in certain areas of Thanet (Cliftonville and Margate Central) are exempt from this provision: with the exception of women fleeing domestic violence, services in those areas are for the exclusive use of people within Thanet.
- 5.4 Referring statutory agencies and voluntary agencies providing statutory duties are expected to keep in contact with the individuals they refer out of area in case individuals reconnect back to their areas of origin. Local housing authorities, Supporting People and accommodation providers accept that supported accommodation is not spread evenly across the county. The Supporting People programme has brought benefit and has also had an impact on how services are delivered and changed how existing resources are used. It cannot be acceptable for agencies to refer service users into supported accommodation located in areas outside of their own without contributing to addressing the consequential need to find settled accommodation for service users when they are ready to move on.
- 5.5 To enable a fair distribution of service users who are able to move to settled accommodation where possible service users will be encouraged to reconnect with their area of origin. Accommodation providers will maintain details of the referring agency and record the service user's place of origin. This information will be collated by the Supporting People Team and shared on a monthly basis with relevant agencies and will help to negotiate and monitor the performance of shared responsibility.
- 5.6 Applicants with no recent local connection anywhere will continue to receive services in the district / borough where they presented. In addition, service users will not be reconnected to an area where assessment has identified that they would be at risk from physical, sexual or psychological harm. This particularly applies to rough sleepers, people escaping domestic abuse and offenders.

## **6.0 The Process**

- 6.1 The process of reconnection is based on commonly agreed guidance for identifying a presenting service user's local area and when appropriate, establish how best to assist the service user to return to services in that area in a manner that results in a positive outcome for them.
- 6.2 Within the guidelines as set out in paragraph applicants are accepted into short-term services based on need rather than 'local connection'. As part of the needs led assessment, a service user's local area should be identified. Support planning should be client-focused and include discussion with the service user to establish where a service user wants to live and whether reconnection is appropriate. The outcome of that discussion should be included as a goal within the support plan.

6.3 Support plans are regularly reviewed and should include on-going exploration of the potential and desirability of reconnection.

6.4 In order to accomplish the process of assisting service users into settled accommodation and to prevent schemes silting up it is necessary to provide the framework where throughput can be achieved. This will be achieved through a range of measures that include:

- Sub-regionally agreed move on arrangements to social housing
- Reciprocal arrangements between local housing authorities
- Access to rent deposit schemes funded by the authority of origin

Local housing authorities agree to refresh the work with those authorities that host supported accommodation to establish such mechanisms and agreements within 12 months of this policy being approved.

6.5 Where service users are agreeable to be reconnected with their local area, the originating local housing authority agrees not to discount or otherwise penalise the period that the service user has lived in supported accommodation outside of their area of origin. (This includes service users who referred themselves to short-term accommodation-based schemes.)

6.6 Service providers have responsibility for supporting service users in accessing move on accommodation and liaising with homeless prevention services. This includes accommodation in the private rented sector. Applications to rent deposit schemes will be made to the local housing authority of origin.

## **7.0 Monitoring the policy and outcomes**

A monitoring system will be established to oversee the operation and outcomes of the Policy. This monitoring system will be operated by the Supporting People Team and will report regularly to the Commissioning Body and the districts/boroughs.

The system will monitor the following inputs as well as outcomes, including equal access to short-term supported housing:

- Details of all service users accessing short-term accommodation-based services funded by Supporting People broken down by area of origin and referring agency
- Actual numbers of successful reconnections established
- Number of service users from out of area refusing to engage with the reconnection process
- Number of cases where reconnection could not be completed due to a lack of provision in another district / borough

