

EQUALITY IMPACT ASSESSMENT

Property Acquisition Programme-Housing Revenue
Account (HRA)

Reference: EIA000304



 **RESET**

 **RESHAPE**

 **RESTART**

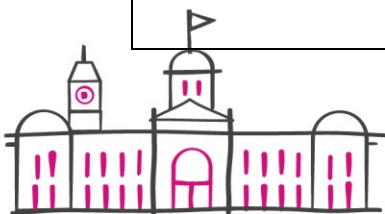
EIA Form – About your EIA

Reference number	EIA000304
Date Submitted	26/01/2024
Subject of the EIA	Property Acquisition Programme-Housing Revenue Account



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 increase 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. 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. A Property Acquisition Program commenced in 2022. This is a general fund purchasing of family homes off the open market to be used as TA. The Program had an initial £60m to purchase up to 240 homes. This has subsequently been augmented with DLUHC grant and has created a flow of 4-5 properties per week to be let at TA with plans to accelerate this to 5-7 properties per week. The pilot is on track to deliver 315 properties that are being used to move on household from B&B into more suitable TA. The new 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 Strategy determines the best way to reduce to zero the number of households with dependents in B&B over 6 weeks and meet medium term temporary accommodation needs. The number of households with dependents over 6 weeks is a key target for the service to reduce to zero. The Strategy also 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 set a path away from B&B use towards



	<p>other, better forms of TA, while in the medium/longer term better supply of affordable homes is delivered. The TA Strategy proposed the acquisition of up to 300 properties p.a. for 5 years = an additional 1500 family homes that initially could be used as TA and if possible then brought into general needs permanent stock. The EIA is addressing the fact that this supply is no longer assured as the capacity to borrow in the way devised by the TA Strategy, is now not possible. Savings Proposal The remaining properties that are being sourced via the property acquisition pilot, will now be purchased as additional HRA stock and rented to TA at LHA rate. The HRA can finance the debt from this income, while the General fund can fund the rent costs from TA rents and retain the remainder. This will achieve the savings proposal put forward over the next two years. However, the knock-on effect of amending this initiative within the TA strategy is that the future of the program is now reliant on finding alternative supply or funding for supply of TA, without the cost of debt. Risk Whilst this saving is a funding change, it does represent a change to the TA Strategy and any change comes with the risk of increased number of households living in B&B (most costly TA provision for the service), and this is what is being considered in this EIA.</p>
Equality Assessment is in support of...	["Amended/refreshed strategy "]
How frequently will you review impact and mitigation measures identified in this EIA?	Annually
Due date of the first review	2025-04-01

Directorate, Division & Service Area

Which directorate(s) are responsible for this EIA?	["City Housing"]
Division	City Housing
Service area	Housing Solutions and Support Service
Budget Saving	Yes

Officers

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



Data Sources	
Data sources	["Birmingham City Observatory data and insight", "Quantitative data (please specify in the box below)", "Relevant research"]
Data source details	<p>Power BI- Housing Solutions and Support Service Data</p> <p>Black people are over three times more likely to experience homelessness - Heriot-Watt University (hw.ac.uk).</p> <p>22.7 HEALTH AND HOMELESSNESS_v08_WEB_0.PDF (local.gov.uk)</p> <p>Homeless_Health_Needs_Audit_Report.pdf (kxcdn.com)</p> <p>Disabled people are disproportionately affected by homelessness – and getting support feels ‘nearly impossible’ (theconversation.com)</p> <p>Barriers faced by people with disabilities in exiting homelessness (homelessnessimpact.org)</p> <p>LGBTQ+ and Homelessness - Statistics and Support Crisis UK</p> <p>Full article: Is LGBT homelessness different? Reviewing the relationship between LGBT identity and homelessness (tandfonline.com)</p> <p>Women are some of the biggest losers in England’s broken housing system - Shelter England</p> <p>How does homelessness differ for women? - The Big Issue</p>

