

General Equality Impact Assessment (EIA) Form

Support:

An [EIA toolkit](#), [workshop content](#), and guidance for completing an [Equality Impact Assessment \(EIA\) form](#) are available on the [EIA page](#) of the [EDI Internal Hub](#). Please read these before completing this form.

For enquiries and further support if the toolkit and guidance do not answer your questions, contact the Equality, Diversity, and Inclusion (EDI) team by emailing Equalities@Brighton-Hove.gov.uk. If your request is urgent, please mention this in the subject line of your email so we can support as required.

Processing Time:

- EIAs can take up to 10 business days to approve after a completed EIA of a good standard is submitted to the EDI Team. This is not considering unknown and unplanned impacts of capacity, resource constraints, and work pressures on the EDI team at the time your EIA is submitted.
- If your request is urgent, we can explore support exceptionally on request.
- We encourage improved planning and thinking around EIAs to avoid urgent turnarounds as these make EIAs riskier, limiting, and blind spots may remain unaddressed for the 'activity' you are assessing.

Process:

- Once fully completed, submit your EIA to the Equalities team by emailing the Equalities inbox and copying in your Head of Service, Business Improvement Manager (if one exists in your directorate), any other relevant service colleagues to enable EIA communication, tracking and saving.
- Your EIA will be reviewed, discussed, and then approved by the assigned EDI Officer and after seeking additional approval as appropriate for your EIA.
- Only approved EIAs are to be attached to Committee reports. Unapproved EIAs are invalid.

1. Assessment details

Throughout this form, 'activity' is used to refer to many different types of proposals being assessed.

Read the [EIA toolkit](#) for more information.

Name of activity or proposal being assessed:	Use of Housing Revenue Account (HRA) voids as Temporary Accommodation Until May 2027
Directorate:	Homes & Adult Social Care
Service:	Temporary & Supported Accommodation
Team:	Temporary Accommodation
Is this a new or existing activity?	Existing (extension to current short term arrangements)
Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	Yes

2. Contributors to the assessment (Name and Job title)

Responsible Lead Officer:	Justine Harris, Head of Tenancy Services / Alice Morel, Head of Homelessness & Housing Options
Accountable Manager:	Harry Williams, Director of Housing People Services
Additional stakeholders collaborating or contributing to this assessment:	

3. About the activity

Briefly describe the purpose of the activity being assessed:

The purpose is to use Housing Revenue Account voids as Temporary Accommodation for a fixed term period to 1 May 2027, this is a continuation of the interim position between 19 January 2026 to 1 May 2026.

During the interim period as of the 31st March 2026, 35 council homes have been repurposed as temporary accommodation, with a further 21 expected to become available by 1 May, bringing the total to 56 homes. A pipeline of a further 59 properties is being progressed by the council's Empty Homes team.

What are the desired outcomes of the activity?

The interim use is expected to achieve £0.757m (with a full year effect) of savings to help address an anticipated in-year overspend of £4.8 million on nightly paid Temporary Accommodation, with the benefit of producing more stable and better-quality housing for newly homeless households, promoting better health and educational outcomes for homeless households.

In the interim period the projected savings to the General Fund from making full use of all HRA void properties available between 19th January 2026 and 1st May 2026 amount to £0.092m for 2025/26 and £0.665m 2026/27, £0.757m per annum in total.

Which key groups of people do you think are likely to be affected by the activity?

Council tenants, households on the housing register and people experiencing homelessness will most likely be affected by this activity.

4. Consultation and engagement

What consultations or engagement activities have already happened that you can use to inform this assessment?

- For example, relevant stakeholders, groups, people from within the council and externally consulted and engaged on this assessment. **If no consultation** has been done or it is not enough or in process – state this and describe your plans to address any gaps.

Relevant internal stakeholders, including the Cabinet Member for Housing, have been kept informed of the increasing cost of Temporary Accommodation, the anticipated in-year overspend, and the intended interim approach to the use of HRA voids.

A full six-week public consultation on the interim use of council-owned homes as temporary accommodation was carried out from 17 February 2026 to 1 April 2026 via the YourVoice Platform. This received around 370 responses. The consultation sought feedback from households on the housing register, people living in temporary accommodation and council tenants on the impacts of the policy on individuals, families and communities. A range of engagement methods were used to support participation, including the council's online consultation hub, articles in Homing In, targeted bulletins and direct communications to households most directly affected. In parallel, the proposals were considered by the People Overview & Scrutiny Committee on 17 March 2026, providing structured challenge and feedback from Members as part of the consultation process.

5. Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this activity? Consider all possible intersections.

(State Yes, No, Not Applicable as appropriate)

Age	Yes
Disability and inclusive adjustments, coverage under equality act and not	Yes
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	Yes
Religion, Belief, Spirituality, Faith, or Atheism	Yes
Gender Identity and Sex (including non-binary and Intersex people)	Yes
Gender Reassignment	Yes
Sexual Orientation	Yes
Marriage and Civil Partnership	No
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	Yes
Armed Forces Personnel, their families, and Veterans	Yes
Expatriates, Migrants, Asylum Seekers, and Refugees	Yes
Carers	Yes
Looked after children, Care Leavers, Care and fostering experienced people	Yes
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	Yes
Socio-economic Disadvantage	Yes
Homelessness and associated risk and vulnerability	Yes
Human Rights	Yes
Another relevant group (please specify here and add additional rows as needed)	Yes, including:

	<ul style="list-style-type: none"> • Ex-offenders and people with unrelated convictions • Lone parents • People experiencing homelessness
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Additional relevant groups that may be widely disadvantaged and have intersecting experiences that create exclusion and systemic barriers may include:

- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy, numeracy and /or digital barriers
- People on a low income and people living in the most deprived areas
- People with experience of or living with addiction and/ or a substance use disorder (SUD)

If you answered “NO” to any of the above, how will you gather this data to enable improved monitoring of impact for this activity?

We have no evidence to suggest that people who have experienced FGM or modern day slavery or are sex workers would be impacted.

What are the arrangements you and your service have for monitoring, and reviewing the impact of this activity?

Data is collected as part of a household’s application for help with homelessness or to join the housing register. Customer feedback will be monitored for any issues arising.

