

# EQUALITY IMPACT ASSESSMENT

Temporary Accommodation Investment Strategy -  
delays to landlords incentives

Reference: EIA000341



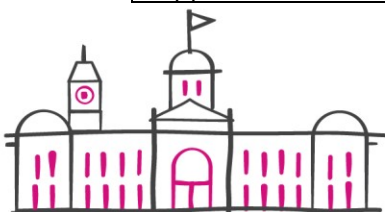
 **RESET**

 **RESHAPE**

 **RESTART**

**EIA Form – About your EIA**

Reference number	EIA000341
Date Submitted	02/02/2024
Subject of the EIA	Temporary Accommodation Investment Strategy - delays to landlords incentives
Brief description of the policy, service or function covered by the EIA	<p>Housing Solutions and Support Service 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. The Temporary Accommodation Strategy (2023) sets out to:</p> <ul style="list-style-type: none"> <li>• reduce the number of households in Bed &amp; Breakfast (B&amp;B),</li> <li>• reduce the time spent by households in B&amp;B</li> <li>• increase the quality of temporary accommodation</li> <li>• increase the supply of accommodation to assist with move on of households and the move on out of temporary accommodation.</li> </ul> <p>The Strategy also determines the best way to reduce to zero the number of households with dependents in B&amp;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 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&amp;B use towards other, better forms of TA, while in the medium/longer term better supply of affordable homes is delivered. As part of the TA investment strategy funds of up to £1.5m revenue per year for 5 financial years (£7.5m) were agreed for landlord incentives and programmes to support the Accommodation Finding Team (AFT) secure increased levels of Private Rented Sector (PRS) accommodation to end homelessness duties. This would provide a faster route into secured accommodation; delay the length of time spent in TA whilst also reducing the pressure on the housing register. Saving Proposal Reduced the investment for this initiative from £1.5m to £1.25m</p> <p>National context Local Housing Allowance rates have always been significantly lower than market rents making the sector harder to access for homeless households on benefits.</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	Housing Solutions and Support Service
Service area	Accommodation Finding Team
Budget Saving	Yes

#### Officers

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

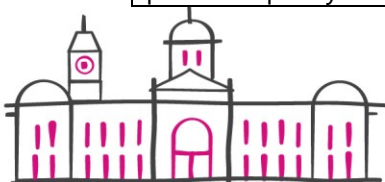
#### Data Sources

Data sources	["Relevant research", "Birmingham City Observatory data and insight", "Quantitative data (please specify in the box below)"]
Data source details	<p>Birmingham City Council Power BI Service Data</p> <p>Local Housing Allowance Rates for Birmingham- ocal Housing Allowance (LHA) rates are used to calculate Housing Benefit for tenants renting from private landlords.</p> <p><a href="https://lha-direct.voa.gov.uk/Secure/SearchResults.aspx?LocalAuthorityId=58&amp;LHACategory=999&amp;Month=4&amp;Year=2022&amp;SearchPageParameters=true">https://lha-direct.voa.gov.uk/Secure/SearchResults.aspx?LocalAuthorityId=58&amp;LHACategory=999&amp;Month=4&amp;Year=2022&amp;SearchPageParameters=true</a></p>

#### Protected Characteristics

##### Protected Characteristic – Age

Does this proposal impact people due to their age as per the Equality Act 2010?	Yes
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<p>What age groups are impacted by your proposal?</p>	<p>["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>
<p>Please describe the impact to the age characteristic</p>	<p>This scheme can be accessed by applicants that have been assessed being owed a duty under the Housing Act 1996.</p> <p>The impact of the proposal will be that it will reduce the amount of incentive that can be offered to private rented landlords, making it more difficult to source private rented accommodation for homeless households.</p> <p>Service data tell us that the service receives highest number of applications from households in the age groups 20-29years, 30-39years, 40-49 years; the age profile of households within temporary accommodation (TA) falls into the same groups. We also know that most of our households in temporary accommodation have dependent children therefore this age group will also be adversely impacted.</p> <p>Homeless applicants wanting to resolve their homelessness by using the option of securing a property via the private rented sector route may find that there are fewer properties available. They will still be able to continue to bid for properties on via our choice-based allocations scheme but may find that it takes longer to resolve their homelessness.</p> <p>Where they have been placed in temporary accommodation (TA) they may find that their stay in TA is prolonged. Adults within these age groups may find themselves placed in TA 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</p>



