

Somerset West and Taunton Council

Full Council – 5 October 2021

Single Homelessness and Rough Sleeper Accommodation Strategy & Delivery Plan

This matter is the responsibility of Executive Councillor Member Fran Smith (Housing)

Report Authors: This report has been prepared by the following:
Single Homelessness and Rough Sleeper Accommodation Strategy: **Mark Leeman** (Strategy Specialist, Housing) and **Simon Lewis** (AD – Housing and Communities)
Delivery Plan and Funding Request: **Chris Brown** (AD – Strategy, Development and Regeneration)

1 Executive Summary / Purpose of the Report

- 1.1 SWT has a significant challenge in meeting the accommodation needs for single homeless customers. This challenge will be exacerbated by both the need to decant Canonsgrove (homeless campus located at Trull, Taunton) by 2023, and the expected general increase in homelessness that is forecast as a result of the easing of Lockdown restrictions (i.e. end of furlough, end of the ban on evictions and the end of the uplift on Universal Credit payments).
- 1.2 To meet this challenge, SWT has prepared the following:
 - Single Homeless and Rough Sleeper Accommodation Strategy
 - Single Homeless and Rough Sleeper Accommodation – Delivery Plan
- 1.3 The Strategy identifies the demand, splits this down by specific need, and puts in place an end-to-end process of interventions, from early help through to tenancy support. SWT and provider partners have significant control over much of the strategy, although we are reliant on strong partnership working to deliver the necessary housing management and support services
- 1.4 The delivery plan looks at the accommodation and support requirements and identifies how these may best be delivered, whether that is through partner providers (preferred) or whether this is through direct intervention by SWT. The delivery plan makes specific request for additional capital (£1.55M) and revenue expenditure, both of which are necessary to enable the effective delivery of the strategy.

2 Recommendations

- 2.1 The recommendations to Full Council are:

- a) Adopt the Single Homelessness & Rough Sleeper Accommodation Strategy (SHRSAS) (Appendix 1) and associated Delivery Plan (Confidential Appendix 2).
- b) To approve the virement of £1.17m and a supplementary General Fund capital budget of £0.38m to support the capital investment of £1.55m as set out in section 6 and Confidential appendix 2.
- c) To delegate authority to the Section 151 Officer to make the final funding decision for any capital budgets used in the GF or HRA, including any reallocation of part of the capital budget (b) from the General Fund to the HRA.
- d) For members to note the predicted increase in revenue costs 2022-2025, and to delegate authority to the Section 151 Officer to agree the revenue funding allocations 2022-2025 through a combination of homelessness earmarked reserves, future successful bids for government grant, and Better Care Fund grant (subject to Health and Wellbeing Board approval on 22nd November 2021).

3 Risk Assessment (if appropriate)

- 3.1 Housing Directorate risks HC39 (Homeless Rough Sleeping Service Failure) and Corporate Risks CR28 (Rough Sleeper Provision) are directly relevant i.e. failure to deliver a prevention-based homelessness service and providing alternative provision to Canonsgrove.
- 3.2 Significantly, if successful, the strategy and delivery plan will help us move to a position of more financial stability within the Housing Options Service, as we become less reliant on the need for costly B&B accommodation and are able to invest in prevention based services such as floating support. Collectively this will help reduce the risks that we currently face around spend and improve the safety/health outcomes for our vulnerable customers.
- 3.3 The implementation timeframe (2021-2027) is within the period for the establishment of a Unitary Authority
- 3.4 There are several risks associated with the delivery of the strategy:
- 3.5 We need to act quickly to facilitate the decant of Canonsgrove and find/deliver alternative accommodation options. This needs to be done by Spring 2023, which is significantly in advance of the end date of strategy that is set at 2027. Elements of the strategy, such as changes to strategic commissioning arrangements, are likely to take longer to deliver than the end date of 2023. The debate around strategic commissioning will take place within multi-agency partnerships such as the Somerset Homelessness Reduction Board (HRB) and the Somerset Health and Wellbeing Board (HWBB). Such conversations will also be an integral component to the Unitary debate. Maintaining good partnership working is essential.
- 3.6 Whilst delivering a successful decant of Canonsgrove by March 2023 officers are considering how demand would be managed should sufficient alternative new supply not be achieved in time. Alternatives will include selective use of Bed and Breakfast accommodation, new lease arrangements and (worst case) a return to streets.
- 3.7 Providing additional 'move-on' accommodation is essential to the delivery of the strategy in the short, medium and long term. Supported accommodation becomes 'silted' without 'move-on' options. However, move-on accommodation (often 1 bed units/shared facilities) are not always easy to provide. Nor are they very popular within the financial portfolio of registered providers given factors such as the changing nature of the housing

benefit regime. The lack of 'move-on' could present a significant risk and dialogue with the council's housing service, emerging corporate company, housing association partners and the private rented sector will need to be an ongoing activity.

