



Equality Impact Assessment [version 2.9]

Title: We Can Make extension of area of operation	
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input checked="" type="checkbox"/> Other <i>[please state] Housing scheme/lettings policy</i>	<input checked="" type="checkbox"/> New <input type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Growth and Regeneration	Lead Officer name: Louise Davidson
Service Area: Housing Delivery	Lead Officer role: Enabling Manager

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

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

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

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

We Can Make (WCM) is a community-led housing initiative that aims to deliver new affordable homes at point of need on underused Council-owned land, including the rear gardens of existing Council properties. It has been developed by the Knowle West Media Centre (KWMC) community organisation and has been focused on the Knowle West area.

We Can Make (WCM) is a Community Interest Company (CIC) set up by KWMC to develop and manage the new affordable homes on these sites. The plots are created by Council tenants voluntarily giving up part of their back garden. The existing tenant has input to the nomination of the first tenant for the new home and the existing tenant benefits from improvements to their external space/garden. There will also be opportunities to create micro plots in suitable back gardens of void properties prior to reletting. The Council will dispose of the micro plots to WCM at a peppercorn i.e. at an under valuation, on long-term leases. The Council sought approval from the Secretary of State for the principle of disposing of garden sites in this way in the Knowle West Regeneration Framework area.

The cabinet paper seeks to gain approval for the extension of the area of operation for We Can Make beyond the area of Knowle West to include the whole of South Bristol. This will require a further application to the Secretary of State.

The project will continue to be focussed on areas where there are older family-size Council houses with generous garden plots. In such areas there is often a lack of smaller affordable homes and the project has identified that there are unmet housing needs that can be met locally through development of underused land. The scheme aims to facilitate opportunities for community support between households and is developed with considerable engagement from the local community.

The value of the We Can Make approach to diversifying and increasing the supply of affordable homes lies in the fact that it creates an additional supply of land and homes that would not be possible other than through a localised community-led approach. However, it requires a high level of trust, local knowledge and engagement with the Council to ensure that it operates within relevant policy frameworks for assessment of housing need and allocations. The proposed homes are subject to the usual Council development management policies through the formal planning application process.

For the report to Cabinet that sought approval to roll out the We Can Make pilot to a further 14 units the EQIA

focused on the Local Lettings Policy.

This EQIA will consider the impacts of rolling out the scheme beyond Knowle West.

1.2 Who will the proposal have the potential to affect?

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

Additional comments: The Local Lettings Plan that governs allocations to the properties created by We Can Make has potential to affect quality of life/standard of living as it relates to access to housing. This was subject to EQIA previously to ensure that the Local Lettings Policy does not discriminate on basis of protected characteristics and is transparent in how homes are allocated.

1.3 Will the proposal have an equality impact?

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

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

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

Yes No [please select]

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 <i>[Include a reference where known]</i>	Summary of what this tells us
<i>Deprivation in Bristol 2019</i> file (bristol.gov.uk) <i>Census 2021 Population Profile Ethnic Group December 2023</i>	Poverty and disadvantage The 10 most deprived neighbourhoods in Bristol are all in the South Bristol areas of Hartcliffe, Whitchurch Park and Knowle West. At ward level, the greatest levels of deprivation in Bristol are in the wards of Hartcliffe & Withywood, Lawrence Hill and Filwood, Ethnicity and diversity

[Census 2021 Population Profile - Ethnic group \(bristol.gov.uk\)](http://bristol.gov.uk)

The population of Bristol is increasingly diverse. In 1991 the 'Black, Asian and Minority Ethnic' population accounted for 5.1% of the total population, in 2021 this increased to 18.9%. In Bristol the largest minority ethnic groups in 2021 were Somali 9,167 (1.9%), Pakistani 9,103 (1.9%) and Indian 8,371 (1.8%). However the South Bristol wards are much less diverse than some central, northern and eastern wards see Ethnic Group atlas [Census 2021 Population Profile - Ethnic group \(bristol.gov.uk\)](http://bristol.gov.uk)

Housing opportunities and tenure differ by ethnicity. People from ethnic minority groups are more likely to experience homelessness and overcrowding and people from Black African and Caribbean backgrounds are more likely to live in social housing than people from other ethnic backgrounds. By targeting South Bristol the We Can Make project may have less impact on improving the housing outcomes for ethnic minority people in the city. However, it will target areas where there are high levels of deprivation.

Research undertaken by KWMC in partnership with UWE School of Architecture, 2017

Research focused on Knowle West included 200 doorstep interviews on sample streets in, during Feb-April 2017. Respondents were asked about their support for and views on the We Can Make initiative. Key findings were:

- 90%: agreed development of micro-sites were a good idea for Knowle West
- 73% agreed it was a good idea for their street
- 36% would be interested in using some of their own land

This level of engagement has not taken place in other areas of South Bristol but there are ad hoc instances where households from other parts of South Bristol have expressed interest in participating in the We Can Make scheme. This includes people with children and older people.

