

EQUALITY IMPACT ASSESSMENT

Temporary Accommodation Investment Strategy: Delays in increasing staffing capacity.

Reference: EIA000263

Date: 23/01/2024











EIA Form – About your EIA	
Reference number	EIA000263
Date Submitted	23/01/2024
Subject of the EIA	Temporary Accommodation Investment Strategy: Delays in
	increasing staffing capacity.





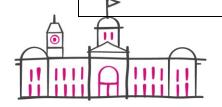






Brief description of the policy, service or function covered by the EIA

Housing Solutions and Support is responsible for statutory service delivery to vulnerable citizens. This includes – people who sleep rough, single homeless and families, including temporary accommodation (TA) and move-on. A redesign of HSS (2019-22) invested in capacity to effectively respond to the persistent increases in homelessness presentation demand. The previous model was placing a financial strain on the General Fund which resulted in overspends in TA in previous years. Since the mobilisation of the new Target Operating Model (TOM), there have been considerable environmental changes that has resulted in the service experiencing further significant increases in the number of households presenting as homeless (39% increase since July 2021), which has resulted in TA usage increasing by 38%, i.e., Covid-19 impact, cost of living crisis, housing market changes, increases in rent, increase in asylum seekers and DA homelessness cases. Despite this increase in homelessness demand, due to the additional capacity the service secured during 2021/22, homelessness prevention rates have improved. The average homeless prevention rate for 2021 was 37.43% this increased to and average homeless prevention rate of 47.26% in 2023. More recently in the last quarter of 2023 we have seen the prevention rate increase to an average of 57.35% The Temporary Accommodation Strategy (2023) sets out to: a) reduce the number of households in B&B, b) reduce the time spent by households in B&B c) increase the quality of temporary accommodation d) increase the supply of accommodation to assist with move on of households and the move on out of temporary accommodation. The number of households with dependents over 6 weeks is a key target for the service to reduce to zero. The Strategy also determines the best way to reduce this number to zero and meet medium term temporary accommodation needs. The TA Strategy (2023) recognised the lack of access to affordable homes in the city and the affordability barriers to the private rented sector. The Strategy accepted that the scale of TA while regrettable, is not the primary problem, that being the nature and cost of some forms of TA. The Strategy sets a path away from B&B use towards other, better forms of TA, while in the medium/longer term better supply of affordable homes is delivered. Savings Proposal: Reducing the number of additional resources approved to deliver the TA strategy, which will result in significant constraints upon the delivery of this Strategy. It is the objective of the service to mitigate against potential harm whilst









Equality Assessment is in support of How frequently will you	acknowledging the already challenging environment and pressures. Equalities Homelessness can have a devastating impact on an individual's health and well-being. According to a report by the Local Government Association, people experiencing homelessness report much poorer health than the general population. A recent national audit found that 41% of homeless people reported a long-term physical health problem and 45% had a diagnosed mental health problem, compared with 28% and 25% respectively in the general population. Across all forms of health care needs, both physical and mental, as well as access to necessary support, people experiencing homelessness report poorer diagnoses and greater barriers to the healthcare needed than the general population Source: In Birmingham 28% of all homeless cases present with additional support needs. The most common reasons for support needs are: • Access to education, employment and training • Domestic Abuse • Mental Health. At present the average length of stay for a household in temporary accommodation is 73 weeks and there are circa 4997 households. The average length of stay for a household in B&B is 21 weeks and there are circa 700 households. ["Amended/refreshed strategy"] Six months
review impact and mitigation	- OK MOREIG
measures identified in this	
EIA?	
Due date of the first review	2024-07-31
Due date of the first review	2024-07-31

Directorate, Division & Service Area	
Which directorate(s) are responsible for this EIA?	["City Housing"]
Division	Housing Solution and Support Service
Service area	Temporary Accommodation and Accommodation Finding Team
Budget Saving	Yes

Officers	
What is the responsible	Ranjeet Kaur
officer's email address?	
What is the accountable	Stephen Philpott
officer's email address?	