Protected Characteristics

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



<p>Please describe the impact to the age characteristic</p>	<ul style="list-style-type: none"> • Increased number of households living in B&B • Households residing in TA for longer periods of time. • Reduced ability to move households out of B&B and into more suitable TA accommodation. • Risk of households being placed in TA outside of City (away from their support network). • Frequent TA moves from one TA to another can affect the degree of support households receives from external agencies.
<p>How will you mitigate against any negative impact to the age characteristic?</p>	<p>The service now has to work with partners to appraise a range of options in seeking to replace in full or in part the loss of the ongoing acquisitions. The options being investigated include – utilising any HRA underspend; the seeking and utilisation of government grant; the creation of supported exempt family temporary accommodation, securing alternate capital investment with leasing options, creating a vehicle for BCC to undertake longer-term leasing of homes, utilisation of assets including land to leverage supply.</p> <p>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.</p> <p>The service will also continue to reduce the use of B&B and improve standards through existing workstreams.</p> <p>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.</p> <p>The ongoing work of the Accommodation Finding Team will continue to provide households with access to accommodation via the private rented sector.</p> <p>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.</p>

Protected Characteristic – Disability



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

Whilst the data shows that 9% of households in B&B have disability 74% of households have not disclosed this information and therefore this figure could be higher.

Whilst our figures are low research shows us households with disabilities are adversely impacted by homelessness and there is a known issue around hidden disabilities and disclosure.

The number of people qualifying for homelessness support in England because of a disability rose by 73% from 2018-2021.

Learning disabilities occur at 2% in the general population but 13% in homeless populations. Autism is estimated to occur in the general population at 1-2%, but at 12 - 18 % in homeless populations.

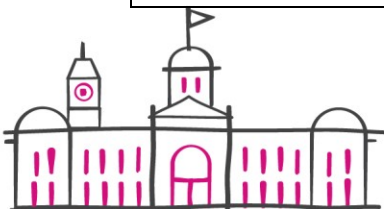
People with disabilities face many barriers to getting support and exiting homelessness, including difficulty getting a diagnosis, unsuitable environments, and a shortage of accessible housing.

Between 2018 to 2022 in England, households accepted as homeless by reason of physical ill health or disability increased by 73%.

The poverty rate for people with disabilities is 32%, 12% higher than poverty rates in the general population.

These statistics suggest that people with disabilities are at an increased risk of experiencing homelessness due to a variety of factors, including institutionalisation, discrimination in access to services, inadequate housing and social supports, a lack of accessible and affordable housing stock, and unaffordable rents.

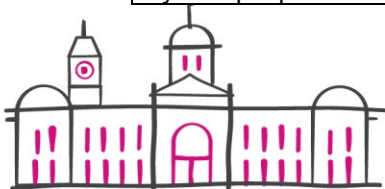
- Increased number of households living in B&B
- Households residing in TA for longer periods of time.
- Reduced ability to move households out of B&B and into more suitable TA accommodation.
- Risk of households being placed in TA outside of City (away from their support network).
- Frequent TA moves from one TA to another can affect the degree of support households receives from external agencies.



<p>How will you mitigate against any negative impact to the disability characteristic?</p>	<p>The service now has to work with partners to appraise a range of options in seeking to replace in full or in part the loss of the ongoing acquisitions. The options being investigated include – utilising any HRA underspend; the seeking and utilisation of government grant; the creation of supported exempt family temporary accommodation, securing alternate capital investment with leasing options, creating a vehicle for BCC to undertake longer-term leasing of homes, utilisation of assets including land to leverage supply.</p> <p>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</p> <p>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.</p> <p>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.</p> <p>The service will also continue to reduce the use of B&B and improve standards through existing workstreams.</p> <p>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.</p> <p>The ongoing work of the Accommodation Finding Team will continue to provide households with access to accommodation via the private rented sector.</p>
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Protected Characteristic – Sex

<p>Does this proposal impact citizens based on their sex as per the Equality Act 2010?</p>	<p>Yes</p>
<p>What sexes will be impacted by this proposal?</p>	<p>["Male", "Female", "Non-binary"]</p>



Please describe the impact to the sex characteristic

Currently 68.05% of residents in TA provided by us are female, this figure aligns and is representative of the national picture.

