

Coventry City Council Equality and Consultation Analysis (ECA) Form

In line with the principles of decision making outlined in the City Council Constitution, the Council will ensure that its decision making is open and transparent, and that due regard is given to the Council's obligations and desire to promote equality of opportunity and equal treatment.

Form 1

This part must be completed and before formal consultation is undertaken and must be available during the consultation stage.

Author of this document: Samantha Richardson

Name of ECA and Service: Temporary Accommodation Charging Policy: Housing and Homelessness Service

Head of Service: Jim Crawshaw

Date of completion: 14th November 2019

Background to the planned changes

1. What is the background to the planned changes? Why is this change being considered?

At the end of October 2019 there were a total of 619 households living in temporary accommodation (TA) provided by CCC; 383 were families and 236 were single people. Temporary accommodation used includes:

- Bed and Breakfast and Hotels
- Hostels, some of which provide specialist support services
- Private rented accommodation
- A small number of properties provided by a Housing Association

The service reported an overspend of £3M in 2018/19, despite an additional £2.7M of resource. In 19/20 the additional resource rises to £6.1M, which reduces in 2020/21 by £1M. It is imperative that the service undertakes a range of activities to both reduce spend and increase income.

Current Position

Coventry does not currently charge households placed in Temporary Accommodation (TA), this means:

- **Council Tax;** The majority of households living in TA do not pay for council tax, it is included in the cost met by CCC
- **Utilities;** The majority of households living in TA do not pay for utilities, it is included in the cost met by CCC
- **Furniture storage;** No households in TA meet any of the costs of storing their furniture this is all paid for by CCC

Coventry City Council Equality and Consultation Analysis (ECA) Form

- **Rental Charges:** No household makes a contribution to the rent on the property, including those in receipt of partial housing benefit, and those not eligible for housing benefit, due to excess income

Temporary Accommodation Charging Policy

The Council has the power to require the payment of reasonable charges for accommodation in accordance with s206(2) Housing Act 1996. In order to address the financial pressures the Council are looking to consult on the implementation of a Temporary Accommodation Charging Policy. The policy will have four elements – rent, utilities, storage and council tax.

The current costs and potential savings from each element are as follows:

Rent - Excess income:

Households with excess income living in TA cost in excess of £400k per annum, and CCC will meet this cost for all households from April 2020 when the responsibility for TA for single people will transfer to the Council. This charging policy, if implemented, would allow a proportion of these costs to be recovered. The Council expect to make £200k savings through rental income.

Ineligibles (Utilities):

Utility costs for most households living in TA cost in excess of £800K per annum*, and as above CCC will meet for all households from April 2020. By allowing these charges to be passed onto households in TA, and negotiation with landlords, it is expected that a large proportion of these costs could be saved. The Council expect to make an annual saving of £400k through households paying for the utilities they use.

Storage:

The Council's forecast spend on storage charges is £163k for the 2019/20 financial year. This cost would expect to reduce to near zero following the implementation of the policy. Households may still be entitled to DHP support, however. The Council expect to make an annual saving of £163k.

Council tax:

By making tenants, instead of landlords, liable for Council Tax it is expected that nightly TA rates would be reduced. However, many households will be entitled to Council Tax support which would offset a large proportion of the benefits. Further work is currently being undertaken to establish the overall financial impact to the Council.

In addition to the economic case for change, a key policy outcome is that single people and families are tenancy ready by the time they move out of Temporary Accommodation and into Permanent Accommodation to ensure tenancy sustainability. To do this the Council will look to:

- **Focus on independent living** – single people and families will be able to manage their money effectively by the time they leave Temporary Accommodation
- **Provide Appropriate Support** - Where single people and families experience financial budgeting difficulties support will be provided through the recommissioned homeless support service

Coventry City Council Equality and Consultation Analysis (ECA) Form

- **Only charge proportionately** - charging will be based upon what people can pay; the Council will not charge indiscriminately.

2. Who do you need to consider as part of this ECA? **stakeholder analysis*

- People currently living in temporary accommodation, who have lived in temporary accommodation or are at risk of homelessness
- Coventry's Homelessness Forum
- Third Sector Organisations, in particular:
 - Specialists in housing and benefits advice
 - Agencies who support women who have experienced domestic violence or abuse
 - Agencies who support the BAMER community
 - LGBTQ+ organisations
 - Agencies who support children impacted by homelessness
 - Agencies who support and advice people with disabilities

Pre-Consultation Engagement

This section refers to any activities that took place (such as briefings, meetings, workshops, scoping exercises etc) with stakeholders before the formal consultation period.

3. What engagement activities took place prior to formal consultation and what feedback (if any) was received in relation to equality issues?

Analysis of Impact

In this section please ensure that you consider the three aims of the general duty as they affect **protected groups**. These groups are:

Age
Disability
Gender reassignment
Marriage/Civil Partnership
Pregnancy/Maternity
Race
Religion/Belief
Sex
Sexual Orientation

The **three aims of the general duty** require that a public authority, in the exercise of its functions, must have due regard to the need to:

- Eliminate discrimination, harassment and victimisation

Coventry City Council Equality and Consultation Analysis (ECA) Form

- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it

4. Outline below how this proposal/review could impact on protected groups positively or negatively, and what steps/mitigations (if any) could be taken to reduce any negative impact that has been identified.

An Equalities Impact assessment has been completed using housing and homelessness and housing benefits data for the period April – October 2019. The data set includes equalities information on the 930 main applicants temporarily accommodated during this time. In addition, data on the sex (gender) and age of all people in the households was also obtainable – a total of 1925 people, including children.

The Council's housing and homelessness service does not currently capture data on gender recognition therefore it is not possible to capture potential impact at this time. The impact will be explored during consultation.

