



Equality Impact Assessment [version 2.9]

Title: We Can Make Community-led Housing Initiative	
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input checked="" type="checkbox"/> Other [please state] <i>Housing scheme</i>	<input checked="" type="checkbox"/> New <input type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Growth and Regeneration	Lead Officer name: Bryony Stevens
Service Area: Housing Delivery	Lead Officer role: Enabling Manager

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use [plain English](#), avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

We Can Make (WCM) is a community-led housing initiative that aims to deliver new affordable homes at point of need on underused Council-owned land, including the rear gardens of existing Council properties. It has been developed by the Knowle West Media Centre (KWMC) community organisation and is focused on the Knowle West area. We Can Make (WCM) is a Community Interest Company (CIC) set up by KWMC to develop and manage the new affordable homes on these sites. The Council will dispose of the micro plots to WCM at a peppercorn i.e. at an under valuation, on long-term leases. BCC has agreed in principle for WCM to undertake a pilot of 16 units on BCC owned sites. WCM has two sites under construction, and BCC are working with WCM to identify and approve suitable sites for future WCM development.

Knowle West has relatively high levels of deprivation and the housing stock in the area is largely older family-size Council houses with generous garden plots. There is a lack of smaller affordable homes and the project has identified that there are unmet housing needs that can be met locally through development of underused land. The scheme seeks to facilitate opportunities for community support between households. It has been developed with considerable engagement from the local community. The aim is for micro-plots to be created by Council tenants voluntarily giving up part of their back garden for development of an additional affordable home. In these instances, the existing tenant has input to the nomination of the first tenant for the new home and the existing tenant benefits from improvements to their external space/garden. There will also be opportunities to create micro plots in suitable back gardens of void properties prior to reletting. In these instances, the first and subsequent tenants will be allocated through the WCM Local Lettings Policy (LLP).

The value of the We Can Make approach to diversifying and increasing the supply of affordable homes, lies in the fact that it creates a truly additional supply of land and homes that would not be possible other than through a localised community-led approach. It requires a high level of trust, local knowledge, and stewardship.

The WCM lettings and nomination policies set out that applicants must be in housing need and be registered on Bristol Home Choice and have a connection to the local area. The existing tenant has input to the nomination for first allocations to WCM homes that are in the former garden of an existing tenant. The new homes are built using

a Modern Method of Construction (MMC) that involves assembly of pre-fabricated panels that are being produced at a local factory, also run by WCM. The aim is for the factory to offer employment and training opportunities for local people, and the opportunity for future tenants of the WCM homes to assist in the manufacture and construction of their homes. It also reduces the CO2 emissions created by the development by producing the building components a short distance from the sites, thus reducing the need for transportation of materials over long distances.

1.2 Who will the proposal have the potential to affect?

<input type="checkbox"/> Bristol City Council workforce	<input checked="" type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community
<input type="checkbox"/> Commissioned services	<input checked="" type="checkbox"/> City partners / Stakeholder organisations	

Additional comments: The We Can Make scheme has potential to affect quality of life/standard of living of existing BCC tenants and other residents of Knowle West area and also to affect access to housing. This EQIA is particularly concerned to ensure that the Local Lettings Policy does not discriminate on basis of protected characteristics and is transparent in how WCM homes are allocated.

1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	[please select]
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2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: <https://www.bristol.gov.uk/people-communities/measuring-equalities-success>.

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g. from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here [Data, statistics and intelligence \(sharepoint.com\)](#). See also: [Bristol Open Data \(Quality of Life, Census etc.\)](#); [Joint Strategic Needs Assessment \(JSNA\)](#); [Ward Statistical Profiles](#).

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as [HR Analytics: Power BI Reports \(sharepoint.com\)](#) which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically active citizens for different characteristics. Additional sources of useful workforce evidence include the [Employee Staff Survey Report](#) and [Stress Risk Assessment Form](#)

