

Equality Impact Assessment (EIA) Tool

Document Control

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Glossary of Terms

Term	Description
Affordable homes	Housing for sale or rent, for those whose needs are not met by the market
Cost of Living Crisis (COL crisis)	The 'cost of living crisis' refers to the fall in 'real' disposable incomes (that is, adjusted for inflation and after taxes and benefits) that the UK has experienced since late 2021.
Department Levelling Up, Housing & Communities (DLUHC)	The Government department responsible for local government
English Housing Survey (EHS)	The English Housing Survey is a continuous national survey commissioned by DLUHC, it covers people's housing circumstances and the condition and energy efficiency of housing in England
Housing Allocations Policy	This policy enables the council to allocate and offer homes to those in the highest housing need
Housing Market	All the dwellings in a location such as Nottingham's housing market.
Housing Needs Assessment (HNA)	An assessment as to the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for.
Housing Register	Waiting list of eligible people for social housing
Joint Strategic Needs Assessment (JSNA)	A statutory document which describes Nottingham's health and wellbeing needs
Private Rented Sector (PRS)	Property owned by a landlord and leased to a tenant.
Registered Providers	These are independent societies, bodies of trustees or companies established for the purpose of providing low-cost social housing for people in housing need on a non-profit-making basis

Section 1 – Equality Impact (NCC staff/ Service users/ Citizen/ Community impact)

1. a. Brief description of proposal/ policy/ service to be assessed

The “Housing Strategy – Homes fit for the future, 2024-2028” provides a framework for future investment and activity.

It replaces and builds upon Nottingham City Council’s previous strategy “Housing Strategy – Quality Homes for All, 2018-2021.” It is not a statutory duty for a council to have a Housing Strategy, but it is considered best practice.

Strategy vision - Homes in Nottingham meet the aspirations and needs of our current and future residents. People live in safe, warm homes, that they can afford, in vibrant local neighbourhoods where everyone can thrive.

Nottingham’s most pressing housing issues have been identified as

- Lack of affordable housing to rent
- Homelessness and rough sleeping
- Quality of rented accommodation and the service provided in all rental sectors
- The impact that carbon emissions from the city’s homes are having on the environment.

Within the strategy there are four main priorities which encompass the interventions we think will have the most significant impact on the long-term challenges in the city’s housing market and help us achieve our priorities.

- **Priority One: Strategically enabling housing led delivery and regeneration and improving housing standards whilst continuing the progress towards a carbon net zero future.**
This priority looks at increasing the number of available homes in the city and simultaneously enabling a more diverse housing market. Promoting age friendly and health promoting homes and neighbourhoods, creating a greener Nottingham, supporting inclusive economic growth, achieving the right balance of student housing, and tackling empty homes are key themes.
This priority also looks at how we will improve council homes, neighbourhoods and services and how we will work with stakeholders in the other housing tenures to improve the condition of the existing housing stock in the city. Explaining how we will work with social housing and private landlords to encourage them to invest in their homes and communities and how we will make the best use all available regulatory and policy tools to support landlords to deliver better housing within the sector and to tackle poor practice. The strategy also looks at how we can help owner occupiers to improve their homes.

- **Priority Two: Making the best use of the available housing stock and supporting the development and acquisition of more affordable homes.**

This priority looks at how the council can enable new social and affordable homes to be built and acquired. As well as delivering new council homes, this priority acknowledges that the council can't meet the city's need for affordable housing on its own and looks at how we can work with and support developers and Registered Providers to deliver new social and affordable homes. This priority also recognises the significant demand for affordable and social housing in the city and considers how the council can work with social housing providers to maximise the use of existing affordable homes and reduce overcrowding and under-occupation.

- **Priority Three: Preventing and reducing homelessness and rough sleeping**

This priority looks at how the council and its partners can prevent and reduce homelessness and rough sleeping and end the routine use of B&B accommodation for families with children.

- **Priority four: In partnership with health services, social care and other partner agencies, supporting people to live independently.**

This priority addresses how the wide-ranging and varied housing needs of different groups in Nottingham can be met and how to tackle the barriers to finding and sustaining a suitable home experienced by some. It covers areas where housing strategy and health and social care cross with housing and looks at how we can support each other priorities.

