

**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: 14<sup>th</sup> November 2019**

### ***Background to the planned changes***

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#### **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
  - LGBT+ organisations
  - Agencies who support children impacted by homelessness
  - Agencies who support and advice people with disabilities

### *Pre-Consultation Engagement*

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*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*

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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%
<b>Grand Total</b>	<b>930</b>	<b>100%</b>

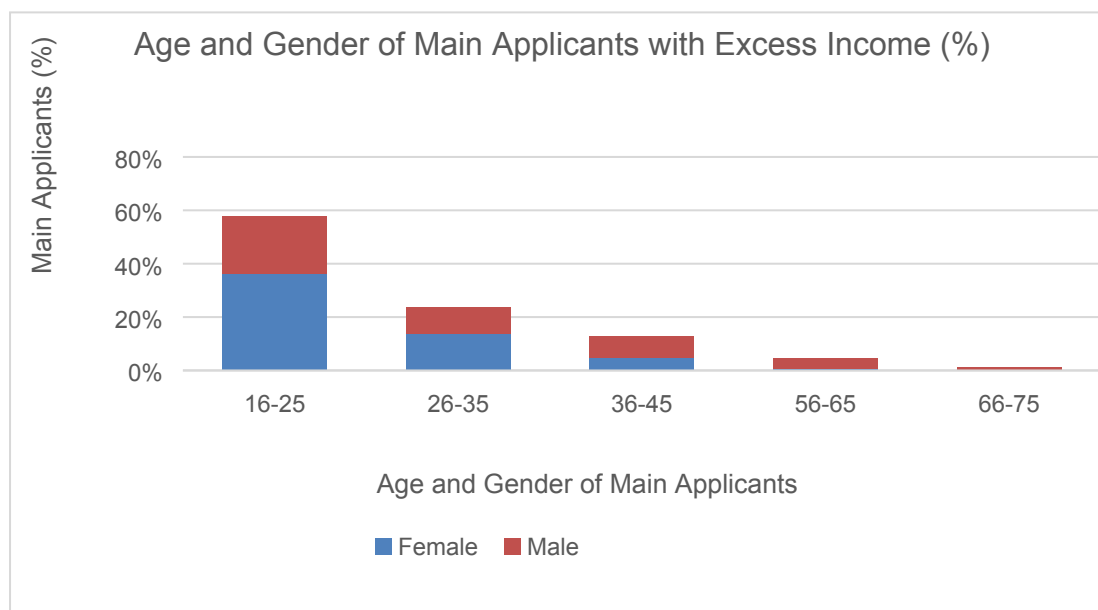
**All family members**  
Exploring impact on

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%
<b>Grand Total</b>	<b>1925</b>	<b>100%</b>

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.

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

## Coventry City Council Equality and Consultation Analysis (ECA) Form

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”<sup>1</sup>.*

### 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.

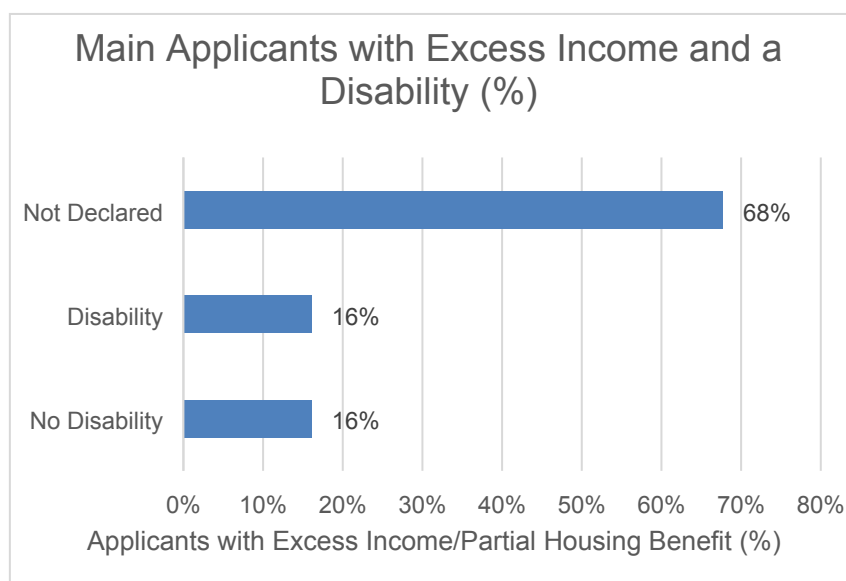
### Disability – Rental element

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.

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<sup>1</sup> 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](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



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

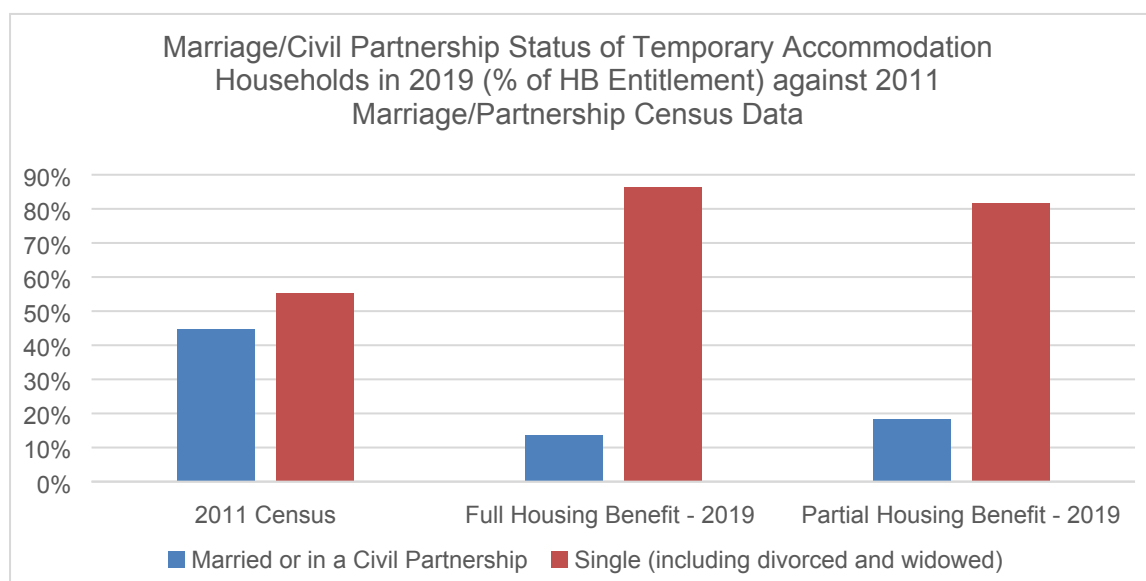
Single people are significantly over represented in Temporary Accommodation when compared with Coventry’s 2011 Census Data of 55%. Single people (not married or in a civil partnership) make up 85% of main applicants in Temporary Accommodation in Coventry.