<p>How will you mitigate against any negative impact to the age characteristic?</p>	<p>Although the funding has reduced the team will continue to incentivise as many landlords as possible and this scheme will continue to work will landlords to secure accommodation in the private rented sector.</p> <p>The Local Housing Allowance (LHA) rate will increase on the 1st April 2024. This will go some way to reducing the shortfall between LHA and market rents making the sector more accessible for households on benefits.</p> <p>The service will continue to support and signpost individuals, where appropriate, to ensure they are in receiving all the welfare benefits they are entitled to.</p> <p>For service users that are placed in temporary accommodation the service will continue to consider any vulnerabilities or needs of service users when assigning them temporary accommodation. We will also commence the use of Regulation 10 to contract emergency TA. This will allow us to source and procure TA at cost and improve standards and limit the use of temporary accommodation outside city limits.</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 to mitigate impact. Our dedicated housing solution for young people 18-25 will continue as will our tailored domestic abuse offer.</p> <p>We will continue with using Direct Lets, which is the ability to offer households a property from our housing stock outside of the Allocation Scheme, for those stuck and in exceptional need in temporary accommodation and increase the use of stock as Dispersed TA.</p>
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**Protected Characteristic – Disability**

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

This scheme can be accessed by applicants that have been assessed being owed a duty under the Housing Act 1996.

The impact of the proposal will be that it will reduce the amount of incentive that can be offered to private rented landlords, making it more difficult to source private rented accommodation for homeless households.

Service data reveals that while 20.92% of service users who presented as homeless and then went onto complete a homeless assessment disclosed, they have a disability, 41.74% did not disclose this information. Similarly, 9.03% of households in Temporary Accommodation disclosed disabilities, 47.22% of households did not disclose any disabilities. Whilst our figures are low, national research on the impact of homelessness on this demographic indicates that households with disabilities are disproportionately affected by homelessness. There is also a recognised issue concerning undisclosed disabilities.

Homeless applicants with disabilities encounter significant challenges in finding suitable accommodation, largely due to a scarcity of accessible housing. The nature of the disability often dictates the extent of these challenges. The difficulty is further exacerbated within the private rented sector, where many landlords are reluctant to structurally modify their properties to accommodate these needs. Homeless applicants with disabilities may therefore find it takes longer to resolve their homelessness via the private sector route.

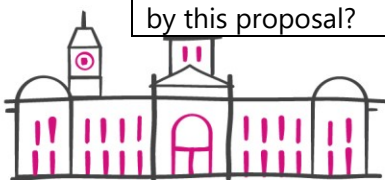
Homeless applicants with disabilities placed in temporary accommodation may find they are in TA for a longer period of time. They may find themselves placed in TA outside the city, distancing them from their support networks, family, and friends. This could necessitate longer travel times to appointments 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.



<p>How will you mitigate against any negative impact to the disability characteristic?</p>	<p>Although the funding has reduced the team will continue to incentivise as many landlords as possible and this scheme will continue to work will landlords to secure accommodation in the private rented sector.</p> <p>Whilst landlords may be reluctant to agree structural modifications to their properties the service will continue to negotiate with landlords to agree adaptations where possible.</p> <p>The service will continue to support and signpost individuals, where appropriate, to ensure they are in receiving all the welfare benefits they are entitled to.</p> <p>The Local Housing Allowance (LHA) rate will increase on the 1st April 2024. This will go some way to reducing the shortfall between LHA and market rents making the sector more accessible for households on benefits.</p> <p>Where service users are placed in temporary accommodation the service will continue to deliver our statutory duty around suitability of temporary accommodation (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>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 to mitigate impact.</p> <p>We will continue with using Direct Lets, which is the ability to offer households a property from our housing stock outside of the Allocation Scheme, for those stuck and in exceptional need in temporary accommodation and increase the use of stock as Dispersed TA.</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

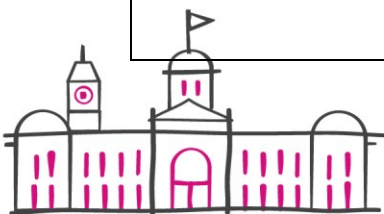
This scheme can be accessed by applicants that have been assessed being owed a duty under the Housing Act 1996.