The implementation of the fixed term measure will be overseen by a panel of relevant service managers - a process established through the introduction of the interim project in early 2026 - who will oversee letting decisions to ensure consistency, fairness and transparency. The panel will consider exceptions to the policy for letting HRA voids as Temporary Accommodation on a case-by-case basis, with clear criteria and records maintained for audit purposes.

6. Impacts

Advisory Note:

- **Impact:**
 - Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination), and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
 - These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean:** Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment:** If there is impact on all groups equally, complete **only** the cumulative assessment section.
- **Data analysis and Insights:**

- In each protected characteristic or group, in answer to the question ‘If “YES”, what are the positive and negative disproportionate impacts?’, describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
- Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on different, and intersecting populations impacted by your activity, especially considering for [Health inequalities](#), review guidance and inter-related impacts, and the impact of various identities.
- For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.
- **Data Sources:**
 - **Consider a wide range (including but not limited to):**
 - [Population and population groups](#)
 - [Census 2021 population groups Infogram: Brighton & Hove by Brighton and Hove City Council](#)
 - [Census](#) and [local intelligence data](#)
 - Service specific data
 - Community consultations
 - Insights from customer feedback including complaints and survey results
 - Lived experiences and qualitative data
 - [Joint Strategic Needs Assessment \(JSNA\) data](#)
 - [Health Inequalities data](#)
 - Good practice research
 - National data and reports relevant to the service
 - Workforce, leaver, and recruitment data, surveys, insights
 - Feedback from internal ‘staff as residents’ consultations
 - Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
 - Insights, gaps, and data analyses on ‘who’ the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.
 - Learn more about the [Equality Act 2010](#) and about our [Public Sector Equality Duty](#).

6.1 Age

<p>Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: older people, people who may be housebound, those under 16, young adults, with other intersections.</p>	<p>Yes, Older people will not be as greatly impacted as older people accomodation is not included. Families with younger children may be subject to short term over crowding. This to be balanced against the nationally recognised impact on children experiencing insecure accommodation (such as hotels and other block booked).</p>
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The majority of main applicants on the housing register are aged 20–49. Children are significantly over-represented among homeless households:

Age Group	Council Interest		Homeless		Homeseeker		Transfer		All four queues	
	No. of live applicants	% of live applicants	No. of live applicants	% of live applicants	No. of live applicants	% of live applicants	No. of live applicants	% of live applicants	No. of live applicants	% of live applicants
<0 or (blank)		0.00%		0.00%	1	0.05%		0.00%	1	0.02%
15-19	4	3.67%	5	0.33%	1	0.05%		0.00%	10	0.21%
20-24	35	32.11%	97	6.32%	57	2.77%	11	0.97%	200	4.13%
25-29	12	11.01%	174	11.33%	230	11.17%	52	4.57%	468	9.66%
30-34	5	4.59%	259	16.86%	317	15.39%	114	10.02%	695	14.35%
35-39	12	11.01%	242	15.76%	323	15.68%	187	16.43%	764	15.78%
40-44	7	6.42%	225	14.65%	287	13.93%	170	14.94%	689	14.23%
45-49	3	2.75%	167	10.87%	219	10.63%	112	9.84%	501	10.34%
50-54	10	9.17%	135	8.79%	147	7.14%	99	8.70%	391	8.07%
55-59	5	4.59%	88	5.73%	136	6.60%	119	10.46%	348	7.19%
60-64	4	3.67%	73	4.75%	115	5.58%	76	6.68%	268	5.53%
65-69	4	3.67%	21	1.37%	79	3.83%	67	5.89%	171	3.53%
70-74	4	3.67%	24	1.56%	65	3.16%	52	4.57%	145	2.99%
75-79	1	0.92%	12	0.78%	37	1.80%	30	2.64%	80	1.65%
80-84	1	0.92%	10	0.65%	22	1.07%	31	2.72%	64	1.32%
85-89	1	0.92%	4	0.26%	11	0.53%	10	0.88%	26	0.54%
90-94		0.00%		0.00%	7	0.34%	4	0.35%	11	0.23%
95-99	1	0.92%		0.00%	4	0.19%	4	0.35%	9	0.19%
100-104		0.00%		0.00%	1	0.05%		0.00%	1	0.02%
105-109		0.00%		0.00%	1	0.05%		0.00%	1	0.02%
Total	109	100.00%	1,536	100.00%	2,060	100.00%	1,138	100.00%	4,843	100.00%

In 2024, 39% of the city's homeless population were children, compared to 17% of the general population:

Age Group	Prevention duty owed (2020 to 2024)	Relief duty owed (2020 to 2024)	Main duty accepted (2020 to 2024)	Brighton & Hove Census 2021
16 to 24	9%	17%	18%	18%
25 to 34	25%	30%	28%	18%
35 to 44	26%	26%	25%	16%
45 to 54	20%	16%	15%	18%
55 to 64	11%	8%	9%	14%
65 plus	7%	3%	5%	17%
Total	100%	100%	100%	100%

Households with children are more likely to be owed a homelessness duty and to be placed in TA. 47% of households in TA at the end of 2024 had children, with a local rate (5.73 per 1,000 households) higher than the national average (3.5 per 1,000).

The scheme prioritises families, particularly those with children in education or with special needs, for in-city placements. This approach is designed to minimise disruption to schooling and maintain access to essential health and support services. It is well established that homelessness places children at a significant disadvantage, which is why statutory guidance restricts hotel placements for families to a maximum of six weeks. The fixed term action is expected to mitigate these negative impacts by enabling families to transition directly into stable, affordable accommodation, rather than experiencing multiple emergency placements.

The Council recognises the importance of this policy and has explicitly committed to moving households with children back into the city wherever possible. While it is not feasible to sustain this approach indefinitely, particularly during periods of exceptionally high demand, which may result in delays for some families, the welfare benefits for children are clear and substantial.

Moving families more quickly from unsuitable TA (e.g., B&Bs, out-of-area placements) is expected to improve health and educational attainment for children.

A temporary reduction in general needs housing is likely to increase waiting times for other families on the housing register. These families have stable accommodation all be it not secure tenancies. The practical impact will need to be assessed on a case-by-case basis; however, in general, delays will

correspond to a proportion of the housing which is used during the fixed term period, anticipated to be in the region of up to 20% of available housing over the term. The cap on the properties is 100 and it is anticipated that annually some 500 properties will be available. Certain properties such as sheltered are exempt.