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 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.

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

## Coventry City Council Equality and Consultation Analysis (ECA) Form



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**

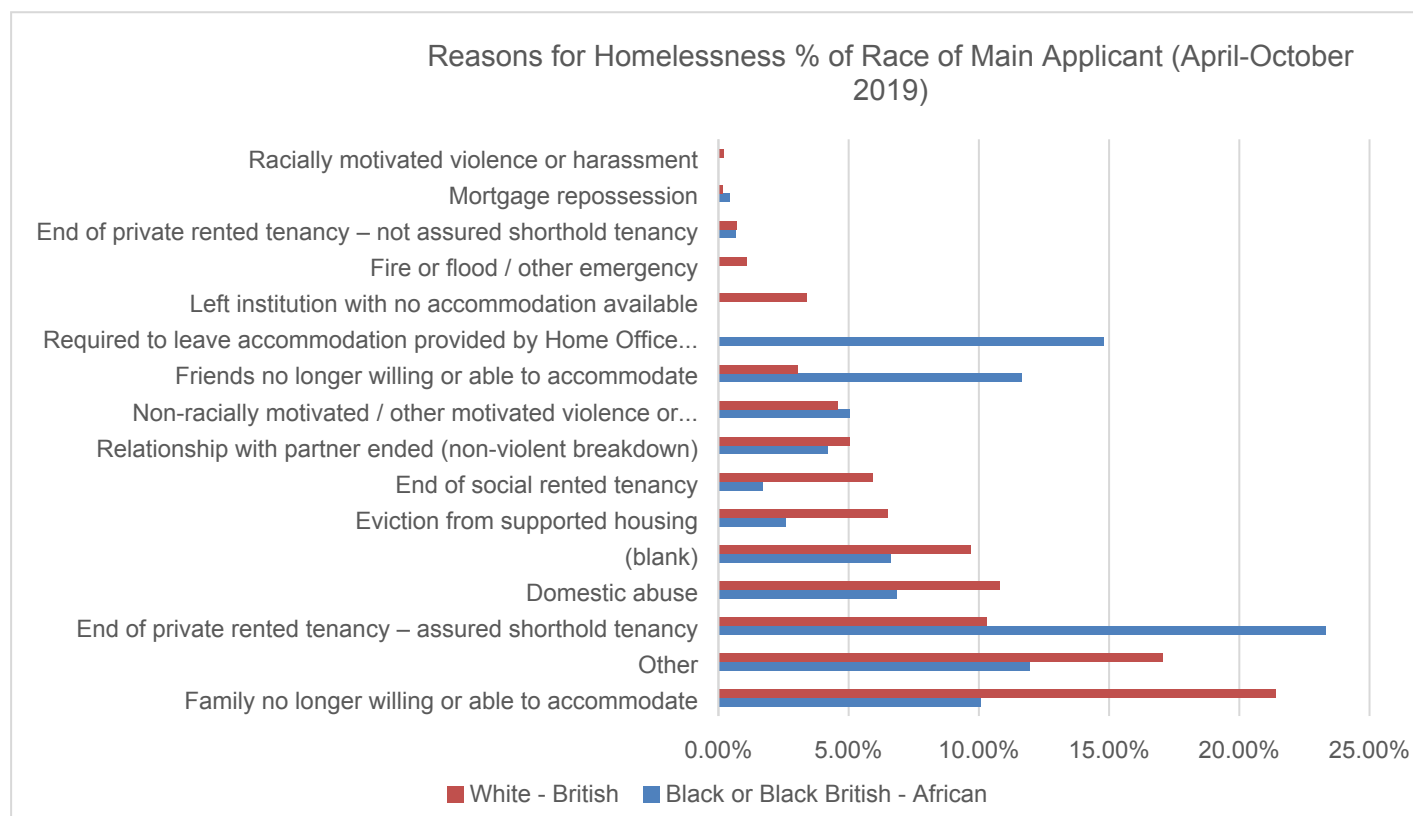
The proportion of statutory homeless households recorded as 'White' has varied slightly between 62% and 67% over the past five years. Between April and October 2019, 60.7% of homeless people in TA were recorded as White British; a further 5.7% were recorded as White 'other', which includes 'White Other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

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.



## Coventry City Council Equality and Consultation Analysis (ECA) Form

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'.