Utilities, Council Tax and Storage

The range and variety of temporary accommodation currently utilised by the Council has resulted in inconsistent approaches to payment of utilities – some households already pay for their utilities and council tax whilst the majority do not. This is particularly true for people living in supported accommodation, and in receipt of full housing benefit of which will not cover utilities.

Similarly, the vast majority of adults regardless of housing tenure are required to pay for their utility usage including those in receipt of welfare benefits because the cost of utilities is included as part of payments for daily living expenses.

It is currently assumed therefore that there will be no negative equalities impact, based on any protected characteristic. Nonetheless, the impact of these elements will be explored during consultation.

The equalities impact of the rental element of the policy is explored, in detail, below.

AGE

The proportions of each age group have stayed relatively stable over the past five years. Younger adults make up 24% of main homelessness applicants whilst 57% are aged 26-45. Adults over the age of 45 are far less likely to approach the Council for support for homelessness and be awarded main homelessness duty.

Coventry City Council Equality and Consultation Analysis (ECA) Form

Table 1 - Age of Main Applicant	Sum of Count	% of Grand Total
<16 or (blank)	2	0%
16-25	222	24%
26-35	314	34%
36-45	218	23%
46-55	120	13%
56-65	42	5%
66-75	11	1%
76-85	1	0%
Grand Total	930	100%

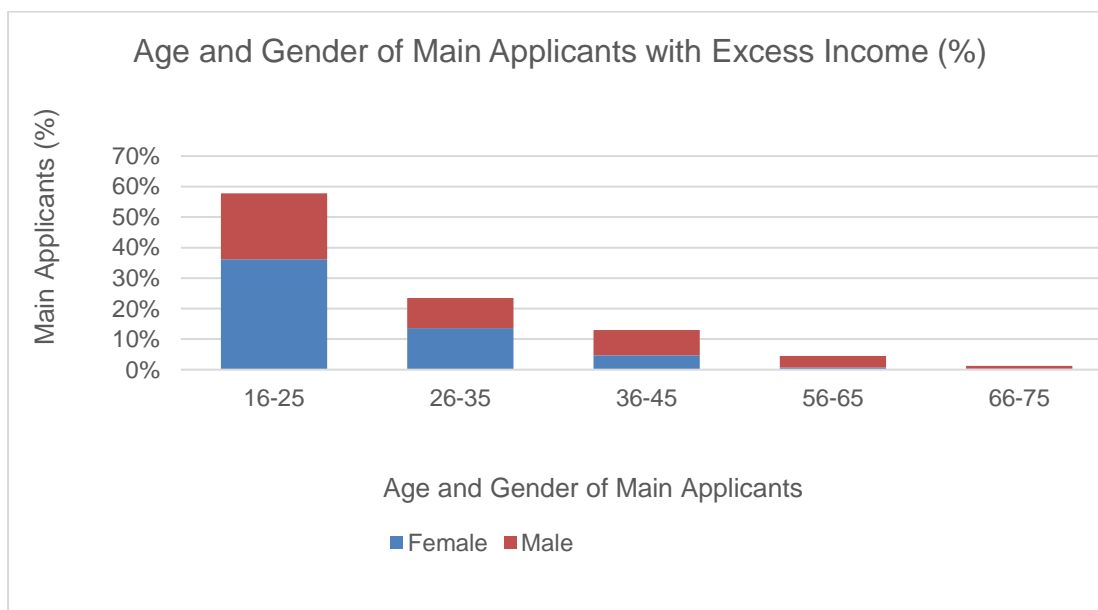
Table 2 – Age of all Household Members	Count of Case Id	% of Grand Total
<18	793	41%
18-27	383	20%
28-37	366	20%
38-47	244	12%
48-57	92	5%
58-67	36	2%
68-77	10	1%
78-87	1	0%
Grand Total	1925	100%

All family members

Exploring impact on the wider family unit reveals 41% of those living in temporary accommodation are children under the age of 18. This accords with national data in that the majority of statutory homeless households are families/parents with dependent children.

Adults – Rental Element

Younger adults (16-25) make up just over half (56%) of the lead housing benefit applications for those households deemed to have an excess income whilst those aged 26-35 make up a further 25% of those in receipt of partial housing benefit.



Housing is less affordable for young people because they earn less than older age groups. In addition, single people under 35-years old without children can only claim housing benefit on the cost of one room in shared accommodation. The impact of the rental element on young single adults has been explored – 48% of households in receipt of partial housing benefits are aged 18-35 years olds and the lead applicant of a family unit; 34% of main applicants are recorded as being a single person 35 and under.

Coventry City Council Equality and Consultation Analysis (ECA) Form

Whilst there is the potential for nearly a third of those who would be required to make a contribution towards their rent being impacted by the one-room rent rate it is not usual practice to place a homeless single person in under-occupied temporary accommodation. Therefore, in circumstances where a young person is deemed to be earning excess income it is extremely unlikely that they will be asked to make a contribution towards the licence fee/rent on any other room in the property. The impact of the rental element of the policy is therefore likely to be minimal.

Children – Rental Element

Exploring the impact of the rental element of the policy on children reveals 50% of households who will be expected to make a contribution towards their rent have one or more children. The data also reveals:

- 23% of those who will be expected to make a contribution are young lone parents (aged 16-25)
- 7% are members of a two-adult household with children where the main applicant is a young person

Research into the social development and educational attainment of homeless children has demonstrated negative impact; the causes can range from practical challenges including keeping track of their school uniform and having no quiet place to do homework, to severe emotional trauma, distress and aggression in older children. Research by Shelter found *“Children housed in temporary accommodation outside their school’s borough, arrived at school late and/or extremely tired and often missed out on school activities as a result.”* They also state; *“Peer relations can be undermined by parents’ inability to pay for activities such as discos due to financial struggles and as a result of children feeling ashamed or uncomfortable to invite friends home after school”¹.*

Equalities Impact

Young people and young people with children living in temporary accommodation may be disproportionately impacted through the implementation of the Temporary Accommodation Charging Policy due to their over-representation in temporary accommodation.