- 3.8 Financial risks are in respect of projected reductions in B&B costs through the planned intervention being successful, and obtaining funding as identified in this report across the period 2022-2025 to mitigate the additional costs of this expanded discretionary (non-statutory) service provision.

4 Background and Full details of the Report

Single Homelessness and Rough Sleeper Accommodation Strategy

- 4.1 The draft Single Homelessness Accommodation Strategy was initially considered by Scrutiny on 3rd March 2021, and by Executive on 17th March 2021. The draft was presented as a background paper to inform the options appraisal for delivering future single homeless and rough sleeper accommodation in SWT. The expectation was that the draft accommodation strategy should be brought back for full consideration and approval.

- 4.2 A link to the previous report to the Executive can be found here:

[Options Appraisal for Delivering Future Single Rough Sleeper and Homeless Accommodation in Somerset .pdf \(somersetwestandtaunton.gov.uk\)](https://www.somersetwestandtaunton.gov.uk/Options%20Appraisal%20for%20Delivering%20Future%20Single%20Rough%20Sleeper%20and%20Homeless%20Accommodation%20in%20Somerset.pdf)

- 4.3 That report (Executive – March 2021) explains the reasoning for and purpose of a single homelessness accommodation strategy for SWT.

- 4.4 The basic premise of the strategy remains unchanged:

- To reduce the Council's dependency on Bed and Breakfast accommodation
- Provide directly or through partners the accommodation required to support the Council's statutory obligation and any additional voluntary obligation to support single homeless
- Provide accommodation which will maximise the opportunities for complex single homeless to stabilise their lives and present the opportunity for them to sustain a tenancy or other form of settled accommodation. This will mean a potential change for elements of the current supply of accommodation, and the use of new and existing investment and support models
- Identify investment models which are sufficiently flexible to manage the scale and the fluid nature of homelessness. This is essential to ensure the Council de-risks its own investment and critically, partners feel able to participate and invest their funds appropriately to support the Council's strategy
- Work with the HRB to progress their commissioning role to enable commissioning partners to bend their revenue spend to improve the support to homeless customers. Success in this area should allow confidence for partners to invest capital but also reduce the concerns raised by MHCLG in relation to SWT's housing benefit levels for complex need single homeless households.
- To help facilitate the successful decant of Canonsgrove over the next 18 months
- To end rough sleeping across SWT by 2027

- 4.5 Since initial consideration by Scrutiny and the Executive, the SHRSAS has been refined to now include the following:

- Amended *vision statement* to reflect the essential emphasis on early help and prevention
- *Objectives* have been refined and sharpened
- Calculations relating to *demand* have been updated
- A clearer picture of *demand, broken down by levels of need* (i.e. none, low, medium and high)
- More detail on the work required to develop future *commissioning* arrangements
- More clarity on the *accommodation options* that we are currently considering
- *Finances* – more clarity on sources of capital and revenue funding

4.6 A Delivery Plan to support the early implementation of the Strategy is attached at confidential Appendix 2. The Delivery Plan sets out a route to achieving the Single Homeless Accommodation Strategy ambition by 2027. However, the loss of bedspaces at Canonsgrove by March 2023 means new supply is front loaded in the delivery plan and changes to the Council's and partners services needs to be embedded early. The repurposing and/or redesign of some accommodation is also front loaded to help ensure the current accommodation supply is being used to its optimum to effectively support the wide range of customer needs. These often-complex actions mean significant resources in personnel and finance are required up to March 2023. The Plan provides a timeline, financial requirement and milestones whereby the progress of the strategy can be measured.