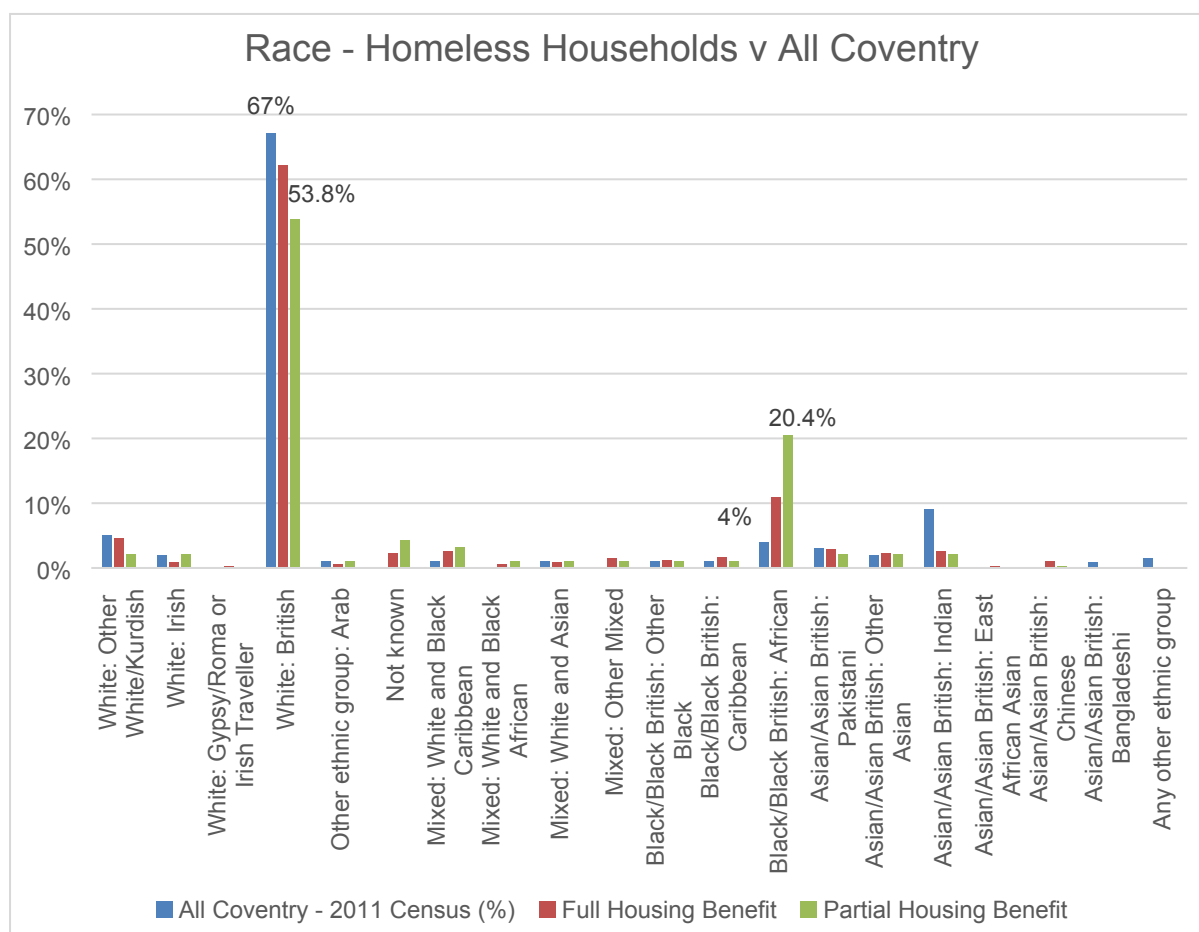


End of Private Rented Tenancy appears to be largest cause of homelessness (23%) in Black African families alongside being required to leave accommodation provided by the Home Office (15%) and friends no longer willing or able to accommodate (12%).

### 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:

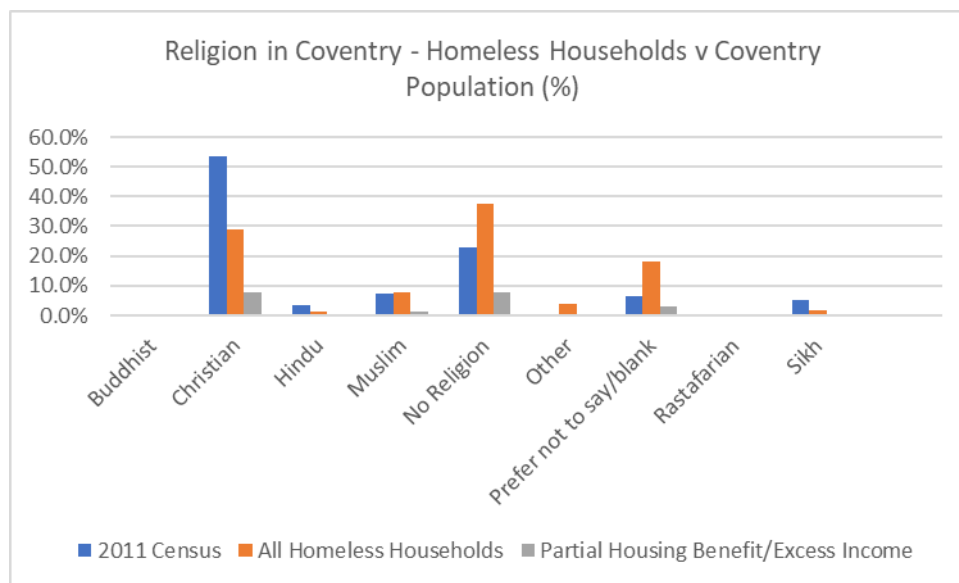
- Whether BAMER households may experience an equality impact as a direct result of the implementation of a TA Charging Policy
- The cause of impact (would the impact occur through the application of one element of the policy, or as cumulation of all elements)
- Potential mitigations where an impact is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