## **Appendix Two - KENT COUNTY COUNCIL**

### **DRAFT EQUALITY IMPACT ASSESSMENT Kent Supporting People Reconnection Policy 2012/13**

**Directorate:**

Customers and Communities

**Name of policy, procedure, project or service**

Supporting People Eligibility Policy 2012/13

**Type**

Policy

**Responsible Owner/ Senior Officer**

Claire Martin, Head of Supporting People

**Date of Initial Screening**

November 2011

### Screening Grid

Characteristic	Could this policy, procedure, project or service affect this group differently from others in Kent? YES/NO	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO	Assessment of potential impact HIGH/MEDIUM/ LOW/NONE/ UNKNOWN		Provide details: a) Is internal action required? If yes, why? b) Is further assessment required? If yes, why? c) Explain how good practice can promote equal opportunities
			Positive	Negative	
<b>Age</b>	No - 1) Supporting People funded services require providers to meet equality & diversity in services, including fair access and monitor this through the Quality assessment Framework. The Reconnection Policy ensures that short term accommodation based Supporting People services are accessible to vulnerable people who have housing related support needs irrespective of age, disability, gender, gender identity, race, religion, or sexual orientation.	Yes - 1) The Reconnection Policy reaffirms the principle that short term accommodation based services should be accessible to the vulnerable people of Kent irrespective of their area of origin, as long as they are in need of housing related support and meet the criteria set out in the Kent Eligibility policy.	High	None	a) No internal action required c) Supporting People will continue to monitor the application of the Reconnection Policy and review services and referrals to services, including diversity to ensure that vulnerable people including people who are vulnerable because of age and who need the services can access them.
<b>Age</b>		Yes - 2) The Policy explicitly states that three client groups may need to access services in Kent from outside of Kent because of particular reasons: offenders, people fleeing domestic abuse and rough sleepers.	High	None	a) No internal action required b) Offenders, rough sleepers and people fleeing domestic abuse are often highly mobile and highly vulnerable and need

Characteristic	Could this policy, procedure, project or service affect this group differently from others in Kent? YES/NO	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO	Assessment of potential impact HIGH/MEDIUM/ LOW/NONE/ UNKNOWN		Provide details: a) Is internal action required? If yes, why? b) Is further assessment required? If yes, why? c) Explain how good practice can promote equal opportunities
			Positive	Negative	
					to access support services from outside of Kent for reasons of safety or because certain conditions prevent them staying/returning to their areas of origin.
<b>Age</b>		Yes – 3) Emphasis on the role of the Rough Sleeper service and other providers in relocating individuals back to their areas of origin where this is appropriate and in resettling service users moving on from supported housing into social or private rented accommodation.	High	None	a) Internal action has already been taken by incorporating the requirements into contracts and service specifications commencing April 2012. c) The Policy promotes supporting vulnerable homeless people, to physically relocate to communities in areas where they have built up sustained attachments. Many vulnerable homeless people access supported accommodation in areas that are not local to them and hence staying in those areas may lead to the loss of valuable social capital that may sustain them in the community.

Characteristic	Could this policy, procedure, project or service affect this group differently from others in Kent? YES/NO	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO	Assessment of potential impact HIGH/MEDIUM/ LOW/NONE/ UNKNOWN		Provide details: a) Is internal action required? If yes, why? b) Is further assessment required? If yes, why? c) Explain how good practice can promote equal opportunities
			Positive	Negative	
<b>Disability</b>	As above	Yes - 1)2) 3) As above	High	None	a) c) As above
<b>Gender</b>	As above	Yes - 1)2) 3) As above	High	None	a) c) As above
<b>Race</b>	As above	Yes - 1)2) 3) As above	High	None	a) c) As above
<b>Gender identity</b>	Not applicable				
<b>Religion or belief</b>	Not applicable				
<b>Sexual orientation</b>	Not applicable				
<b>Pregnancy and maternity</b>	Not applicable				

## **Part 1: INITIAL SCREENING**

### **Context**

The Supporting People Programme commissions the non-statutory provision of housing related support in a range of services including short term accommodation based supported housing. The commissioning of Supporting People funded services is guided by the Supporting People Strategy 2010-2015. The strategy aims to work in partnership with stakeholders to deliver where possible needs led, value for money and high quality housing support services for vulnerable people.

The overarching objectives of the Supporting People Strategy 2010-15 are: -

- Delivering housing related support the primary objective of which is to promote “independent living”.
- Housing related support is to have clear preventative benefits, promote well being and meet identified need and link with partners’ objectives in delivering the Programme
- Focusing on the priority outcomes including the maximisation of independence and prevention
- Addressing the needs of socially excluded groups, particularly in areas of high deprivation, whose needs are not met by current support provision. Services will apply principles of equal opportunities and fair access. This will enhance diversity and social inclusion in local communities.

The current Reconnection Policy was agreed by the Commissioning Body in December 2007 and was the result of partnership working with district/borough housing departments as key stakeholders through the Joint Policy and Planning Board (Housing). At the time, the Supporting People Programme was funded by direct grant from central government. The Policy was developed within the spirit of the CLG grant conditions which applied to all Administering Authorities. The grant conditions required that short-term services (up to two years of duration) should not operate a local connection policy that excludes people who come from outside Kent or from a different district or borough council within Kent. The clause reads as follows:

*“An Authority shall ensure fair and open access to appropriate and strategically relevant Supporting People services and, without prejudice to the operation of any reconnections policy that it has developed, in respect of short term services shall not take account of whether an applicant has a local connection to the area covered by the Authority”.*