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
<p data-bbox="132 210 756 241"> Filwood statistical ward profile 2021 (bristol.gov.uk) </p> <p data-bbox="108 1688 727 1756"> Research undertaken by KWMC in partnership with UWE School of Architecture, </p>	<p data-bbox="807 210 1027 241"> Age and disability </p> <p data-bbox="807 248 1437 533"> Filwood has an age distribution with higher than average under 15s. 25.2% of residents aged 65+ are receiving a community-based service. It has higher than average % of people with illness or health condition which limits day-to-day activities at least a little (36% compared to Bristol 25%). Life expectancy in Filwood is lower than the Bristol average – especially for males. </p> <p data-bbox="807 584 1155 616"> Poverty and disadvantage </p> <p data-bbox="807 622 1453 757"> 39% of school children are on free school meals, and 44% disadvantaged. Neighbourhoods within the ward are amongst those in Bristol scoring highest on the indices of deprivation. </p> <p data-bbox="807 801 1082 833"> Ethnicity and diversity </p> <p data-bbox="807 840 1465 1041"> Filwood is less ethnically diverse than Bristol overall with 9.9 % Black and Minority Ethnic compared to 16% for Bristol as a whole. There is a higher than average population of ‘Other Asian’ residents. 9.4% of residents were born outside of the UK, and 6.1% speak English as an additional language. </p> <p data-bbox="807 1086 1070 1117"> Community Cohesion </p> <p data-bbox="807 1124 1461 1294"> Only 51% of residents feel they belong to their neighbourhood and 59% think people of different backgrounds get along well together. 58% of residents feel anti-social behaviour is a problem locally (34% Bristol overall). </p> <p data-bbox="807 1339 995 1370"> Housing supply </p> <p data-bbox="807 1377 1437 1615"> There are significantly less than average numbers of flats and significantly more semi-detached homes in the area. Overcrowding is relatively high. The proportion of socially rented homes is higher than average (41%) compared to Bristol as a whole (20%). The supply of private rented homes is significantly lower (13%) than Bristol overall (25%). </p> <p data-bbox="807 1688 1461 1832"> Included 200 doorstep interviews on sample streets in Knowle West, during Feb-April 2017. Respondents were asked about their support for and views on the We Can Make initiative. Key findings were: </p> <ul data-bbox="959 1872 1437 2112" style="list-style-type: none"> <li data-bbox="959 1872 1437 1973">• 90%: agreed development of micro-sites were a good idea for Knowle West <li data-bbox="959 1980 1437 2047">• 73% agreed it was a good idea for their street <li data-bbox="959 2054 1437 2112">• 36% would be interested in using some of their own land

Additional comments:	

2.2 Do you currently monitor relevant activity by the following protected characteristics?

<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Disability	<input checked="" type="checkbox"/> Gender Reassignment
<input checked="" type="checkbox"/> Marriage and Civil Partnership	<input checked="" type="checkbox"/> Pregnancy/Maternity	<input checked="" type="checkbox"/> Race
<input checked="" type="checkbox"/> Religion or Belief	<input checked="" type="checkbox"/> Sex	<input checked="" type="checkbox"/> Sexual Orientation

2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

Diversity monitoring is required as part of the HomeChoice Bristol Housing Allocation Scheme. However, there are gaps in our citywide equality data for some characteristics e.g. sexual orientation, especially where this has not historically been required in statutory reporting.

2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol's diverse communities. See <https://www.bristol.gov.uk/people-communities/equalities-groups>.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to [Managing change or restructure \(sharepoint.com\)](#) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups and trades unions as well as affected staff.

We Can Make has undertaken extensive consultation with tenants and the wider community. This has included:

- A series of co-design workshops with tenants and community representatives to identify ways tenants could better meet their own housing needs, and to develop the overall community-led approach to unlocking micro-sites.
- A series of co-design workshops and public exhibition made with tenants and community representatives to develop a Community Design Code for Micro-Sites.
- Existing BCC tenants who volunteer to give up a part of their garden for a micro site have been fully consulted and provided with independent legal advice.
- New tenants who move into a property where a micro site has been created from the garden will have the scheme and the new development fully explained and given the choice whether to take up a tenancy in that property without any penalty as to further offers of housing through BCC.
- A previous EQIA relating to the WCM factory proposal (2019) highlighted the need to consider how the needs of equality groups would be met through the proposal. The project made a commitment to promote opportunities widely using networks that reach equalities groups and economically challenged communities.

The We Can Make proposal has been developed to engage people from protected characteristic and under-represented groups. For example, they will ensure all marketing materials depict a diverse range of participants.