4.7 The delivery plan is proposing to work with several small voluntary organisations to provide some of the new supply. This includes exploring new models of delivery such as Malachi project with Citizens Somerset, and Green Pastures funding model with Canon Street and Trull churches. Officers are recommending to the Council the lease of a 'meanwhile site' to Citizens Somerset/Salvation Army for a 10year period with the opportunity for additional extension periods of five years subject to mutual agreement. A 'meanwhile site' is a site which is awaiting development and can be put to a meanwhile use. The 'meanwhile site' will be a HRA underused garage site. The properties will be removed by the Salvation Army when the lease ends. This project is subject to grant support and if progressed the council will carry out consultation and preparatory works ready to hand over the site. Officers are requesting delegated authority to the Section 151 Officer, Portfolio Holder for Housing and the Director of Housing to lease HRA land (garage site). The approval of the portfolio holder will only be sought after consultation with local members. See section 14.

5 Links to Corporate Strategy

5.1 The report and its recommendations strongly support our 'Homes and Communities' corporate priority and in particular the Council's ambition to "work to end homelessness and rough sleeping in the District."

6 Finance / Resource Implications

6.1 The Single Homeless Accommodation Delivery Plan aims to reduce the Council's dependency on bed & breakfast accommodation currently funded by the General Fund Homelessness budget, to facilitate the successful decant of Canonsgrove over the next 18 months, and to end rough sleeping across the District by 2027.

6.2 The successful delivery of the Single Homeless Accommodation Delivery Plan is dependent on financial support being provided by SWT, by both the General Fund and

the Housing Revenue Account (HRA). Given the existing financial pressures recognised in the Medium Term Financial Plan (MTFP), affordability is a real challenge. Significant investment is also required by partners and/or increased government funding for the plans in this report to be affordable.

- 6.3 Members should note that possible impact on the MTFP in respect of this Plan, however the intent is to fund the additional costs through a combination of Better Care Fund grant income, homelessness earmarked reserves (in 2022/23), and will pursue successful bids for further government grant funding. This should provide sufficient funding, but represents a risk for current MTFP projections if not successful.

General Fund Capital Budget:

- 6.4 The Single Homeless Accommodation Delivery Plan aims to increase single homeless bedspace capacity through the provision of an additional 54 bedspaces over the 18 months ending March 2023. This will require an estimated total capital investment of c£5m. The intent in this Plan is that the property assets will be purchased and owned by the individual partners and not SWTC. This will need to be financed through a combination of capital grant contributions received from MHCLG, other associated partners and has been modelled on the basis of some capital subsidy from SWTC.
- 6.5 The proposal is for SWTC to provide a one-off General Fund capital grant contribution to the lesser of (up to) 31% of partners’ capital costs or a maximum of £1.55m in total. The current proposal is for this to be financed through commuted sums S106 capital grants, Better Care Fund capital grant, and Hinkley Point C capital grant as shown in table 1 below. As with other capital financing arrangements it is proposed to delegate authority to the S151 Officer to determine the final financing mix for each scheme on its own financial merit and will approve on a scheme by scheme basis.
- 6.6 It is believed sufficient funding has been identified to remove any borrowing requirements. The capital funding approach has prioritised options to support investment by partners over direct investment, avoiding the need for borrowing as this would add further cost into the MTFP for debt repayment and interest costs, further exacerbating the Council’s existing budget gap.
- 6.7 The Single Homeless Delivery Plan seeks to increase the supply of accommodation primarily through partners purchasing bedspaces or through leases. The Council will only increase its assets if it directly invests in place of partner investment. This is considered only beneficial where partners are unable to deliver certain types of accommodation or where the Council is more appropriate as a landlord to manage properties, and would likely require an increase in the level of the Council’s proposed capital investment.

Table 1: Financing of Capital Grant (indicative funding split)

Source of Finance	2021/22	2022/23	2023/24	Total
	£k	£k	£k	£k
S106 Commuted Sum Capital Receipts	300	0	0	300
Better Care Fund	350	790	30	1,170
Hinkley Point C S106 Funds	50	30	0	80
Right to Buy Capital Receipts	TBC	0	0	TBC
Total Financing	700	820	30	1,550

- 6.8 The estimated total cost of capital investment is uncertain and the financing of this is

dependent on the success of the Council and partners accessing capital grants and partnership contributions to complete the necessary funding. Total costs are also based on reasonable estimates but are not certain with properties to be bought on the open market.