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%

Women who are homeless have a “very distinct” experience of homelessness that differs from men. There is a significant correlation between domestic abuse and homelessness among women; domestic abuse and other forms of gender-based violence are “near universal experiences” for women experiencing homelessness. Having children then correlates with the likelihood of requiring temporary accommodation.

The impact:

- Increased number of households living in B&B
- Households residing in TA for longer periods of time.
- Reduced ability to move households out of B&B and into more suitable TA accommodation.
- Risk of households being placed in TA outside of City (away from their support network).
- Frequent TA moves from one TA to another can affect the degree of support households receives from external agencies.



<p>How will you mitigate against any negative impact to the sex characteristic?</p>	<p>The service now has to work with partners to appraise a range of options in seeking to replace in full or in part the loss of the ongoing acquisitions. The options being investigated include – utilising any HRA underspend; the seeking and utilisation of government grant; the creation of supported exempt family temporary accommodation, securing alternate capital investment with leasing options, creating a vehicle for BCC to undertake longer-term leasing of homes, utilisation of assets including land to leverage supply.</p> <p>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 to mitigate impact</p> <p>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.</p> <p>The service will also continue to reduce the use of B&B and improve standards through existing workstreams.</p> <p>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.</p> <p>The ongoing work of the Accommodation Finding Team will continue to provide households with access to accommodation via the private rented sector.</p>
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Protected Characteristic - Gender Reassignment

<p>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?</p>	<p>Yes</p>
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Please describe the impact to the gender reassignment characteristic

We do not hold any data on this characteristic however 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.

The impact:

- Increased number of households living in B&B
- Households residing in TA for longer periods of time.
- Reduced ability to move households out of B&B and into more suitable TA accommodation.
- Risk of households being placed in TA outside of City (away from their support network).
- Frequent TA moves from one TA to another can affect the degree of support households receives from external agencies.



<p>How will you mitigate against any negative impact to the gender reassignment characteristic?</p>	<p>The service now has to work with partners to appraise a range of options in seeking to replace in full or in part the loss of the ongoing acquisitions. The options being investigated include – utilising any HRA underspend; the seeking and utilisation of government grant; the creation of supported exempt family temporary accommodation, securing alternate capital investment with leasing options, creating a vehicle for BCC to undertake longer-term leasing of homes, utilisation of assets including land to leverage supply.</p> <p>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.</p> <p>The service will also continue to reduce the use of B&B and improve standards through existing workstreams.</p> <p>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.</p> <p>The ongoing work of the Accommodation Finding Team will continue to provide households with access to accommodation via the private rented sector.</p>
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Protected Characteristic - Marriage and Civil Partnership

<p>Does this proposal impact people who are married or in a civil partnership as per the Equality Act 2010?</p>	<p>Yes</p>
<p>What legal marital or registered civil partnership status will be impacted by this proposal?</p>	<p>["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"]</p>



Please describe the impact to the marriage and civil partnership characteristic

Whilst we do not gather data on this characteristic in the format required, the service does collect household composition data and households in TA could fall under any of the legal marital or registered civil partnership statuses available for selection in the box above.

Data shows us that single people with children are most impacted at 44.44% followed by couples and single people without any children.

The impact:

- Increased number of households living in B&B
- Households residing in TA for longer periods of time.
- Reduced ability to move households out of B&B and into more suitable TA accommodation.
- Risk of households being placed in TA outside of City (away from their support network).
- Frequent TA moves from one TA to another can affect the degree of support households receives from external agencies.
- TA moves will impact a child's education who is living in TA.



