

# Equality Impact Assessment [version 2.10]



Title: Temporary Accommodation Project: Funding and Planning Strategy	
<input checked="" type="checkbox"/> Strategy / Function	<input type="checkbox"/> New <input checked="" type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Growth & Regeneration	Lead Officer name: Paul Sylvester
Service Area: Housing & Landlord Services	Lead Officer role: Head of Housing Options

## 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.

This EQIA relates to a Cabinet report which provides an overview of the Temporary Accommodation project and seeks to gain necessary approvals for spend and delegations; as well as seeking approval for the recommissioning of an Emergency Accommodation Framework.

Temporary Accommodation (TA) demand has continued to grow and has increased 87% since Covid. The council has a legal obligation to house people who are legally homeless and vulnerable. Due to a lack of affordable housing much of that accommodation is secured via expensive spot purchased accommodation from the private rental sector. The council claims some of the cost back from Housing Benefit, but this is capped, so the amount that the council pays above the cap results in a loss to the council, known as subsidy loss.

The annual TA subsidy loss for 2023/24 is estimated to total around £11.1m, generating a budget pressure of £5m, with a risk that demand will increase. There's a lack of supported housing, for which the council can claim the full cost, though the council still pays for the support element (significantly less than the full subsidy loss).

Our project goal is to reduce the Housing Benefit subsidy loss which is the main cost to the council from Temporary Accommodation, by providing more Council-owned TA, and increasing the amount of supported exempt accommodation available.

Our key outcomes are:

- Cashable savings of £2.76m, of which £1.9m is committed for delivery in 23/24
- A more stable portfolio of TA, so that costs can be more easily controlled
- More supported housing.
- Medium term plan to significantly reduce subsidy loss for TA

The Temporary Accommodation key work stream objectives are:

- Temporarily allocating a small proportion of general needs housing to Temporary Accommodation (TA)
- Increasing supply of supported exempt accommodation from Registered Providers (RPs) by creating two procurement frameworks for RPs, as well as actively enabling and supporting the delivery of TA by RPs
- An optimisation of the existing HRA new build programme and additional capital funding for an accelerated delivery pipeline (including conversion opportunities from the council's disposal list, accelerated new builds, and MMC new build). We would aim to move existing council tenants who are looking to downsize or upgrade into the new build properties, allowing the older HRA General Needs housing that they vacate to be freed up for TA.
- Refurbishment by General Fund of 24 hospital trust properties for use as TA.

Additionally, we are recommissioning our Emergency Accommodation Framework, which is our framework for purchasing spot and block contracts from private landlords, to use as emergency accommodation. The framework will be updated to include the following:

- Changes to who can use the framework – the framework is currently jointly commissioned with South Gloucestershire, but we are considering other arrangements including having a separate lot that South Gloucestershire will manage, or a Bristol only framework. The framework will serve clients of other BCC services - Children's services, Adult Social Care, and No Recourse to Public Funds (NRPF – the Asylum team) as well as Housing.
- Better controls over pricing including fixed price per size of property, annual inflationary uplift built into the contract, and BCC no longer responsible for recovering service charges from the clients – this will be the provider's responsibility
- Landlords will be required to meet high standards – including responsibility for repairs and maintenance, safeguarding and DBS checks, gas and electricity safety certification, and inspections to be carried out by BCC prior to use of the properties
- Providers will be commissioned to provide housing-related support, and there will be requirements for better accessibility and availability to clients

The proposal links into the following elements of our Corporate Strategy:

Development and Delivery Principle: specifically, ED05 Good Governance

HC1 - Housing supply: This proposal will reduce availability of general needs housing as it will be used for Temporary Accommodation, however more supported accommodation will be delivered.

HC2 - Low or zero carbon homes: New builds and refurbishments will increase the number of low carbon homes.

HC3 - Homelessness: Cost effective Temporary Accommodation for people who are homeless will increase.

Housing Revenue Capital Strategy:

The investment programme is driven by the 30-year HRA Business Plan which is reflected in a rolling 5–10-year outlook based on stock condition and planned projects. Temporary Accommodation will be prioritised and delivered through the investment programme.

**a. 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 type="checkbox"/> City partners / Stakeholder organisations	
Additional comments:		

**b. Will the proposal have an equality impact?**

**Yes**       **No**      [please select]

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.