Older people are less likely to be directly affected by the fixed term measure, as seniors housing is excluded from the scheme. However, there may be indirect impacts for older individuals who are carers for children. For those who do not wish to access seniors housing, their circumstances will be considered in relation to other vulnerabilities that may be exacerbated by age, ensuring that any additional needs are appropriately addressed.

6.2 Disability:

Does your analysis indicate a disproportionate impact relating to Disability, considering our anticipatory duty?	Yes
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

44% of people identified as homeless in the 2021 Census had a limiting long-term condition, compared to 19% citywide.

Disability-related support needs (overlapping categories) recorded at time of assessment for homeless application	Prevention duty owed (2020 to 2024)	Relief duty owed (2020 to 2024)	Main duty accepted (2020 to 2024)
History of mental health problems	27%	35%	37%
Learning disability	4%	5%	5%
Physical ill health and disability	23%	22%	30%
At least one of the above	42%	46%	54%

8.8% of applicants on the housing register have a mobility code, but this likely underestimates the true prevalence of disability, especially for non-physical or neurodivergent conditions:

Mobility Category	Council Interest		Homeless		Homeseeker		Transfer		All four queues	
	No. of live applicants	% of live applicants	No. of live applicants	% of live applicants	No. of live applicants	% of live applicants	No. of live applicants	% of live applicants	No. of live applicants	% of live applicants
1	5	4.59%	7	0.46%	8	0.39%	36	3.16%	56	1.16%
2	4	3.67%	21	1.37%	18	0.87%	73	6.41%	116	2.40%
3	8	7.34%	41	2.67%	67	3.25%	140	12.30%	256	5.29%
None	92	84.40%	1465	95.38%	1956	94.95%	883	77.59%	4396	90.77%
(blank)		0.00%	2	0.13%	11	0.53%	6	0.53%	19	0.39%
Total	109	100.00%	1536	100.00%	2060	100.00%	1138	100.00%	4843	100.00%

54% of main duty homeless applicants had at least one disability-related support need (mental health, learning disability, or physical ill health):

All support needs (overlapping categories) recorded at time of assessment for homeless application	Prevention duty owed (2020 to 2024)	Relief duty owed (2020 to 2024)	Main duty accepted (2020 to 2024)
Access to education, employment or training	3%	2%	1%
Alcohol dependency needs	4%	10%	7%
At risk of/has experienced abuse (non-domestic abuse)	2%	4%	4%
At risk of/has experienced domestic abuse	6%	12%	16%
At risk of/has experienced sexual abuse/exploitation	2%	3%	4%
Care leaver aged 18-20 years	0.3%	1%	1%
Care leaver aged 21+ years (retired category)	0.3%	1%	1%
Difficulties budgeting	7%	2%	2%
Drug dependency needs	4%	12%	7%
Former asylum seeker	2%	3%	3%
History of mental health problems	27%	35%	37%
History of repeat homelessness	3%	9%	5%
History of rough sleeping	2%	9%	3%
Learning disability	4%	5%	5%
Offending history	3%	11%	5%
Old age	3%	1%	2%
Physical ill health and disability	23%	22%	30%
Served in HM Forces	0.1%	0.3%	0.1%
Victim of modern slavery	0.3%	0.4%	0.3%
Young parent requiring support to manage independently	1%	1%	2%
Young person aged 16-17 years	0.3%	0.2%	0.2%
Young person aged 18-25 years requiring support	3%	5%	5%
At least one of the above	58%	68%	71%

All Temporary Accommodation must meet the council's lettable standard and be suitable for the specific needs of each household. In addition, the prioritisation matrix within the policy includes households who are vulnerable or have medical needs requiring frequent local treatment. A key objective of the scheme is to provide local accommodation for those who need to remain in the city for the reasons set out in the policy

In terms of physical disability mobility adapted properties are generally excluded from the scheme, unless in exceptional circumstances. The impact on these households is likely to be minimal, if at all. Disabled households who require mobility adapted properties, or Extra Care, will still be able to access these homes during the fixed term period. Adaptation to temporary accommodation units can be made if the circumstances warrant it or a move effected. Those newly homeless are known to have poor health outcomes due to the instability of accommodation which can be outside the area (for example). Health and education are identified as important factors in this policy and as such will benefit from not being in unstable or for instance short term hotel accommodation.

What [inclusive adjustments](#) are you making for diverse disabled people impacted? For example: those who are housebound due to disability or disabling circumstances, D/deaf, deafened, hard of hearing, blind, neurodivergent people, those with non-visible disabilities, and with access requirements that may not identify as disabled or meet the legal definition of disability, and have various intersections (Black and disabled, LGBTQIA+ and disabled).

The policy allows for a series of exemptions that on a case-by-case basis allow for properties to be excluded from the proposal and let to households on the housing register. The exemptions include:

- Where there is a serious safeguarding risk or urgent medical need and allocating an existing council tenant, a new property is deemed the only way to safeguard.
- Where there is a household with an assessed care and support need in residential or alternative care whose needs could be met within general needs accommodation
- Other exceptional circumstances to be assessed on a case-by-case basis.

- There will be benefit for those with non-mobility related disability as they will be given stable accommodation and will be within the city making access to medical services more accessible.

6.3 Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers):

Does your analysis indicate a disproportionate impact relating to ethnicity?	Yes
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If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Black and Racially Minoritised (BRM) groups are over-represented among homeless applicants: 36–39% of main duty applicants, compared to 26% of citywide residents

Ethnic Group	Prevention duty owed (2020 to 2024)	Relief duty owed (2020 to 2024)	Main duty accepted (2020 to 2024)	Brighton & Hove Census 2021
White UK/British	61%	67%	64%	74%
White Other	17%	11%	10%	12%
Black or Black British	5%	7%	8%	2%
Asian or Asian British	6%	5%	6%	5%
Mixed	3%	3%	3%	5%
Another ethnic group	8%	7%	9%	3%

BRM households are more likely to be in priority need due to dependent children and less likely due to mental health problems:

Priority need for Black or Racially Minoritised (BRM) households and White UK/British households accepted for a main housing duty	BRM households owed main duty 2020 to 2024	White UK/British households owed main duty 2020 to 2024
Priority need: household includes dependent children	39%	29%
Priority need: vulnerable as result of physical disability / ill health	16%	19%
Priority need: vulnerable as result of mental health problems	9%	19%
Priority need: homeless due to having fled domestic abuse	4%	4%
Priority need: former asylum seeker	3%	0%

National data shows higher rates of homelessness and overcrowding among Black, Asian, and Minority Ethnic households.