<p>How will you mitigate against any negative impact to the marriage and civil partnership characteristic?</p>	<p>The service now has to work with partners to appraise a range of options in seeking to replace in full or in part the loss of the ongoing acquisitions. The options being investigated include – utilising any HRA underspend; the seeking and utilisation of government grant; the creation of supported exempt family temporary accommodation, securing alternate capital investment with leasing options, creating a vehicle for BCC to undertake longer-term leasing of homes, utilisation of assets including land to leverage supply.</p> <p>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.</p> <p>The service will also continue to reduce the use of B&B and improve standards through existing workstreams.</p> <p>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.</p> <p>The ongoing work of the Accommodation Finding Team will continue to provide households with access to accommodation via the private rented sector.</p>
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Protected Characteristic - Pregnancy and Maternity

<p>Does this proposal impact people covered by the Equality Act 2010 under the protected characteristic of pregnancy and maternity?</p>	<p>Yes</p>
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Please describe the impact to the pregnancy and maternity characteristic

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 midwives.

The impact:

- Increased number of households living in B&B
- Households residing in TA for longer periods of time.
- Reduced ability to move households out of B&B and into more suitable TA accommodation.
- Risk of households being placed in TA outside of City (away from their support network).
- Frequent TA moves from one TA to another can affect the degree of support households receives from external agencies.
- Households residing in TA for longer periods of time.
- Disruption of continuity of care for pregnant women in TA having to travel further for appointments.



<p>How will you mitigate against any negative impact to the pregnancy and maternity characteristic?</p>	<p>The service now has to work with partners to appraise a range of options in seeking to replace in full or in part the loss of the ongoing acquisitions. The options being investigated include – utilising any HRA underspend; the seeking and utilisation of government grant; the creation of supported exempt family temporary accommodation, securing alternate capital investment with leasing options, creating a vehicle for BCC to undertake longer-term leasing of homes, utilisation of assets including land to leverage supply.</p> <p>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.</p> <p>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.</p> <p>The service will also continue to reduce the use of B&B and improve standards through existing workstreams.</p> <p>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.</p> <p>The ongoing work of the Accommodation Finding Team will continue to provide households with access to accommodation via the private rented sector.</p>
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Protected Characteristic - Ethnicity and Race

<p>Does this proposal impact people due to their race as per the Equality Act 2010?</p>	<p>Yes</p>
<p>What ethnic groups would be impacted by this proposal?</p>	<p>["White British", "Other White", "Bangladeshi", "Chinese", "Indian", "Pakistani", "Other 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"]</p>



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.

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%

Research by Herriot Watt University identified that:

- Black people are over three times more likely to experience homelessness compared to White British people.
- People from Black and minoritised ethnic backgrounds in England experience the highest levels of homelessness risks.
- Discrimination, harassment, or abuse on the grounds of race or ethnicity in housing, or in other aspects of life, appears to be associated with elevated risks of homelessness.
- People from black and mixed ethnic backgrounds experience the highest risks – three-and-a-half times higher than white UK-born people – particularly of statutory and core homelessness.
- Race, ethnicity, and homelessness are thoroughly intertwined. People of colour are more likely to experience homelessness.

Data for 2022-23 showed 48% of those in TA had come through a migration route into the UK.

The impact:

- Increased number of households living in B&B
- Households residing in TA for longer periods of time.
- Reduced ability to move households out of B&B and into more suitable TA accommodation.
- Risk of households being placed in TA outside of City (away from their support network).
- Frequent TA moves from one TA to another can affect the degree of support households receives from external agencies.