Children make up 41% of the people living in temporary accommodation. Research into the social development and educational attainment of homeless children has demonstrated negative impact, in part due to their families’ financial struggle.

During consultation the Council will explore any equalities impact on young people and children and seek out solutions and mitigations to any impact found.

DISABILITY

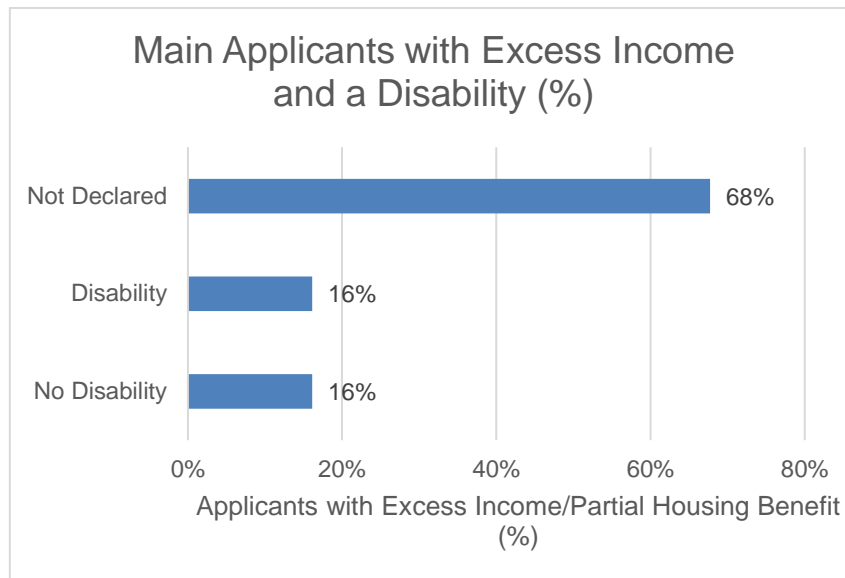
In 2017/18 the ‘reason for priority need’ found 8% of households had a priority need due to a mental illness or disability, and 9% due to a physical disability. Similarly, between April and October 2019 18.2% of main applicants had disclosed a disability.

¹ Shelter (2017) Impacts of homelessness on children – research with teachers
(https://england.shelter.org.uk/data/assets/pdf_file/0011/1474652/2017_12_20_Homelessness_and_School_Children.pdf)

Coventry City Council Equality and Consultation Analysis (ECA) Form

Disability – Rental element

In 16% of the cases where the household is deemed to have excess income the main applicant has declared a disability. However, disability status has not been recorded in 68% of cases therefore prevalence could be higher.



There is a severe shortage of accessible housing across all tenures: in England only 7% of homes have accessibility features – people with physical disabilities face added challenges when looking for suitable accommodation that will fit their right to independent living. Whilst disabled people are considered 'priority need' in homelessness applications, it can be difficult to find accessible social housing to move them into. This may mean that people with physical disabilities will spend longer in temporary accommodation and will therefore be impacted above and beyond others in Temporary Accommodation.

This impact has been explored and the current data suggests that there will be no impact on people with physical disabilities waiting for properties with suitable adaptations, albeit this may change. There does, however, appear to be an over-representation of people with mental health conditions who have an excess income when compared with all households in temporary accommodation. This will require further exploration during consultation.

MARRIAGE/CIVIL PARTNERSHIP

Single people are significantly over represented in Temporary Accommodation when compared with Coventry's 2011 Census Data of 55%. Single people (not married or in a civil partnership) make up 85% of main applicants in Temporary Accommodation in Coventry.

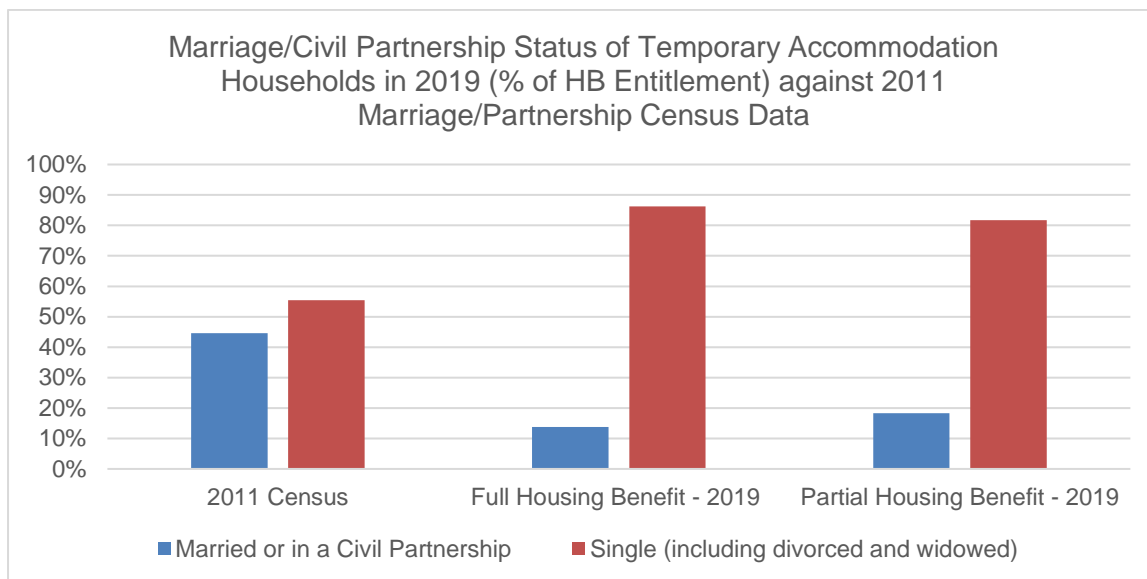
The data does not account for people who are cohabiting; in 20% of cases there are two adults or more in the household.