The use of HRA voids as Temporary Accommodation will reduce the risk of BRM families being placed far from cultural, faith, and community support networks

The policy may expedite more suitable housing for larger families living in Temporary Accommodation, which are more common in some ethnic groups.

However, if waiting times for general needs housing increase, BRM households on the register may be disproportionately affected: It is again a balancing exercise. Those with an accepted duty will have stability of housing with for instance a Court order required to evict them. Newly homeless households often face several moves to attain the same level of stable accommodation. This is made more difficult by any language barriers which might exist. It is believed that the tenant's journey for this group will be simpler if they are placed straight into HRA voids.

Age Group	Council Interest		Homeless		Homeseeker		Transfer		All four queues	
	No. of live applicants	% of live applicants	No. of live applicants	% of live applicants	No. of live applicants	% of live applicants	No. of live applicants	% of live applicants	No. of live applicants	% of live applicants
<0 or (blank)		0.00%		0.00%	1	0.05%		0.00%	1	0.02%
15-19	4	3.67%	5	0.33%	1	0.05%		0.00%	10	0.21%
20-24	35	32.11%	97	6.32%	57	2.77%	11	0.97%	200	4.13%
25-29	12	11.01%	174	11.33%	230	11.17%	52	4.57%	468	9.66%
30-34	5	4.59%	259	16.86%	317	15.39%	114	10.02%	695	14.35%
35-39	12	11.01%	242	15.76%	323	15.68%	187	16.43%	764	15.78%
40-44	7	6.42%	225	14.65%	287	13.93%	170	14.94%	689	14.23%
45-49	3	2.75%	167	10.87%	219	10.63%	112	9.84%	501	10.34%
50-54	10	9.17%	135	8.79%	147	7.14%	99	8.70%	391	8.07%
55-59	5	4.59%	88	5.73%	136	6.60%	119	10.46%	348	7.19%
60-64	4	3.67%	73	4.75%	115	5.58%	76	6.68%	268	5.53%
65-69	4	3.67%	21	1.37%	79	3.83%	67	5.89%	171	3.53%
70-74	4	3.67%	24	1.56%	65	3.16%	52	4.57%	145	2.99%
75-79	1	0.92%	12	0.78%	37	1.80%	30	2.64%	80	1.65%
80-84	1	0.92%	10	0.65%	22	1.07%	31	2.72%	64	1.32%
85-89	1	0.92%	4	0.26%	11	0.53%	10	0.88%	26	0.54%
90-94		0.00%		0.00%	7	0.34%	4	0.35%	11	0.23%
95-99	1	0.92%		0.00%	4	0.19%	4	0.35%	9	0.19%
100-104		0.00%		0.00%	1	0.05%		0.00%	1	0.02%
105-109		0.00%		0.00%	1	0.05%		0.00%	1	0.02%
Total	109	100.00%	1,536	100.00%	2,060	100.00%	1,138	100.00%	4,843	100.00%

6.4 Religion, Belief, Spirituality, Faith, or Atheism:

Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?	Yes
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Muslims are over-represented among homeless households (12% of main duty applicants vs. 3% of citywide residents). It is also noted that half of the applicants have no religious beliefs and so they will benefit. Please also see the comments above in terms of race as they also apply in part here.

Religion or belief	Prevention duty owed (2020 to 2024)	Relief duty owed (2020 to 2024)	Main duty accepted (2020 to 2024)	Brighton & Hove Census 2021
Buddhist	1%	1%	2%	1%
Christian	27%	22%	21%	31%
Hindu	0%	0%	0%	1%
Jewish	0%	0%	0%	1%
Muslim	8%	12%	12%	3%
No religion	50%	52%	50%	55%
Other	4%	4%	4%	1%
Prefer Not To Say	10%	9%	11%	7%
Sikh	0.3%	0.1%	0.1%	0.1%
Total	100%	100%	100%	100%

Decisions to place someone into Temporary Accommodation can affect proximity to places of worship. Further, faith-based needs (e.g., dietary requirements, single-sex accommodation) may not always be met in TA, particularly nightly paid TA where facilities are often shared or limited.

In-city placements allow households to remain close to distinct places of worship and faith communities.

Reduced use of nightly paid TA will improve access to cooking and washing facilities for households. This may be of particular importance to certain faiths with strict dietary and or other requirements.

Consultation during the interim period has not attracted comments specifically around faith-based needs being overlooked in the allocation or adaptation of voids.

6.5 Gender Identity and Sex:

Does your analysis indicate a disproportionate impact relating to Gender Identity and Sex (including non-binary and intersex people)?	Yes
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Women are more likely to be main applicants for homelessness prevention or main duty (55–60%), while men are more likely to present at the relief stage or as rough sleepers. Women will often be head of household and have families with dependent children or where women have a caring role. Therefore, there will be multiple protected characteristics in one household.

Sex	Prevention duty owed (2020 to 2024)	Relief duty owed (2020 to 2024)	Main duty accepted (2020 to 2024)	Brighton & Hove Census 2021
Female	60%	37%	55%	51%
Male	39%	62%	44%	49%
Other	1%	1%	1%	-

Trans and non-binary people are over-represented among homeless applicants compared to the general population (1.8% vs. 0.2%):

Gender identity	Prevention duty owed (2020 to 2024)	Relief duty owed (2020 to 2024)	Main duty accepted (2020 to 2024)	Brighton & Hove Census 2021
No (gender identity different from sex registered at birth)	1.1%	1.5%	1.8%	0.2%
Yes (gender identity same as sex registered at birth or not recorded)	98.9%	98.5%	98.2%	99.8%

Our computerised record system was not able to produce a report on the sex/gender of the applicants on the Housing Register. Data on the title of main applicants in each priority queue on the Housing Register has been used as a proxy for sex/gender and is set out below. Based on this data, women are also more likely to be main applicants on the housing register:

Title	Council Interest		Homeless		Homeseecker		Transfer		All four queues	
	No. of live applicants	% of live applicants	No. of live applicants	% of live applicants	No. of live applicants	% of live applicants	No. of live applicants	% of live applicants	No. of live applicants	% of live applicants
Miss	30	27.52%	298	19.40%	650	31.55%	413	36.29%	1391	28.72%
Mr	49	44.95%	286	18.62%	783	38.01%	302	26.54%	1420	29.32%
Mrs	6	5.50%	66	4.30%	187	9.08%	226	19.86%	485	10.01%
Ms	12	11.01%	191	12.43%	168	8.16%	150	13.18%	521	10.76%
Mx		0.00%	5	0.33%		0.00%		0.00%	5	0.10%
Other	1	0.92%	9	0.59%	9	0.44%	2	0.18%	21	0.43%
(blank)	11	10.09%	681	44.34%	263	12.77%	45	3.95%	1000	20.65%
Total	109	100.00%	1536	100.00%	2060	100.00%	1138	100.00%	4843	100.00%

The policy prioritises families, many of which include a woman as main/lead applicant, and includes criteria for those fleeing domestic abuse, which women are more typically survivors of compared to men.