<p>How will you mitigate against any negative impact to the ethnicity and race characteristic?</p>	<p>The service now has to work with partners to appraise a range of options in seeking to replace in full or in part the loss of the ongoing acquisitions. The options being investigated include – utilising any HRA underspend; the seeking and utilisation of government grant; the creation of supported exempt family temporary accommodation, securing alternate capital investment with leasing options, creating a vehicle for BCC to undertake longer-term leasing of homes, utilisation of assets including land to leverage supply.</p> <p>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.</p> <p>We will continue to working with refugee and migrant team for EIP to support households who have come through a refugee and migrant route.</p> <p>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.</p> <p>The service will also continue to reduce the use of B&B and improve standards through existing workstreams.</p> <p>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.</p> <p>The ongoing work of the Accommodation Finding Team will continue to provide households with access to accommodation via the private rented sector</p>
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Protected Characteristic - Religion or Beliefs

<p>Does this proposal impact people's religion or beliefs as per the Equality Act 2010?</p>	<p>Yes</p>
<p>What religions could be impacted by this proposal?</p>	<p>["No religion", "Christian", "Buddhist", "Hindu", "Jewish", "Muslim", "Sikh"]</p>



<p>Please describe the impact to the religion or beliefs characteristic</p>	<p>Whilst we do not gather data on this characteristic the service can be accessed by all regardless of religion or belief.</p> <p>The service will continue to improve the way this data is collected and review its impact.</p> <p>The impact that applies to all characteristics will still apply.</p> <ul style="list-style-type: none"> • Increased number of households living in B&B • Households residing in TA for longer periods of time. • Reduced ability to move households out of B&B and into more suitable TA accommodation. • Risk of households being placed in TA outside of City (away from their support network). • Frequent TA moves from one TA to another can affect the degree of support households receives from external agencies.
<p>How will you mitigate against any negative impact to the religion or beliefs characteristic?</p>	<p>The service now has to work with partners to appraise a range of options in seeking to replace in full or in part the loss of the ongoing acquisitions. The options being investigated include – utilising any HRA underspend; the seeking and utilisation of government grant; the creation of supported exempt family temporary accommodation, securing alternate capital investment with leasing options, creating a vehicle for BCC to undertake longer-term leasing of homes, utilisation of assets including land to leverage supply.</p> <p>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.</p> <p>The service will also continue to reduce the use of B&B and improve standards through existing workstreams.</p> <p>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.</p> <p>The ongoing work of the Accommodation Finding Team will continue to provide households with access to accommodation via the private rented sector</p>



Protected Characteristic - Sexual Orientation

Does this proposal impact people's sexual orientation as per the Equality Act 2010?	Yes
What sexual orientations may be impacted by this proposal?	["Straight or heterosexual", "Gay or lesbian", "Bisexual", "Pansexual", "Asexual", "Queer", "All other sexual orientations"]
Please describe the impact to the sexual orientation characteristic	<p>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.</p> <p>The reasons why LGBTQA identity increases a person's chance of becoming homeless are not as well documented.</p> <p>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.</p> <p>Individuals that fall under this characteristic may face a higher likelihood of discrimination or harassment.</p> <p>The impact:</p> <ul style="list-style-type: none"> • Increased number of households living in B&B • Households residing in TA for longer periods of time. • Reduced ability to move households out of B&B and into more suitable TA accommodation. • Risk of households being placed in TA outside of City (away from their support network). • Frequent TA moves from one TA to another can affect the degree of support households receives from external agencies.



<p>How will you mitigate against any negative impact to the sexual orientation characteristic?</p>	<p>The service now has to work with partners to appraise a range of options in seeking to replace in full or in part the loss of the ongoing acquisitions. The options being investigated include – utilising any HRA underspend; the seeking and utilisation of government grant; the creation of supported exempt family temporary accommodation, securing alternate capital investment with leasing options, creating a vehicle for BCC to undertake longer-term leasing of homes, utilisation of assets including land to leverage supply.</p> <p>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.</p> <p>The service will also continue to reduce the use of B&B and improve standards through existing workstreams.</p> <p>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.</p> <p>The ongoing work of the Accommodation Finding Team will continue to provide households with access to accommodation via the private rented sector.</p>
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Monitoring

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