1. b. Information used to analyse the equalities implications

Key information used to analyse the equalities

A [Housing Needs Assessment](#) (HNA) was commissioned to provide evidence to support housing market interventions and prospective future funding bids.

The assessment includes detailed analysis of Older Persons Housing Needs and Housing People with Disabilities. There is also a detailed assessment of the need for Affordable Housing which is needed by lower income households which will include all the protected characteristics groups.

Many people in these groups will fit criteria for affordable housing but currently find that due to limited supply they cannot access the housing tenure that would be best suited to them.

As the shortage of social housing continues the Private Rented Sector (PRS) is a sector will serve more people that traditionally would have been served by social landlords including people in the protected characteristics groups.

Detailed analysis on the PRS is also included, who is accessing it and financial barriers to it and the need for Build to Rent developments to help address the shortage of supply in this sector.

There has also been a [Gypsy and Traveller Accommodation Assessment](#) commissioned, to look at the needs of this group in detail.

The Joint Strategic Needs Assessment [Housing with excess winter deaths and cold-related harm](#) has informed this strategy. This JSNA looks at data linking housing and health. Housing is a key determinant of health and poor quality or unsuitable homes can directly affect people's physical and mental wellbeing, creating or exacerbating health issues. Those who are already vulnerable through disability, existing/chronic ill-health, age and/or low income, are most at risk of deprivation including poor quality homes and neighbourhood environments.

The Joint Strategic [Needs Assessment Domestic & Sexual Violence & Abuse Safe Accommodation Needs Assessment 2021](#). The purpose of this Needs Assessment is to assess the need for support for all victims (within Nottingham) of Domestic Abuse in relevant safe accommodation.

We have carried out a detailed assessment of Census data to ascertain key population and housing characteristics and how they have change over time and are predicted to change in the future. This includes insights on all the protected characteristics groups.

The Housing Strategy is underpinned by an Evidence Base. The Evidence Base is a key document that brings together all other housing related strategies, or housing components contained within complementary strategies into one place. These, alongside the data, are collated into one unified, coherent plan of action which supports the direction and delivery of services that citizens want and need, within the available resources – The Housing Strategy.

The Evidence Base contains and analyses available local data on a wide selection of different groups to ascertain their needs. These specifically include families with children, the elderly, people with disabilities, people having mental health needs, learning disabilities, autism, minority ethnic groups, gypsies and travellers, travelling show people and boat dwellers, asylum seekers, refugees and migrants, students, homeless and rough sleepers, severe multiple disadvantages, victims of domestic abuse, care leavers and people suffering deprivation. Includes national data sets such as the Census, English Housing Survey (EHS) and local data such as the Housing Register.

Before work started on the current draft document an initial consultation was held where the proposed key themes were shared and a workshop discussion was held, this took place in 2022 with key partners and stakeholders such as Private Landlords, Housebuilders/Developers, Registered Providers, Planners, Environmental Health, Homelessness Practitioners, Councillors, Housing Services etc. who are expected to share responsibility in delivery/service provision. This feedback formed the basis of the actions to be taken over the strategy period.

In late summer 2022 a Have Your Say event on Race and Housing was held. This event was held to uncover the needs and barriers associated with housing experienced by minority ethnic groups.

Findings from these events were incorporated into the strategy.

The draft Housing Strategy will be subject to a public and stakeholder consultation with key partners and stakeholders from:

- Citizens, including tenants and leaseholders
- Councillors
- Private developers
- Social housing providers
- Landlords and Agents
- Health, Social Care and Specialist Services

1. c. Who will be affected and how?

Impact type (NCC staff/ Service users/ Citizens/ Community)	Equality group/ individual	Positive	Negative	None	Reasons for your assessment (Including evidence)	Details of mitigation/ actions taken to advance equality	Details of any arrangements for future monitoring of equality impact (Including any action plans)
Citizens	People from different ethnic groups National data shows that minority ethnic groups repeatedly, and disproportionately, lack access to good quality,	✓			There is a section on Minority Ethnic Groups in our evidence base including feedback from	<ul style="list-style-type: none"> • Review our monitoring arrangements across tenures for a range of housing related indicators to 	Monitored via the Implementation plan This EIA will be updated with any equality impacts arising and