Data Sources	
Data sources	["Birmingham City Observatory data and insight", "Relevant reports/strategies", "Relevant research", "Quantitative data (please specify in the box below)"]
Data source details	BCC Power Bi - Housing Solutions and Support Service Data
	Black people are over three times more likely to experience homelessness - Heriot-Watt University (hw.ac.uk).
	Women are some of the biggest losers in England's broken housing system - Shelter England
	How does homelessness differ for women? - The Big Issue
	Full article: Is LGBT homelessness different? Reviewing the relationship between LGBT identity and homelessness (tandfonline.com)
	LGBTQ+ and Homelessness - Statistics and Support Crisis UK
	Women are some of the biggest losers in England's broken housing system - Shelter England
	How does homelessness differ for women? - The Big Issue

Protected Characteristics

Protected Characteristic – Age	
Does this proposal impact	Yes
people due to their age as	
per the Equality Act 2010?	
What age groups are	["0-9 years","10-19 years","20-29 years","30-39 years","40-
impacted by your proposal?	49 years","50-59 years","60-69 years","70-79 years","80-89
	years","90 years or over"]











Please describe the impact to the age characteristic

All citizens regardless of their age can access the service and assistance will be given to all in accordance with legislative requirements.

However, it is important to note that this specific proposal will only impact households that have been placed in temporary accommodation provided by Birmingham City Council.

Service data tells us that most of the households in our temporary accommodation fall into the 20-29 years, 30-39 years, and 40-49 years categories and therefore they will be adversely impacted. We also know that most of our households in temporary accommodation have dependent children therefore this age group will also be adversely impacted.

Adults within these age groups may find themselves housed in unfamiliar parts of the city or even outside the city limits. This displacement could distance them from their support networks, friends, and family. Employed individuals might face extended commutes to their workplaces. Similarly, households with children may have to travel further to reach schools and children's education could be impacted. If these households rely on public transport, they could incur additional costs. These factors could potentially have a detrimental effect on their health and wellbeing.

There is also a general impact that all characteristics will experience; in that it will take longer to resolve their homelessness.

Households are generally placed in B&B accommodation and then moved into more suitable TA. The transfer from B&B into more suitable TA will take longer











How will you mitigate against any negative impact to the age characteristic?

The service will continue to build on existing partnership working arrangements with the Children's Trust, Adult Social Care, Early Intervention and Prevention service and other relevant partners to mitigate impact.

The service will also continue to reduce the use of B&B and improve standards through existing workstreams.

We will commence the use of Regulation 10 to contract emergency TA. This will allow us to source and procure TA at cost and improve standards.

The ongoing work of the Accommodation Finding Team will continue to provide households with access to accommodation via the private rented sector.

We will continue with using Direct Lets for those stuck and in exceptional need in TA and increase the use of stock as Dispersed TA.

Protected Characteristic – Disability

Does this proposal impact those people with a disability as per the Equality Act 2010? Yes











Please describe the impact to the disability characteristic

All citizens regardless can access the service and assistance will be given to all in accordance with legislative requirements.

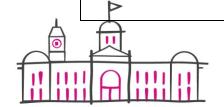
However, it is important to note that this specific proposal will only impact households that have been placed in temporary accommodation provided by Birmingham City Council.

Our data reveals that while 9% of households in B&Bs have disclosed a disability, 47% have not, suggesting the actual figure could be higher. National research on the impact of homelessness on this demographic indicates that households with disabilities are disproportionately affected by homelessness. There is also a recognized issue concerning undisclosed disabilities.

Households in temporary accommodation with disabilities may face challenges in sourcing suitable accommodation due to a shortage of accessible housing. They may be placed in temporary accommodation outside the city, distancing them from their support networks, family, and friends. This could necessitate longer travel times to appointments with external support agencies or medical appointments, potentially incurring additional costs if they rely on public transport. Certain disabilities, such as mental health conditions, could be exacerbated, potentially having a detrimental impact on their health and wellbeing if they are unable to attend appointments.

There is also a general impact that all characteristics will experience; in that it will take longer to resolve their homelessness.