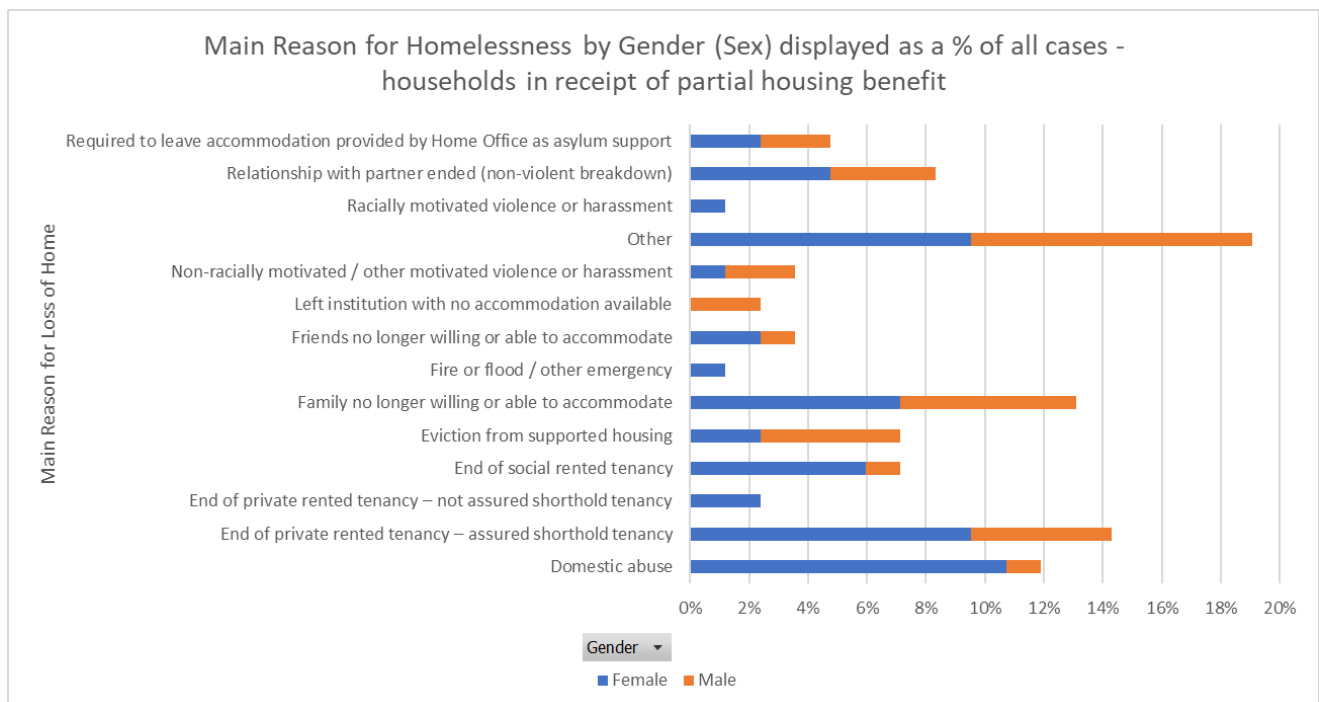
The impact of the rental element on households in receipt of partial housing benefit, due to having an 'excess income' based on the main applicant's sex (gender) has been explored. It has been found:

- 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 survey<sup>2</sup>. 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.<sup>3</sup>

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.

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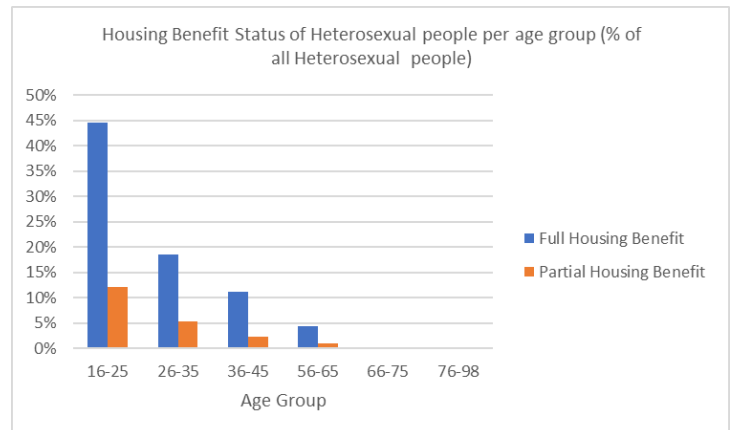
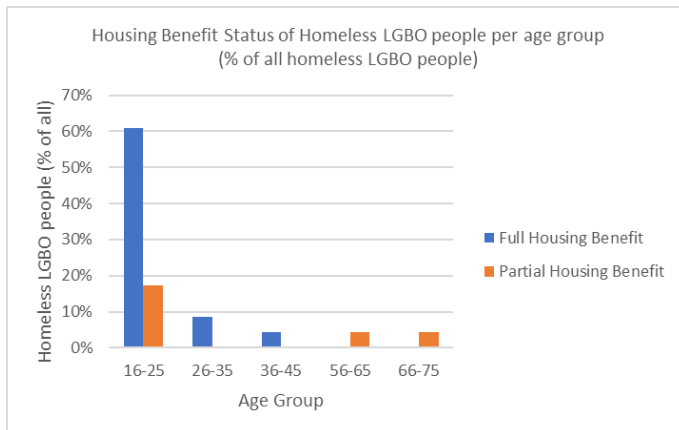
<sup>2</sup> ONS (2019) Sexual Orientation, UK:2017 (<https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualidentityuk/2017>)

<sup>3</sup> 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](mailto:caroline.ryder@coventry.gov.uk)) or Hannah Watts ([hannah.watts@coventry.gov.uk](mailto: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: Samantha Richardson**

**Date of completion: 12<sup>th</sup> February 2020**

### *Potential Impacts – further information*

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**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.**

### Age

In part 1 of this ECA, young people and young people with children living in temporary accommodation were identified as potentially being 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 struggles.

This potential impact was explored during consultation, through the survey and focus groups. Of those who responded and currently living in temporary accommodation 20% were aged 16-24, 32% were aged 25-34 and 24% were aged 35-44. However, younger adults were not as well represented amongst 'All Respondents' with only 5.3% of respondents aged 16-24 and 21.3% aged 25-34.