Women on the housing register will also be affected by this policy, as the temporary reduction in available properties during the fixed term will limit opportunities for secure tenancies. However, those impacted will continue to have access to stable accommodation through Temporary Accommodation placements. The primary disadvantage is the absence of a secure tenancy, which is mainly a matter of financial security. It is noted that one of the primary objectives is to support households around better health and educational attainment. It is therefore believed that women in newly homeless households will be better positioned by having faster access to stable accommodation.

6.6 Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Reassignment ?	Yes
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

<p>Trans people have a higher risk of homelessness and report poor experiences in some homeless services, including safety concerns whilst living in Temporary Accommodation. This was identified in the Trans Needs Assessment undertaken by the council in 2015.</p> <p>Consultation on the Homelessness & Rough Sleeping Strategy identified the following issue for this group:</p> <ul style="list-style-type: none"> • Hate crime against trans people and the need for a zero-tolerance policy in social and supported housing. • Safety issues, particularly in emergency / interim and other temporary accommodation. • Fear of discrimination when approaching services for support. • A clearer pathway for trans survivors of domestic abuse and sexual violence. • The need for trans friendly accommodation and service provision in the city. <p>There is limited data on Trans people on the housing register. It is not possible to fully determine the disproportionate impact on this group in this initial EIA. Formal consultation carried out during the interim period, has not raised particular impacts on Trans people on the housing register. However, during the fixed term period the panel can consider individual needs and safety for trans applicants. It is probable that they will feel safer in a council accommodation.</p>
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6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation ?	Yes
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

<p>Brighton & Hove has the highest rate of LGBTQ+ residents in England (10.7%), according to the Census 2021, which nationally 3.7% of respondents identified as lesbian, gay, bisexual or other sexual orientation across England and Wales.</p> <p>LGBTQ+ people are at greater risk of homelessness, often reported as due to family rejection or discrimination:</p> <table border="1"> <thead> <tr> <th>Sexual Orientation (excluding prefer not to say)</th> <th>Prevention duty owed (2020 to 2024)</th> <th>Relief duty owed (2020 to 2024)</th> <th>Main duty accepted (2020 to 2024)</th> <th>Brighton & Hove Census 2021</th> </tr> </thead> <tbody> <tr> <td>Bisexual</td> <td>1%</td> <td>1%</td> <td>1%</td> <td>4%</td> </tr> <tr> <td>Gay / Lesbian</td> <td>4%</td> <td>6%</td> <td>5%</td> <td>6%</td> </tr> <tr> <td>Heterosexual / Straight</td> <td>91%</td> <td>88%</td> <td>89%</td> <td>89%</td> </tr> <tr> <td>Other sexual orientation</td> <td>4%</td> <td>5%</td> <td>5%</td> <td>1%</td> </tr> <tr> <td>Total</td> <td>100%</td> <td>100%</td> <td>100%</td> <td>100%</td> </tr> </tbody> </table> <p>The prioritisation of households placed out of city may help of LGBTQ+ people maintain support networks within the city.</p>	Sexual Orientation (excluding prefer not to say)	Prevention duty owed (2020 to 2024)	Relief duty owed (2020 to 2024)	Main duty accepted (2020 to 2024)	Brighton & Hove Census 2021	Bisexual	1%	1%	1%	4%	Gay / Lesbian	4%	6%	5%	6%	Heterosexual / Straight	91%	88%	89%	89%	Other sexual orientation	4%	5%	5%	1%	Total	100%	100%	100%	100%
Sexual Orientation (excluding prefer not to say)	Prevention duty owed (2020 to 2024)	Relief duty owed (2020 to 2024)	Main duty accepted (2020 to 2024)	Brighton & Hove Census 2021																										
Bisexual	1%	1%	1%	4%																										
Gay / Lesbian	4%	6%	5%	6%																										
Heterosexual / Straight	91%	88%	89%	89%																										
Other sexual orientation	4%	5%	5%	1%																										
Total	100%	100%	100%	100%																										

LGBTQ+ people are underrepresented on the council's housing register, with only 6.5% of households identifying as lesbian, gay, bisexual or other sexual orientation:

Sexual Orientation	Council Interest		Homeless		Homeseeker		Transfer		All four queues	
	No. of live applicants	% of live applicants	No. of live applicants	% of live applicants	No. of live applicants	% of live applicants	No. of live applicants	% of live applicants	No. of live applicants	% of live applicants
Bisexual	4	3.67%	56	3.65%	80	3.88%	30	2.64%	170	3.51%
Gay	1	0.92%	10	0.65%	73	3.54%	23	2.02%	107	2.21%
Heterosexual	71	65.14%	509	33.14%	1162	56.41%	511	44.90%	2253	46.52%
Lesbian		0.00%	6	0.39%	29	1.41%	5	0.44%	40	0.83%
Not Declared	18	16.51%	665	43.29%	300	14.56%	286	25.13%	1269	26.20%
Other		0.00%	4	0.26%	2	0.10%	3	0.26%	9	0.19%
Prefer not to say	10	9.17%	72	4.69%	194	9.42%	112	9.84%	388	8.01%
(blank)	5	4.59%	214	13.93%	220	10.68%	168	14.76%	607	12.53%
Total	109	100.00%	1536	100.00%	2060	100.00%	1138	100.00%	4843	100.00%

The impact of this policy on this group may not be fully known, especially through under-reporting. Consultation on the interim policy with households on the housing register has not raised issues specifically relating to the intersection of LGBTQ+ and housing precarity.