Households are generally placed in B&B accommodation and then moved into more suitable TA. The transfer from B&B into more suitable TA will take longer









How will you mitigate against any negative impact to the disability characteristic?	We will continue to deliver our statutory duty around suitability of TA and support households with disabilities within TA. In accordance with legislation, households with disabilities receive greater priority need on the housing register
	We will continue with using Direct Lets for those stuck and in exceptional need in TA and increase the use of stock as Dispersed TA.
	The service will also continue to build on existing partnership working arrangements with the Children's Trust, Adult Social Care, Early Intervention and Prevention service and other relevant partners to mitigate impact for households that fall under this characteristic.
	The service will also continue to reduce the use of B&B and improve standards through existing workstreams.
	We will commence the use of Regulation 10 to contract emergency TA. This will allow us to source and procure TA at cost and improve standards.
	The ongoing work of the Accommodation Finding Team will continue to provide households with access to accommodation via the private rented sector.

Protected Characteristic – Sex	
Does this proposal impact citizens based on their gender as per the Equality Act 2010?	Yes
What genders will be impacted by this proposal?	["Male","Female","Non-binary"]











Please describe the impact to the gender characteristic

All citizens regardless can access the service and assistance will be given to all in accordance with legislative requirements. It is important to note that this specific proposal will only impact households that have been placed in temporary accommodation provided by Birmingham City Council.

There is an impact on all genders, but national research tells that there is a greater impact on females who are adversely and disproportionately affected by homelessness in comparison to males.

Shelter England's report (Dec 2021) shows that 60% of all homeless adults living in temporary accommodation in England are women, despite only making up 51% of the general population. In the past decade, the number of homeless women living in temporary accommodation has almost doubled from 40,030 in 2011 to 75,410 in 2021 – a rise of 88%

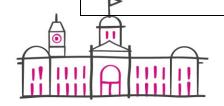
Currently 68.05% of residents in TA provided by Birmingham City Council are female, we also know that females in our TA are likely to be single parents with children and that the one of the highest reasons for homeless is domestic abuse.

All genders may find themselves housed in unfamiliar parts of the city or outside the city limits however females may feel less safe in unfamiliar surroundings especially after dark (ONS research on perceptions of safety). This displacement could have a positive impact for those fleeing DV as it may distance them from the locality their abuser resides in however it will also distance them from their support networks, friends, and family at a time when support may be required.

All genders may find that they have an extended commute to work and school and incur additional costs if they are reliant on public transport. However, single parents with children may experience an additional pressure of managing the logistics of getting to work, school and childcare arrangements without additional support.

These factors could potentially have a detrimental effect on their health and wellbeing.

There is also a general impact that all characteristics will











experience; in that it will take longer to resolve their homelessness.

Households are generally placed in B&B accommodation and then moved into more suitable TA. The transfer from B&B into more suitable TA will take longer

The reduced capacity will make it challenging to maintain the current level of support and assistance to households. This includes helping them find and move into secure accommodation and ensuring they possess the necessary skills to sustain their tenancies and break the cycle of repeat homelessness. There's a risk that citizens may accrue arrears or debt due to the reduced capacity to address rent issues promptly.

How will you mitigate against any negative impact to the gender characteristic?

The service will continue to build on existing partnership working arrangements with the Childrens Trust, Adult Social Care, Early Intervention and Prevention service, Public Health and other relevant partners to mitigate impact

Our tailored housing solutions offer for victims of DA will continue and the service will continue its partnership working with the NHS midwifery team in supporting pregnant women that are placed in TA.

The service will also continue to reduce the use of B&B and improve standards through existing workstreams.

We will commence the use of Regulation 10 to contract emergency TA. This will allow us to source and procure TA at cost and improve standards.

The ongoing work of the Accommodation Finding Team will continue to provide households with access to accommodation via the private rented sector.

Protected Characteristic - Gender Reassignment

Does this proposal impact people who are proposing to undergo, undergoing or have undergone a process to reassign one's sex as per the Equality Act 2010? Yes











Please describe the impact to the gender reassignment characteristic All citizens regardless can access the service and assistance will be given to all in accordance with legislative requirements. It is important to note that this specific proposal will only impact households that have been placed in temporary accommodation provided by Birmingham City Council.

We do not currently collate any internal data on this characteristic, but the service will seek to improve data collection and review impact.

National research from Stonewall shows that almost one in five LGBTQA+ people have experienced homelessness at some point in their lives. Rates are even higher amongst trans people, with 25% having experienced homelessness at some point.