<b>Age</b>	<b>All Respondents (%)</b>	<b>Respondents in TA (%)</b>
Under 16	0	0
16-24	5.3	20
25-34	21.3	32
35-44	27.2	24
45-54	25.4	16
55-64	16.0	4
65-74	4.1	4
75-84	0.6	0
85 or over	0	0

### **Consultation Responses**

In-line with the desktop research carried out in part 1, concerns were raised during consultation regarding the cost of utilities and the impact on children, in particular if the temporary



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accommodation used by the Council is of low energy efficiency and if the Council choose to install (more expensive) pre-payment meters:

*“We would support fuel poverty being taken into account when placing households in TA and asking them to pay utilities costs. This is particularly relevant for those with young children or illnesses, who have higher energy needs.”*

During the consultation with Coventry Refugee and Migrant Centre service users one attendee stated that the cost of travel her son was so high that some weeks she had to make a choice between buying food and sending her son to school. This supports the analysis in part 1 of this ECA that being placed into temporary accommodation that is not near to a child’s school can have a **negative equality impact** on a child’s educational attainment – especially if a parent cannot afford to send their child to school.

One person also stated that utilities and council tax would not be affordable to young adults (under 25) in receipt of universal credit.

*“Not affordable for all households. Especially those on universal credit that are under 25 years of age.”*

The Universal Credit personal allowance for people under the age of 25 is set through local government legislation regardless of housing tenure therefore people within this age range will be expected to pay their utilities and council tax costs once permanently accommodated. Therefore, no evidence has been found of an equalities impact on young adults as a direct result of implementing this policy.

### Mitigations

- 1) **Utility Costs:** A working group has been established to explore the potential impact of charging for utilities on children, and other vulnerable groups, alongside mitigations. The working group will explore the best form of payment method (bills or pre-payment meters or a mix of the two) alongside other advice, support and/or mitigations.
- 2) **Travel Costs:** Explore other financial support options for supporting households in temporary accommodation with children whose current school is not located near their current accommodation (e.g. prevention pot or funding via education service)

### Disability

In part 1 of this ECA there appeared to be an over-representation of people with mental health conditions with an excess income when compared with all households in temporary accommodation. In order to explore this impact further a meeting was held with the Disability Equalities Action Partnership, where collective feedback was given. In addition, survey responses captured equalities feedback.

Of 180 people who responded to the survey, 166 answered the disability question - 14.5% reported having a disability whilst 20% of those living in temporary accommodation stated they had a disability.

Disability	All Respondents (%)	Respondents in TA (%)
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Yes	14.5	20
No	85.5	80

Of all those who disclosed the nature of their disability 11 reported having a long-standing illness health condition (2 of which lived in temporary accommodation), 10 reported a mobility impairment and 6 reported a mental health condition (3 lived in Temporary Accommodation).

Impairment	All Respondents (Number of People)	Respondents in TA (Number of People)
Mental Health Condition	6	3
Long-standing Illness or Health Condition	11	2
Hearing Impairment	1	0
Mobility Impairment	10	0
Reduced Physical Capacity	4	0
Visual Impairment not Correct by Spectacles of Contact Lenses	1	0
Learning Disability	1	0
Neurological Condition	5	0
Sensory Impairment	0	0
Learning Difficulties	1	0
Speech Impairment	0	0
Physical Co-ordination Difficulties	0	0
Mental Illness	1	0
Physical Impairment	5	0
Prefer not to say	2	0
Other	1	0

For the most part, there were levels of support for each proposal with respect to disabled and non-disabled people. However, the responses to Q7 and Q11 differed. Whilst both groups indicated strong support for the proposals, on Q7 disabled people were markedly less enthusiastic (45.8% agreement, 31.7% disagreement against 54.9% agreement, 35.2% disagreement amongst non-disabled people). This trend continued for Q11 (54.2% agreement, 29.4% disagreement against 61.8% agreement, 22.0% disagreement amongst non-disabled people). Disabled people who responded to the online consultation were therefore less enthusiastic (but nonetheless supportive) of paying Council Tax or making an affordable contribution to rent.

### Consultation Responses

Text analysis revealed concerns that charging for removals and storage could either cause or exacerbate mental health conditions, during what is already a difficult time, and potentially lead to repeat homelessness:

*“This will further place already vulnerable families in more debt, depression, depravity and these people will become a revolving door into the vicious circle of homelessness. So in other words, no penny will be saved.”*

Similarly, some respondents also leant towards the charging for utilities and council tax exacerbating the difficulties experienced by people with health conditions:

## Coventry City Council Equality and Consultation Analysis (ECA) Form

*“Reasons for requiring temporary accommodation are complex, but can often be linked to health poverty, loss of income, domestic abuse, all of which have financial implications that are difficult to get out of even when living in a stable home. There should continue to be a compassionate and generous offer towards those in crisis, otherwise we are at risk of increasing the burden onto families themselves, or onto the work of the charitable sector who are already overwhelmed in many areas.”*

There was particular resistance to the Council’s proposal to using Pre-Payment Meters due to some people with disabilities requiring constant access to electricity (for example Chronic Obstructive Pulmonary Disease – COPD) and the danger of disconnection:

*“the proposed move to base utility charging on tenants using prepayment meters means they are likely to be paying more for their energy - as PPM users have fewer choices on competitive tariffs than others - and be more prone to 'self-disconnection' because they don't have the money to put in the meter. This will be particularly true for larger families or families with disabilities which require higher levels of energy use.”*

The Disability Equalities Action Partnership (DEAP) fed back that they feel the current situation does not teach people to manage their finances and debts and they could not understand why we are not already charging for rent, utilities, council tax and storage. They stated that the money that has been spent so far could have been spent on other areas such as adult’s social care. One attendee also expressed the view that it does not provide people in temporary accommodation with an incentive to improve their situation, they said; *“It’s the same as the rich getting richer and poor getting poorer”*, which pointed towards a **positive equalities impact** with regards to fostering good relations between persons who share a relevant protected characteristic and persons who do not share it, given people with protected characteristics are often over-represented within Temporary Accommodation.

### Mitigations

**Utility Costs:** A working group has been established to explore the potential impact of charging for utilities on children, and other vulnerable groups, alongside mitigations. The working group will explore the best form of payment method (bills or pre-payment meters or a mix of the two) alongside other advice, support and/or mitigations.