**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: [How we measure equality and diversity \(bristol.gov.uk\)](http://bristol.gov.uk)

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
<a href="#">Census 2021</a> Bristol Census Data Profiles: <a href="#">Power BI</a> Bristol Census Dashboard <a href="#">Power BI</a>	The Census details the demographic profile of Bristol – including differences by protected and other relevant characteristics and circumstances such as deprivation, and housing tenure etc.

<p><a href="#">The population of Bristol</a></p> <p><a href="#">Bristol Key Facts 2022</a></p>	<p>Updated annually. The report brings together statistics on the current estimated population of Bristol, recent trends in population, future projections and looks at the key characteristics of the people living in Bristol.</p>																								
<p><a href="#">Ward profile data (bristol.gov.uk)</a></p>	<p>The Ward Profiles provide a range of datasets, including population, life expectancy, health and education disparities etc. for each of Bristol's electoral wards.</p>																								
<p><a href="#">Quality of Life Survey 2022/23</a></p>	<p>The Quality of Life (QoL) survey is an annual randomised sample survey of the Bristol population, mailed to 33,000 households (with online &amp; paper options), and some additional targeting to boost numbers from low responding groups. In brief, the most recent QoL survey indicated that inequality and deprivation continue to affect people's experience in almost every element measured by the survey.</p> <p>The <a href="#">Quality of Life Data Dashboard 2022/23</a> highlights those indicators, wards and equality and demographic groups which are better or worse than the Bristol average.</p> <p>For example there are significant disparities in the extent to which Bristol citizens are satisfied with the state of repair and cost of heating their home on the basis of their protected and other relevant characteristics and circumstances.</p> <p>Indicator</p> <table border="1" data-bbox="587 1095 1509 2098"> <thead> <tr> <th data-bbox="587 1095 967 1216">Indicator</th> <th data-bbox="967 1095 1509 1216">% satisfied with the cost of heating their home</th> </tr> </thead> <tbody> <tr> <td data-bbox="587 1216 967 1290">Bristol Average</td> <td data-bbox="967 1216 1509 1290">21.6</td> </tr> <tr> <td data-bbox="587 1290 967 1364">Most Deprived 10%</td> <td data-bbox="967 1290 1509 1364">23.8</td> </tr> <tr> <td data-bbox="587 1364 967 1438">16 to 24 years</td> <td data-bbox="967 1364 1509 1438">13.9</td> </tr> <tr> <td data-bbox="587 1438 967 1512">50 years and older</td> <td data-bbox="967 1438 1509 1512">27.5</td> </tr> <tr> <td data-bbox="587 1512 967 1585">65 years and older</td> <td data-bbox="967 1512 1509 1585">32.4</td> </tr> <tr> <td data-bbox="587 1585 967 1659">Disabled</td> <td data-bbox="967 1585 1509 1659">21.3</td> </tr> <tr> <td data-bbox="587 1659 967 1769">Black, Asian and minoritised ethnic</td> <td data-bbox="967 1659 1509 1769">17.8</td> </tr> <tr> <td data-bbox="587 1769 967 1843">Asian/Asian British</td> <td data-bbox="967 1769 1509 1843">17.6</td> </tr> <tr> <td data-bbox="587 1843 967 1917">Black/Black British</td> <td data-bbox="967 1843 1509 1917">19.3</td> </tr> <tr> <td data-bbox="587 1917 967 2027">Mixed/Multiple ethnic groups</td> <td data-bbox="967 1917 1509 2027">18.6</td> </tr> <tr> <td data-bbox="587 2027 967 2098">White</td> <td data-bbox="967 2027 1509 2098">22.1</td> </tr> </tbody> </table>	Indicator	% satisfied with the cost of heating their home	Bristol Average	21.6	Most Deprived 10%	23.8	16 to 24 years	13.9	50 years and older	27.5	65 years and older	32.4	Disabled	21.3	Black, Asian and minoritised ethnic	17.8	Asian/Asian British	17.6	Black/Black British	19.3	Mixed/Multiple ethnic groups	18.6	White	22.1
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White Minority Ethnic	18.6
Female	21.4
Male	21.7
Christian	26.7
Other religion	18.5
No religion or faith	19.4
LGB+	19.0
No qualifications	30.4
Degree qualification	19.7
Non degree qualifications	23.7
Full-time Carers	19.2
Part-time carer	20.6
All Carers	20.2
Owner Occupier	21.8
Rented from housing association	29.7
Rented from private landlord	17.9
Rented from the council	28.0
Single parent household	20.7
Two parent household	15.1
All Parents	15.8

