

Equality Impact Assessment [version 2.9]



Title: Project 1000: Affordable Housing Delivery Plan	
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input checked="" type="checkbox"/> Other [please state] <i>Delivery Plan</i>	<input type="checkbox"/> New <input checked="" type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Growth & Regeneration	Lead Officer name: Elaine Olphert
Service Area: Housing Delivery	Lead Officer role: Head of Housing Delivery

Step 1: What do we want to do?

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.

The current Housing Delivery Plan period ran from 2017 – 2020. Project 1000: Affordable Housing Delivery Plan 2022-25 (Project 1000) is required to set out the strategic approach to delivering new homes (especially affordable homes) to meet the Mayors affordable housing targets to deliver 1,000 affordable units a year by 2024. This target is also specified in the draft Corporate Strategy.

Project 1000 will outline how more affordable housing can be delivered. This will have a positive impact across the City as more people can have homes that is affordable to them.

This is not a Housing Strategy for the City; it is a plan for accelerating the delivery of affordable homes.

Project 1000 is being supported by a review of the Affordable Housing Funding Policy, which will subject to its own equality impact assessment as part of the Decision Pathway to its approval.

1.2 Who will the proposal have the potential to affect?

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

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.

Yes **No** [please select]

Having a clear plan for the accelerated delivery of affordable housing in the City will help improve the quality of life and standard of living of households in Bristol, who have a housing need.

Step 2: What information do we have?

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												
West of England Local Housing Needs Assessment, September 2021	35% of new delivery in the City needs to be affordable housing												
HomeChoice – Housing Register	<p>Shows the number and further details of applicants on the Council's housing register as at 05.10.21. There were 16,043 applicants on the register.</p> <p>The information below pertains to the main applicant:</p> <ul style="list-style-type: none"> • 43% of applicants are 35 or under and 6% of applicants are 66 or over • 41% said they are disabled • 6% said they are lesbian, gay, bi-sexual or other • 59% of applicants are female • The ethnicity of the main applicant is below: <table border="1" data-bbox="624 1883 1430 2103"> <tbody> <tr> <td>Asian or Asian British: Any Other</td> <td>2%</td> </tr> <tr> <td>Asian or Asian British: Bangladeshi</td> <td>1%</td> </tr> <tr> <td>Asian or Asian British: Indian</td> <td>1%</td> </tr> <tr> <td>Asian or Asian British: Pakistani</td> <td>2%</td> </tr> <tr> <td>Black or Black British: African</td> <td>10%</td> </tr> <tr> <td>Black or Black British: Any Other</td> <td>2%</td> </tr> </tbody> </table>	Asian or Asian British: Any Other	2%	Asian or Asian British: Bangladeshi	1%	Asian or Asian British: Indian	1%	Asian or Asian British: Pakistani	2%	Black or Black British: African	10%	Black or Black British: Any Other	2%
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Asian or Asian British: Pakistani	2%												
Black or Black British: African	10%												
Black or Black British: Any Other	2%												

Black or Black British: Caribbean	5%
Chinese	0%
Gypsy, Romany, Irish Traveller	0%
Mixed: Any Other	1%
Mixed: White and Asian	0%
Mixed: White and Black African	1%
Mixed: White and Black Caribbean	3%
Not known	0%
Not stated	2%
Other Ethnic	2%
White Any Other	8%
White British	60%
White Irish	1%
White Scottish	0%
White Welsh	0%

Please note some ethnicities have 0% above, but all have at least 1 applicant, some just have a very small proportion of people in the ethnicity category.

We can assume that Black African includes Somali as there is not a category for this group.

- Please note for some categories people chose to prefer to not say/left blank.

In the last census (2011) 17% of Bristol’s population are disabled, 16% of the population belonged to a Black, Asian or minority ethnic group and this is likely to be higher now. Non-White British make up 6%, and brings the overall total to 22% Black, Asian, Minority Ethnic communities who live in Bristol. This shows the housing register has substantially higher proportion of disabled people and people who belong to a Black, Asian, or Minority Ethnic community and women are also overrepresented in their need for housing.