	genuinely affordable homes and are more likely to live in overcrowded and poor-quality housing that fails to meet their needs. They are also more likely to work in lower-paid jobs and spend a higher proportion of their income on housing costs.				the Race and Housing Event.	<p>see how we can improve knowledge in this area.</p> <ul style="list-style-type: none"> Annually review our housing register and lettings data to understand the need for social housing amongst ethnic minority communities and monitor against 2021 Census data 	mitigation to be taken
Citizens	Men			X none specific			
Citizens	Women			X none specific			
Citizens	Trans	X			National research from Stonewall shows that 25% of trans people have experienced	<ul style="list-style-type: none"> Investigate what data we can access at a local level 	<p>Monitored via the Implementation plan</p> <p>This EIA will be updated with any equality impacts arising and</p>

					homelessness at some point.		mitigation to be taken
Citizens	<p>Disabled people/ carers</p> <p>Nottingham has a higher than England average occurrence of households that have at least one person with a disability. This population within the city is expected to increase in the coming years. We need to plan to ensure that appropriate housing will be available for this group.</p>	✓				<ul style="list-style-type: none"> • In-depth analysis and solutions proposed in the HNA • Enable integrated partnerships between health, housing to address our collectively identified priorities 	<ul style="list-style-type: none"> • HNA will be periodically updated in line with the council's Local Plan revisions • Revise the JSNA/s that cover disabled people led by Public Health timescale tbc
Citizens	Pregnancy and maternity			X none specific			
Citizens	Marriage/Civil Partnership			X none specific			

Citizens	People of different faiths/ beliefs and those with none			X none specific			
Citizens	Lesbian/ Gay/ Bisexual people	X			Research from Stonewall shows that almost one in five LGBT people have experienced homelessness at some point in their lives	<ul style="list-style-type: none"> Investigate what data we can access at a local level 	<p>Monitored via the Implementation plan</p> <p>This EIA will be updated with any equality impacts arising and mitigation to be taken</p>
Citizens	Older The older population within the city is expected to increase in the coming years. We need to plan to ensure that appropriate housing will be available for this group.	✓			<p>There is a section on Older People in our evidence base.</p> <p>The HNA brings together a variety of evidence about the Older People population in Nottingham.</p>	<ul style="list-style-type: none"> Independent Living Schemes to be reviewed Revise the JSNA/s that cover older people 	<ul style="list-style-type: none"> Monitored via the Implementation plan Revise the JSNA/s that cover disabled people led by Public Health timescale – council plan commitment
Citizens	Younger	✓			Requirements for family housing analysed in the	<ul style="list-style-type: none"> Support Nottingham's bid to become a child-friendly 	<ul style="list-style-type: none"> Child Friendly City project monitoring

					Housing Needs Assessment	city. <ul style="list-style-type: none"> End the routine use of B&Bs for families with children. 	<ul style="list-style-type: none"> Monitored via the Implementation plan
	<p>Other (e.g. <u>looked after children</u>, cohesion/good relations, vulnerable children/adults), socio-economic background.</p> <p><i>Please underline the group(s) /issue more adversely affected or which benefits.</i></p>				There are about 400 care leavers aged 18-21 in Nottingham. Each year around a hundred young people who on reaching 18 years old are leaving care and require suitable accommodation to prevent homelessness	<ul style="list-style-type: none"> Support the delivery of the Care Leavers Pathway and Protocol for accommodation. 	Monitored via the Implementation plan
Citizens	<p>Gypsies and Traveller</p> <p>Gypsy, Roma and Traveller people have the worst outcomes of any ethnic group across a huge range of areas, including education, health, employment,</p>	✓			Gypsy and Traveller Accommodation Assessment (GTAA) for the	Commission an updated Gypsy and Traveller accommodation needs assessment	GTAA will be periodically updated in line with the council's Local Plan revisions

	criminal justice and hate crime - House of Commons Women and Equalities Committee ¹				period 2020-2038 ²		
Citizens	<p>Lower Income Groups / Protected Characteristics groups</p> <p>Lower income groups have the least choice of and access to housing.</p>	✓			<p>University of Bristol research The Inequality of Poverty³ (2021) finds that some protected characteristics are associated with an increased risk of poverty in the UK: race, sex (in the case of single mothers), and disability.</p>	<p>Increase the availability of affordable housing available and increase quality of rented sector.</p>	<ul style="list-style-type: none"> • Council Plan commitment to increase affordable housing in the city • Council Plan commitment to renew the PRS discretionary licensing schemes

1. d. Summary of any other potential impact (including cumulative impact/ human rights implications):

Cost of Living Crisis
 People with protected characteristics have been adversely affected by the Cost of Living Crisis (COL). Housing costs and energy costs are key drivers of the COL and both are considered in the strategy.