### Gender Reassignment

Data regarding gender reassignment within the housing service at the point of completion was missing and therefore potential impact was difficult to analyse however 3.8% of survey respondents stated that their gender is different than the gender they were assigned at birth. Similarly, 4% of people living in TA stated that their gender is different to the gender assigned at birth.

Gender Reassignment	All Respondents	Respondents in TA (%)
Yes	3.8	4
No	87.5	88
Prefer not to say	8.8	8

## Coventry City Council Equality and Consultation Analysis (ECA) Form

Comments received from these respondents were both positive and negative – 83.3% either strongly agreed or agreed that people living in temporary accommodation should pay for the utilities they use and 66.7% strongly agreed or agreed with charging for Council Tax. However, 66.7% strongly disagreed or disagreed with charging for removals and storage.

The reasons stated for not being supportive of the storage element of the policy were in-line with other respondents – concerns that it will cause further hardship rather than being related to gender reassignment. No positive or negative impact has been identified.

### Marriage or Civil Partnership

Part 1 of the ECA did not identify any equalities impact based on marriage or civil partnership and argued that the introduction of the policy could decrease inequalities between single people in TA and families in TA.

Analysis of the survey responses found that 44% of those living in temporary accommodation, who responded to the survey, were single (never married and never registered a civil partnership) whilst 32% were married.

<b>Marriage or Civil Partnership Status</b>	<b>All Respondents (%)</b>	<b>Respondents in TA (%)</b>
Never Married and Never Registered a Civil Partnership	29.5	44
Married	38.0	32
Separated but still legally married	2.4	8
Divorced	12.7	4
Prefer not to say	15.7	12
Widowed	1.2	0
In a registered civil partnership	0.6	0
Separated but still legally in a civil partnership	0	0
Formally in a civil partnership which is not legally dissolved	0	0
Surviving Partner from a civil partnership	0	0

Analysis of the consultation findings has been carried out based on marriage and civil partnership and no positive or negative equality impact has been identified, based on this protected characteristic.

### Religion

Prior to consultation desktop analysis found no known equalities impact based on religion. Analysis of the data found 48% of those living in temporary accommodation were of Christian faith – a group identified as being more likely to have to make a contribution to the rent through a licence fee than other groups in Temporary Accommodation.

<b>Religion</b>	<b>All Respondents (%)</b>	<b>Respondents in TA (%)</b>
Christian	41.9	48
Muslim	7.8	28
No Religion	19.2	8

## Coventry City Council Equality and Consultation Analysis (ECA) Form

Prefer not to say	13.2	8
Atheist	10.2	4
Other	7.8	4
Buddhist	0	0
Hindu	0	0
Jewish	0	0
Sikh	0	0

When filtering responses based on faith positive and negative comments were made regarding each element of the policy however none of them were faith related. Therefore, no positive or negative equalities impact has been identified.

### Pregnancy/Maternity

Prior to consultation (in form 1) initial research indicated that there would be minimal to no equalities impact through pregnancy or maternity. Analysis of the consultation survey has revealed that 4% of all respondents were pregnant, 2% had a baby in the last 6 months and 3% were breastfeeding.

The proportion of pregnant, recently pregnant or breast-feeding people rose however when filtering responses for people in Temporary accommodation – 11.5% of respondents in TA were pregnant, 3.8% had a baby in the last 6 months and 7.7% were breastfeeding.

Pregnancy/Maternity	All Respondents (%)	Respondents in TA (%)
Pregnant	4	11.5
Had a baby in the last six months	2	3.8
Breastfeeding	3	7.7
No	121	57.7
Not Applicable	36	19.2

Analysis of this group has found that they are generally unsupportive of the utilities element of the policy with 37.5% strongly disagreeing compared with 25% agreeing or strongly agreeing. Similarly, 50% strongly disagreed with charging Council Tax compared with 25% who agreed and 37.5% disagreed with charging for storage (12.5% agreed). When asked about the Licence Fee 50% also strongly disagreed with this element with 25% agreeing that people in temporary accommodation should contribute to the rent, through a licence fee – the LHA was the preferred rate of the two suggested rent rates with 75% preferring this option.

Despite the groups generally being unsupportive of the proposals no reasons were given that directly related to pregnancy, being recently pregnant or breast feeding or maternity. Therefore, **no equalities impact has been identified** based on pregnancy or maternity.

### Race

Equalities analysis prior to consultation revealed a disproportionate representation of non-white households in temporary accommodation, and therefore the potential for an equalities impact. This potential impact was explored during consultation through focus groups with service users of Coventry Refugee and Migrant Sector and engagement with third sector organisations.

## Coventry City Council Equality and Consultation Analysis (ECA) Form

Analysis of consultation responses reveals the proportion of all respondents who reported as white was 68.4% (non-BAME), with 20.1% reporting as BAME and 11.5% preferring not to say. Conversely, only 28% of respondents in TA were white (none-BAME) whilst 60% were BAME (12% preferred not to say).

Race	All Respondents (%)	Respondents in TA (%)
Arab	1.1	0
Asian or Asian British Bangladeshi	0	0
Asian or Asian British Chinese	0	0
Asian or Asian British Indian	2.3	4
Asian or Asian British Pakistani	1.1	4
Black or Black British African	8.0	24
Black or Black British Caribbean	0	0
Mixed White and Asian	1.1	4
Mixed White and Black African	0.6	4
Mixed White and Black Caribbean	1.7	4
Other	0	0
Other Asian Background	0	0
Other Mixed or Multiple Ethnic Background	1.1	4
Other/Black/African/Caribbean Background	2.9	12
Prefer not to say	11.5	12
White British	64.4	20
White Gypsy or Irish Traveller	0	0
White Irish	1.1	4
White Other	2.9	4

There were substantial differences in the level of agreement with respect to race across different proposals. The following table details the differences:

	Non-BAME		BAME	
	Agree (All levels)	Disagree (All levels)	Agree (All levels)	Disagree (All levels)
<b>Q6 - Utilities</b>	70.6%	23.2%	50.0%	35.5%
<b>Q7 – Council Tax</b>	59.8%	34.8%	38.7%	37.1%
<b>Q9 - Storage</b>	50.9%	34.8%	26.2%	44.3%
<b>Q11 – Licence Fee</b>	69.7%	21.5%	41.0%	22.9%
<b>Q13 – Licence Fee Rate</b>	LHA	Median Rate	LHA	Median Rate
	71.7%	28.3%	66.0%	34.0%

BAME respondents were supportive of the utilities, council tax and licence fee elements but less enthusiastic than non-BAME people. They disagreed with charging for storage, whereas non-BAME respondents did not. Whilst supportive of the LHA rate, relatively more BAME respondents supported the Median rate than non-BAME respondents.