General Fund Revenue Budget:

- 6.9 The Single Homeless Accommodation Delivery Plan is a voluntary adoption by the Council to enhance its core service provision to support and provide accommodation for the additional homeless client group across SWT in order to achieve the Government’s ambition to end rough sleeping by 2027.
- 6.10 The expectation by the service is that demand on the homelessness statutory service, including the voluntary adoption of the homeless client group, will increase over the next 5 years. The Single Homeless Accommodation Delivery Plan aims to mitigate the increased financial impact on SWTC of this projected increase in demand through partners providing more accommodation and support and through better care funding.
- 6.11 Financial modelling undertaken by the housing service to estimate the projected costs suggest that the future mitigated additional revenue budget requirements are as per table 2 below. The service is requesting the support of the Health and Wellbeing Board at their meeting on 16th September to support SWT utilise better care funding to support the revenue element to complement the use of the fund to contribute to capital costs. The service will continue to seek other grant funding and service efficiencies to remove or minimise any additional funds through the General Fund revenue budget.

Table 2: Estimated additional revenue budget requirements over the next five years

Financial Year	Amount (£)
2021/22	0
2022/23	113,000
2023/24	255,000
2024/25	73,000
2025/26 (+)	0
Total	441,000

- 6.12 The current financial position of the Homelessness Service and planned spend for 2021/22 is summarised in table 3 below. The General Fund Homelessness base budget in 2021/22 is £1.378m. This budget covers the costs of staffing, bed & breakfast accommodation costs, third party payments to partners and other operational costs. The Homelessness service also receives ringfenced funding from MHCLG in for the form of the Homeless Prevention Grant (£443k in 21/22) and Rough Sleepers Initiative Grant (£660k in 21/22). These annual allocations are not guaranteed and are also not known in advance. The Executive also approved a carry forward request of £320k on 21st July 2021. Table 3 below shows a predicted net budget surplus 2021/2022 of £253k. This net surplus prediction is anticipated to reduce due to several factors including the ending of the landlord ban on evictions and additional lease costs for Canonsgrove and other properties.

Table 3: Current Financial Position of the Homelessness Service for 2021/22

	2021/22 £000
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Sources of Revenue Funding	
Base Budget – Staffing	736
Base Budget - Operational	642
Base Budget - Housing Options	48
Earmarked Reserves (RSI, NSAP & Positive Lives) – ring fenced and to be allocated	246
Earmarked Reserves – not ring fenced	163
Carry Forward Request - to be added to above EMR	320
Homeless Prevention Grant	443
Rough Sleepers Initiative Grant	660
Sub Total Income	3,258
Expenditure	
Staffing	916
B&B, Third Party Payments and other Operational Costs	860
Grant Spend - Homeless Prevention	443
Grant Spend - Rough Sleeping	786
Sub Total Expenditure	3,005
Net Surplus / (Deficit)	253

Housing Revenue Account Capital Budget:

- 6.13 As mentioned above, the provision of an additional 54 bedspaces over the 18 months ending March 2023 is hoped to be delivered through the partners. However, there may be a need to obtain approximately 5 bedspaces within the near future. Whilst other avenues are being explored to deliver this, the HRA may be asked to purchase (and own) additional temporary accommodation. If this is the case, this is expected to cost in the region of £0.5m and met from existing HRA capital budget (financed through RTB Capital Receipt and HRA borrowing). Whilst we aim for partners to purchase the accommodation the HRA could also be used to speed up delivery through purchasing new supply or repurposing a small number of existing properties to support homelessness. Should the HRA increase its role in increasing new supply the intension would be to manage this within the total capital allocation and utilise where possible Right to Buy Receipts. However, the HRA will not have access to the revenue streams identified in table one above and therefore the Director of Housing and Communities would need to consult with the S151 Officer on a scheme-by-scheme proposal.
- 6.14 The delivery plan also refers to the HRA providing a garage site to a partner to utilise. This may require the purchase of up to three individual garages within a site that is otherwise fully owned by SWT, although garage swaps are being offered. Therefore, there may be a capital cost required to purchase up to three individual garages. If this is required, then this is expected to cost in the region of £12k per garage and would be financed through a HRA revenue contribution to capital via the social housing development earmarked reserve. Strategically this would provide the HRA with block ownership and provide more options for future utilisation of the site such as re-development.
- 6.15 The request is to provide delegated authority to the Housing & Communities Director to vire HRA capital funds if required to finance the purchase of additional temporary accommodation bedspace and the garage sites, and to delegate authority to the Section 151 Officer to agree on the final financing of this.