6.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	No
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If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Being married or in a civil partnership is a protective factor against homelessness; single people are over-represented among homeless populations.

The policy does not directly discriminate based on marital status.

Whilst still considered a priority, single people are less likely to benefit from the fixed term policy, as families with children or care needs have a higher priority weighting.

6.9 Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum):

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	Yes
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If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Of the 2,205 households who were accepted for the main duty between the 2020 and 2024 calendar years combined, 1.5% were recorded as in priority need because the applicant was or the household included a pregnant woman.

Pregnant people and parents with young children are prioritized for in-city placements, reducing health risks and supporting family stability.

Our computerised record system does not record whether applicants on the Housing Register are pregnant.

The impact of this policy on this group may not be fully known. Consultation on the interim policy with households on the housing register included respondents with growing families sharing concerns of any consequential delays to suitable housing allocation.

6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	Yes
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The 2021 Census estimates that there are 5,618 people in Brighton and Hove who have previously served in the armed forces. This is around 2.4% of the population.

Housing service data on support needs for applicants between the 2020 and 2024 calendar years combined indicates that those recorded as having served in the armed forces were 0.1% of those owed a prevention duty, 0.3% of those owed a relief duty and 0.1% of those accepted for the main housing duty if homelessness was not prevented or relieved. The total number of applicants was 21, of which 3 initially owed a prevention duty and 18 a relief duty (with 3 of those who were owed a relief duty going on to be accepted for the main housing duty).

Our computerised record system does not record whether applicants on the Housing Register are Armed Forces Personnel, their families, or Veterans, however there are only 3 households on the Council’s Housing Register with an armed forces band reason – these households may be on the register but under a different band reason.

The policy does not exclude veterans and may benefit veterans who are part of a wider household with dependent children.

It may also benefit veterans who have complex mental health needs such as PTSD as the health outcome is a relevant factor in allocating properties.

The impact of this policy on this group may not be fully known. Consultation on the interim policy with households on the housing register has not raised additional expected effects for this group.

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)	Yes
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Analysis of housing service data on the nationality of homeless main applicants between the 2020 and 2024 calendar years combined indicates that a sizeable minority were recorded as nationals of a country

other than the UK, who were 19% (529 of 2,754) of those owed a prevention duty, 16% (945 of 5,741) of those owed a relief duty and 17% (383 of 2,205) of those accepted for the main housing.

Migrant and refugee families face additional barriers (language, discrimination).

There are considerable support networks for migrants and refugees and frequently in-city placements supports integration and access to services.

Our computerised record system does not record whether applicants on the Housing Register are expatriates, migrants, asylum seekers and refugees.

The impact of this policy on this group may not be fully known. However, the belief is that it will benefit, in particular, migrant and other households with children. It should be noted that Asylum seekers must have recourse to public funds to be given housing through the homeless route. They may be owed duty by Children's service or adult social care depending on need. There is a service level agreement in place to address this, which may or may not include the voids.

6.12 [Carers](#):

Does your analysis indicate a disproportionate impact relating to [Carers](#) (Especially considering for age, ethnicity, language, and various intersections).

Yes

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Data from the Census 2021 indicates that 20,804 people in the city provide unpaid care for someone who has long-term physical or mental ill-health conditions, illness or problems related to old age

Carers can include people who have care needs themselves or be young carers looking after a parent or other family member. Financial vulnerability increases risk of homelessness in this group. Around 28% of carers in the UK live in relative poverty after housing costs, with 1.2 million unpaid carers living in poverty. Only 51% of informal carers aged 16+ are in employment compared with 60% of the general population aged 16+.

Data on this protected characteristic is not recorded in the data held on homelessness applications and assessments in a structured way that can readily be analysed. Further, our computerised record system does not record whether applicants on the Housing Register are carers.

The impact of this policy on this group may not be fully known. Many respondents to the consultation on the interim policy with households on the housing register illustrated the effects of care provision in an uncertain housing situation. There were also concerns about the potential for the policy to extend waiting times. As is repeated in this EIA, there is a balance: some households may suffer extended wait times in homes which are not ideal, however other new entrants into the system will have access to more stable accommodation. As part of the desired outcome is health related this is likely to be of benefit to carers who will support the people they care for with access to healthier choices.

6.13 Looked after children, Care Leavers, Care and fostering experienced people:

Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections).

Yes

Also consider our [Corporate Parenting Responsibility](#) in connection to your activity.

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

In 2023 a total of 345 children were in care in Brighton & Hove. The number of children in care varies from year to year but has fallen over time in the city. In the same year, 163 children ceased to be looked after by the local authority.

Analysis of housing service data on support needs for homelessness applicants between the 2020 and 2024 calendar years combined indicates that those recorded as care leavers at the time of their initial assessment were 0.6% (16 of 2,754) of those owed a prevention duty, 2.5% (146 of 5,741) of those owed a relief duty and 2.4% (53 of 2,205) of those accepted for the main housing duty.

Brighton & Hove City Council's as corporate parent has collective responsibility to act as a good parent for the children and young people in its care, including care leavers. This legal duty involves all council employees, elected members, and commissioned services supporting these young people's education, health, welfare, and overall well-being

The interim policy prioritised Care Leavers for letting to HRA voids as Temporary Accommodation, allowing for Care Leavers to access better quality and more affordable accommodation.

Our computerised record system does not record whether applicants on the Housing Register are Care Leavers, however there are 44 households on the register with the care leaver priority band reason.

The impact of this policy on this group may not be fully known initially – more research would be needed around health outcomes. Some may well also be in education as often the education of those who have been through the care system will be disrupted or less than optimal. Many care leavers return to education post 18.

6.14 Homelessness:

Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)

Yes

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

A detailed review of homelessness in the city has informed the development of the interim policy and supported the drafting of this Equality Impact Assessment. Data on homelessness and rough sleeping [can be found in the review document](#).

Intersections between homelessness and protected characteristics are identified in other sections of this equality impact assessment. Two categories of risk in relation to protected characteristics and their intersections need to be highlighted here: the risk of becoming homeless and increased risk when homeless. Other factors, not related to characteristics protected under the Equality Act 2010, are also likely to compound risk, for example, substance misuse, employment status, educational achievement, and personal circumstances.

The interim pilot directly targeted those at highest risk, aiming to improve outcomes and reduce the negative impacts of homelessness; however, some groups may remain in less suitable TA as supply of HRA voids is limited.

