

## Appendix 2: Equalities Impact Assessment

Title of proposed EIA	Implementation of the Temporary Accommodation strategy
Reference No	EQUA1113
EA is in support of	City Housing Investment Proposal to Supply Accommodation for Homeless Families - Cabinet Report
Review Frequency	Annually
Date of first review	29/03/2025
Directorate Division Service	City Housing
Area Responsible Officer(s)	Lewis Rees
Quality Control Officer(s)	Claire Brett
Accountable Officer(s)	Stephen Philpott
Purpose of proposal	To obtain Cabinet approval of the City Housing Investment Proposal to Supply Accommodation for Homeless Families
Data sources	
Please include any other sources of data	<p>Birmingham Temporary Accommodation Strategy 2023</p> <p><a href="#">Population and household estimates, England and Wales - Office for National Statistics (ons.gov.uk)</a></p> <p><a href="#">Rental-Trends-Tracker-Q3-2022-Final.pdf (rightmove.co.uk)</a></p> <p><a href="https://www.gov.uk/government/statistics/rough-sleeping-snapshot-in-england-autumn-2021">https://www.gov.uk/government/statistics/rough-sleeping-snapshot-in-england-autumn-2021</a></p> <p><a href="#">source national homelessness statistics</a></p> <p><a href="#">Population and household estimates, England and Wales - Office for National Statistics (ons.gov.uk)</a></p> <p><a href="https://www.crisis.org.uk/media/247716/zoopla_briefingv6.pdf">https://www.crisis.org.uk/media/247716/zoopla_briefingv6.pdf</a></p>

ASSESS THE IMPACT AGAINST THE PROTECTED CHARACTERISTICS	
<p>Protected characteristic: Age</p> <p>Age details:</p>	<p>A person of any age can be threatened with or experience homelessness. Our homelessness duties are to all people at any stage of life.</p> <p>Children in homeless families are particularly vulnerable being more likely to be born at a low birth weight, miss their immunisations, are less likely to be registered with a GP and are more likely to experience mental health issues - which can be long lasting.</p> <p>Housing policy Temporary Accommodation Placement Protocol emphasises duties under section 11 of the Children Act 2004 and seeks wherever possible to ensure that disruption to schooling is taken into account and minimised for those attending SEN schools, and those studying for final year GCSEs or A levels. Children who are in a suitable property have a better chance of doing well as they will potentially have a more suitable learning/studying environment.</p> <p>Birmingham has a higher percentage of families with young children than the national average. Young families are likely to have lower income and are often viewed by Landlords as potentially high risk and therefore disadvantaged in the housing market. With nearly half of the City within the bottom 10% most deprived nationally this is a particular challenge. Between March 2020 – March 2022 the number of families in TA rose by 463% - there are over 3,000 families with children in TA.</p> <p>With Birmingham having one of the least affordable private rented sectors for families on low incomes securing affordable independent accommodation is a challenge.</p> <p>The procurement of additional properties, investment to incentivise private sector landlords to increase lettings and increase in resource capacity will enable the Council to meet its statutory obligation to provide temporary</p>

	<p>accommodation (TA) to homeless families and reduce Bed &amp; Breakfast (B&amp;B) usage to no more than 6 weeks.</p> <p>This proposal will facilitate supporting families with dependent children spend less time in B&amp;B and secure suitable TA.</p>
<p>Protected characteristic: Disability</p> <p>Disability details:</p>	<p>Disability is highly prevalent among people living in TA, from problems with mental health to physical impairments, and more hidden disabilities. People living with a disability are more likely to experience poverty and be in need of support, which makes them more vulnerable to homelessness. Once homeless, the environment in TA can be disabling, exacerbating symptoms and experiences of disability.</p> <p>The procurement of additional properties will enable the Council to meet its statutory obligation to provide TA for homeless families.</p> <p>Appropriate regard and provision is already embedded in service delivery, for example the PRS Suitability Assessment regime, to ensure accessibility for all family members with particular needs.</p> <p>The current matching of homeless families presenting with disability with suitable TA takes full account of their needs particularly with regard to the adaptations required to be in place ahead of placement to ensure full equality for those in this group.</p> <p>This proposal has as a focus the provision of appropriate TA for homeless families and will contribute to improving the scope and scale of suitable accommodation to meet the needs for families impacted by this protected characteristic.</p>
<p>Protected characteristic: Sex</p> <p>Sex details:</p>	<p>The number of women in temporary accommodation has increased by 88% over the last decade, according to research suggesting single mothers have been disproportionately affected by homelessness. Sixty per cent of all</p>