The impact of the proposal will be that it will reduce the amount of incentive that can be offered to private rented landlords, making it more difficult to source private rented accommodation for homeless households. There will be 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%.

Service data shows that currently 52.05% of service users who present as homeless and complete a homeless assessment are from females compared to 47.57% are males. However, 68.05% of households in Temporary Accommodation are female compared to 31.95% male. 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 homelessness is domestic abuse. For individuals fleeing DV, or single parents with children who wish to prevent their homelessness and secure a property in the private rented sector, rather than being placed in temporary accommodation for long periods of time, there may be fewer properties available. Equally homeless applicants of any gender wanting to resolve their homelessness by using the option of securing a property via the private rented sector route, may find that there are fewer properties available. They will still be able to continue to bid for properties on via our choice-based allocations scheme but may find that it takes longer to resolve their homelessness.

Where placed in temporary accommodation, 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





	<p>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.</p> <p>These factors could potentially have a detrimental effect on their health and wellbeing.</p>
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How will you mitigate against any negative impact to the sex characteristic?

Although the funding has reduced the team will continue to incentivise as many landlords as possible and this scheme will continue to work will landlords to secure accommodation in the private rented sector.

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 continue to support and signpost individuals, where appropriate, to ensure they are in receiving all the welfare benefits they are entitled to.

The Local Housing Allowance (LHA) rate will increase on the 1st April 2024. This will go some way to reducing the shortfall between LHA and market rents making the sector more accessible for households on benefits.

Where service users are placed in temporary accommodation the service will continue to deliver our statutory duty around suitability of temporary accommodation (TA) and support households with disabilities within TA. In accordance with legislation, households with disabilities receive greater priority need on the housing register.

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 to mitigate impact.

We will continue with using Direct Lets, which is the ability to offer households a property from our housing stock outside of the Allocation Scheme, for those stuck and in exceptional need in temporary accommodation and increase the use of stock as Dispersed TA.

**Protected Characteristic - Gender Reassignment**



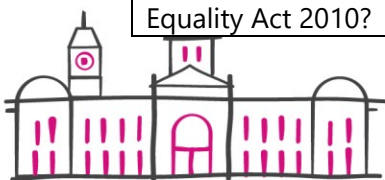
<p>Does this proposal impact people who are proposing to undergo, undergoing or have undergone a process to reassign one's sex as per the Equality Act 2010?</p>	<p>Yes</p>
<p>Please describe the impact to the gender reassignment characteristic</p>	<p>This scheme can be accessed by applicants that have been assessed being owed a duty under the Housing Act 1996.</p> <p>We do not currently collate any internal data on this characteristic, but the service will seek to improve data collection and review impact.</p> <p>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.</p> <p>Homeless applicants that fall under this characteristic may face a higher likelihood of discrimination or harassment. This could present further obstacles in their efforts to resolve their homelessness, particularly when seeking accommodation in the private rented sector as these individuals may prefer to stay within close proximity to their support networks or friends as a safety measure, further reducing the options. The general impact of the proposal will be that it will reduce the amount of incentive that can be offered to private rented landlords, making it more difficult to source private rented accommodation for individuals that fall under this characteristics and prolonging the resolution of their homelessness.</p>