Additional comments:

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

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

2.3 Are there any gaps in the evidence base?

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

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

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

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

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

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

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

We Can Make has undertaken extensive consultation with tenants and the wider community in Knowle West and some engagement with local residents in other parts of South Bristol. This has included:

- A series of co-design workshops with tenants and community representatives to identify ways tenants could better meet their own housing needs, and to develop the overall community-led approach to unlocking micro-sites.
- A series of co-design workshops and public exhibition made with tenants and community representatives to develop a Community Design Code for Micro-Sites.
- Existing BCC tenants who volunteer to give up a part of their garden for a micro site have been fully consulted and provided with independent legal advice.
- New tenants who move in to a property where a micro site has been created from the garden will have the scheme and the new development fully explained and given the choice whether to take up a tenancy in that property without any penalty as to further offers of housing through BCC.
- Engagement with local residents in vicinity of sites in Rodfords Mead, Hengrove, Queens Road, Withywood and Pensford Court, Stockwood regarding community-led housing. The consultation for each of the small sites (Rodford Meads, Pensford Court, Queens Road) was designed to be accessible in the following ways:
- Undertaking consultation through extensive door-knocking for homes and businesses in the vicinity of each sites, thereby ensuring that the consultation team went to people rather than on relying on people coming to events.
- Using a disabled accessible community venue for a pop-up consultation event to engage a wide range of community groups and residents in the area. This included elders, people with learning and physical disabilities and young people with additional needs.
- Designing and hosting an on-site daylong pop-up workshop that used creative play and engagement tools to support people of all ages to explore ideas, hopes, and concerns about the possible development. This designed to be as accessible as possible - and again going to where people are in the everyday life of the neighbourhood.
- This community engagement supported the land disposal process. WeCanMake is now undertaking community mapping research and designing a full programme of community co-design for the three sites, which will begin in early Spring 2024.

The roll out to areas in South Bristol will involve further community consultation through engagement with Council housing officers and tenant engagement officers and with local communities.

2.5 How will engagement with stakeholders continue?

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

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

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

BCC will be reviewing the pilot developments to assess how it has worked in practice and highlight any issues to be resolved for further roll out.

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)*

Whilst we have not identified any significant negative impacts from the proposal at this stage, we are aware of the following issues for people on the basis of their characteristics which we will seek to mitigate / address:

- the focus on housing local people, the emphasis on community support and the local connection criteria in the Local Lettings Plan has potential to exclude people from diverse communities and backgrounds, given the relatively less diverse nature of the community in South Bristol.
- host tenants may be hostile or discriminatory towards some groups of people based on their protected characteristics
- new properties may not be suitable or fully meet the needs of potential tenants in terms of accessibility or adaptability

These issues can be mitigated / will be addressed because:

- the Local Lettings Policy will operate within the parameters of the [HomeChoice Bristol Housing Allocation Scheme](#) which has clear eligibility and prioritisation criteria, and has been subject to a separate equality impact assessment process
- the WCM Equality and Diversity Policy sets out the organisations' framework for challenging discrimination, including for housing nominations and allocations, management of tenancies, meeting funders' needs and project delivery, dealing with volunteers, suppliers, supporters and other associated third parties.
- we have recommended that WCM develop an equality action plan to address any emerging issues or under-representation, and include bias awareness training as part of roll-out of the scheme for staff, volunteers and host tenants

- there is an established diversity monitoring system in place for the allocation scheme
- the overall scheme is subject to the Community Led Housing Land Disposal Policy & Self-Build Housing Land Disposal Policy, which underwent a separate equality impact assessment process to ensure there is a fair and transparent process for disposal of land, and that future site development meets the needs of Bristol's diverse population
- the scheme is a pilot and learning (including in relation to equality and inclusion) will inform future / more large-scale projects