It can be assumed that BAME people are less supportive of the policy than non-BAME people because of race however comparing the data across both tables reveals that the lower levels of enthusiasm may well be down to household's accommodation status rather than their race – BAME respondents were predominantly living in temporary accommodation and therefore will be directly impacted by the policy proposals.

## Coventry City Council Equality and Consultation Analysis (ECA) Form

The survey feedback was similar to the feedback obtained from attendees at the Coventry Refugee and Migrant Centre focus groups - The respondents stated that they felt that if you had a home you should expect to pay bills. They added, however, that they would not be able to afford to pay bills. One reason given was that, as they were asylum seekers, they received an income which was less than standard benefits which indicated that they may be in more support or the policy if they were in support of standard benefits. Another comment was that they could afford to pay bills if they were working but unable to afford it if they were not.

Consultation feedback has revealed that there may be some **negative equalities impact for BAME** people because of their over-representation in temporary accommodation when compared with the population as a whole however responses received revealed that BAME people were supportive of charging for most policy elements.

### Mitigations

The mitigations already suggested for other impacted groups (one-month's free storage, financial assessment on storage charges and the opportunity to apply for Direct Housing Payments) should help to mitigate some of this impact.

### Sex

Prior to consultation it was identified that 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 explored this potential impact during consultation through a focus group with women fleeing domestic violence and engagement with third sector organisations.

The consultation survey has also been analysed using filters based on sex. The analysis revealed 65.9% of respondents were females, 28.2% of respondents were male, 1.2% described their sex in another way and 4.7% preferred not to say. There was a higher percentage of women in temporary accommodation (76%) compared with respondents from the general public (65.9%).

Sex	All Respondents (%)	Respondents in TA (%)
Male	28.2	24
Female	65.9	76
In another way	1.2	0
Prefer not to say	4.7	0

Analysis of the opinions held based on sex showed responses differed substantially between male and female respondents. There were not enough respondents who identified differently to draw any strong conclusions. The below table details the differences between male and female respondents.

	Male		Female	
	Agree (All levels)	Disagree (All levels)	Agree (All levels)	Disagree (All levels)

## Coventry City Council Equality and Consultation Analysis (ECA) Form

<b>Q6 - Utilities</b>	56.3%	33.4%	68.8%	25.9%
<b>Q7 – Council Tax</b>	43.8%	47.9%	57.1%	32.1%
<b>Q9 - Storage</b>	41.6%	45.9%	21.3%	35.8%
<b>Q11 – Licence Fee</b>	58.4%	25.1%	61.2%	21.6%
<b>Q13 – Licence Fee Rate</b>	LHA	Median Rate	LHA	Median Rate
	78.9%	21.1%	68.7%	31.3%

Though both groups were in favour of People in Temporary Accommodation paying for utilities and a licence fee, female respondents were more enthusiastic. Both groups were not in favour of the proposal to start charging for storage, however males were more balanced between agreement and disagreement. Males were not in favour of charging for Council Tax, whereas females were. Both groups favoured the LHA, though males were more greatly in favour. Consequently, males were not in favour of charges for Council Tax or storage costs, but were in favour of charges for utilities and rent contributions. Females were in general more supportive than males, and were supportive of all proposals except charging for storage costs.

### Consultation Responses

During consultation some respondents expressed concern over the storage element of the policy and its potential impact on people fleeing domestic violence (the majority of which are women):

*“There is an expectation that tenants could store their belongings in another way if charges are introduced, eg using family/friends instead. We would note that this won’t always be possible, for example those escaping DV may not have a support network they can use in this way.”*

However, other respondents stated that people fleeing domestic violence often leave without any belongings and therefore may not have anything placed into storage.

*“i was in temporary accommodation a number of years ago and still got all my benefits, as i had left my husband, i had nothing but what me and the children stood up in. but as i got all my benefits the first payment went on clothes, i was sensible and kept buying mop bucket/ plates etc, but others just spent it as they had no bills to pay - everybody else has to pay, why should they have extra money in their pockets when within their benefits they get paid towards bills”*

Analysis of the survey equalities data and text entries has revealed there may be some **negative equalities impact on women** fleeing domestic violence however women were more supportive of the policy than men.

### Mitigations

During focus groups and workshops, Council Officers discussed any potential impact, and mitigations should they materialise. In addition, the online survey has been analysed and solutions suggested have been discussed. The following mitigations are being put forward:

1. **Storage Costs:** A one-month grace period for every household placing furniture into storage is granted to allow them time to settle into temporary accommodation and carry out personal budgeting.



## Coventry City Council Equality and Consultation Analysis (ECA) Form

*“To help with the above affordability issues, we suggest there could be a grace period for keeping items in storage without charge while a household is in TA.”*

2. **Storage Costs:** A financial assessment will be carried out to ascertain how much a household can afford to pay. The repayment costs of storage will spread over a longer period of time taking into account the affordable amount.

*“We understand that households will not be asked to pay these costs in full if affordability checks show that they are unaffordable. We strongly support this”*

3. **Lack of Essential Items:** Households who have no, or few, essential items due to their homelessness status (for example, because they have left a domestically abusive relationship) can make an application for a Community Support Grant.