Between April and October 2019, 14% of the people living in temporary accommodation

Number of Adults in Household	HB Entitlement		Grand Total
	Full	Partial	
1	64.7%	15.6%	80.4%
Female	37.9%	9.2%	47.1%
Male	26.8%	6.5%	33.3%
2	13.4%	5.1%	18.5%
Female	7.4%	3.1%	10.5%
Male	6.0%	2.0%	8.0%
3	1.1%	0.0%	1.1%
Female	0.7%	0.0%	0.7%
Male	0.4%	0.0%	0.4%
Grand Total	79.2%	20.8%	100.0%

Coventry City Council Equality and Consultation Analysis (ECA) Form

and claiming full housing benefit were recorded as married or in a civil partnership this rose to 18% for households with excess income, and therefore in receipt of partial housing benefits.



Whilst this demonstrates an over representation, when compared with the marital status of all households in TA, increased household earnings are to be expected in dual-income families. It therefore follows that people who are married or in a civil partnership will be more likely to meet the excess income threshold.

In addition, homeless people living in hostel accommodation (who are usually single people) are required to pay their ineligible costs (utilities and council tax) - the vast majority of people in temporary accommodation do not pay these charges. It could be argued therefore that the introduction of this policy will decrease inequalities between single people in TA and families in TA.

It is assumed that there will be no equalities impact based on marriage/civil partnership as a protected characteristic in itself however, it should not be assumed that a couple with excess income will not be impacted or face financial hardship if the policy is implemented.

PREGNANCY/MATERNITY

Pregnant women make up 2% of main applicants temporarily accommodated by the Council with the main reasons for homelessness amongst pregnant women being families no longer or willing to accommodate (28% of cases), domestic abuse and end of social rented tenancy (22% respectively). Pregnant women are under-represented when compared with ONS data on conception rates for 2016 7.7%. None of the pregnant women between April 2019 and November 2019 would have had to make a contribution towards their rent through excess income therefore it is assumed that there will be minimal to no equalities impact through pregnancy or maternity.

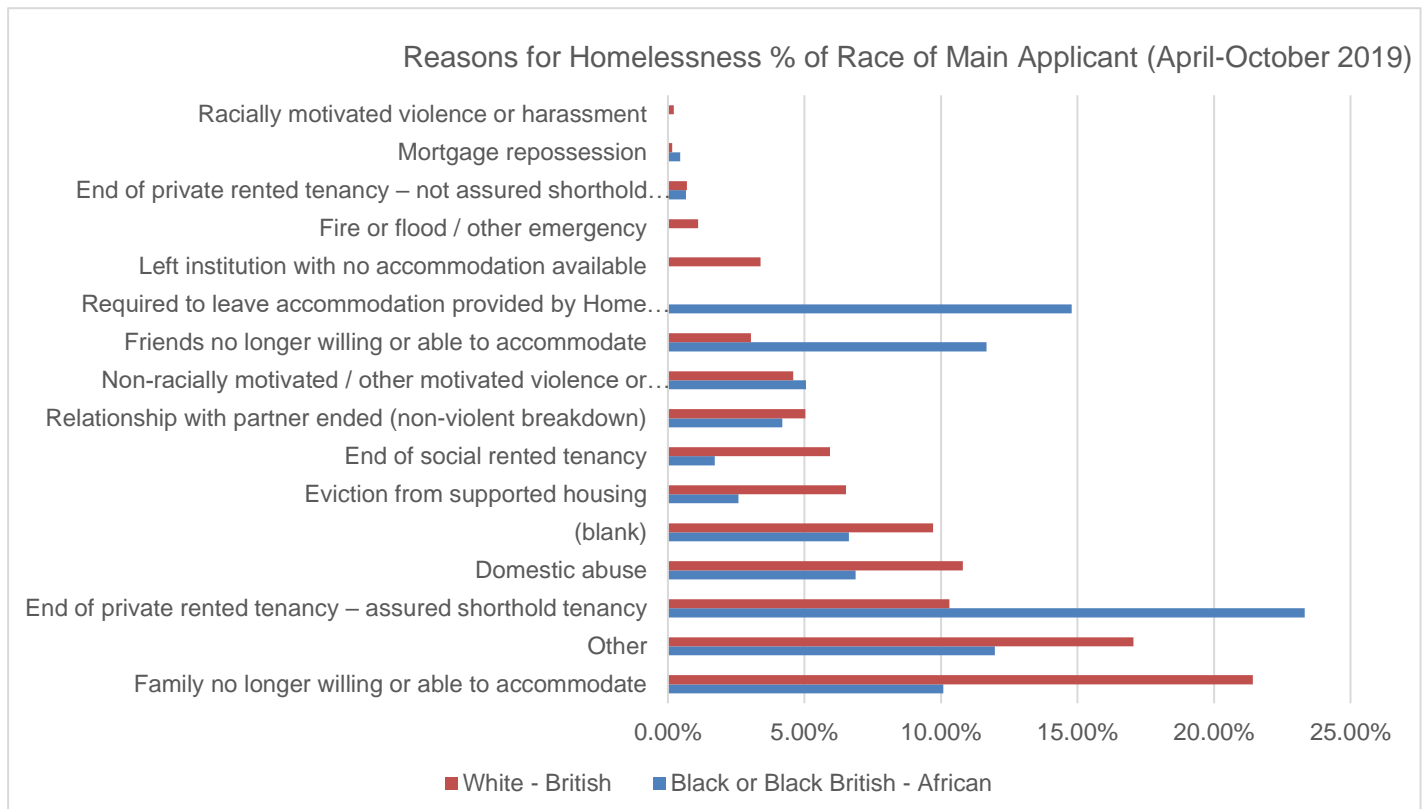
RACE

The proportion of statutory homeless households recorded as 'White' has varied slightly between 62% and 67% over the past five years. Between April and October 2019, 60.7% of homeless people in TA were recorded as White British; a further 5.7% were recorded as White 'other', which includes 'White Other Kurdish' (0.2%), 'White Other Irish traveller' (0.3%) and 'White Other Gypsy/Roma' (0.1%).