Individuals that fall under this characteristic may face a higher likelihood of discrimination or harassment. This may lead to challenges when they are placed in TA in an unfamiliar locality or outside of the city. They may be distanced from support networks or friends, further exacerbating their situation.

There is also a general impact that all characteristics will experience; in that it will take longer to resolve their homelessness.

Households are generally placed in B&B accommodation and then moved into more suitable TA. The transfer from B&B into more suitable TA will take longer











How will you mitigate against any negative impact to the gender reassignment characteristic?	The service will also continue to build on existing partnership working arrangements with the Childrens Trust, Adult Social Care, Early Intervention and Prevention service, Public Health, and other relevant partners to mitigate impact. We will also continue ensure that any commissioning is inclusive and that our workforce continue to receive regular training around inclusivity and unconscious bias.
	The service will also continue to reduce the use of B&B and improve standards through existing workstreams. We will commence the use of Regulation 10 to contract emergency TA. This will allow us to source and procure TA

at cost and improve standards.

The ongoing work of the Accommodation Finding Team will continue to provide households with access to accommodation via the private rented sector.

Protected Characteristic - Marriage and Civil Partnership	
Does this proposal impact people who are married or in a civil partnership as per the Equality Act 2010?	Yes
What legal marital or registered civil partnership status will be impacted by this proposal?	["Single","Never married and never registered a civil partnership","Married: Same sex","Married: Opposite sex","In a registered civil partnership: Opposite sex","In a registered civil partnership: Same sex","Separated, but still married","Separated, but still in a registered civil partnership","Divorced","Formerly in a civil partnership now legally dissolved","Widowed","Surviving partner from civil partnership"]











Please describe the impact to the marriage and civil partnership characteristic All citizens regardless can access the service and assistance will be given to all in accordance with legislative requirements. It is important to note that this specific proposal will only impact households that have been placed in temporary accommodation provided by Birmingham City Council.

Whilst we do not gather data on this characteristic, households in TA could fall under any of the legal marital or registered civil partnership statuses considered under this characteristics and therefore could be impacted by this proposal.

The service will continue to improve the way this data is collected and review its impact and whilst we are uncertain of any specific impact this characteristic may face the general impact that all characteristics will experience will still apply; in that it will take longer to resolve their homelessness.

Households are generally placed in B&B accommodation and then moved into more suitable TA. The transfer from B&B into more suitable TA will take longer











How will you mitigate against any negative impact to the marriage and civil partnership characteristic? The service will continue to build on existing partnership working arrangements with the Childrens Trust, Adult Social Care, Early Intervention and Prevention service, Public Health, and other relevant partners to mitigate impact and look to improve its data collection against this characteristic.

The service will also continue to reduce the use of B&B and improve standards through existing workstreams.

We will commence the use of Regulation 10 to contract emergency TA. This will allow us to source and procure TA at cost and improve standards.

The ongoing work of the Accommodation Finding Team will continue to provide households with access to accommodation via the private rented sector.

Protected Characteristic - Pregnancy and Maternity Does this proposal impact people covered by the Equality Act 2010 under the protected characteristic of pregnancy and maternity? Yes











Please describe the impact to the pregnancy and maternity characteristic All citizens regardless can access the service and assistance will be given to all in accordance with legislative requirements. It is important to note that this specific proposal will only impact households that have been placed in temporary accommodation provided by Birmingham City Council.

We don't currently hold any internal data on this characteristic. The service will continue to improve the way this data is collected and review its impact.

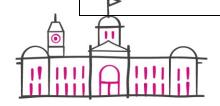
National research shows that pregnant women are adversely impacted by homelessness. Homelessness puts the health of pregnant mothers and their unborn babies at risk, as stress in pregnancy can adversely affect both the baby's growth and future development. Frequent moves and moves out of area can affect the degree to which families engage with maternity and health services, leading to broken relationships with professionals such as GPs and midwifes.

Pregnant women may find themselves housed in unfamiliar parts of the city or even outside the city limits. This displacement could distance them from their support networks, friends, and family and disrupt the continuity of maternity care provided the NHS. They may have to travel further for antenatal appointments, or transfer care to another NHS provider if placed in TA outside of the city. If they are reliant on public transport, they could incur additional costs. These factors could potentially have a detrimental effect on their health and wellbeing of the pregnant mother and unborn child.