Quality of Life Survey 2022-23

Indicator	% satisfied with the state of repair of their home
Bristol Average	75.4
Most Deprived 10%	64.8
16 to 24 years	67.4

50 years and older	77.9
65 years and older	81.4
Disabled	65.4
Black, Asian and minoritised ethnic	65.3
Asian/Asian British	71.5
Black/Black British	61.4
Mixed/Multiple ethnic groups	60.9
White	76.6
White British	78.0
White Minority Ethnic	66.3
Female	75.1
Male	75.8
Christian	77.2
Other religion	62.3
No religion or faith	76.3
LGB+	68.0
No qualifications	74.0
Degree qualification	77.0
Non degree qualifications	71.8
Full-time Carers	64.5
Part-time carer	73.8
All Carers	71.2
Owner Occupier	80.9
Rented from housing association	55.8
Rented from private landlord	65.7

Rented from the council	57.9
Single parent household	57.6
Two parent household	79.3
All Parents	76.7
Quality of Life Survey 2022-23	

Joint Strategic Needs Assessment (JSNA)

The Joint Strategic Needs Assessment reports on the health and wellbeing needs of the people of Bristol. It brings together detailed information on local health and wellbeing needs and looks ahead at emerging challenges and projected future needs. The JSNA is used to provide a comprehensive picture of the health and wellbeing needs of Bristol (now and in the future); to inform decisions about how we design, commission and deliver services, and also about how the urban environment is planned and managed; to improve and protect health and wellbeing outcomes across the city while reducing health inequalities; and to provide partner organisations with information on the changing health and wellbeing needs of Bristol, at a local level, to support better service delivery.

Bristol One City: Cost of Living Crisis – Bristol’s One City approach to supporting citizens and communities (Oct 2022)

Cost of Living Risk Index (arcgis.com)

The rising cost of living is not impacting on everyone equally. People who are already experiencing inequity and poverty will be disproportionately impacted:

- **People on the lowest incomes** - will have less available income but also pay more for the same services. For example, people unable to pay their bills by Direct Debit and those borrowing money are subject to higher costs and interest rates. This is what anti-poverty campaign group Fair by Design has referred to as a Poverty Premium
- **Households with pre-payment energy meters** - households with pre-payment meters often pay above-average costs for their fuel. They will face a significant rise in their monthly bills in autumn and winter with increased energy usage as they do not benefit from the “smoothing” effect of Direct Debits, which spread usage costs evenly across the year
- **Parents and young families** – parents of young children are more likely to seek credit and alternative support as they are less able, on average, to afford an unexpected expense. Single parents will be disproportionately affected; and one in four single parents find it difficult to manage financially.
- **Disabled people** – just under half of all people in poverty in the UK are Disabled people or someone living with a Disabled person. Disabled people have higher living costs, and tend to pay more for their heating, travel, food/diet, prescription payments, and specialist equipment. It is estimated that UK households that include Disabled children pay on average £600 more for their energy bills than an average household

	<ul style="list-style-type: none"> <li>• <b>Black and Minoritised people</b> – A higher proportion of Black and minoritised ethnic groups reported finding it difficult to manage financially. The Social Metrics Commission found that almost half of people living in a family in the UK where the head of the household is Black are in poverty. Age UK report that poverty among older Black and minoritised ethnic groups is twice as high as for white pensioners</li> <li>• <b>People in rented accommodation</b> – it is estimated that 69% of low-income private renters in England will be forced to go without food and heating at least one day per week to meet rising housing and living cost. Almost three in ten homes in Bristol are privately rented</li> <li>• <b>Underserved populations</b> - It is likely that populations that are not typically well represented in data and research are likely to also face increased risk from rising cost of living. For example, refugees and asylum seekers, people experiencing homelessness, and Gypsy/Roma/Traveller groups.</li> <li>• <b>Cost of Living Risk Index</b> (October 2022) identified Lawrence Hill, Hartcliffe &amp; Withywood, Filwood, Lockleaze, Ashley, Southmead, Easton, Avonmouth &amp; Lawrence Weston, Hillfields and Eastville as neighbourhoods in Bristol more at risk of the impact of the cost of living crisis.</li> </ul>																																																
Housing Support Register	Case specific database for at risk and vulnerable citywide Homelessness prevention placements																																																
Housing Register Data diversity monitoring ( <i>all households who have applied for social housing in Bristol</i> )	<table border="1"> <tr><td>Under 18</td><td>0.2%</td></tr> <tr><td>18-25</td><td>11.6%</td></tr> <tr><td>26-35</td><td>29.7%</td></tr> <tr><td>36-45</td><td>26.2%</td></tr> <tr><td>46-55</td><td>15.8%</td></tr> <tr><td>56-65</td><td>10.1%</td></tr> <tr><td>66-75</td><td>4.2%</td></tr> <tr><td>Over 75</td><td>2.3%</td></tr> <tr><td>Female</td><td>58.3%</td></tr> <tr><td>Male</td><td>41.5%</td></tr> <tr><td>Prefer not to say</td><td>0.3%</td></tr> <tr><td>Asian or Asian British</td><td>5.4%</td></tr> <tr><td>Black or Black British</td><td>16.3%</td></tr> <tr><td>Mixed / multiple ethnicity</td><td>5.5%</td></tr> <tr><td>White British</td><td>60.0%</td></tr> <tr><td>White Other</td><td>8.1%</td></tr> <tr><td>Other Ethnic Background</td><td>2.4%</td></tr> <tr><td>Disabled person</td><td>44.2%</td></tr> <tr><td>LGBTQ+</td><td>6.4%</td></tr> <tr><td>Christian</td><td>25.5%</td></tr> <tr><td>Other faith group</td><td>18.5%</td></tr> <tr><td>No religion</td><td>37.8%</td></tr> <tr><td>Trans</td><td>0.4%</td></tr> <tr><td>Pregnant</td><td>1.8%</td></tr> </table>	Under 18	0.2%	18-25	11.6%	26-35	29.7%	36-45	26.2%	46-55	15.8%	56-65	10.1%	66-75	4.2%	Over 75	2.3%	Female	58.3%	Male	41.5%	Prefer not to say	0.3%	Asian or Asian British	5.4%	Black or Black British	16.3%	Mixed / multiple ethnicity	5.5%	White British	60.0%	White Other	8.1%	Other Ethnic Background	2.4%	Disabled person	44.2%	LGBTQ+	6.4%	Christian	25.5%	Other faith group	18.5%	No religion	37.8%	Trans	0.4%	Pregnant	1.8%
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National Statistics (Department of Levelling up Housing and Communities)	National Homelessness Data from quarterly returns by local government through H-CLIC returns
Homelessness Trends	Quarterly report on citywide homeless trends
Rough Sleeping Snapshot	Citywide monthly and annual street count reported to gov.uk
<a href="#">Bristol Key Facts 2022 - July 2022 update</a>	<ul style="list-style-type: none"> <li>– As of May 2022, there were 207,140 homes in Bristol.</li> <li>– Bristol City Council (BCC) is working towards ensuring that 2,000 homes are built in Bristol each year, with 1000 of those being affordable</li> <li>– During 2020/21, 1,589 new homes were built in Bristol. Just over 3,500 student units had been completed between 2006 and 2021.</li> <li>– Over 3,800 affordable dwellings (net) have been completed since 2006</li> <li>– 90% of all dwellings completed in 2020/21 were on previously developed land 56.</li> <li>– As of 1st April 2021, there were over 13,400 planning permissions for new dwellings</li> <li>– Bristol City Council has 26,885 Council Homes under its control (April 2020)</li> <li>– Homelessness The impact of the Pandemic and the ‘Everyone In’ scheme has had a tangible effect on the levels of people sleeping rough in the city for the last two years. The city received significant funding through the Rough Sleeper Initiative Funding in line with the governments aims to end rough sleeping by 2024. Continued high levels of government funding and an increase in the supply of affordable housing in the city will be needed to achieve this</li> <li>– There is a direct correlation between the success of the ‘Everybody in’ funding initiatives and high levels of placements as people are moved into the emergency temporary accommodation pipeline 58.</li> <li>– Homelessness in the city continues to disproportionately affect certain communities, particularly single households, young people and minoritised ethnic people (particularly Black/Black British).</li> <li>– Bristol Household tenure: 53% Owner occupied, 29% Private Rented, 18% Social Rented 60.</li> <li>– Average house prices: Bristol: £333,000 England &amp; Wales: £287,000 (January 2022)</li> <li>– Average house prices in Bristol have increased by £161,000 over the last ten years, an increase of 93%. This compares with an increase of 67% for England and Wales over the same period.</li> <li>– In 2021 Bristol had a ‘housing affordability ratio’ of 9.71, which means that the average house price is almost 10 times higher than average earnings. This is higher than the England average of 8.96, and the highest of all of the English Core Cities (who all have ratios lower than the national average).</li> </ul>

Housing Register data	<p>Over representation of Black and minoritised ethnic people – 37.7% of households on the Housing register</p> <p>Over representation of Disabled people – 44.2% of households on the Housing Register identify as having a disability or long term health condition</p>
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## 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.

Although our corporate approach is to collect diversity monitoring for all relevant characteristics, there are gaps in the available local diversity data for some characteristics, especially where this has not always historically been included in census and statutory reporting e.g. for sexual orientation.

We also know there are some under-reporting gaps in our workforce diversity information - where personal and confidential information is voluntarily requested from staff.

Data collected for the homelessness review in 2017 indicated that there were gaps in existing ethnicity data, with ethnicity not always stated or recorded. The recording of data has improved, and the data shows that Black, Asian and minority ethnic homelessness applicants are over-represented compared to their relative proportion in the Bristol Community as a whole.

We also know that there are gaps in our data relating to sexual orientation with 13.4% of households on the Housing Register preferring not to say.

In general, we acknowledge that there are gaps in our knowledge about the future demands on homelessness services as it affects a range of equalities groups and will be looking to improve the range of equalities data we gather, both as a local authority and through the homelessness services we commission.

## 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.

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 \(sharepoint.com\)](https://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 launched a public consultation on our budget proposals between Friday 11 November and Friday 23 December. This consultation set out all the savings proposals we had identified to produce a balanced budget in the context of reduced available funding and increasing financial pressures.

## 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.

A Temporary Accommodation Action Group (TAAG) is being established with representation from the wider homelessness sector, providers and clients. This will be a forum where progress against initiatives will be discussed, and feedback gathered.

For the new build and conversions work streams, there is a consultation and engagement plan which will be followed for each site, as follows:

1. The project team will keep residents, local businesses and other stakeholders informed during the development of these sites. The objectives of the Communication Plan are:
  - a. Ensuring stakeholders are fully informed of proposed changes to their neighbourhood.
  - b. Offering a channel and space to communicate directly with the project team through the development & construction process.
2. Through the duration of the project, the project team will lead on public consultation & member engagement on the development of the site. Once planning has been submitted, the LPA will lead on formal consultation for planning purposes.

### **Who we will communicate with**

The stakeholder list for each site will be agreed with the LPA to ensure all statutory consultees are communicated with ahead of planning submission. This will consider:

- Affected residents and non-residential properties - these are people living or working in the immediate vicinity of the site or those who will be affected at any stage of the project duration. This assessment is made on a project-by-project basis. This could include neighbouring residents and residents bordering the site.
- Local community groups - groups in the locality which have an interest in the site
- Ward councillors within the affected ward
- Statutory consultees – through the planning process we will consult with statutory consultees such as transport, fire and waste.

## 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.

<b>GENERAL COMMENTS</b> (highlight any potential issues that might impact all or many groups)	
<p>The main impact we anticipate is for households on the Housing Register with a home choice application who are bidding on social housing properties. The initiative which looks to convert some general needs council housing into Temporary Accommodation will reduce the availability of properties for households to bid on, leading to longer average waiting times to be rehoused. Whilst overall there will be fewer properties available for long term housing, Black / Black British people and Disabled people who are overrepresented in Housing Register diversity data are also overrepresented in homelessness prevention accommodation and waiting lists, so we do not anticipate a disproportionately negative impact from the reallocation of general needs housing into Temporary Accommodation on this basis.</p> <p>For any conversion of properties from the council disposal list, and refurbishment of hospital trust properties we will ensure there is a wide range of property/locations (and property details are accurately recorded) with a suitable proportion of accessible and adaptable properties, and sufficient properties for larger families. We will also ensure that accommodation is culturally appropriate and near to support networks. Individual conversion schemes will be subject to separate equality analysis and will be centred around the specific needs of the homelessness client cohort.</p> <p>For new units of modular homes on council land we are aware that in some instances accommodation may not always have ground floor access or be fully accessible for Disabled people with mobility impairments. However, whilst not suitable for all we will ensure as above there is a sufficient range of more accessible accommodation and always use client needs as a basis to determine placement.</p> <p>The recommissioning of Emergency Accommodation may have a negative impact for clients as they will need to pay their energy bills. Whilst this is partially mitigated by being introduced at a time when we anticipate energy bills will be reducing overall in cost, we know that the cost of energy impacts people differently, as well as particularly for low-income households. Some research indicates that Disabled people pay on average £600 more for their energy bills than an average household, and the Quality of Life shows significant differences in the extent to which people are satisfied with the cost of heating their home, depending on their characteristics and other circumstances (see Evidence section above).</p> <p>We are also aware of other existing structural inequalities and particular considerations, issues, and disparities for people in Bristol based on their characteristics, summarised below, which we will take into account.</p>	

<b>PROTECTED CHARACTERISTICS</b>	
<b>Age: Young People</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> <li>• Single households and younger people overrepresented in Bristol homelessness (linked to mortality rates)</li> <li>• Young people are often under-represented in engagement and consultation in Bristol and are less satisfied than average with the way the council runs things.</li> <li>• Children and young people from the most deprived areas of Bristol have the poorest outcomes in health and education in terms of health, education and future employment etc.</li> <li>• Young people in Bristol are more likely to: <ul style="list-style-type: none"> <li>○ have poor emotional health and wellbeing</li> <li>○ find inaccessible public transport prevents them from leaving their home when they want to</li> <li>○ 4.9% of 16-17 year olds are “not in education, employment or training” (NEET)</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>Young adults are most likely to have lost work or seen their income drop because of COVID-19 and the cost of living crisis</li> </ul>
Mitigations:	See general comments above
<b>Age: Older People</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> <li>Bristol Ageing Better estimated at least 11,000 older people are experiencing isolation in the city.</li> <li>We must factor aging and the needs of older people into long term budgeting and service design</li> </ul>
Mitigations:	See general comments above
<b>Disability</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> <li>44.2% of applicants on the Housing Register are from a household with a Disabled person or someone with a long term health condition. The impact will depend on the scale of the temporary reduction in supply of affordable housing</li> </ul>
Mitigations:	<ul style="list-style-type: none"> <li>Properties that are accessible for Disabled clients with physical impairments will, on the whole, not be converted into Temporary Accommodation unless it meets the needs of homeless clients who are Disabled people.</li> </ul>
<b>Sex</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> <li>58.3% of all applicants for social housing in Bristol are female</li> <li>In recent years there has been higher levels of women in local homelessness presentation (18-20%)</li> <li>Nationally 27% of women experience domestic abuse in their lifetimes. The rate of recorded domestic abuse incidents in Bristol has shown a significant rise over the last two years and 74% of victims were female.</li> <li>A higher proportion of boys have physical impairments and more boys than girls have diagnosed mental health disorders and learning difficulties.</li> </ul>
Mitigations:	See general comments above
<b>Sexual orientation</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> <li>Lesbian, gay and bisexual people are statistically more vulnerable to verbal and physical abuse</li> <li>1 in 5 Lesbian, Gay, Bisexual and Trans (LGBT+) staff have been the target of negative comments or conduct from work colleagues in the last year because they're LGBT+.</li> <li>One in four lesbian and bisexual women have experienced domestic abuse in a relationship, one third of them were abused by a man. Almost half of all gay and bisexual men have experienced at least one incident of domestic abuse from either a family member or a partner since the age of 16.</li> </ul>
Mitigations:	See general comments above
<b>Pregnancy / Maternity</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> <li>The Equality Act 2010 applies to those who are pregnant or have given birth in the past 26 weeks, as well as making provisions to protect rights for breastfeeding.</li> <li>Ensure there is equality of opportunity for services in relation to pregnancy and maternity. This includes e.g. providing physical access when using prams and pushchairs, and availability of toilets and baby-changing facilities etc. , and flexible working patterns and service times for childcare arrangements</li> <li>Women from minoritised ethnic backgrounds are more likely to experience complications at birth</li> </ul>
Mitigations:	See general comments above
<b>Gender reassignment</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> <li>As sexual orientation above trans people are statistically more vulnerable to verbal and physical abuse. Trans people regularly face prejudice and discrimination because of the way in which they transgress many of the norms of our culture and society.</li> </ul>

	<ul style="list-style-type: none"> <li>1 in 8 trans people (12%) in the workplace have been physically attacked by customers or colleagues in the last year because they were trans</li> </ul>
Mitigations:	See general comments above
<b>Race</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> <li>37.7% of households on the Housing Register are from Black and minoritised ethnic backgrounds</li> </ul>
Mitigations:	See general comments above
<b>Religion or Belief</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Marriage &amp; civil partnership</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>OTHER RELEVANT CHARACTERISTICS</b>	
<b>Socio-Economic (deprivation)</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> <li>Bristol has 41 areas in the most deprived 10% in England, including 3 in the most deprived 1%. The greatest levels of deprivation are in Hartcliffe &amp; Withywood, Filwood and Lawrence Hill. In Bristol 15% of residents - 70,800 people - live in the 10% most deprived areas in England, including 19,000 children and 7,800 older people.</li> </ul>
Mitigations:	See general comments above
<b>Carers</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> <li>Being a carer can be a huge barrier to accessing services and maintaining employment</li> <li>Studies show around 65% of adults have provided unpaid care for a loved one.</li> <li>Women have a 50% likelihood of being an unpaid carer by the age of 46 (by age 57 for men)</li> <li>Young carers are often hidden and may not recognise themselves as carers.</li> </ul>
Mitigations:	See general comments above

### 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 scale of the potential gap in our core funding means that there is very limited opportunity to bring genuine additional benefit to equalities groups in the circumstances. However we have considered as far as possible the need to: eliminate discrimination, harassment, victimisation and any other conduct prohibited under the Equality Act 2010; advance equality of opportunity between people from different groups; and foster good relations between people from different groups.

We anticipate a positive impact from increasing the supply of supported exempt accommodation delivered by Registered Providers, because most temporary accommodation is currently unsupported, and this will promote a higher standard of overall support for service users.

The recommissioning of Emergency Accommodation will have a positive impact in terms of better quality homes with housing management support, and better safeguarding and access for clients.

## 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:

There will be a temporary reduction in supply of affordable housing for non-homeless clients as we create an in-house portfolio of Temporary Accommodation.

The scale of the impact will be mitigated by limiting the number of properties that are converted into Temporary Accommodation, whilst achieving the necessary reduction in expenditure.

Properties that are accessible for Disabled people with physical impairments will generally not be converted into Temporary Accommodation. We anticipate that the impact will be felt over a period of 3 years.

The recommissioning of the Emergency Accommodation Framework will result in clients having to pay their gas and electricity bills. To mitigate the impact, we are introducing this at a time when energy bills are likely to be reducing in cost.

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

Changing some of the Temporary Accommodation provision from private organisations to in-house or delivered by Registered providers will improve standards.

Bringing on-line additional Temporary Accommodation with support will have a positive impact on clients with support needs

The recommissioning of the Emergency Accommodation framework will include higher standards for landlords to meet, so the standards of emergency accommodation will be better for those that need it and will have a positive impact on clients.

### 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
We are in the process of conducting further detailed needs analysis to inform implementation of this proposal	Paul Sylvester	2023-24 / ongoing
We will continue to update EqlAs for in scope projects as appropriate	Paul Sylvester	2023-24 / ongoing

### 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.

We'll know we have been successful when we have saved £1.9m cashable savings in 23/24, and £821k cashable savings in 24/25 due to a reduction in subsidy loss.

There will be more supported accommodation available than currently.

There will be a significant reduction in budget pressures that are caused by subsidy loss.

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 Director<sup>1</sup>.

<b>Equality and Inclusion Team Review:</b> <b><i>Reviewed by Equality and Inclusion Team</i></b>	<b>Director Sign-Off:</b> <b><i>Donald Graham</i></b>
Date: 19/5/2023	Date:

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<sup>1</sup> 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.