Coventry City Council Equality and Consultation Analysis (ECA) Form

The proportion of Asian applicants, 7.0% between April and October 2019 is consistently lower than the proportion of the overall population who are Asian (15.1% in the 2011 Census). This is a long-term trend.

Conversely, the proportion of applicants recorded as Black (15%-23% over the last 5 years) is consistently higher than the proportion of the overall Coventry population who are Black (5.5% in the 2011 Census). Between April and October 2019, 16.3% of homeless households living in TA were recorded as Black, the vast majority of which (13.6%) were recorded as 'Black or Black British – African'.

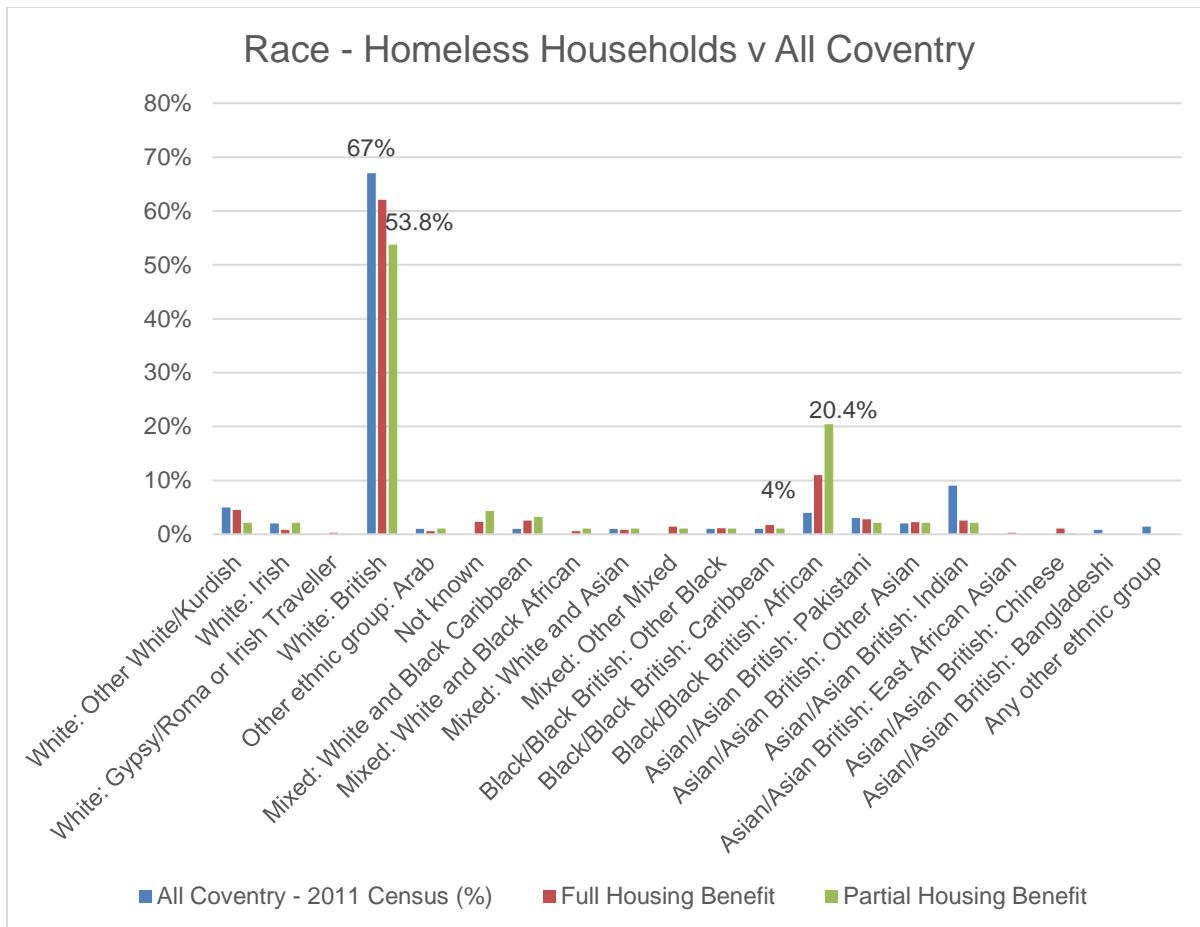


End of Private Rented Tenancy appears to be largest cause of homelessness (23%) in Black African families alongside being required to leave accommodation provided by the Home Office (15%) and friends no longer willing or able to accommodate (12%).

Race – Rental Element

Exploring the equality impact of the rental element of the policy reveals a disproportionate impact on Black families. The 2011 Coventry population census recorded 5.5% of people living in Coventry as black however the housing benefit and housing data found that 23% of those families deemed as having excess income and therefore able to contribute to the rent/lease on the property as Black or Black British – African (20%), Caribbean (1%) or 'Other Black (1%)'.