6.15 Domestic and/or Sexual Abuse and Violence Survivors, people in vulnerable situations:

Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?	Yes
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Housing service data on homelessness applications between the 2020 and 2024 calendar years combined includes the main reason for the applicant’s loss of their settled home, with a category for cases where they are a victim of domestic abuse. This applied to 4% (104 of 2,754) of households owed a prevention duty and 9% (543 of 5,741) of those owed a relief duty. Of the 2,205 households whose homelessness was not prevented or relieved and who were accepted for the main duty during the same period, 4% were recorded as in priority need specifically because the applicant fled domestic abuse.

The proportion of people who are at risk of and/or have experienced domestic abuse is higher (16%) based on the data on additional support needs for homelessness applicants. The data on additional support needs includes three categories relating to different types of abuse, as shown in the table below. This shows that significant proportions of homeless applicants are likely to be survivors of domestic, sexual and/or other forms of abuse, ranging from 8% of those owed a prevention duty, 17% of those owed a relief duty, and 20% of those accepted for the main housing duty.

All support needs (overlapping categories) recorded at time of assessment for homeless application	Prevention duty owed (2020 to 2024)	Relief duty owed (2020 to 2024)	Main duty accepted (2020 to 2024)
At risk of/has experienced abuse (non-domestic abuse)	2%	4%	4%
At risk of/has experienced domestic abuse	6%	12%	16%
At risk of/has experienced sexual abuse/exploitation	2%	3%	4%
At least one of the above	8%	17%	20%

Analysis of housing service data over time points to a significant increase in the numbers of victims of domestic abuse approaching the council at the relief stage (where they are already homeless). The table below shows the number of people assessed as owed a relief duty by main reason.

Calendar Year of assessment: Relief duty owed	Family or friends no longer willing or able to accommodate	End of private rented tenancy	Victim of domestic abuse	Eviction from supported housing
2020	323	117	41	45
2021	308	134	96	87
2022	224	186	106	84
2023	239	204	144	117
2024	290	206	156	116
Total	1,384	847	543	449

Source: Home Connections (data extracted on 13/01/25 using the 'Hope Extract' report)

The interim policy prioritised households made homeless due to domestic violence or abuse; however may require specialist support and safe, confidential placements that are better achieved during this fixed term scheme

The council has developed a series of Women's only Temporary Accommodation schemes, one of which includes on site support, which will help address this issue.

Our computerised record system does not record whether applicants on the Housing Register are DVA survivors. However, as stated previously, women are overrepresented as the lead applicant for help with homelessness or to join the housing register. Typically, women are more likely to experience DVA. Whilst on one hand survivors of DVA in Temporary Accommodation will benefit from this policy, survivors on the register will be impacted.

6.16 Socio-economic Disadvantage:

Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections)

Yes

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

All applicants on the housing register are likely to be subject to socio-economic disadvantage; average incomes are well below the threshold for market rents

The fixed term period policy aims to reduce the use of expensive, poor-quality TA and support financial stability for affected households who have to pay a contribution towards their rent, as they are not entitled to full Housing Benefit, due to factors such as employment.

Households on the waiting list but not prioritised for TA may experience increased hardship due to longer waits.

6.17 Human Rights:

Will your activity have a disproportionate impact relating to Human Rights?

Yes

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Brighton & Hove City Council recognises the right to adequate housing and signed the Homeless Bill of Rights in 2021. In practice, this means placements should enable people to live with security, peace, and dignity.

In city placements in council TA reduce disruption to family life, support continuity of healthcare and schooling. Suitability assessments and review rights further protect household autonomy.

6.18 Cumulative, multiple intersectional, and complex impacts (including on additional relevant groups):

What cumulative or complex impacts might the activity have on people who are members of multiple Minoritised groups?

- For example: people belonging to the Gypsy, Roma, and/or Traveller community who are also disabled, LGBTQIA+, older disabled trans and non-binary people, older Black and Racially Minoritised disabled people of faith, young autistic people.
- Also consider wider disadvantaged and intersecting experiences that create exclusion and systemic barriers:
 - People being housebound due to disabilities or disabling circumstances
 - Environmental barriers or mobility barriers impacting those with sight loss, D/deafness, sensory requirements, neurodivergence, various complex disabilities
 - People experiencing homelessness
 - People on a low income and people living in the most deprived areas
 - People facing literacy, numeracy and/or digital barriers
 - Lone parents
 - People with experience of or living with addiction and/ or a substance use disorder (SUD)
 - Sex workers
 - Ex-offenders and people with unrelated convictions
 - People who have experienced female genital mutilation (FGM)
 - People who have experienced human trafficking or modern slavery

Many households affected by homelessness and temporary accommodation in Brighton & Hove experience not just a single disadvantage, but a combination of factors that interact and compound risk.

The intersection of these characteristics increases both the complexity of need and the risk of exclusion or poor outcomes. For example, a lone parent from a racially minoritised background with a disabled child may face barriers related to language, discrimination, caring responsibilities, and access to suitable housing

The use of a multi-disciplinary panel to oversee allocations and exceptions is designed to identify and respond to intersectional needs. By reviewing cases holistically, the panel can consider the full context of each household rather than applying a one-size-fits-all approach.

The prioritisation criteria explicitly include factors that often intersect, such as children with special educational needs, households experiencing domestic abuse, and those with complex medical or care needs.

The fixed term measure's focus on in-city placements and suitability assessments creates opportunities to reduce the cumulative impact of multiple disadvantages (e.g., keeping children in their schools, maintaining access to health and support services, and reducing isolation for minoritised groups).

Despite improvements, there are still significant gaps in the collection and analysis of data on intersectional identities and needs. For example, not all disabilities are recorded (especially neurodivergence or mental health), and data on sexual orientation, gender identity, and caring

status is often incomplete or missing. This can lead to some needs being overlooked in both policy design and individual case decisions

If the fixed term action reduces the availability of general needs housing, those with less visible or less “prioritised” intersectional needs (e.g., single adults with mental health issues and a history of care) may experience longer waits and greater instability, further compounding their disadvantage.

It is recommended that the lettings panel regularly review the impact of the pilot on households with multiple disadvantages, using both quantitative data and qualitative feedback, and adapt processes as needed to address gaps.

7. Action planning

What SMART actions will be taken to address the disproportionate and cumulative impacts you have identified?