Throughout the project KWMC will ensure it fosters good relations between people who share a protected characteristic and those who do not (including tackling prejudice and promoting understanding between people from different groups). Material promoting and inviting people to participate in workshops (eg design code workshops; planning consultations) includes positive images and representation of people from a diverse range of backgrounds, and this is followed up in social media coverage of WCM events.

The low carbon construction/retrofit and SME support/training aspect of the project actively targets support for people who may lack entrepreneurial experience and appropriate skills, or who face entrenched attitudinal barriers and/or structural inequality such as women, and people from minoritised ethnic backgrounds. For its MMC construction training workshops We Can Make has a target that participants must be 50% female. All workshops and training programmes so far have not only met, but exceeded this target.

KWMC actively targets opportunities to women by working with local organizations such as the Children's Centre. KWMC/We Can Make works to create positive spaces and opportunities for people from Black, Asian and minority communities to engage with the project and take on leadership roles, helping to reach out and welcome other people from diverse communities. For example, We Can Make has employed a local young Black woman as the Chief Reporter on its podcast series, which documents and shares the story of We Can Make and also employed a young woman of Chinese heritage to be the host of a Chat Show series, and is the voice of WCM short films and publicity.

2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

WCM provide bespoke consultation with the tenants who opt-in to the scheme. This consultation package includes:

- A viability assessment to check that the We Can Make approach is a suitable way of meeting their housing needs and that they are eligible;
- A participation agreement, which the tenants sign, that sets out how the project will work; their role in it;
- Independent legal advice which sets out target rent levels, the legal process; their rights; and the land assembly process; their involvement and rights in nomination process for any future lets.
- Co-design workshops to develop the specific design of their micro-site home.

There will be a process of review of the 16 unit pilot to assess how it has worked in practice and highlight any issues to be resolved for further roll out. This will comprise:

- a. Interviews with host BCC tenants and WCM tenants to assess satisfaction with the scheme;
- b. Findings of WCM consultation with neighbours/local community to gauge satisfaction/support for the initiative;
- c. Review of EQIA and assessment of equalities impacts to be carried out jointly by BCC and WCM;
- d. BCC Assessment of value for money/social value and sustainability of the scheme.

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#)

3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)	
<p>Whilst we have not identified any significant negative impacts from the proposal at this stage, we are aware of the following issues for people on the basis of their characteristics which we will seek to mitigate / address:</p> <ul style="list-style-type: none"> the focus on housing local people, the emphasis on community support and the local connection criteria in the Local Lettings Plan has potential to exclude people from diverse communities and backgrounds, given the relatively less diverse nature of the community in Knowle West host tenants may be hostile or discriminatory towards some groups of people based on their protected characteristics new properties may not be suitable or fully meet the needs of potential tenants in terms of accessibility or adaptability <p>These issues can be mitigated / will be addressed because:</p> <ul style="list-style-type: none"> the Local Lettings Policy will operate within the parameters of the <u>HomeChoice Bristol Housing Allocation Scheme</u> which has clear eligibility and prioritisation criteria, and has been subject to a separate equality impact assessment process the WCM Equality and Diversity Policy sets out the organisations' framework for challenging discrimination, including for housing nominations and allocations, management of tenancies, meeting funders' needs and project delivery, dealing with volunteers, suppliers, supporters and other associated third parties. we have recommended that WCM develop an equality action plan to address any emerging issues or under-representation, and include bias awareness training as part of roll-out of the scheme for staff, volunteers and host tenants there is an established diversity monitoring system in place for the allocation scheme the overall scheme is subject to the <u>Community Led Housing Land Disposal Policy & Self-Build Housing Land Disposal Policy</u>, which underwent a separate equality impact assessment process to ensure there is a fair and transparent process for disposal of land, and that future site development meets the needs of Bristol's diverse population the scheme is a pilot and learning (including in relation to equality and inclusion) will inform future / more large-scale projects 	
PROTECTED CHARACTERISTICS	
Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Host tenants may be hostile or discriminatory towards young people
Mitigations:	WCM adhere to and promote their Equality and Diversity policy and adhere to Home Choice allocations scheme and its equalities requirements. WCM monitor to ensure that there is no bias/indirect discrimination in implementation of the LLP. On the other hand the employment/training aspects of the scheme may provide opportunities for young people.
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	The scheme may not meet the needs older people in terms of accessibility or future adaptability
Mitigations:	See above mitigations
Disability	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