<p>How will you mitigate against any negative impact to the gender reassignment characteristic?</p>	<p>Although the funding has reduced the team will continue to incentivise as many landlords as possible and this scheme will continue to work will landlords to secure accommodation in the private rented sector.</p> <p>The Local Housing Allowance (LHA) rate will increase on the 1st April 2024. This will go some way to reducing the shortfall between LHA and market rents making the sector more accessible for households on benefits.</p> <p>The service will continue to support and signpost individuals, where appropriate, to ensure they are in receiving all the welfare benefits they are entitled to.</p> <p>The service will 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 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>For service users that are placed in temporary accommodation the service will continue to consider any vulnerabilities or needs of service users when assigning them temporary accommodation. We will also commence the use of Regulation 10 to contract emergency TA. This will allow us to source and procure TA at cost and improve standards and limit the use of temporary accommodation outside city limits.</p> <p>We will continue with using Direct Lets, which is the ability to offer households a property from our housing stock outside of the Allocation Scheme, for those stuck and in exceptional need in temporary accommodation and increase the use of stock as Dispersed TA.</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>
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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

This scheme can be accessed by applicants that have been assessed being owed a duty under the Housing Act 1996.

The service does not currently collect data on this characteristic however we will continue to improve the way this data is collected and review its impact

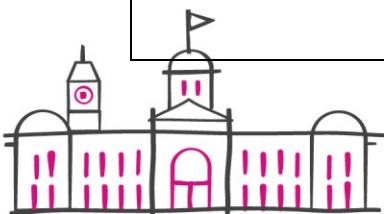
The service does however collect data on the household composition for homeless applicants. Service data for households who present as homeless and go on to complete a homeless assessment reveals that 73.21% are single people. When compared to households accommodated in temporary accommodation (TA), the largest group consists of single parents 35.14%, followed by couples with children at 30.21% with single people ranking third 21.44%. The reason for the variation in data is due the fact that single people, are typically classified as non-priority according to homelessness legislation. Consequently, they are not included on the housing register or placed in TA unless a housing need is identified. Single people are generally provided assistance to locate appropriate housing through collaborative efforts with supported accommodation providers. If single individuals are placed in TA, they are likely to be categorised as vulnerable and in need of additional support.

These individuals could fall into any of marital or civil partnership statuses and therefore could be impacted by this proposal.

The general impact of the proposal for this characteristic will be that it will reduce the amount of incentive that can be offered to private rented landlords, making it more difficult to source private rented accommodation for homeless households.

Single people may find there are fewer one-bedroom properties available to help them resolve their homelessness. Single people that have been placed in temporary accommodation will be vulnerable and in need of additional support and this delay in resolving their homelessness could exacerbate their situation further and be detrimental to their health and wellbeing.

Similarly, larger households with dependents who may already struggle to source affordable private rented properties on their own may find that there are fewer



	<p>properties are available via this scheme. Additionally, there is also a shortage of larger properties available on the housing register so these households may find it takes them longer to resolve their homelessness.</p> <p>If these households are placed in Temporary Accommodation (TA), they might experience extended stays. They could be housed in unfamiliar areas of the city or even beyond the city limits. Such displacement could separate them from their support networks, friends, and family.</p> <p>Employed individuals within these households might face longer commutes to their workplaces. Similarly, households with children might need to travel further for schools, potentially impacting the children's education. Single parents with children may experience an additional pressure of managing the logistics of getting to work, school and childcare arrangements without additional support. If these households depend on public transport, they might face additional costs. All these factors could potentially have a detrimental effect on their health and wellbeing.</p>
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<p>How will you mitigate against any negative impact to the marriage and civil partnership characteristic?</p>	<p>Although the funding has reduced the team will continue to incentivise as many landlords as possible and this scheme will continue to work will landlords to secure accommodation in the private rented sector.</p> <p>The Local Housing Allowance (LHA) rate will increase on the 1st April 2024. This will go some way to reducing the shortfall between LHA and market rents making the sector more accessible for households on benefits.</p> <p>The service will continue to support and signpost individuals, where appropriate, to ensure they are in receiving all the welfare benefits they are entitled to.</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 to mitigate impact.</p> <p>For service users that are placed in temporary accommodation the service will continue to consider any vulnerabilities or needs of service users when assigning them temporary accommodation. We will also commence the use of Regulation 10 to contract emergency TA. This will allow us to source and procure TA at cost and improve standards and limit the use of temporary accommodation outside city limits.</p> <p>We will continue with using Direct Lets, which is the ability to offer households a property from our housing stock outside of the Allocation Scheme, for those stuck and in exceptional need in temporary accommodation and increase the use of stock as Dispersed TA.</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>
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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

This scheme can be accessed by applicants that have been assessed being owed a duty under the Housing Act 1996.