Help to Buy Register

Shows the number of households on the Help to Buy Register who are interested in Shared Ownership, Rent to Buy and Home Ownership People with Long Term Disabilities. In September 2021 there were 1,894 applicants who registered their interest in living in Bristol. The information below pertains to the first applicant:

- 64% of applicants are under 35
- 7% are disabled
- The ethnic origin of the first applicant is below:

Any Other Asian Background	1%
Any Other Black Background	0%
Any Other Ethnic Group	1%
Any Other Mixed / Multiple Ethnic Background	2%
Any Other White Background	10%
Arab	0%
Asian or Asian British Bangladeshi	0%
Asian or Asian British Indian	1%
Asian or Asian British Pakistani	1%
Asian or Asian Chinese	0%
Black or Black British African	3%

	Black or Black British Caribbean	3%
	Mixed White & Asian	1%
	Mixed White & Black African	0%
	Mixed White & Black Caribbean	2%
	Prefer to Not Say	3%
	White British	69%
	White Irish	0%
Please note some ethnicities have 0% above, but all have at least 1 applicant, some just have a very small proportion in it.		
<ul style="list-style-type: none"> Please note for some categories people chose to prefer to not say/left blank. 		
Additional comments:		
It should be noted that Project 1000is about accelerating the delivery of new affordable homes, not about the detail of design and nor about its allocation.		

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

<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Disability	<input type="checkbox"/> Gender Reassignment
<input type="checkbox"/> Marriage and Civil Partnership	<input 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.

<p>The statistics we have identified relates to the who is waiting to be housed and who would like to be housed with Government support. This provides information about which equality groups could possibly be affected if this proposal is not approved.</p> <p>The evidence base is about strategic housing need, and we are looking at the quantity of homes being delivered overall.</p> <p>The impact of the development of new homes can differ depending on where the homes are built, the tenure and cost of those homes. Therefore, specific equality impact assessments will still need to be carried on as part of any specific decision making, governance and the proximity of housing.</p>
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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.

Community engagement and consultation will occur at a site-specific level, not at this strategic level.

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.

As above.

Step 3: Who might the proposal impact?

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)

Project 1000 does not seek to go into scheme specific details and as such, any adverse impacts on protected characteristics will not be considered until individual developments come forward, this is a high level EqIA. All affordable homes will comply with Planning Policy requirements around standards of quality. Detailed assessments of housing need will be used to support the tenure and mix of homes coming forward on sites to address specific local demands.

Because individual sites won't be assessed as part of Project 1000 it isn't possible to identify adverse impacts at this stage, although we are aware of housing issues for each protected characteristic group.

This proposal will have a positive impact on equality groups who are on the housing register, and on the housing waiting list and people would like shared ownership, and is clear by the data the groups most affected and noted above.

PROTECTED CHARACTERISTICS

Age: Young People

Does your analysis indicate a disproportionate impact? Yes No

Potential impacts:

Many younger people are struggling to access homes in Bristol due to high property prices, rent levels and welfare reforms. Younger people are over-represented as a percentage of households to whom the Council owes a housing duty and as a percentage of Council tenants (demonstrating they are more likely to be in housing need).

Mitigations:

Deliver more affordable housing, and government support will be required for some buyers

Age: Older People

Does your analysis indicate a disproportionate impact? Yes No

Potential impacts:

The number of older people is growing with a number of existing housing products no longer fit for purpose (e.g. too large/difficult to maintain, not adapted/unadaptable)

Mitigations:

Deliver more specialist affordable housing

Disability

Does your analysis indicate a disproportionate impact? Yes No

Potential impacts:

Households/individuals with mental and physical impairments are over-represented as the percentage of benefit recipients, making accessing and maintaining housing at market rent/purchase more difficult (disabled households/individuals are over-