Coventry City Council Equality and Consultation Analysis (ECA) Form



This is a much wider problem and a natural consequence of structural barriers for black households to access good quality rented housing and to be in the financial position to be homeowners. Home ownership in black families has fallen quite significantly over the last decade, and national figures also show that 48% live in social housing and 21% in the private rented sector. It may be reasonable to assume that there is a substantial number of black households who are earning but on lower incomes and therefore able to make a contribution to their TA costs under the proposed charging policy.

Asian people make up 15% of Coventry's population according to the 2011 census whilst 6.7% of those households who are deemed as being able to afford to pay are recorded as Asian, which would indicate no equality impact. However, when compared with the proportion of all Asian households living in temporary accommodation (7%) it appears that a disproportionate number of Asian households will be required to contribute to the rent/lease than their non-Asian homeless counterparts.

Whilst national research points to structural barriers as a reason for the disproportionate representation of non-white households in temporary accommodation, during consultation the Council will seek to explore:

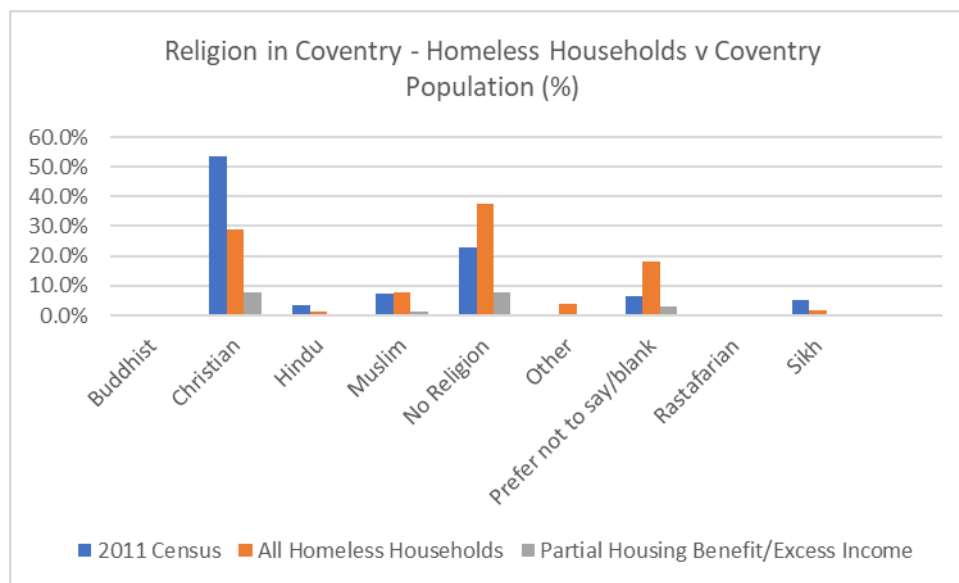
- Whether BAMER households may experience an equality impact as a direct result of the implementation of a TA Charging Policy
- The cause of impact (would the impact occur through the application of one element of the policy, or as cumulation of all elements)
- Potential mitigations where an impact is identified

Coventry City Council Equality and Consultation Analysis (ECA) Form

RELIGION

Temporary accommodation data for the period April-October 2019 shows an over-representation of people with no religion (37.6% of the proportion of people in TA) when compared with the 2011 Census data for Coventry (23% of Coventry residents identify as having no religion). There is also an over representation of people who prefer not to disclose their religion (18.3%) when compared with the 2011 census (6.4%).

Christian households are far less represented within homelessness figures with 29% of people living in temporary accommodation recorded as Christian despite 53.7% of Coventry's residents identifying as Christian in the 2011 census.



Religion – Rental Element

Households of Christian faith are more likely to be expected to contribute towards the rent in the property because they have excess income (36.6% of people in receipt of partial housing benefit are Christian) when compared with all homeless households who do not need to contribute (27% of those claiming full housing benefit are Christian).

However, when compared with Coventry's Population data (2011 census data reports 53.7% of people are Christian) this does not suggest an equality impact upon Christian people as a result of them being asked to contribute towards their rent. The council will nonetheless explore any equality impact on individuals or groups, because of their religion, should the policy be implemented.

SEX

In Coventry 55% of main applicants (and 54% of all people including children) living in temporary accommodation are women; 55% of main applicants (and 56% of all People in TA) and men.