There is also a general impact that all characteristics will experience; in that it will take longer to resolve their homelessness.

Households are generally placed in B&B accommodation and then moved into more suitable TA. The transfer from B&B into more suitable TA will take longer

The reduced capacity will make it challenging to maintain the current level of support and assistance to households. This includes helping them find and move into secure accommodation and ensuring they possess the necessary skills to sustain their tenancies and break the cycle of repeat homelessness. There's a risk that citizens may





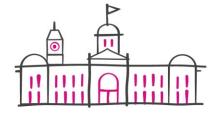






	accrue arrears or debt due to the reduced capacity to
	address rent issues promptly.
How will you mitigate against any negative impact to the pregnancy and maternity characteristic?	The service will continue its partnership working with the NHS midwifery team in supporting pregnant women that are placed in TA to ensure they continue to receive their antenatal care.
	The service will also continue to build on existing partnership working arrangements with the Childrens Trust, Adult Social Care, Early Intervention and Prevention service, Public Health, and other relevant partners to mitigate impact.
	The service will also continue to reduce the use of B&B and improve standards through existing workstreams.
	We will commence the use of Regulation 10 to contract emergency TA. This will allow us to source and procure TA at cost and improve standards.
	The ongoing work of the Accommodation Finding Team will continue to provide households with access to accommodation via the private rented sector.

Protected Characteristic - Ethnicity and Race	
Does this proposal impact	Yes
people due to their race as	
per the Equality Act 2010?	
What ethnic groups would	["White British","Other
be impacted by this	White","Bangladeshi","Chinese","Indian","Pakistani","Other
proposal?	Asian","African","Caribbean","Black British","Other
	Black","Arab","Latin American","Irish","Gypsy or Irish
	Traveller","Roma","Central and Eastern Europe","Western
	and Southern Europe","Black African"]











Please describe the impact to the ethnicity and race characteristic All citizens regardless of ethnicity and race can access the service and assistance will be given to all in accordance with legislative requirements.

It is important to note that this specific proposal will only impact households that have been placed in temporary accommodation provided by Birmingham City Council and therefore this proposal will currently disproportionately impact those who identify as White British, Pakistani and Black African

Service Data for households in TA tell us that our current residents are Black African 21%, Asian or Asian British Pakistani 15%, White British 13%

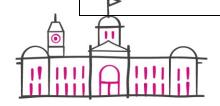
National research by Herriot Watt identified that minority groups and more significantly Black people are more likely to experience homelessness compared to White British people. They are also more likely to experience discrimination, harassment, or abuse on the grounds of race and ethnicity in housing. Refugees, migrants and individuals where English is a second language may experience difficulties in accessing services and understanding process and procedures due to language barriers. These groups may find that they are placed in TA in unfamiliar areas or outside of the city in localities where they are underrepresented and distanced from any community support networks, family, or friends that would aid and support them through homelessness.

Employed individuals might face extended to their workplaces. Similarly, households with children may have to travel further to reach schools and children's education could be impacted. If these households rely on public transport, they could incur additional costs.

These factors could potentially have a detrimental effect on their health and wellbeing.

There is also a general impact that all characteristics will experience; in that it will take longer to resolve their homelessness.

Households are generally placed in B&B accommodation and then moved into more suitable TA. The transfer from B&B into more suitable TA will take longer











The reduced capacity will make it challenging to maintain the current level of support and assistance to households. This includes helping them find and move into secure accommodation and ensuring they possess the necessary skills to sustain their tenancies and break the cycle of repeat homelessness. There's a risk that citizens may accrue arrears or debt due to the reduced capacity to address rent issues promptly.

How will you mitigate against any negative impact to the ethnicity and race characteristic?

The service will be working with WMCA and Herriot Watt University who are undertaking research around people learning to tackle race and inequalities in homelessness.

We will continue to working with refugee and migrant team for EIP to support households who have come through a refugee and migrant route.

We will continue to use interpreting services where required to ensure households in TA understand homeless process and procedure.

The service will also continue to build on existing partnership working arrangements with the Children's Trust, Adult Social Care, Early Intervention and Prevention service, Public Health and other relevant partners.

The service will also continue to reduce the use of B&B and improve standards through existing workstreams.