	<p>represented as a percentage of households on the housing register and social housing tenants). There is an insufficient supply of adapted homes, of all tenures, to meet needs. Issues include:</p> <ul style="list-style-type: none"> • Lack of accessible properties across all tenures. • Lack of adaptable properties. • Lack of accessible wheelchair standard properties. • Most of the above require larger building footprints than standard accommodation so developers are less likely to build accessible properties.
Mitigations:	Deliver more homes which meet M4(2) Category 2: Accessible and adaptable dwellings and M4(3) Category 3: Wheelchair user dwellings standards.
Sex	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Women are more likely to lack the finances to secure accommodation on the open market being more likely to suffer from pay inequality; single parents (who are more likely to be women) are over-represented as benefit recipients and social housing tenants and who are on the housing register. Women are more likely to be carers which can limit earning capacity and bring specific housing requirements (location and amenities). Lone parent households headed by a female account for the majority of homelessness acceptances which is referenced in the Homelessness Review 2018 .
Mitigations:	Deliver more affordable housing
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	<p>Research has shown Sexual orientation and gender reassignment are grouped together here as research shows that people from the LGBT community face similar issues in relation to housing: National research has shown that young LGBT people are particularly at risk of homelessness due to:</p> <ul style="list-style-type: none"> • Homophobia and transphobia which can lead to young people being thrown out or leaving home due to a hostile environment • Increased risk of mental health and addiction problems, which often increase the risk of homelessness. • 24% of homeless people aged 16-24 are LGBTQI+ and 18% of LGBTQI+ people have been homeless at some point in their lives¹. • 25% of Trans people have been homeless at some point in their lives². <p>LGBTQ+ may experience homophobic harassment or hate crime in general needs homes but may also face harassment or ostracism in shared housing, care or sheltered housing.</p>
Mitigations:	Deliver more specialist housing
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Issues raised regarding single parents extend to single expectant mothers, discussed above.
Mitigations:	
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Discussed in the sexual orientation category.
Mitigations:	
Race	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	<p>Black, Asian and minority ethnic (BAME) households are also over-represented as a percentage of households to whom the Council owes a housing duty and as a percentage of Council tenants (demonstrating they are more likely to be in housing need).</p> <p>BAME households are less likely to own their home and more likely to living in overcrowded households (more people than bedrooms) and intergenerational households. Bangladeshi and Pakistani groups are more likely to live in multi-family households.</p>

¹ https://www.stonewall.org.uk/sites/default/files/lgbt_in_britain_home_and_communities.pdf

² https://www.stonewall.org.uk/sites/default/files/lgbt_in_britain_home_and_communities.pdf

	Gypsy, Roma, Travellers - in any type of dwelling, encounter discrimination and/or racism and would like access to a more inclusive living environment. This community has historically opted to purchase their own land with a view to living communally with others from this community and are less likely to be affected by this proposal.
Mitigations:	Deliver more and different types and sizes of affordable housing
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	No housing issues have been identified for these group
Mitigations:	N/A
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	No particular housing issues have been identified
Mitigations:	N/A
OTHER RELEVANT CHARACTERISTICS	
Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	People who are unemployed or have low incomes are more likely to need affordable housing as they may be priced out of the private market. In 2020 Bristol had a 'housing affordability ratio' of 8.59, which means that the average house price is almost 9 times higher than average earnings.
Mitigations:	Deliver more affordable housing
Carers	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	No housing issues have been identified
Mitigations:	N/A

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

Accelerating the delivery of new affordable homes in the City provides greater opportunities for people in housing need to be adequately housed, and groups of who are from an equality group who experience financial hardship. This will have a positive impact on their quality of life, particularly where housing provision is targeted to meet a specific need e.g., older persons housing, wheelchair accessible housing.

Step 4: Impact

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:

N/A at Delivery Plan level

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

Accelerating the delivery of new affordable homes in the City provides greater opportunities for people in housing need to be adequately housed, and groups of who are from an equality group who experience financial hardship.

This will have a positive impact on their quality of life, particularly where housing provision is targeted to meet a specific need e.g., older persons housing, wheelchair accessible housing.

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
At a scheme level appropriate assessment to equality issues will be given, including EqIA where required.	Martyn Pursey	Ongoing
EqiA's should gather as much focussed information at a local level for equality groups who are overrepresented on the housing register and require govt support. E.g., disabled people (with information on type of disability/impairment), women, Black, Asian and Ethnic Minority and the LGBTQ+ community and their particular need	Martyn Pursey	Ongoing
The Affordable Housing Funding Policy is being developed to address a range of affordable housing needs and the policy will have its own equality impact assessment in due course.	Louise Davidson	February 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.

Existing systems in place to monitor the delivery of affordable housing and the groups that benefit from this Policy decision.

Progress reported quarterly to the Housing Delivery Board and Cabinet Member.

Step 5: Review

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 Director³.

Equality and Inclusion Team Review: Reviewed the Equality and Inclusion Team	Director Sign-Off: Zoe Willcox, Director Development of Place
Date: 20 th January 2022	Date: 21 st January 2022

³ 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.