PROTECTED CHARACTERISTICS

Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Host tenants may be hostile or discriminatory towards young people
Mitigations:	WCM adhere to and promote their Equality and Diversity policy and adhere to Home Choice allocations scheme and its equalities requirements. WCM monitor to ensure that there is no bias/indirect discrimination in implementation of the LLP.
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	The scheme may not meet the needs older people in terms of accessibility or future adaptability but may offer opportunities to downsize and still have family support.
Mitigations:	WCM adhere to and promote their Equality and Diversity policy and adhere to Home Choice allocations scheme and its equalities requirements. WCM seek to ensure that older people have access to the scheme in the way they promote it locally.
Disability	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	The scheme may not meet the needs disabled people in terms of accessibility or future adaptability. Host tenants may be hostile or discriminatory to Disabled people – particularly if they have hidden impairments or mental health problems
Mitigations:	WCM adhere to and promote their Equality and Diversity policy and adhere to Home Choice allocations scheme and its equalities requirements. WCM monitor to ensure that there is no bias/indirect discrimination in implementation of the LLP. WCM seek to ensure that Disabled people have access to the scheme in the way they promote it locally.
Sex	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Host tenant may be hostile, homophobic or discriminatory towards people because of their sexual orientation.
Mitigations:	WCM adhere to and promote their Equality and Diversity policy and adhere to Home Choice allocations scheme and its equalities requirements. WCM monitor to ensure that there is no bias/indirect discrimination in implementation of the LLP and take up of the scheme.
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Host tenant may be hostile or discriminatory towards trans people
Mitigations:	WCM adhere to and promote their Equality and Diversity policy and adhere to Home Choice allocations scheme and its equalities requirements. WCM monitor to ensure that there is no bias/indirect discrimination in implementation of the LLP and take up of the scheme.
Race	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	The local connection criteria and emphasis on community links may exclude people from minority ethnic backgrounds, and host tenants may be hostile or discriminatory toward people from different ethnic backgrounds
Mitigations:	WCM adhere to and promote their Equality and Diversity policy and adhere to Home Choice allocations scheme and its equalities requirements. WCM monitor to ensure that there is no bias/indirect discrimination in implementation of the LLP and promote the scheme to people from all ethnic groups.

Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	The local connection criteria and emphasis on community links may exclude people from diverse religions, and host tenants may be hostile or discriminatory toward people from different religious backgrounds
Mitigations:	See above. WCM adhere to their Equality and Diversity policy for lettings. WCM monitor to ensure that there is no bias/indirect discrimination in implementation of the LLP and promote the scheme to all faith communities.
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
OTHER RELEVANT CHARACTERISTICS	
Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	The 10 most deprived neighbourhoods in Bristol are all in the South Bristol areas of Hartcliffe, Whitchurch Park and Knowle West. At ward level, the greatest levels of deprivation in Bristol are in the wards of Hartcliffe & Withywood, Lawrence Hill and Filwood, The roll out of the We Can Make project to the whole of South Bristol has potential to empower some households in these areas to improve their housing situation.
Mitigations:	
Carers	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	The scheme has potential to assist in keeping carers and those they care for living in close proximity but with adequate privacy and individual space.
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:	Has potential to assist these groups in facilitating new housing with links to existing support networks.
Mitigations:	

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

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

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

The scheme aims to provide additional low-cost housing for people in housing need and has potential to benefit people with characteristics who are more likely to face housing issues and homelessness.

It has potential to enhance equality of opportunity by providing training to tenants with regard to neighbourliness and equalities and to provide opportunities for community-based support.

It has potential to foster good relations between people who share a protected characteristic and those who don't if allocations are managed effectively, and the Equality and Diversity policy and ethos are implemented and promoted.

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

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

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

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

Whilst there are no significant negative impacts identified at this stage, there is a risk that the scheme may not meet the diverse needs of citizens or that the Local Lettings Policy will favour only tenants from the local community who are of similar background, and allow prejudice of host households to influence allocations. These risks can be mitigated and through robust policies, and by an ongoing organisational commitment to diversity monitoring, and proactively addressing any emerging discriminatory impacts of the LLP. We Can Make should ensure that they promote the scheme actively in new areas in South Bristol and take into account the characteristics of the local populations in these areas in relation to protected characteristics in the ways that they promote the scheme.

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

The scheme is an opportunity to empower communities in areas with high levels of deprivation to provide new affordable housing with the active involvement of local people. There is also an opportunity to advance equality of opportunity and foster good relations between different communities. Extending the project geographically opens up opportunities to develop the scheme to cater to different communities and people with a range of protected characteristics.

4.2 Action Plan

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

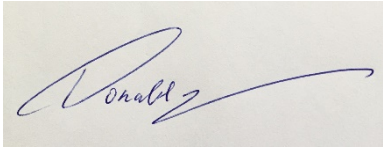
Improvement / action required	Responsible Officer	Timescale
Monitoring of allocations and impact of extension of the scheme to South Bristol as a whole. Review of equalities impacts of the implementation of the LLP and the WCM pilot project	Louise Davidson/Bryony Stevens	End of the financial year 2025-26.

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.

- Extent that it has Increased provision of affordable housing in South Bristol on underused BCC land
- WCM diversity monitoring of participants in the scheme
- Feedback from participants in the scheme of different ethnic and other protected characteristics.

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

Equality and Inclusion Team Review: Reviewed by Equality and Inclusion Team	Director Sign-Off: Donald Graham, Director Housing and Landlord Services 
Date: 11/1/2024	Date: 11/01/2024

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