

# Equality Impact Assessment [version 2.12]



Title: Goram Homes Limited Business Plan 2024/25	
<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: Growth and Regeneration	Lead Officer name: Helen Davis
Service Area: N/A	Lead Officer role: Shareholder Liaison Manager

## 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.

BCC's wholly owned companies are required to annually refresh their business plans and submit them to the Council for approval. This proposal relates to the Goram Homes business plan for 2024/2025.

### 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 type="checkbox"/> City partners / Stakeholder organisations	
Additional comments:		

### 1.3 Will the proposal have an equality impact?

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

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

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

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	[please select]
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We have not identified any significant equality impact for service users or the wider community on the basis of their protected or other relevant characteristics from the business plan, however, the following information explains how Goram intends to deliver on its equalities objectives.

The 2024/25 Business Plan outlines Goram Homes mission to work in partnership with Bristol City Council and external development partners to build high-quality, sustainable homes that meet the housing needs of the city, create inclusive communities, respect the environment, innovate with speed and contribute to the local economy, including employing local people and ensuring a regionally sourced supply chain where possible. In addition, when the homes are sold, half of the profit made will be returned to the shareholder to reinvest back into the city.

The plan states that the company will aim to build places that people love to live in, with mixed communities where council or affordable housing are indistinguishable from market sale homes. Goram Homes delivers high proportions of affordable housing across its developments, exceeding policy requirements, Currently, 50% of its pipeline of new homes will be for affordable housing.

The designs aim to incorporate safe, public open spaces that encourage people outdoors and into nature. As part of Goram Homes' social value commitments, each development will support the surrounding community; this includes Skills Academies to provide free construction training, employing local people, running community initiatives such as Green Gyms, and supporting local charities and voluntary organisations. For example, in Lockleaze Goram Homes will be using some of its donation-in-kind funds to rebuild a Disabled toilet in a local community centre. In addition, the Building for a Healthy Life tool is used to ensure at least 10 out of 12 categories are met by each project.

It is important to Goram Homes that, when new developments are being designed, they hear from a wide range of voices, particularly those underrepresented groups who may not always get involved in consultations on a new housing project – but who may greatly benefit from it. Good and diverse engagement ensures successful placemaking. For example, according to data from both the National Housing Federation and Shelter, Black and minoritised ethnic groups are disproportionately affected by the housing crisis. Goram Homes will make sure it is reaching an ethnically diverse group. And ensuring consultation events are timed during the afternoon as well as the evening ensures it hears from parents, older people as well as those who may work during daylight hours.

Therefore, Goram Homes plans to carry out individual assessments of equality impacts (based on this BCC template) when each development contained in the business plan comes to consultation / engagement. Goram Homes has an engagement strategy that ensures full equalities considerations are made at the necessary stages.

The areas Goram Homes will be focusing its engagement on during the 2024/25 Business Plan year are below. These are sites (or phases of sites) that the housing company will be submitting a planning application for prior to 31<sup>st</sup> March 2025:

Filwood – Novers Hill site  
Westbury on Trym – St Ursula's site  
Central – The Grove Car Park site  
Hengrove – Hengrove Park site

Goram Homes will always be led by insight from communities and the data available to use when devising these plans.

## 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 \(bristol.gov.uk\)](https://www.bristol.gov.uk/equality-diversity)

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](#)