	<p>homeless adults living temporary accommodation in England today are women, despite only making up 51% of the general population.</p> <p>Women have made up a disproportionate share of those in TA as they are more often in lower-paid, less-secure work and likely to have caring responsibilities.</p> <p>Domestic abuse and violence are major factors leading to homelessness, with over a third of women who become homeless having experienced domestic abuse or sexual violence.</p> <p>Appropriate regard and provision is already embedded in service delivery, for example the risk provision in the PRS Suitability Assessment regime, to ensure priority is given to homeless families with particular needs.</p> <p>Housing policy Temporary Accommodation Placement Protocol emphasises that in all cases involving domestic abuse the safety of victims and social considerations in relation to the household will be considered when securing temporary accommodation. Wherever possible the Council will seek to offer same sex or refuge accommodation, as well as facilitate out of area placements should there be a need to do so. If an out of area placement is not appropriate, consideration will be given as to the location of accommodation offered to minimise risk of further harm to victims.</p> <p>The procurement of additional properties will enable the Council to meet its statutory obligation to provide TA for homeless families.</p> <p>This proposal has as a focus increasing the provision of appropriate TA for homeless families and will contribute to providing more accommodation options for lone parent families.</p>
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<p>Protected characteristic: Gender Reassignment Gender Reassignment details:</p>	<p>Research undertaken by University of Salford Frontline Fife, highlights the complexity of LGBT+ life courses, with fluidity and confusion around gender identity can exacerbate the experience of homelessness.</p> <p>The placement inquiries undertaken by offices, for example the PRS Suitability Assessment, take account of the homeless applicants 'protected characteristics' of disability and gender reassignment in determining the suitability of accommodation offered.</p> <p>The Temporary Accommodation Support Offices (TASO) team provide a wide range of support to families in homeless TA which includes dealing with an individual's changing circumstances and ensuring that support is provided to access specialist services across a wide range of agencies and networks.</p> <p>The procurement of additional properties will enable the Council to meet its statutory obligation to provide TA for homeless families.</p> <p>Increasing the procurement of properties dispersed across the City's wards expands the scope of suitable accommodation.</p>
<p>Protected characteristic: Marriage &amp; Civil Partnership Marriage &amp; Civil Partnership details:</p>	<p>Poverty and homelessness are associated with the break-up of families. Studies have documented that children in families who experience homelessness frequently become separated from their parents.</p> <p>Families in B&amp;B accommodation are subject to stress and lack of privacy, and also heightened scrutiny. Precarious housing as a constant backdrop can contribute to added stress and strain within relationships.</p> <p>When prioritising and matching homeless families regard is given to specific circumstances and duration in B&amp;B. In addition, the complex case team has been created with a specific mandate to support the move on to TA of those families with particularly challenging needs.</p>

	<p>The procurement of additional properties will enable the Council to meet its statutory obligation to provide TA for homeless families.</p> <p>This proposal has as a focus increasing provision of appropriate TA for homeless families and will contribute to reducing some of the challenges faced by families in TA.</p>
<p>Protected characteristic: Pregnancy &amp; Maternity</p> <p>Pregnancy &amp; Maternity details:</p>	<p>A pregnant woman, and anyone with whom she lives has a priority need for accommodation under the main homelessness duty. The provision of appropriate TA is critical to ensure every child has the best start in life.</p> <p>Housing policy Temporary Accommodation Placement Protocol emphasises duties owed to households with family commitments, placement in suitable TA is a priority.</p> <p>The procurement of additional properties will enable the Council to meet its statutory obligation to provide TA for homeless families.</p> <p>This proposal has as a focus increasing the provision of appropriate TA for homeless families, providing fit for purpose accommodation for pregnant women.</p>
<p>Protected characteristic: Race</p> <p>Race details:</p>	<p>There is statistical evidence that people from Black and minority ethnic communities, taken as a whole, experience disproportionate levels of homelessness in the UK.</p> <p>In England, a high level of homelessness risk is experienced by people from Black and Mixed ethnic backgrounds. These groups seem particularly exposed to 'statutory homelessness', that is, applying and/or being accepted as homeless by a local authority.</p> <p>Black people are three and a half times as likely to experience this as White British people. Asian people in England, experience lower rates of statutory</p>

	<p>homelessness than Black people, and White British people. However, they are at highly disproportionate risk of more hidden aspects of homelessness, such as overcrowding or 'doubling up' with other households.</p> <p>There is evidence that race, ethnicity and discrimination-related factors can heighten levels of poverty, or the chances of being a renter rather than an owner, which in turn increases exposure to homelessness.</p> <p>Appropriate regard and provision is already embedded in service delivery, for example the risk provision in the PRS Suitability Assessment regime, to ensure priority is given to homeless families at risk of racial or other harassment.</p> <p>The procurement of additional properties will enable the Council to meet its statutory obligation to provide TA for homeless families.</p> <p>This proposal has as a focus increasing the provision of appropriate TA for all homeless families, regardless of race.</p>
<p>Protected characteristic: Religion or Beliefs</p> <p>Religion or Beliefs details:</p>	<p>The placement inquiries undertaken take account of the homeless applicants 'protected characteristics' of religion and beliefs in determining the suitability of accommodation offered – increasing the procurement of properties expands the scope of suitable accommodation.</p> <p>The procurement of additional properties will enable the Council to meet its statutory obligation to provide TA for homeless families regardless of religion or beliefs.</p>
<p>Protected characteristic: Sexual Orientation</p> <p>Sexual Orientation details:</p>	<p>Stonewall have identified that; two in five trans people (41 per cent) and three in ten non-binary people (31 per cent) have experienced a hate crime or incident because of their gender identity in the last 12 months; more than a quarter of trans people (28 per cent) in a relationship in the last year have faced domestic abuse from a partner; and one in four trans people (25 per cent) have experienced homelessness at some point in their lives.</p>