Potential impacts:	The scheme may not meet the needs disabled people in terms of accessibility or future adaptability. Host tenants may be hostile or discriminatory to disabled people – particularly if they have hidden impairments or mental health problems.
Mitigations:	See above mitigations. WCM adhere to and promote their Equality and Diversity policy and adhere to Home Choice allocations scheme and its equalities requirements. WCM monitor to ensure that there is no bias/indirect discrimination in implementation of the LLP. WCM ensure that employment arrangements in the factory are compliant with the DDA and offer opportunities to people with disabilities.
Sex	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Host tenant may be hostile, homophobic or discriminatory towards people because of their sexual orientation.
Mitigations:	WCM adhere to and promote their Equality and Diversity policy and adhere to Home Choice allocations scheme and its equalities requirements. WCM monitor to ensure that there is no bias/indirect discrimination in implementation of the LLP.
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Host tenant may be hostile or discriminatory towards trans people
Mitigations:	WCM adhere to and promote their Equality and Diversity policy and adhere to Home Choice allocations scheme and its equalities requirements. WCM monitor to ensure that there is no bias/indirect discrimination in implementation of the LLP.
Race	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	The local connection criteria in the LLP and emphasis on community links may exclude people from minority ethnic backgrounds, and host tenants may be hostile or discriminatory toward people from different ethnic backgrounds
Mitigations:	WCM adhere to and promote their Equality and Diversity policy and adhere to Home Choice allocations scheme and its equalities requirements. WCM monitor to ensure that there is no bias/indirect discrimination in implementation of the LLP.
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	The local connection criteria and emphasis on community links may exclude people from diverse religions, and host tenants may be hostile or discriminatory toward people from different religious backgrounds
Mitigations:	See above. WCM adhere to their Equality and Diversity policy and ensure that a cascade mechanism is used for lettings. WCM monitor to ensure that there is no bias/indirect discrimination in implementation of the LLP.
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
OTHER RELEVANT CHARACTERISTICS	
Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Carers	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Other groups	Asylums and Refugees; Looked after Children / Care Leavers; Homelessness
Potential impacts:	
Mitigations:	

3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our Public Sector Equality Duty to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

The scheme aims to provide additional low-cost housing for people in housing need and has potential to benefit people with characteristics who are more likely to face housing issues and homelessness. It has potential to enhance equality of opportunity by providing training to tenants with regard to neighbourliness and equalities and to provide opportunities for community-based support. The scheme has potential to offer training and employment opportunities for women, young people, disabled people, and people from diverse ethnic and religious backgrounds.

4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

Summary of significant negative impacts and how they can be mitigated or justified:

Whilst there are no significant negative impacts identified at this stage, there is a risk that the scheme may not meet the diverse needs of citizens or that the Local Lettings Policy will favour only tenants from the local community who are of similar background and allow prejudice of host households to influence allocations. These risks can be mitigated through robust policies, and by an ongoing organisational commitment to diversity monitoring, and proactively addressing any emerging discriminatory impacts of the LLP.

Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:

The scheme is an opportunity to empower a community in an area with high levels of deprivation to provide new affordable housing with the active involvement of local people. It also offers opportunities for employment and training in an area of high levels of deprivation. There is also an opportunity to advance equality of opportunity and foster good relations between different communities. Learning from this pilot scheme can be used inform future large-scale projects.

4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.


Improvement / action required	Responsible Officer	Timescale
Monitoring of allocations and review of equalities impacts of the implementation of the LLP and the WCM scheme more broadly and engagement with participants and people from the wider neighbourhood.	Louise Davidson/Bryony Stevens	Annually from inception of scheme and first allocations, Review of pilot September 2022

4.3 How will the impact of your proposal and actions be measured?

How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

- Increased affordable housing in Knowle West
- WCM diversity monitoring
- Relevant Housing / Community Quality of Life in Bristol Survey indicators by Ward and Equalities Groups

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the Equality and Inclusion Team before requesting sign off from your Director¹.

<p>Equality and Inclusion Team Review: <i>Reviewed by Equality and Inclusion Team</i></p>	<p>Director Sign-Off:</p>  <p>Zoe Willcox, Director, Development of Place</p>
<p>Date: 18.11.2021</p>	<p>Date: 18.11.2021</p>

¹ Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.