The service does not currently collect data on this characteristic however we 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 general impact of the proposal for this characteristic will be that it will reduce the amount of incentive that can be offered to private rented landlords, making it more difficult to source private rented accommodation for pregnant women, and it may therefore take longer to resolve there homelessness.

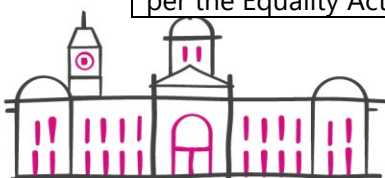
Where they have been placed in TA their stay may be prolonged. Pregnant women may find themselves housed in unfamiliar parts of the city or even outside the city limits. This displacement could distance them from their support networks, friends, and family and disrupt the continuity of maternity care 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.



<p>How will you mitigate against any negative impact to the pregnancy and maternity characteristic?</p>	<p>Although the funding has reduced the team will continue to incentivise as many landlords as possible and this scheme will continue to work will landlords to secure accommodation in the private rented sector.</p> <p>The Local Housing Allowance (LHA) rate will increase on the 1st April 2024. This will go some way to reducing the shortfall between LHA and market rents making the sector more accessible for households on benefits.</p> <p>The service will continue to support and signpost individuals, where appropriate, to ensure they are in receiving all the welfare benefits they are entitled to.</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 to mitigate impact.</p> <p>For service users that are placed in temporary accommodation the service will continue to consider any vulnerabilities or needs of service users when assigning them temporary accommodation. We will also commence the use of Regulation 10 to contract emergency TA. This will allow us to source and procure TA at cost and improve standards and limit the use of temporary accommodation outside city limits.</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>We will continue with using Direct Lets, which is the ability to offer households a property from our housing stock outside of the Allocation Scheme, for those stuck and in exceptional need in temporary accommodation and increase the use of stock as Dispersed TA.</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>
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What ethnic groups would be impacted by this proposal?

["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"]



Please describe the impact to the ethnicity and race characteristic

This scheme can be accessed by applicants that have been assessed being owed a duty under the Housing Act 1996.

Our service data tells us that the majority of service users that present and homeless and complete a homeless assessment are White British 23.13%, Black African 11.24%, Asian Or Asian British Pakistani 10.71%, and for households residing in temporary accommodation, Black African 21%, Asian or Asian British Pakistani 15%, White British 13%

The difference in the ranking of ethnicity and race across the two sets of data can be contributed to a higher proportionate of White British applicants being single people who would be supported to find alternative accommodation via other routes rather than being placed on the housing register or in temporary accommodation.

The general impact of this proposal will be that it will reduce the amount of incentive that can be offered to private rented landlords, making it more difficult to source private rented accommodation for homeless household of any ethnicity and race but Black African , Asian or Asian British Pakistani, White British will be adversely impacted.

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 due to language barriers. Data for 2022-23 showed 48% of those in TA had come through a migration route into the UK. These groups may find that where they are placed in TA their stay is prolonged. They may find themselves in unfamiliar areas or outside of the city in localities where they are underrepresented and distanced from any community support networks, family, or friends.



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

Although the funding has reduced the team will continue to incentivise as many landlords as possible and this scheme will continue to work will landlords to secure accommodation in the private rented sector.

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 continue to use interpreting services where required.

The Local Housing Allowance (LHA) rate will increase on the 1st April 2024. This will go some way to reducing the shortfall between LHA and market rents making the sector more accessible for households on benefits.

The service will continue to support and signpost individuals, where appropriate, to ensure they are in receiving all the welfare benefits they are entitled to.

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 to mitigate impact.