<b>Data / Evidence Source</b> [Include a reference where known]	<b>Summary of what this tells us</b>
<p>Full EQIAs will be undertaken prior to engagement work, and local data and information gained through these assessments will help Goram Homes design its approach to consultation.</p> <p>Goram Homes also wants to ensure it does not only hear from residents living closest to the development sites, but those who might directly benefit from the high levels of affordable housing it is building. To ensure this includes marginalised communities, it will work with community groups across the city.</p> <p>Post engagement, design teams (comprised of architects and landscape designers) will continue to work with specialist organisations, to promote equality within placemaking, for example disability groups to ensure accessibility in design.</p>	
<b>HENGROVE</b>	
Larger population of people aged 60+ than the average Bristol population	Consider working with local older people’s forums. Pilot questionnaires with broad section of older people. Ensure hard copies of materials in different formats. Seek feedback on event timings and locations. And ensure they are accessible to meet diverse needs.
Two LSOAs in Hengrove are in the lowest decile for deprivation.	Teams need an awareness of local needs and how placemaking can support communities
<b>FILWOOD</b>	
9.9% English not first language – this is just below city average of 10.1%	People may require consultation materials in different languages. Work with community groups to ensure events and materials are accessible and held in appropriate venues.
Areas of Filwood are some of the most deprived in England according to government’s Deprivation by Lower Super Output Area (LSOA) data.	Teams need an awareness of local needs and how placemaking can support communities
14.5 from Black Asian Minoritised Ethnic, slightly below city average of 18.9%	There is always a strong need to work closely with community groups and advocates to ensure diversity of voice within consultation and engagement
22.3% People with long-term physical or mental health conditions or illnesses where day-to-day activities are limited – this is deemed high against the Bristol city average of 17.2%	Teams must ensure all consultation and engagement is accessible and considers the larger levels of Disability in this area, which may be visible or hidden.
<b>WESTBURY ON TRYM</b>	
Double the percentage of people aged 80+ than city average	Consider working with local older people’s forums. Pilot questionnaires with broad section of older people. Ensure hard copies of materials in different

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
	formats. Seek feedback on event timings and locations. And ensure they are accessible to meet diverse needs
<b>CENTRAL</b>	
39.8% children living in poverty, which is significantly higher than city average of 21.8%	Teams need a high awareness of local needs and challenges and how placemaking can support communities
Crime rate is 476.6 per 1,000 of ward population	Safety is always a top priority, but this highlights the need to explore this issue during engagement and work with Avon and Somerset Police’s Designing Out Crime team on plans
37.6% born outside UK, against city average of 18.8% For 20.8% people, English is not their main language and 1.9% cannot speak English well	There is always a strong need to work closely with community groups and advocates to ensure diversity of voice within consultation and engagement.  People may still require consultation materials in different languages. Work with community groups to ensure events and materials are accessible and held in appropriate venues.
Young population - three times more 15–24-year-olds than the city average	Consider tailored engagement activities for young people, for example working with Place-Up, a social enterprise that empowers young people to have a voice in how their place changes around them.
Higher numbers of people from Hindu, Buddhist and Jewish faiths than city averages.	Work closely with community groups and advocates to ensure diversity of voice within consultation and engagement.
<b>Additional comments: Homes are designed to meet or exceed BCC planning policy. To ensure accessibility of its homes.</b>	

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

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

Goram Homes hasn’t historically collected this data from people during its consultation and engagement work but has been aware of using evidence and insight on each area to guide its activities.
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## 2.4 How have you involved communities and groups that could be affected?

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

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 a change process 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.

Goram Homes will involve and consult internal and external stakeholders before any engagement activities begin relating to the projects in the 2024/25 business plan, and will form its plans based on the insight gained and data found.

In the 2023/24 financial year, Goram Homes undertook engagement and consultation work on three projects: Hengrove Park, Dovercourt Road (Lockleaze), New Fosseyway Road (Hengrove).

Goram Homes' engagement strategy sets out its aim to work in partnership and form close relationships with community groups and frontline services to reach underrepresented groups with its activity.

It is important to enhance representation and participation. According to the Local Government Organisation, [Research by Uberoi and Johnston](#) typified politically disengaged citizens as those who do not know, value or participate in democratic processes – for example housing consultations - and identified some groups that were more likely to be disengaged. They found that older people and white people were more likely to be actively involved than younger people and ethnic minorities.

Trust is often identified as a barrier. Therefore, Goram Homes works with local community leaders and advocates to encourage attendance, involvement and feedback from these traditionally less engaged groups.

During consultation for all the above projects, Goram Homes held in-person events in accessible venues, at a time that suited both a retired and younger population, ran digital surveys and paper-based surveys for those who couldn't be there in person, and provided content to community groups to proactively share too. It also had a telephone line available for people to call and ask questions.

Goram Homes has begun talking to a social enterprise called Place-Up, which specialises in reaching young people and engaging them in development projects. Goram hopes to work with this organisation in future work.

Goram Homes undertakes social value activities across its live construction sites, including:

Green Gym in Lockleaze: anyone can volunteer to take part in conservation sessions in Lockleaze, run by The Conservation Volunteers (a charity). The Green Gym recently welcomed a group of people with disabilities and their carers, and has a diverse range of men and women from different backgrounds take part. The Green Gym also has upcoming conservation events planned with the local secondary school in the area.