### Sexual Orientation

Data analysis prior to consultation revealed a high number of ‘blank’ and ‘other’ responses on Homelessness Applications which made assessing the potential equality impact based on sexual orientation difficult.

During consultation the project team reached out to the LGBT+ community through Coventry Pride to try and gain insight into any potential equality impact. This activity resulted in a good response from the community with 8.4% of respondents identifying as Lesbian, Gay, Bisexual, Queer or Asexual (4% of respondents in TA identified as Bisexual).

Sexual Orientation	All Respondents (%)	Respondents in TA (%)
Heterosexual/Straight	74.4	88
Prefer not to say	17.9	8
Bisexual	3.0	4
Asexual	1.8	0
Gay Man	1.2	0
Gay Woman/Lesbian	1.2	0
Queer	0.6	0
Other	0	0

None of the free text responses in the consultation survey indicated an equalities impact based on sexual orientation therefore survey responses were filtered based on sexual orientation to investigate whether there is a difference in opinion between heterosexual and non-heterosexual people.

	Heterosexual		Non-Heterosexual	
	Agree (All levels)	Disagree (All levels)	Agree (All levels)	Disagree (All levels)
<b>Q6 - Utilities</b>	64%	27.2%	84.7%	15.4%
<b>Q7 – Council Tax</b>	56%	33.6%	53.9%	46.2%
<b>Q9 - Storage</b>	41.9%	36.8%	46.2%	46.2%
<b>Q11 – Licence Fee</b>	58.4%	20.8%	75%	25%

## Coventry City Council Equality and Consultation Analysis (ECA) Form

Q13 – Licence Fee Rate	LHA	Median Rate	LHA	Median Rate
	70.1%	29.9%	72.7%	27.3%

Analysis has revealed that non-heterosexual people are more supportive of the utilities, storage and licence fee elements of the policy than heterosexual people, whilst heterosexual people are more supportive of charging for council tax than non-heterosexual people. **No equalities impact** has been identified based on sexual orientation.

### Care Leavers and Armed Forces

Whilst not protected characteristics, analysis was also carried out to look any potential impact on care leavers and armed forces. Analysis found that 3.7% of respondents were care leavers (4.2% lived in Temporary Accommodation) and 12% had been or had a close family member who had been a member of the armed forces (12.5% of people living in temporary accommodation).

The analysis found no mention of an impact on these groups other than a concern around affordability for people under the age of 25 (discussed in under the 'Age' section of this report). Analysis found no equalities impact on this group as a direct result of the implementation of this policy.

### Outcome of equality impact

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#### 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

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**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.*

The equalities analysis has indicated both potential positive and negative equality implications of implementing a temporary accommodation charging policy in Coventry. The consultation process identified the following **negative equality impacts** on people with the following protected characteristics:

## Coventry City Council Equality and Consultation Analysis (ECA) Form

- **Age:** Concerns were expressed that the levelling charges would impact on parent's ability to get children to school thus impacting on the child's educational attainment. Especially, under the circumstances when the Council places children in temporary accommodation far from their school.
- **Age and/or disability:** concerns were raised regarding the cost of utilities and the impact on people with higher energy needs (children and people with disabilities such as COPD). Especially if the temporary accommodation used by the Council is of low energy efficiency and if the Council choose to install (more expensive) pre-payment meters.
- **Disability:** Concerns were raised that charging for removals and storage could either cause or exacerbate mental health conditions, during what is already a difficult time.
- **Sex:** Some respondents expressed the view that the storage element could negatively impact people fleeing domestic violence (predominantly women) as they may not have support networks available to help store belongings whilst others' felt they were less likely to be impacted as they often leave without any belongings.

Respondents to the consultation mainly provided more generic positive and negative feedback on the proposals which could apply to all protected characteristics.

Some respondents to the consultation expressed concern that the proposed policy would negatively affect already vulnerable people and/or families; people/families who are already experiencing financial difficulties/poverty, people with physical and mental disabilities and discourage people wanting to leave domestic violence and abusive relationships.

**Positive equality impacts:** Some respondents to the consultation felt that the proposals provided a positive opportunity to support people living in temporary accommodation to develop or regain a sense of personal and financial responsibility for their day to day lives. The overarching benefit of the policy would be potentially increasing the sustainability of longer-term accommodation options for those who have experienced homelessness.

Some respondents expressed the view that the current situation could be widening inequality between people living in temporary accommodation and those who do not – they felt the money currently being spent would be better spent on in other areas, such as adult social care.

### Mitigations

Following consultation analysis and discussions with third sector organisations the following mitigations are recommended:

- **Storage Costs:** It is recommended a one-month grace period for every household placing furniture into storage is granted to allow households time to settle into temporary accommodation and carry out personal budgeting.
- **Storage Costs:** A financial assessment will be carried out to ascertain how much a household can afford to pay. The repayment costs of storage will spread over a longer period of time taking into account the affordable amount.
- **Utility Costs:** A working group has been established to explore the potential impact of charging for utilities on children, and other vulnerable groups, alongside mitigations. The working group will explore the best form of payment method (bills or pre-payment meters or a mix of the two) alongside other advice, support and/or mitigations.
- **Travel Costs:** The Council will explore other financial support options for supporting households in temporary accommodation with children whose current school is not located near their current accommodation (e.g. prevention pot or funding via education service)

## Coventry City Council Equality and Consultation Analysis (ECA) Form

Households on low incomes can make an application for Council Tax Support, whilst households in receipt of full or partial housing benefit can apply for a Discretionary Housing Payment to help with housing and storage costs.

The newly commissioned support providers will also actively work with people and families in temporary accommodation to understand the policy, their responsibilities and support people with their budgeting skills in order to mitigate where possible any overall negative impacts.

A review of the revised policy will be undertaken one year after implementation which will include a review of actual ECA impact.

### Approvals from Director and Cabinet Member

**Name of ECA Author** Samantha Richardson

**Date** 13/02/2020

**Director:**

**Cabinet Member:**

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

Name	Date	Chair	Decision taken
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### *Next steps*

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

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