For service users that are placed in temporary accommodation the service will continue to consider any vulnerabilities or needs of service users when assigning them temporary accommodation. We will also commence the use of Regulation 10 to contract emergency TA. This will allow us to source and procure TA at cost and improve standards and limit the use of temporary accommodation outside city limits.

We will continue with using Direct Lets, which is the ability to offer households a property from our housing stock outside of the Allocation Scheme, for those stuck and in exceptional need in temporary accommodation and increase the use of stock as Dispersed TA.



**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>This scheme can be accessed by applicants that have been assessed being owed a duty under the Housing Act 1996.</p> <p>The service can be accessed by all regardless of religion or belief, however we do not currently gather data on this characteristic. The service will continue to improve the way this data is collected and review its impact.</p> <p>People with certain religious beliefs or affiliations may face barriers in accessing services due to discrimination, unconscious bias or cultural insensitivity, however this scheme is accessible by all homeless applicant regardless of religion or belief.</p> <p>Although the precise impact of this characteristic is challenging to ascertain without service data, the overall general impact of the proposal will remain. This proposal will reduce the amount of incentive that can be offered to private rented landlords, making it more difficult to source private rented accommodation for homeless households of any religion and belief. Consequently, resolving their homelessness may take additional time.</p>





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

Although the funding has reduced the team will continue to incentivise as many landlords as possible and this scheme will continue to work will landlords to secure accommodation in the private rented sector.

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 continue to use interpreting services where required.

The Local Housing Allowance (LHA) rate will increase on the 1st April 2024. This will go some way to reducing the shortfall between LHA and market rents making the sector more accessible for households on benefits.

The service will continue to support and signpost individuals, where appropriate, to ensure they are in receiving all the welfare benefits they are entitled to.

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 to mitigate impact.

For service users that are placed in temporary accommodation the service will continue to consider any vulnerabilities or needs of service users when assigning them temporary accommodation. We will also commence the use of Regulation 10 to contract emergency TA. This will allow us to source and procure TA at cost and improve standards and limit the use of temporary accommodation outside city limits.

We will continue with using Direct Lets, which is the ability to offer households a property from our housing stock outside of the Allocation Scheme, for those stuck and in exceptional need in temporary accommodation and increase the use of stock as Dispersed TA.

**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>This scheme can be accessed by applicants that have been assessed being owed a duty under the Housing Act 1996.</p> <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>The service will continue to improve the way this data is collected and review its impact but the overall impact will be that homeless applicants that fall under this characteristic may face a higher likelihood of discrimination or harassment. This could present further obstacles in their efforts to resolve their homelessness, particularly when seeking accommodation in the private rented sector as these individuals may prefer to stay within close proximity to their support networks or friends as a safety measure, further reducing the options. The general impact of the proposal will be that it will reduce the amount of incentive that can be offered to private rented landlords, making it more difficult to source private rented accommodation for individuals that fall under this characteristic and prolonging the resolution of their homelessness.</p>



<p>How will you mitigate against any negative impact to the sexual orientation characteristic?</p>	<p>Although the funding has reduced the team will continue to incentivise as many landlords as possible and this scheme will continue to work will landlords to secure accommodation in the private rented sector.</p> <p>The Local Housing Allowance (LHA) rate will increase on the 1st April 2024. This will go some way to reducing the shortfall between LHA and market rents making the sector more accessible for households on benefits.</p> <p>The service will 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 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>For service users that are placed in temporary accommodation the service will continue to consider any vulnerabilities or needs of service users when assigning them temporary accommodation. We will also commence the use of Regulation 10 to contract emergency TA. This will allow us to source and procure TA at cost and improve standards and limit the use of temporary accommodation outside city limits.</p> <p>We will continue with using Direct Lets, which is the ability to offer households a property from our housing stock outside of the Allocation Scheme, for those stuck and in exceptional need in temporary accommodation and increase the use of stock as Dispersed TA.</p>
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### Monitoring

<p>How will you ensure any adverse impact and mitigation measures are monitored?</p>	<p>The service will continue its 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>