Coventry City Council Equality and Consultation Analysis (ECA) Form

Rental Element

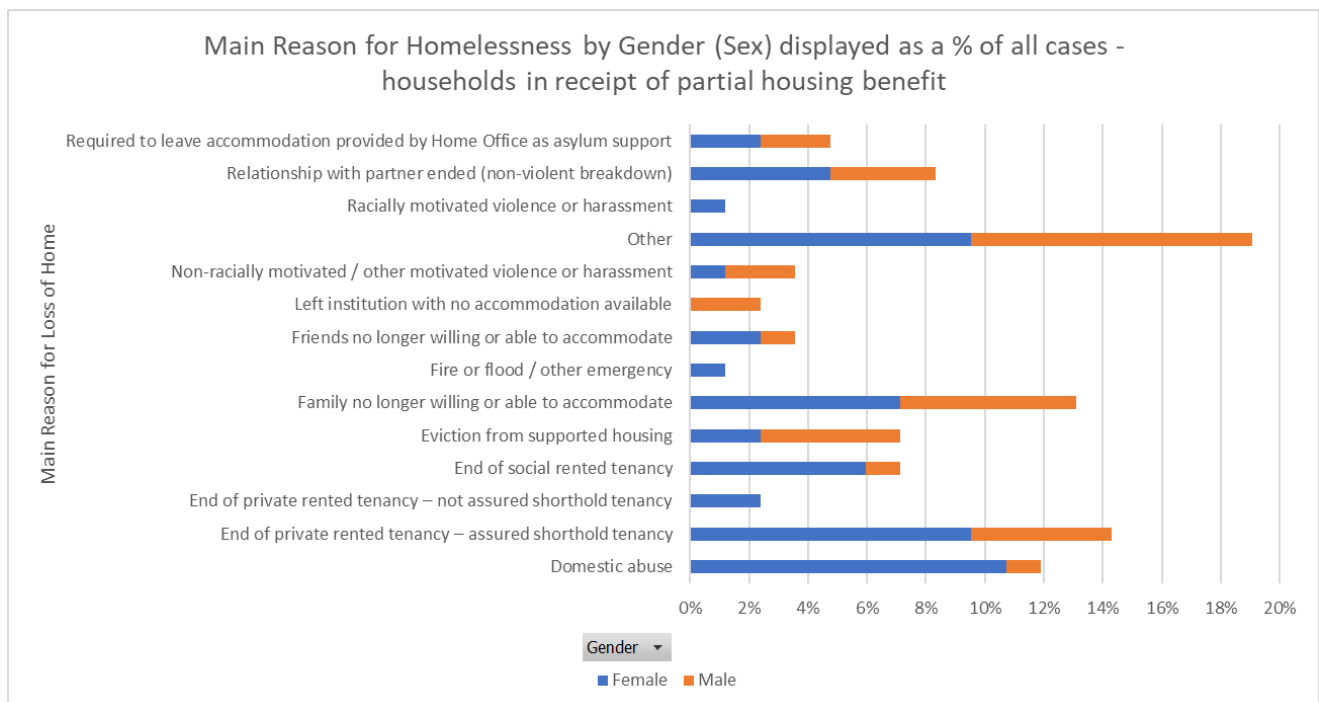
The impact of the rental element on households in receipt of partial housing benefit, due to having an 'excess income' based on the main applicant's sex (gender) has been explored. It has been found:

- 41% of lead applicants are male (76% of male lead applicants are single or in a couple without children - 24% are part of a household with Children)
- 59% are female (33% are single or in a relationship with no children and 68% are part of a household with children).
- Single women with children are disproportionately impacted – 68% of single women are lone parents compared with 3% of single men

Women fleeing DVA may be particularly impacted by the policy change due to the financial element of DVA. Banks, mortgage providers and estate agents are often not familiar with financial abuse, how it manifests and how to prevent it. Joint mortgages can be used for financial abuse, as the perpetrator refuses to contribute leading to repossession - they are difficult to break. Similarly, a woman may have rent arrears as a result of financial abuse which she may be forced to pay off before securing another social housing property. These debts may not be picked up during the initial homelessness application, or they may materialise after the application has been made.

Exploring Coventry's homelessness data for those in receipt of partial housing benefit demonstrates domestic violence is the leading cause of homelessness in women in receipt of partial housing benefit (11% of all households), closely followed by 'other' and 'end of private rented - assured shorthold tenancy' (at 10% each).

The leading cause of homelessness in men in receipt of housing benefit is 'other' (10% of all households) followed by 'family no longer willing or able to accommodate' (6%).



Coventry City Council Equality and Consultation Analysis (ECA) Form

Coventry's homelessness data backs national research therefore it will be important during consultation to understand how the financial aspect of domestic violence may impact a survivor's ability to meet the charges set out in the policy alongside what mitigations can be applied.

Equalities Impact

Women living in temporary accommodation may be disproportionately impacted through the implementation of the Temporary Accommodation Charging Policy due to:

- women's over-representation in temporary accommodation
- the higher proportion of women as lone parents
- the financial element of domestic violence and abuse

The Council will explore this potential impact during consultation and engage partner organisations working with homeless women including Valley House, Panaghar and Relate to understand the impact of the policy (if any) and possible mitigations.

SEXUAL ORIENTATION AND GENDER REASSIGNMENT

The proportion of people in TA recorded as 'LGBO - Lesbian, Gay, Bisexual or other' (5%) is more than double the proportion of the overall West Midlands area (2.2%) and UK population (2.0%), as recorded in the 2017 annual population survey². The Council does not currently collect data on Gender Reassignment.

The Albert Kennedy Trust carried out research into LGBT youth Homelessness and found that young LGBT people are overrepresented in the young homelessness population (24%) and in the vast majority of cases (69%) abuse and estrangement from family is expressed as being the biggest cause.³

These findings are not reproduced, to the same extent, in Coventry's homelessness data – 5% of young homeless people (16-25) identify as being LGBO. However, the data does reveal 78% of homeless LGBO people in Coventry are aged 16-25, 9% are in the 26-35 age bracket and the remaining 12% are aged between 36 and 75.

Similarly, Coventry's data neither confirms or opposes the Albert Kennedy Trust's findings on the causes of homelessness in young LGBT people. The reason for homelessness in LGBO young people (16-25) in Coventry has been left blank in 36% of cases, 'other' was the reason stated in 25% of cases followed by 'Family no longer willing or able to accommodate' (12%) and 'Relationship with partner ended (non-violent)' at 12%.

Given the high number of 'blank' and 'other' responses on Homelessness Applications and in light of the findings of the Albert Kennedy Trust, the impact of all elements of the policy on LGBT people, and younger people in particular, will require exploration during consultation.