A key priority of the strategy is to increase the number of homes locally for both sale and to rent to help ease the pressure in the housing market.

¹ <https://publications.parliament.uk/pa/cm201719/cmselect/cmwomeq/360/report-summary.html>
² <https://www.gnplan.org.uk/media/3372879/greater-nottingham-ashfield-gtaa-report.pdf>
³ <https://fairbydesign.com/wp-content/uploads/2021/02/The-Inequality-of-Poverty-Full-Report.pdf>

Another key priority of the strategy is to improve the quality of rented homes. Housing condition assessments include properties energy efficiency which is illustrated by the EPC rating awarded. The Housing Strategy supports the city's Fuel Poverty Strategy 2018 – 2025 which aims to reduce bills, increase energy efficiency and maximise household income.

Increasing the number of homes in the city, reducing fuel poverty and increasing energy efficiency will help protect local people from further COL shocks.

The benefit of these interventions will be felt more by lower income groups.

Environmental

In Nottingham the housing sector is responsible for 34.7% of the city's CO2 emissions, making the sector the biggest contributor. More than 350,000 tonnes of CO2 are produced by homes in the city per year. Inevitably the building of new homes will also create carbon emissions both by the construction of it and from their future households.

Climate change will affect people in the UK unevenly, and there could potentially be strong distributional variations across different group of people. People with lower income groups being more adversely affected.

There is a need to reduce carbon emissions from housing and this is embedded into Nottingham city councils Carbon Neutral Nottingham 2020-2028 Action Plan and the Fuel Poverty Strategy, and their actions supported in this strategy.


Section 2 – Equality outcome

Please include summary of the actions identified to reduce disproportionate negative impact, advance equality of opportunity and foster good relations. Please pull out all of the mitigations you have identified and summarise them in this action plan

Equality Outcome	Adjustments to proposal and/or mitigating SMART actions	Lead Officer	Date for Review/ Completion	Update/ complete
Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act 2010.	Review our Housing Allocations Policy to ensure it remains lawful and reflect changes contained within the Act	Leon Mclean	Next review by end of 2024	
Advance equality of opportunity between those who share a protected characteristic and those who don't	<p>Building more affordable homes for local people</p> <p>Enable integrated partnerships between health, housing, and social care to promote investment in housing and our collectively identified priorities.</p> <p>Work in partnership with health and social care colleagues, Registered Providers and private developers to enable new specialist provision to come forward.</p>	<p>Mark Lowe</p> <p>Dan Lucas</p> <p>Dan Lucas</p>	<p>Council plan target</p> <p>Housing Strategy monitoring</p> <p>Housing Strategy monitoring</p>	
Foster good relations between those who share a protected characteristic and those who don't	Review our planning docs to ensure they set a framework to enable mixed communities	Ruth Stallwood	In line with the Local Plan refresh timescales	
(Please add other equality outcomes as required – e.g. mitigate adverse impact identified for people with a disability)				

Please note: All actions will need to be uploaded onto Pentana

Section 3 – Approval and publishing

<p>The assessment must be approved by the manager responsible for the service /proposal. Approving Manager details (name, role, contact details):</p> <p>Dan Lucas, Housing Strategy and Partnerships Manger, Dan.Lucas2@nottinghamcity.gov.uk</p>	<p>Date sent for advice:</p> <p>05/06/2024</p>
<p>Approving Manager Signature:</p> 	<p>Date of final approval:</p> <p>10/07/2024</p>

For further information and guidance, please visit the [Equality Impact Assessment Intranet Pages](#)
Alternatively, you can contact the Equality and Employability Team by telephone on 0115 876 2747

Send document or link for advice and/ or publishing to: edi@nottinghamcity.gov.uk