### **Aims and Objectives**

The overall aim of the Policy is to ensure that short term accommodation based supported housing is accessible to the vulnerable people of Kent irrespective of area of origin. Whilst the twelve districts/boroughs of Kent aim to meet local needs in support services available in their own areas, due to lack of resources this is not always possible. Short term supported housing is not distributed equitably across Kent. There are no districts/boroughs that have services within their boundaries that include all 21 client groups within the Programme. This is why there is a need to retain a policy which does not preclude service users within Kent from accessing the supported housing they need wherever it happens to be within Kent. However, it is critical that districts and boroughs that host these services do not end up having to

facilitate access to private or social rented housing in their area. Some districts/boroughs have more supported housing than others and would be placed under considerable pressure to meet the housing needs of people who are moving on from supported accommodation.

At the same time, providing equal access under the provisions described above has implications for move-on opportunities for individuals in Supporting People services not normally resident in the district where the service is delivered. Offering permanent move-on irrespective of a local connection is unsustainable in the face of local demand exceeding supply for social housing and may also put pressure on other local resources. Therefore, a second aim of the Policy is to link vulnerable people, where appropriate, back to areas of origin or other areas where they may have sustained attachment to local communities.

Since 2010 Supporting People funding is incorporated into formula funding to Kent County Council and hence grant conditions do not apply anymore. The aim of revising the Supporting People Reconnection Policy was to re-affirm the parts of the Policy which remain unchanged and identify what needs to be changed in order to meet the aims of the Supporting People Strategy 2010-15.

In summary, the Policy has been reviewed and amended as follows:

1. Removal of all references to Supporting People Grant Conditions
2. Reaffirmation of the principle of open access to short term accommodation based supported housing to the vulnerable people of Kent irrespective of area of origin within Kent.
3. The Policy explicitly states that three client groups may access services in Kent from outside of Kent because of particular reasons: offenders, people fleeing domestic abuse and rough sleepers.
4. Emphasis on the role of the Rough Sleeper service and other providers in reconnecting individuals back to their areas of origin where this is appropriate.
5. The role of providers of short term accommodation based services in resettling service users moving on from supported housing into social or private rented accommodation (these requirements have been incorporated into the amended Kent Eligibility Policy 2012/13 and into service contracts and specifications to commence April 2012).

## **Beneficiaries**

The beneficiaries of the Programme are vulnerable people in need of housing related support services in Kent as defined in the Kent Supporting People Eligibility Policy. They include:

- single homeless people with support needs and rough sleepers
- older people with support needs
- people with physical/sensory disabilities and people with learning disabilities
- people with mental health problems
- families with support needs and teenage parents
- young people at risk and care leavers
- offenders

- people at risk of domestic abuse
- people with alcohol and/or drug problems

Any provider commissioned by the Supporting People Programme to provide one or more of the proposed services is awarded a contract which is monitored through the Quality Assessment Framework (QAF). The QAF has clear and explicit standards to ensure that all Supporting People funded services are inclusive to all members of the community. All contracts have clauses requiring providers to work within the Equality Act 2010 and the Human Rights Act 1998. Providers must all have an equal opportunities policy that complies with all statutory obligations as stipulated by the Equality and Human Rights Commission as far as possible.

All contracts also contain service specifications setting out eligibility criteria for the service that comply with the Reconnection and Eligibility Policies.

### **Consultation and data**

The revised Policy is based on:

- Analysis of access to short term accommodation based supported housing funded by the Supporting People Programme. This information was collected as part of the strategic review of access to short term accommodation based supported housing.
- Analysis of Client Records through which providers identify the area of origin of clients newly accessing services
- Consultations with service users as part of the strategic review of access to short term accommodation based services
- Consultations with districts and boroughs as main stakeholders

### **Potential Impact**

The Supporting People Programme monitors and reviews the services it commissions to ensure that they are accessible to the vulnerable people who need them irrespective of race, religion, gender identity, and sexual orientation. Potential adverse impacts could only affect the protected characteristics of age, disability, race (only where this affects a floating support service specifically for BME groups) and gender (where services are focused on those escaping domestic abuse and teenage parents).

The Supporting People Reconnection Policy ensures that short term accommodation based services are resources accessible to all vulnerable people of Kent irrespective of local connection. It applies to all client groups equally and will not affect groups of people with the protected characteristics more than others. In the case of offenders, people fleeing domestic abuse and rough sleepers the Policy explicitly widens access to vulnerable people from outside of Kent.

### **Adverse Impact:**

A review of the revised Reconnection Policy has been considered and based on the information currently available no adverse impacts have been identified that may affect one group of people with the protected characteristics disproportionately more than others.