- Summarise relevant SMART actions from your data insights and disproportionate impacts below for this assessment, listing appropriate activities per action as bullets. (This will help your Business Manager or Fair and Inclusive Action Plan (FIAP) Service representative to add these to the Directorate FIAP, discuss success measures and timelines with you, and monitor this EIA’s progress as part of quarterly and regular internal and external auditing and monitoring)

1. Monitor the lettings decisions made by the panel to capture information on groups benefiting or impacted by the interim measure to support any changes or amendment to the interim policy and better inform a decision at the end of the interim period.

2.

Which action plans will the identified actions be transferred to?

- For example: Team or Service Plan, Local Implementation Plan, a project plan related to this EIA, FIAP (Fair and Inclusive Action Plan) – mandatory noting of the EIA on the Directorate EIA Tracker to enable monitoring of all equalities related actions identified in this EIA. This is done as part of FIAP performance reporting and auditing. Speak to your Directorate’s Business Improvement Manager (if one exists for your Directorate) or to the Head of Service/ lead who enters actions and performance updates on FIAP and seek support from your Directorate’s EDI Business Partner.

The actions will be transferred into a wider project plan for the interim measure, and overseen by a programme board focusing on the longer-term financial sustainability of the council, related to the costs of homelessness and temporary accommodation.

8. Outcome of your assessment

What decision have you reached upon completing this Equality Impact Assessment? (Mark ‘X’ for any ONE option below)

Stop or pause the activity due to unmitigable disproportionate impacts because the evidence shows bias towards one or more groups.

Adapt or change the activity to eliminate or mitigate disproportionate impacts and/or bias.	
Proceed with the activity as currently planned – no disproportionate impacts have been identified, or impacts will be mitigated by specified SMART actions.	
Proceed with caution – disproportionate impacts have been identified but having considered all available options there are no other or proportionate ways to achieve the aim of the activity (for example, in extreme cases or where positive action is taken). Therefore, you are going to proceed with caution with this policy or practice knowing that it may favour some people less than others, providing justification for this decision.	X

If your decision is to “Proceed with caution”, please provide a reasoning for this:

Social housing and accessible TA are scarce. The fixed term measure temporarily reduces the number of general needs lets available via bidding. The evidence indicates disproportionate impact may arise for some groups on the housing register, while strong positive impacts are expected for those who are newly homeless or in interim placements outside the city and in particular those households which are families have children, disabled households, and survivors of domestic abuse through improved quality of accommodation, better security of tenure and the benefits of in city housing.

Proceeding with caution is justified because the fixed term position is time limited, tightly governed by a multidisciplinary panel, subject to weekly monitoring, and includes clear exemptions and remediation routes. The SMART Actions set out above will mitigate and monitor impacts. It is of note that there have been no significant challenges to the policy during the interim period.

In the event that there are no suitable households to meet the criteria for a placement under this process, then the property will either be held over for others or go back onto the housing register for bidding on.

Summarise your overall equality impact assessment recommendations to include in any committee papers to help guide and support councillor decision-making:

An initial Equality Impact Assessment (EIA) has been undertaken to assess the time-limited fixed term measure for the use of HRA voids as Temporary Accommodation. The analysis demonstrates that the fixed term measure will have material, and in many cases positive, differential impacts for a range of protected groups and intersecting cohorts. These include:

- Children and young people, and families
- Disabled people, including neurodivergent people and those with non-visible disabilities
- Ethnicity, race and ethnic heritage, including Black and Racially Minoritised (BRM) households
- Religion or belief
- Sex and gender identity, including women and TNBI people
- Pregnancy, maternity and early parenthood
- Migrants, asylum seekers and refugees
- Carers and care-experienced people
- Survivors of domestic and sexual abuse
- Human rights considerations

Many households experience multiple, overlapping disadvantages. To address this, the Lettings Panel will record an intersectional rationale for each decision, ensuring that overlapping needs are considered in prioritisation and that any adjustments are clearly documented. Monthly dashboards will monitor for disparities across characteristics and intersections, enabling targeted action where required.

To mitigate risks and ensure the fixed term measure remains responsive to equalities considerations, the EIA proposes the following key action(s):

1. Monitor lettings decisions made by the panel to capture information on groups benefiting from or impacted by the measure, supporting any necessary changes to the policy and informing decisions at the end of the fixed term period.

The EIA recommends proceeding with caution. The recommended approach incorporates a clear cap on the number of homes used, time-limited application of the policy, strengthened exemptions, exclusion of four-bedroom homes, and flexible month-by-month operation. Ongoing monitoring and review are built into the approach to ensure impacts remain proportionate and can be addressed if required.

Evidence indicates strong positive impacts for families with children, disabled households, survivors of domestic abuse, and households currently placed out of area, through improved quality and stability of accommodation.

However, there are also risks of longer waits for some groups on the housing register during the fixed term period, and gaps in structured equality data that require active management.

Proceeding with caution is justified given the urgent need to reduce expenditure on nightly-paid accommodation and to improve in-city stability for households. The proposed actions provide a proportionate and practical mitigation framework for the fixed term period.

9. Publication

All Equality Impact Assessments will be published. If you are recommending, and choosing not to publish your EIA, please provide a reason:

10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Justine Harris, Head of Tenancy Services / Alice Morel, Head of Homelessness & Housing Options	
Accountable Manager:	Harry Williams, Director of Housing People Services	09/01/2026

Notes, relevant information, and requests (if any) from Responsible Lead Officer and Accountable Manager submitting this assessment:

EDI Review, Actions, and Approval:

Equality Impact Assessment sign-off

EDI Business Partner to cross-check against aims of the equality duty, public sector duty and our civic responsibilities the activity considers and refer to relevant internal checklists and guidance prior to recommending sign-off.

Once the EDI Officer has considered the equalities impact to provide approval for by those submitting the EIA, they will get the EIA signed off and sent to the requester copying the Head of Service, Business Improvement Manager, [Equalities inbox](#), any other service colleagues as appropriate to enable EIA tracking, accountability, and saving for publishing. Budget and Staffing EIAs secure approval via different templates.

Signatory:	Name:	Date: DD-MMM-YY
EDI Business Partner:	Eric Page	9 th April 2026
EDI Manager:		

Notes and recommendations from EDI Business Partner reviewing this assessment:

See comments added to document

Notes and recommendations (if any) from EDI Manager reviewing this assessment:

