

Equality Impact Assessment [version 2.9]



Title: 2024/25 HRA Budget Proposal.	
<input type="checkbox"/> Policy <input checked="" type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input type="checkbox"/> New <input checked="" type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Housing and Landlord Services	Lead Officer name: Richard James
Service Area: Business Development	Lead Officer role: Interim Asset Management Consultant

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.

Objective

To support the recommendations/proposals for:

- The 2024/25 Housing Revenue Account (HRA) budget
- The 2024/25 Housing Investment Plan
- The 2024/25 Housing Delivery Programme
- The 5-year capital programme (medium-term financial plan)
- Increasing the supply of affordable homes
- The procurement of relevant contractors to support delivery of these programmes, and delegate the authority to the Executive Director of Growth and Regeneration, in consultation with the Cabinet Member for Housing Services & Energy and Housing Delivery & Homelessness, to appoint relevant contractors

Background to the Proposal

Housing and Landlord Services (H&LS) 30 year Business Plan and Budget focusses on:

- repairing, maintaining and improving the existing BCC council housing stock;
- this includes proposals responding to the Building and Fire safety Acts and upcoming Consumer Standards and proactive regulation.
- providing services for council tenants and leaseholders;
- and increasing the provision of new affordable council homes

The HRA operates in a difficult housing market and environment. The cost-of-living crisis is affecting our residents, and the cost of providing services, repairing and maintaining homes and building new homes. Levels of homelessness and rough sleeping are increasing, along with the number of households in temporary accommodation. Many tenants struggle to maintain their tenancies and access the support they require.

There are city ambitions for housing, that include increasing the supply of affordable housing and tackling the climate emergency and reducing carbon emissions.

The main source of HRA income is the rent and service paid by council tenants and leaseholders. From 2020 there was a new rent standard that allows social landlords to increase rent levels by up to the September CPI +1%. As a result, the maximum rent increase that BCC is able to implement for 2024/25 is 7.7%. More detailed and specific EqIA's will be developed for individual operational activities.

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	

The proposal will affect everyone from residents as it will affect the service they receive, the workforce responsible for delivering the service, the wider community who are dependent on accessing council housing when needed and other partners who provide additional supporting services or who are contracted to deliver a service on behalf of Housing & Landlord Services

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]

Impact

The key principles for the 2024/25 budget and medium-term financial plan are:

- Rents and service charges increase by 7.7% (September CPI + 1%).
- Repair & Investment of existing homes: Continue to ensure our homes are decent; warm, weathertight, modern and safe remain key priorities.
- Retain the 2023/24 priorities and commitments to improve standards in individual homes, communal areas, blocks and estates. Including:
 - Continue delivering the commitment to make homes more energy efficient and to reduce carbon emissions, through further wall insulation schemes and a programme of photo-voltaic (PV) panel installations. The investment includes contributions from BCC of: £11m in 2024/25, £76m in the first 5 years of the plan and a total of £100m up to 2030/31. This will help us to work towards a target of all homes reaching a minimum EPC of C by 2030 and Net Zero Carbon. Further funding is likely to be required to ensure all homes meet EPC C and will require further grant funding being made available from central government.
 - £83m over 15 years for planned bathroom replacement programme
 - c.£1m for HRA park and play area refurbishment covering 2023/24 & 2024/25.
 - Additional Investment in blocks, estates and communal areas between 2024/25 & 2026/27 of £6.15m (£2.05m per annum):
 - £0.6m contribution to the Rapid Response Service
 - £0.36m for the Assisted Gardens Programme
 - £0.61m for additional waste & recycling facilities
 - £1.78m for stock condition surveys that will inform future investment programmes

- £0.98m for CCTV & security upgrades
- £1.82m currently unallocated. We will engage with the Housing Management Board in 2024/25 to agree the allocation this investment (this is in addition to a 'Neighbourhood Investment budget of £462K per annum for one off neighbourhood improvement projects).
- In light of the proposed increase to tenants' rents, the HRA contribution to the Local Crisis Prevention Fund, which is earmarked for Social Housing tenants has been increased from £350k to £500k. New Homes: commitment to provide new affordable homes to meet housing need, and address homelessness and rough sleeping.
- New priorities to invest more in fire safety measures this includes waking watch, general fire remedial actions, evacuation alarms, the removal of EPS cladding and a sprinkler programme.

Procurement of Contractors

The report requests approval for delegated authority to procure contractors as necessary to support the delivery of proposed expenditure (including the Housing Investment Plan and New Build & Acquisition programme). This is a positive impact for the council and our tenants, as this proposal aims to make the procurement of contractors more efficient, meaning work programmes can be started earlier without the need for further approvals which can add additional costs to the budget.

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
<p>Demographic of tenants: H&LS has c.33,500 tenants living in c.27, 000* properties. It is estimated that in total H&LS houses over 60,000 people. In addition, there are c.2,350 leaseholders leasing c.1,800 properties. (This is all HRA homes except for those sold to leaseholders; therefore it includes those let under secure tenancies,</p>	<p>The ethnicity of 89% of tenants is known, of those: 62% are White British.</p> <p>c.21% are of Black, Asian or Minority Ethnicity, of which the largest groups are Black Africans and African Somalis 4% are White Other.</p> <p>A higher proportion of our tenants are female (61%) and male (37%). Not known or stated and prefer not to say (2%)</p>

<p>introductory tenancies, licences or temporary accommodation etc).</p>	<p>The age of 94% of tenants is known; of these the most common age bands is 45–54-year-olds (20%) and 55-64 years (21%). 22% of our tenants are aged over 65, and 2% under 25.</p> <p>29% of our tenants have told us that they are Disabled people. 13% of our tenants report a long-term illness, 13% experience mental or emotional distress and 13% of our tenants report mobility problems. 16% of our tenants have hearing, mobility or visual impairment.</p> <p>When compared to the Bristol population as a whole the differences include older people, aged 65+, make up 13% of Bristol’s population compared to 22% of BCC tenants, and women make up 50% of Bristol’s population compared to 61% of BCC tenants.</p>
<p>Rent Arrears: Overall, 24.3% of tenants have rent arrears over £250. This is 1.9% higher than 23/24.</p>	<p>30.32% of tenants from Black, Asian or Minority Ethnic backgrounds have rent arrears over £250, compared to 22.7% of White British tenants and 20.47% of White Other tenants.</p> <p>25.46% of female tenants are in arrears over £250 compared to 22.27% of male tenants.</p> <p>Younger tenants are at higher risk of arrears than older tenants. 44.82% of under 25’s are in arrears over £250, 9.40% of tenants aged 65-74 are.</p> <p>Disabled tenants are less likely to be in arrears with 19.27% having rent arrears over £250.</p>
<p>Response Repairs: In the year 1st November 2022- 31st October 2023 there were c.77,000 response repairs orders completed.</p>	<p>Middle-aged tenants were most likely to request repairs with an average of 35-44 22% & 45-54 22% & 55-64 21% compared with over 65 which was 21% and 34 and below at 14%.</p> <p>White British tenants have c.62% of repairs compared with 28% of Black, Asian and minority ethnic tenants.</p>
<p><u>Bristol One City: Cost of Living Crisis – Bristol’s One City approach to supporting citizens and communities (Oct 2022)</u></p> <p><u>Cost of Living Risk Index (arccgis.com)</u></p>	<p>The rising cost of living is not impacting on everyone equally. People who are already experiencing inequity and poverty will be disproportionately impacted:</p> <ul style="list-style-type: none"> • 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 (28.6%).

- **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
- **Black and Minoritised people** – A higher proportion of Black and minoritised ethnic groups reported finding it difficult to manage financially (14.9%) in 2021. In 2020 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
- **People in rented accommodation** – 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
- **Underserved populations** - 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.

Cost of Living Risk Index (October 2022) identified Lawrence Hill, Hartcliffe & Withywood, Filwood, Lockleaze, Ashley, Southmead, Easton, Avonmouth & Lawrence Weston, Hillfields and Eastville as neighbourhoods in Bristol more at risk of the impact of the cost-of-living crisis.

Bristol Quality of Life Survey 2021-22
(A Bristol Quality of Life Survey was undertaken in 2023/24 and result will be available from March 2024)

The Quality of Life (QoL) survey is an annual randomised sample survey of the Bristol population, mailed to 33,000 households (with online & 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.

The Quality of Life 2021/22 data dashboard highlights those indicators, wards and equality and demographic groups which are better or worse than the Bristol average.

For example there are significant disparities based on people’s characteristics and circumstances in the extent to which they find it difficult to manage financially:

Quality of Life Indicator	% who find it difficult to manage financially
16 to 24 years	12.5

	50 years and older	6.7
	65 years and older	3.2
	Female	8.6
	Male	8.5
	Disabled	21.6
	Asian /Asian British	9.9
	Black/Black British	19.8
	Mixed/Multiple Ethnicity	16.3
	White British	7.8
	White Minority Ethnic	8.4
	Lesbian Gay or Bisexual	12.7
	No Religion or Faith	8.0
	Christian Religion	8.3
	Other Religions	18.2
	Carer	10.7
	Full Time Carer	14.0
	Part Time Carer	9.7
	Single Parent	28.6
	Two Parent	9.6
	Parent (all)	12.0
	No Qualifications	10.0
	Non-Degree Qualified	12.9
	Degree Qualified	6.7
	Rented (Council)	20.3
	Rented (HA)	20.6
	Rented (Private)	14.6
	Owner Occupier	4.6
	Most Deprived 10%	18.8
	Bristol Average	8.7
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 type="checkbox"/> Gender Reassignment
<input type="checkbox"/> Marriage and Civil Partnership	<input type="checkbox"/> Pregnancy/Maternity	<input checked="" type="checkbox"/> Race
<input type="checkbox"/> Religion or Belief	<input checked="" type="checkbox"/> Sex	<input 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.

We don't proactively hold or collect data on gender reassignment or pregnancy/maternity for our residents but will update records as notified. Data is proactively collected with the use of tenancy audits where we collate all current data on household's occupancies and definitions.

Additionally, we also collect this data when letting a home or part of a transfer / rehousing request / mutual exchange. The move to NEC will involve a data audit which will be used to improve the equalities data held.

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.

In 2021 we launched a consultation open to all Bristol residents and council employees to seek their view on how to fund additional investments within a 30-year business plan, the first year of this plan informed the budget for 2022/23, 2023/24 & 2024/25. The consultation was open for six weeks.

We had responses from 1,471 people and approximately 60% were tenants in one of our properties. Participants could either use an online simulator tool which provided a realistic simulation of the budget decisions we need to make or take part in a survey that was available online, by telephone survey and by post. In line with BCC policy if during any consultation we identify a Disabled resident or language barrier that was impacting their ability to engage we would bring in support such as translation services to support the resident.

The above results will inform decision making for this internal review of the HRA budget proposals.

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.

~~We will create a communication plan, utilising accessible forms of communication,~~ write to residents informing them on the rent increase decision. If required, we are able to adapt the letter to make it more accessible and provide translation services. We will continue to signpost and refer tenants for debt and financial support.

There is currently a Housing Management Board that includes council tenant representation on it to ensure strategic engagement in the work of housing and landlord services. There are also tenant forums open to all tenants that meet several times a year, which is an opportunity for residents to raise important issues. The Big Housing Conversation will continue to be used as an engagement tool with residents throughout the lifetime of the current administration.

We are developing a resident engagement strategy for Building Safety which will describe how we will engage with residents regarding building safety on an ongoing basis.

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)

In general any increase in rent and service charges during a cost of living crisis is likely to have a disproportionate impact on low income households experiencing food and fuel poverty, unless this is adequately mitigated through other initiatives such as the local crisis prevention fund (LCPF) and the Household Support Fund (HSF).

There are no proposals to reduce housing management services for 2024/25.

Analysis demonstrates that some groups disproportionately affected by rent arrears. With the cost-of-living crisis it's important that we:

- Promote opportunities to apply for benefits and to sign post residents to support
- Monitor the impact of the rent increase and its impact of younger people; Black, Asian and Minority Ethnic communities; and women.

For residents with rent arrears, Income Officers will engage with residents on a one to one basis and take into account residents specific to individuals circumstances.

Our Asset Management Strategy has an EQIA in place to mitigate against negative impacts in relation to our investment decisions. We complete EQIAs before procuring each of the major refurbishment projects, and when reviewing our standards and developing new approaches to investment to maximise positive impacts and mitigate against any potential adverse impacts.

PROTECTED CHARACTERISTICS

Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Rent Increase
Mitigations:	Monitor the impact of the rent increase. For 2024/25 up to £350k will be made available for council tenants in financial crisis, with applications managed through the council's Local Housing Crisis Prevention fund.
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Rent increase
Mitigations:	Some older people receive a pension that increases with the rate of inflation. Promote opportunities to apply for benefits and to sign post residents to support.
Disability	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

Potential impacts:	There may be a disproportionate impact on increased rent to Disabled tenants. One in five Disabled adults faces extra costs of over £1,000 a month even after they have received welfare payments designed to meet those costs ¹ . Income Officers undertake proactive contact with residents in rent arrears. They will work individually with residents and sign posts to specialist support if required.
Mitigations:	Monitor the impact of the rent increase. Promote opportunities to apply for benefits and to sign post residents to support, and staggered payments options. For 2024/25 up to £350k will be made available for council tenants in financial crisis, with applications managed through the council's Local Housing Crisis Prevention fund.
Sex	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Rent increase: Women are more likely to be rent arrears - the impact of the rent increase.
Mitigations:	Promote opportunities to apply for benefits and to sign post residents to support, and staggered payments options. For 2024/25 up to £350k will be made available for council tenants in financial crisis, with applications managed through the council's Local Housing Crisis Prevention fund.
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Rent increase
Mitigations:	Promote opportunities to apply for benefits and to sign post residents to support, and staggered payments options. For 2024/25 up to £350k will be made available for council tenants in financial crisis, with applications managed through the council's Local Housing Crisis Prevention fund.
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	We do not have the data on the proportion of tenants who are pregnant, however rent increase may have a disproportionate impact due to the cumulative effect of other increased costs.
Mitigations:	Promote opportunities to apply for benefits and to sign post residents to support, and staggered payment options. For 2024/25 up to £350k will be made available for council tenants in financial crisis, with applications managed through the council's Local Housing Crisis Prevention fund.
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	We do not have the data for the group
Mitigations:	
Race	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Rent Increase- Black, Asian and Minority Ethnic tenants are more likely to be in rent arrears - the impact of the rent increase. In line with BCC policy, translation services are available to residents upon request. If a BCC Officer identifies any language barrier they will proactively engage with translation support.
Mitigations:	Promote opportunities to apply for benefits and to sign post residents to support, and staggered payment options. For 2024/25 up to £350k will be made available for council tenants in financial crisis, with applications managed through the council's Local Housing Crisis Prevention fund.
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
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 checked="" type="checkbox"/> No <input type="checkbox"/>

¹ Disability Price Tag | Disability charity Scope UK

Potential impacts:	See general comments above – increased rents are likely to have a disproportionate impact on low-income households unless this is adequately mitigated through other initiatives.
Mitigations:	Promote opportunities to apply for benefits and to sign post residents to support, and staggered payments. For 2024/25 up to £350k will be made available for council tenants in financial crisis, with applications managed through the council’s Local Housing Crisis Prevention fund.
Carers	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Other groups [Please add additional rows below to detail the impact for other relevant groups as appropriate e.g. 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

This proposal does have some benefits for our tenants in the following ways:

- **Repair & Investment:** continue to focus on our priorities previously identified by tenants including providing warm and reducing fuel poverty, ensuring homes are safe and on key elements such as kitchens. This benefits older and disabled tenants for whom the cold may be a particular issue, and recognises that many of the protected characteristic groups are more likely to live below the poverty line.
- **New Homes:** Women, Black and minority ethnic people, and Disabled people are overrepresented as both households seeking homelessness prevention advice and on the housing register. Addressing housing needs by providing more homes is therefore beneficial in addressing inequalities. In addition, new homes bring in a new income stream, safeguarding future income and service provision for all tenants.
- **Fire Safety:** The profile of residents varies from block to block, but in some block the following groups are over-represented: older people or Black, Asian and Minority Ethnic tenant. Additional funding for fire safety precautions and improvements increases demonstrates our commitment to safety.
- **Service provision:** continue to focus on provision of low-cost housing that supports tenants and focusses services on the most vulnerable whilst considering impacts on estates and neighbourhoods.
- **Procurement of Contractors:** The city council tendering process will assess potential contractors on a range of factors including how they bring social value and the level of customer care offered.

We are also mindful that because Disabled, and Black, Asian and Minority ethnic communities are over represented in seeking homelessness prevention advice, on the housing register and particularly they are more likely to be in rent arrears, this proposal may not be promoting equality of opportunity and therefore we need to ensure that outlined mitigations and actions plans are carried through.

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:
For tenants who are in rent areas this proposal will influence their current debt situation. We will be mindful that support should be put in place for those who have been identified as having existing arrears and help from appropriate services will be forthcoming.
Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:
The equalities impact assessment has reinforced existing knowledge that service provision is not always able to respond flexibly and effectively to the different needs of groups with protected characteristics. Focussing on maximising income, improving services and increasing the provision of homes is a targeted approach to addressing inequalities.

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
Maximise service charge income to enable future improvements. Delivered through a review of service charges, this will require a further equality impact assessment	Miles Tilling	March 2025
A stock condition survey will be undertaken to 20,000 of BCC homes during 2024/25 & 2025/26. This will inform a strategic stock appraisal that will inform a new Asset Management Strategy to be delivered by March 2026.	Miles Tilling	March 2026
Complete the external review of our preparedness for the upcoming Consumer Standards and develop an improvement plan responding to any areas requiring improvement.	Miles Tilling	March 2024
We do not have data for tenants with the following protected characteristic: gender reassignment, pregnancy and maternity, religion & belief, sexual orientation and marriage and civil partnership. We need to consider whether the data is relevant and will be useful to help tailor and improve our services	Miles Tilling	March 2024

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

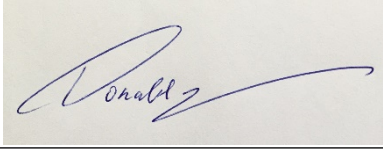
How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

<ul style="list-style-type: none"> • Key Performance Indicators will be used to monitor the contractor’s performance. • Monitor the complaints and identify systemic failures and lessons learned • Continue to collect asset intelligence, proactive surveys, identify urgent priorities, assess information and feed into investment plan to ensure we have good sound knowledge and data of our homes. • Carry out ongoing equalities monitoring and impact assessments for specific projects. • Levels of rent arrears, have they increased and for which equality group, and in relation to housing register demographics

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 Director².

Equality and Inclusion Team Review: <i>Reviewed by Equality and Inclusion Team</i>	Director Sign-Off: Donald Graham, Director Housing and Landlord Services 
Date: 12/1/2024	Date: 12/01/2024

² 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.