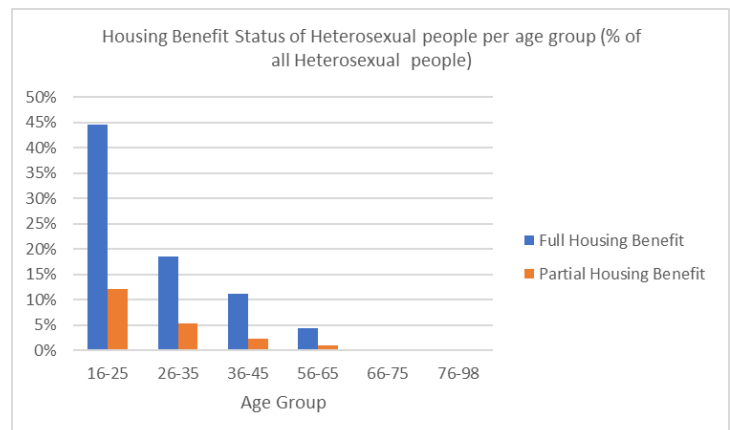
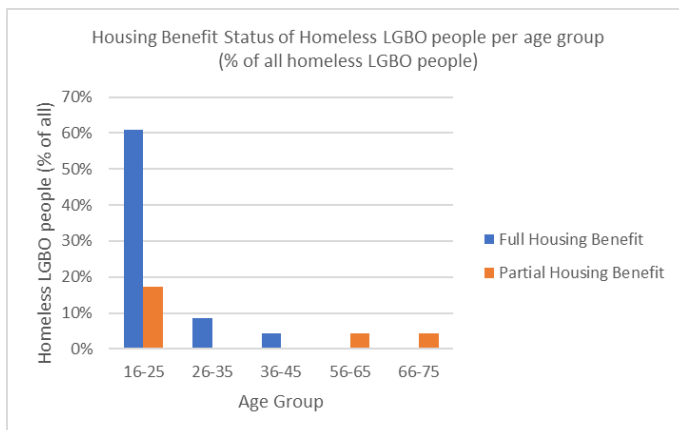
² ONS (2019) Sexual Orientation, UK:2017 (<https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualidentityuk/2017>)

³ Albert Kennedy Trust (2015) *LGBT Youth Homelessness: A UK National Scoping of Cause, Prevalence, Response & Outcome* (<http://bit.ly/2IXFuhR>)

Coventry City Council Equality and Consultation Analysis (ECA) Form

Rental Element

The impact of the rental element of the policy on homeless LGBT people has been explored and it demonstrates that nearly two thirds (74%) of homeless people will not be impacted because they will be in receipt of housing benefit; 26% of LGBT people will be asked to make a contribution towards their rent. Young LGBT will be making the largest contribution - 17% are in the 16-25 age bracket.



Homelessness data reveals that not only are LGBO people disproportionately represented within Temporary Accommodation data but a higher percentage will be expected to make a contribution towards their rent. Nearly four fifths (79%) of heterosexual people are in receipt of housing benefits. Similar to their LGBO counterparts, young people will be making the largest contribution (when compared with all heterosexual people) - 12% are in the 16-25 age bracket.

Equalities Impact

The Council's homelessness data reveals LGBO people are disproportionately represented within Temporary Accommodation and the vast majority of those people are in the 16-25 age bracket. Housing affordability can be a particular issue for younger people therefore there could be a cumulative impact on young homeless LGBO people. The Council will reach out to the LGBT+ community; service users and LGBT groups such as 'Prism LGBTQ+' and Coventry Pride throughout consultation.

Are there any other vulnerable groups that could be affected? i.e. deprivation, looked after children, carers.

Also include any information about the health inequalities/Marmot implications of this proposal. Contact Caroline Ryder (caroline.ryder@coventry.gov.uk) or Hannah Watts (hannah.watts@coventry.gov.uk) in Public Health for more information.

The policy will inevitably impact the most vulnerable who are already at a severe disadvantage suffering multiple disadvantage and is therefore likely to increase the health inequalities gap in the City.

Coventry City Council Equality and Consultation Analysis (ECA) Form

There may also be a risk that this could exacerbate child poverty as the largest group of affected individuals are lone parents with dependent children. Over 70% of households which are statutory homeless have children which would be affected.

5. What are the gaps in evidence? Can this be addressed during the consultation stage?

The Council's housing and housing benefit systems do not appear to capture information on gender reassignment and therefore it is not currently possible to identify the impact on this group.

The Council will reach out to the LGBT+ community; service users and LGBT groups such as 'Prism LGBTQ+' and Coventry Pride throughout consultation to understand more about any potential impact and mitigations.

6. What are the likely impacts of this project/review on staff from protected groups?

This policy should impact customers/tenants only.

Coventry City Council
Equality and Consultation Analysis (ECA) Form

Form 2

This section should be completed AFTER any consultation has been concluded.

Author of this document:

Date of completion:

Potential Impacts – further information

8. Referring to the information detailed in question 4 of ECA Form 1, state if the potential impacts have been confirmed. Also detail below any additional information about potential impacts that has been highlighted during any consultation.

Outcome of equality impact

9. Indicate which of the following best describes the equality impact of this project/review:

There will be **no** equality impact if the proposed option is implemented

There will be **positive** equality impact if the proposed option is implemented

There will be **negative** equality impact if the proposed option is implemented but this can be objectively justified

There will be both **positive and negative** impacts if the proposed option is implemented

Summary of ECA

Write a paragraph below which summarises the key aspects of this ECA.

This paragraph should be included in the Equalities/EIA section of any Cabinet/Cabinet Member Report.

Coventry City Council Equality and Consultation Analysis (ECA) Form

Approvals from Director and Cabinet Member

Name of ECA Author

Date

Director:

Cabinet Member:

Please detail below any committees, boards or panels that have considered this analysis.

Name

Date

Chair

Decision taken

Next steps

Please send this completed ECA to the Insight Team as follows:

Wendy Ohandjanian (wendy.ohandjanian@coventry.gov.uk tel. 7683 2939)

Jaspal Mann (jaspal.mann@coventry.gov.uk tel. 7683 3112)