One Lockleaze Skills Academy is an initiative set up by Goram Homes and Vistry Bristol. It is run by Partners in Bristol (PiB), who provide free training to adults 19+ who are unemployed or paid the minimum wage / below. Referrals usually come through the Job Centres or direct enquiries to PiB. Goram Homes has asked Partners in Bristol to provide any insight they have from any data they collect on protected characteristics of those who have been trained. Goram Homes wants to ensure a diverse group of people has access to this training.

Goram Homes has also engaged with communities on two additional projects, Novers Hill and Portwall Lane Car Park. It ran successful design competitions on both of these projects. It worked with Redcliffe Neighbourhood Forum on design workshops with residents, and at each workshop the team heard feedback from men and women of varying ages and ethnicities, including Disabled residents.

Goram Homes has reached out to WECIL and Bristol Disability Forum, who the design teams can work with as development plans across its sites progress.

## 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.

Goram Homes will continue to devise its engagement plans on a case-by-case basis, informed by insight received from its community contacts and from the data available to it.

Goram Homes has links with community groups across Bristol, including Black South West Network, West of England Centre for Inclusive Living and Voscur – which ensures it can link up with community and voluntary organisations across the city.

Goram has also formed connections with Bristol City Council’s neighbourhood teams and are able to make use of Bristol City Council’s demographic and health data.

## 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 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)

There is no overall disproportionate impact on a particular group as a result of this Business Plan as a whole, however this is something that the housing company will analyse through the EqIAs (based on this BCC template) undertaken ahead of each consultation / engagement period.

It is always beneficial to explore potential adverse impacts on people with combined characteristics. The more voices heard in the engagement and consultation phase, the more successful the placemaking will be.

For example, Goram Homes heard feedback through recent engagement on Hengrove Park that some parents did not feel the park in its current form was safe. Therefore, it is important to consider this disproportionate impact on young people, and young women. Goram Homes worked with the Designing out Crime team at Avon and Somerset Police to ensure a safe first design of Phase 1 and will continue to involve young people at the next stage of consultation.

#### PROTECTED CHARACTERISTICS

<b>Age: Young People</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
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Potential impacts:	
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Mitigations:	
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<b>Age: Older People</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
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Potential impacts:	
Mitigations:	
<b>Disability</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Sex</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Sexual orientation</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Pregnancy / Maternity</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Gender reassignment</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Race</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Religion or Belief</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Marriage &amp; civil partnership</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>OTHER RELEVANT CHARACTERISTICS</b>	
<b>Socio-Economic (deprivation)</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Carers</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Other groups</b> [Please add additional rows below to detail the impact for any other relevant groups as appropriate e.g. asylum seekers and refugees; care experienced; homelessness; armed forces personnel and veterans]	
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



Goram Homes aims to create inclusive communities where people can thrive, which has the potential to help foster good relations between people who share a protected characteristic and those who don't.

Its social value activities, for example the Skills Academy, which provides free training to those out of work or earning below the minimum wage, also has the potential to advance equality of opportunity between people who share a protected characteristic and those who don't.

## 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 is no overall disproportionate impact on a particular group as a result of this Business Plan as a whole, however this is something that the housing company will analyse through the EqIAs (based on this BCC template) undertaken ahead of each consultation / engagement period.

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

There is no overall disproportionate impact on a particular group as a result of this Business Plan as a whole, however this is something that the housing company will analyse through the EqIAs (based on this BCC template) undertaken ahead of each consultation / engagement period.

### 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
The mitigations and actions listed above are managed by Goram Homes as part of each individual development therefore this is not an action plan which BCC will track in detail.	Goram Homes	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.

The mitigations and actions listed above are managed by Goram Homes as part of each individual development therefore this is not a plan which BCC will track in detail.

## 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 Director<sup>1</sup>.

<b>Equality and Inclusion Team Review:</b> <i>Reviewed by Equality and Inclusion Team</i>	<b>Director Sign-Off:</b> Tim O’Gara, Director: Legal and Democratic Services
Date: 22/2/2024	Date: 22/02/2024

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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.