	<p>A person of any sexual orientation can be threatened with or experience homelessness. Our homelessness duties are to all families of all sexual orientation.</p> <p>The placement inquiries undertaken take account of the homeless applicants 'protected characteristics' of sexual orientation in determining the suitability of the locality and accommodation offered – increasing the procurement of properties expands the scope of suitable accommodation.</p> <p>The procurement of additional properties will enable the Council to meet its statutory obligation to provide TA for homeless families regardless of sexual orientation.</p>
Socio Economic Impacts	<p>This programme through providing more suitable TA will have a positive impact on homeless families:</p> <ul style="list-style-type: none"> <li>• <b>Income</b> – provision of a more stable and suitable TA living environment combined with support provided by TASO team contributes to homeless families receiving the right benefits, training, and advice to access the jobs market.</li> <li>• <b>Education</b> – a more stable quality home environment supports children and dependent youths settle and maximise the opportunities a good education provides.</li> <li>• <b>Employment</b> – provision of more settled TA provides a referenceable postcode/address combined with TASO guidance on how to access training and support to re-enter the job market can contribute to someone finding work.</li> <li>• <b>Social support</b> – stable TA, in combination with working with their TASO, can help households access the services that they need and are entitled to use, such as local GPs, social services and education for school-age children.</li> <li>• <b>Health</b> – providing accommodation which meets BCC quality standards will help meet public health challenges and reduce the widening health inequalities in our communities.</li> </ul>



<p>Please indicate any actions arising from this screening</p>	<p>Optionally monitoring can be undertaken of successful TA placement of families with protected characteristics - within the Councils obligations of compliance with GDPR legislation.</p> <p>Please note as part of BAU:</p> <ul style="list-style-type: none"> <li>• To support the matching of homeless families the Council has in place the Temporary Accommodation Placement Protocol; Suitability Assessments framework and procedures; and has created the complex case team to support homeless families with challenging needs. The combination covers the needs of groups with protected characteristics.</li> <li>• To support homeless families placed in TA the TASO (Temporary Accommodation Support Officer) team has a broad support remit which includes dealing with changes in individual circumstances; repairs and maintenance requests; multi-agency liaison; child abuse; domestic violence; move-on support; and local issues.</li> </ul>
<p>Please indicate whether a full impact assessment is recommended</p>	<p>Yes a full assessment will be required as per the detail contained in this initial screening.</p> <p>Operational procedures and support are in place, including the housing allocation matching team and AFT team ensure that protected characteristics are accounted for when matching homeless families to property and the TASO team ensure that homeless families are supported throughout their stay in TA.</p> <p>The TASO remit is broad dealing with changes in individual circumstances; repairs and maintenance requests; multi-agency liaison; child abuse; domestic violence; move-on support; local issues – the impact is expected to be universally positive.</p>

	However, a full screening and consultation / surveying of TA residents as well as analysis of key data will be crucial in establishing a continually improving service going forward.
What data has been collated to facilitate the assessment of this policy/Proposal?	In addition to current numbers for families in B&B and TA and the BCC Temporary Accommodation Placement Protocol data has been provided from the HSS End-2-End Customer journey workshops held in April/May 2023.
Consultation Analysis	N/A
Adverse impact on any people with protected characteristics	The provision of an increased stock of accommodation, access to more PSL accommodation and support to move on to PRS, the focus of this Cabinet Report, are all positive outcomes for all homeless families, there is no negative impact on any people with protected characteristics.
Could the policy/proposal be modified to reduce or eliminate any adverse impact How will the effect(s) of the is policy/proposal on equality be monitored?	The Council has the appropriate policies and procedures to ensure that families and citizens with protected characteristics receive support at point of matching to suitable TA and via their TASO for the duration of their placement.
What data is required in the future?	Capturing equality data on the delivery with regard to presentations and placements.
Are there any adverse impacts on any particular group(s)	The provision of an increased stock of accommodation, access to more PSL accommodation and support to move on to PRS, the focus of this Cabinet Report, are all positive outcomes for all families, regardless of protected characteristics.
If yes please explain your reasons for going ahead	N/A
Initial equality impact assessment of your proposal	Not conducted – full impact assessment conducted
Consulted People or Groups	Equalities Team, EIA Champions, HSS Temporary Accommodation Service team
Informed People or Groups	Equality, Diversity Inclusion team

Summary and evidence of findings from your EIA	<p>Anybody in society can become homeless and any of these protected characteristics can be part of a family in B&amp;B / TA. This strategy is specifically targeting family groups within B&amp;B.</p> <p>As a result, this initial screening indicates that we need to undertake a full EIA to ensure due consideration and attention is given to the potential impacts on these groups - positive or negative. Only then we will be able to provide a truly universal and comprehensive service.</p>
Quality Control Section	N/A