Housing Revenue Account Revenue Budget:

- 6.16 The Single Homeless Accommodation Delivery Plan includes leasing 'meanwhile' HRA garage sites at peppercorn rent for the next 10 years. This would be a rental income loss of £5k per year (assuming full capacity for 10 units at 21/22 weekly private tenant rates) however these are currently under-occupied, and the actual rental loss is significantly lower.
- 6.17 If the HRA does purchase additional temporary accommodation and/or garages then the financial impact on revenue in relation to the cost of financing and the repayment of debt will need to be taken into consideration.

7 Legal Implications

- 7.1 The following legislation and legal obligations are relevant:
- Part VII of the Housing Act 1996 to deal with homelessness and the prevention of homelessness; and in particular the statutory assessments around priority need (of which being 'single' is not of itself a qualifying criteria)
 - Part VI of the same Act dealing with allocation of accommodation
 - The need to ensure that all allocation decisions are taken in compliance with the Homefinder Somerset policy, having particular regard to the duties around reasonable preference
- 7.2 The council needs to be aware of these duties when creating, approving or operating any strategy focused on one particular type, or element, of homelessness.

8 Climate and Sustainability Implications

- 8.1 The Single Homeless Accommodation Strategy has included a low carbon requirement on homeless accommodation.
- 8.2 The Delivery Panel includes sustainability as one of the measures of accommodation suitability including access to public transport routes, facilities, green space, walkways and cycle ways.

9 Safeguarding and/or Community Safety Implications

- 9.1 The SHRSAS provides an ambition to provide sustainable accommodation and support for rough sleepers. This will enhance our ability to safeguard a group of very vulnerable adults. The average life expectancy of a rough sleeper is 47 which indicates the extent of risks faced from living on the streets which this strategy will help mitigate. The strategy greatly promotes the welfare of adults at risk.
- 9.2 Any accommodation that hosts a number of rough sleepers can expect some level of noise nuisance and related anti-social behaviour, particularly where tenants have poor mental health, learning difficulties and addictions. The impact of this and measures to mitigate this will need to be considered as part of any long-term proposal.

10 Equality and Diversity Implications

- 10.1 Comprehensive Equalities Impact Assessments (EIA) were recently completed to inform the development of the Somerset Housing Strategy (2019) and Somerset Homelessness

and Rough Sleeper Strategy (2019). An EIA was also undertaken to inform the Canonsgrove Options appraisal.

10.2 These EIA illustrate that it is the vulnerable who are often disadvantaged in relation to housing conditions and housing circumstances. The following are presented as examples in relation to single homeless and rough sleeping:

- Age: For the elderly - dementia, cold homes, lack of accessible/adapted properties, rising incidence of homelessness. For the young – increasing incidence of homeless, care leavers and access to supported accommodation and move-on accommodation, overcrowding, rising incidence of case complexity, ‘sofa surfing’, reluctance to use/lack of awareness of Homefinder;
- Armed Forces Veterans: case complexity, need for support services, access to Homefinder;
- Race and Ethnicity: language barriers, exploitation, overcrowding, hate crimes, failure to meet the housing and health needs of the gypsy and traveller community;
- Disability: increasing complexity of mental health problems for rough sleepers/complex homeless, lack of accessible/adapted properties for physical and mental disabilities;
- Rurality: social isolation, distance from services, lack of transport options.

10.3 The accommodation options, improved support services and enhanced collaboration proposed by the SHRSAS will help address the issues highlighted above.

10.4 An Equalities Impact Assessment is attached as Appendix 3.

11 Social Value Implications

11.1 We are working with partners to jointly commission support services for our rough sleeper and single homeless community. This will deliver clear social value benefits, not only socially but also economically for this group. We shall co-design and coproduce solutions with our partners in the Voluntary and Community Sector (VCS). We shall also be working with our VCS partners to help them explore accommodation options, this includes financial support drawn down from MHCLG or via SWT. Our approach will place our partners within the VCS in a position to better work with this client group, and so maximise the efficiency of their service. This will be good for the VCS and also for the client group who will experience improved health related outcomes. We have engaged with the DWP to see how they can support our work so that not only can we help people address social and health issues, but can help move them ultimately to greater independence with a focus on improving skills and ideally accessing employment opportunities.