We will commence the use of Regulation 10 to contract emergency TA. This will allow us to source and procure TA at cost and improve standards.

The ongoing work of the Accommodation Finding Team will continue to provide households with access to accommodation via the private rented sector

Protected Characteristic - Religion or Beliefs

Does this proposal impact people's religion or beliefs as per the Equality Act 2010?

Yes











What religions could	["No
be impacted by this proposal?	religion","Christian","Buddhist","Hindu","Jewish","Muslim","Sikh"]
Please describe the impact to the religion or beliefs	Whilst we do not gather data on this characteristic the service can be accessed by all regardless of religion or belief.
characteristic	The service will continue to improve the way this data is collected and review its impact.
	The general impact that all characteristics will experience will however still apply; in that it will take longer to resolve their homelessness.
	Households are generally placed in B&B accommodation and then moved into more suitable TA. The transfer from B&B into more suitable TA will take longer
	The reduced capacity will make it challenging to maintain the current level of support and assistance to households. This includes helping them find and move into secure accommodation and ensuring they possess the necessary skills to sustain their tenancies and break the cycle of repeat homelessness. There's a risk that citizens may accrue arrears or debt due to the reduced capacity to address rent issues promptly.











How will you mitigate against any negative impact to the religion or beliefs characteristic?

The service will continue to build on existing partnership working arrangements with the Children's Trust, Adult Social Care, Early Intervention and Prevention service, Public Health and other relevant partners.

The service will be working with WMCA and Herriot Watt university who are undertaking research around people learning to tackle race and inequalities in homelessness.

We will continue to working with refugee and migrant team for EIP to support households who have come through a refugee and migrant route.

The service will also continue to reduce the use of B&B and improve standards through existing workstreams.

We will commence the use of Regulation 10 to contract emergency TA. This will allow us to source and procure TA at cost and improve standards.

The ongoing work of the Accommodation Finding Team will continue to provide households with access to accommodation via the private rented sector

Protected Characteristic - Sexual Orientation

Total and a control of the control o		
Does this proposal impact	Yes	
people's sexual orientation as		
per the Equality Act 2010?		
What sexual orientations may	["All other sexual orientations","Straight or	
be impacted by this	heterosexual","Gay or	
proposal?	lesbian","Bisexual","Pansexual","Asexual","Queer"]	











Please describe the impact to the sexual orientation characteristic All citizens regardless of sexual orientation can access the service and assistance will be given to all in accordance with legislative requirements.

It is important to note that this specific proposal will only impact households that have been placed in temporary accommodation provided by Birmingham City Council.

Whilst our internal data around this characteristic is insufficient, we know that national research has found clear evidence that LGBTQA+ are overrepresented among homeless populations.

The reasons why LGBTQA identity increases a person's chance of becoming homeless are not as well documented.

Research from Stonewall shows that almost one in five LGBT people have experienced homelessness at some point in their lives. Rates are even higher amongst trans people, with 25% having experienced homelessness at some point.

Individuals that fall under this characteristic may face a higher likelihood of discrimination or harassment. This may lead to challenges when they are placed in TA in an unfamiliar locality or outside of the city. They may be distanced from support networks or friends, further exacerbating their situation.

The general impact that all characteristics will experience will however still apply; in that it will take longer to resolve their homelessness.

Households are generally placed in B&B accommodation and then moved into more suitable TA. The transfer from B&B into more suitable TA will take longer











How will you mitigate against any negative impact to the sexual orientation characteristic? The service will continue to build on existing partnership working arrangements with the Childrens Trust, Adult Social Care, Early Intervention and Prevention service, Public Health, and other relevant partners to mitigate impact. We will also continue to ensure that any commissioning is inclusive and that our workforce continue to receive regular training around inclusivity and unconscious bias.

The service will also continue to reduce the use of B&B and improve standards through existing workstreams.

We will commence the use of Regulation 10 to contract emergency TA. This will allow us to source and procure TA at cost and improve standards.

The ongoing work of the Accommodation Finding Team will continue to provide households with access to accommodation via the private rented sector.

Monitoring		
How will you ensure any adverse impact and mitigation measures are monitored?	Periodic review of service data	
Please enter the email address for the officer responsible for monitoring impact and mitigation	Stephen Philpott	