12 Partnership Implications

12.1 The success of any future accommodation proposal will require strong partnership working with accommodation providers such as the YMCA, Arc and others as well as a wide range of support services partners including SCC (Social Care, Public Health), NHS, Somerset Partnership, Turning Point (drug and alcohol service), Avon and Somerset Constabulary, Second Step, Salvation Army, Probation, Open Door and local church and voluntary and community groups.

12.2 The principle approved through the HWBB (and to be delivered through the HRB) is that we should develop a joint commissioning approach for support services, and we will continue developing this approach alongside the work we do on accommodation.

13 Health and Wellbeing Implications

- 13.1 The strategy's vision and objectives align themselves with the aspirations of the HWBB as expressed in Improving Health and Care Through the Home in Somerset – a Memorandum of Understanding (2020). This includes the proposal to create a Homelessness Reduction Board that will report into the Health and Wellbeing Board. The HRB will be critical to the delivery of the SHRSAS. There are clear links between people being health and being suitably accommodated with the correct support, so there is a strong alignment between the objectives of this report and improving health and wellbeing. One of the three Health and Wellbeing priorities for Somerset is "Somerset people are able to live independently" and therefore this strategy and delivery plan will be key to enabling this.

14 Asset Management Implications

- 14.1 The Single Homeless delivery plan seeks to increase the supply of accommodation primarily through partners purchasing bedspaces or through leases. The Council will only increase its assets if it directly invests in place of partner investment. This is considered only beneficial where partners are unable to deliver certain types of accommodation or where the council is more appropriate as a landlord to manage properties.
- 14.2 The delivery plan is proposing to lease one underused garage site to Salvation Army/Citizens Somerset to use on a meanwhile basis at a peppercorn rent. The garage site will be a 'meanwhile site' (site with development potential for the Council). It will be leased on a 10 year initial lease with 5 year review periods thereafter subject to mutual agreement. The properties will be removed by the Salvation Army when the lease ends. the council will carry out consultation and preparatory works ready to hand over the site.

15 Data Protection Implications

- 15.1 None at this stage. We will require information sharing agreements between the Council and any providers and support services that we use

16 Consultation Implications

- 16.1 The development of the strategy has been an iterative process, involving regular dialogue with local accommodation providers, and prospective providers of accommodation.
- 16.2 The framework to the strategy is provided by the Better Futures programme, which underwent extensive consultation with the commissioners and providers of support services (among many others)
- 16.3 As the Council identifies new sites to support single homeless accommodation requirements consultation will take place at the appropriate time.

17 Scrutiny comments/recommendations

- 17.1 The SHRSAS was considered by Community Scrutiny on 29th July 2021. Community Scrutiny supported the progress of the strategy and delivery plan, officers revised the report in particular enhancing the contextual evidence within the strategy. The Executive considered the comments of the Community Scrutiny Committee at their meeting 18th August. The comments of the Community Scrutiny are summarised below:

- The Chair on behalf of Community Scrutiny welcomed the report and the ambitions of the strategy and delivery plan
- Contextual evidence needs to be added to the strategy to explain the justification for a focus on single homelessness (as opposed to other forms of homelessness) - Officers made this amendment
- Community Scrutiny is aware the report includes a number of delegated financial decisions to officers, and seek reassurance delegation is not being over used
- The importance of the delivery of key elements highlighted within the Equalities Impact Assessment e.g. female only accommodation, accessible accommodation, etc. To be mindful of the impact of the Domestic Abuse Act 2021
- Community Scrutiny is keen to see the strategy continue and progress within the larger unitary authority arrangement
- To ensure that the Canonsgrove facility is closed at or before March 2023
- To maximise the opportunity of external funding (e.g. Government grants)

Democratic Path:

- **Community Scrutiny – Yes**
- **Executive – Yes**
- **Full Council – Yes**

Reporting Frequency: Once only

List of Appendices

Appendix 1	Single Homeless Accommodation Strategy
Appendix 2	CONFIDENTIAL - Single Homeless Accommodation Strategy – Delivery Plan
Appendix 3	Single Homeless Accommodation Strategy – Equality Impact Assessment

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