

## Appendix B: Equality Impact Assessment

This form will help you to identify the aims and objectives of the policy, service or function you are assessing and help you decide if a full Equality Impact Assessment is required. Please use this form as a recording tool and follow the further guidance on each of the Steps, which is available in the EIA Toolkit.  
NOTE: This template is a guide only.

### Step One – Decide who will contribute to the EIA

<b>Title of policy, service or function</b>	<b>Officer responsible for EIA</b>	
NCH Decommissioning and Regeneration Programme 2012 - 2017	Gill Moy, Director of Housing	
<b>Service area</b>	<b>Other members of the EIA Team</b>	
Company Wide	Afzal Hussain	Business Administration Apprentice
	Annette Lane	Relocation Support Officer
	Colin Bull	Programme Planner
	Diane Karlonis	Housing Patch Manager (Clifton)
	Elaine Crofts	Homelink Support Manager
	Gary Rackstraw	Equality and Diversity Research Officer
	Janet Glass	Head of Business and Improvement
	Mark Lawson	Performance Improvement Manager
	Mark Lowe	Housing Development Manager (NCC)
	Richard Holland	Assistant Director of Housing Services
	Stuart Smith	Policy and Partnerships Officer
Teresa Raffle	Lettings Manager	
<b>Date form was completed</b>	<b>Review date (See question 7)</b>	
12 April 2012	<ul style="list-style-type: none"> <li>• Decommissioning Steering Group</li> <li>• Scheme based EIAs.</li> </ul>	

Step Two - Preliminary Assessment – Identify aims and objectives

1. Briefly describe the policy/ service or function and its aims and objectives

Nottingham City Homes is recommending the demolition of 973 flats and maisonettes by 2017 in the following areas of the city:

Scheme	Total Dwellings	Number of Tenanted Dwellings	Number of leasehold dwellings
Cranwell Road flats	88	84	2
Lenton high rise	480	457	0
Meadows Cross Wall	84	84	5
Meadows Q Blocks	209	208	25
Radford high rise	90	70	0
St. Anns	22	22	0
<b>Total</b>	<b>973</b>	<b>925</b>	<b>32</b>

To manage a large scale decommissioning programme in conjunction with Nottingham City Council and ensure that all residents are consulted and supported in moving to alternative accommodation. The programme will include the management of a new build programme, which will be a mix of property types. Some may be built on sites becoming available as a result of demolitions and others on newly identified sites.

The decommissioning proposals and their timing arose as part of the planning for the implementation of self financing of the Housing Revenue Account. The Council was required to give the Government details of its housing stock by 4 October 2011, including any properties it was intending to demolish prior to April 2017. From 1 April 2012 local authorities now keep the rents they collect but income must support the costs of providing the housing service and finance all investment in the stock. There will be no further major grants expected from the government. The properties planned for demolition were identified using a 30 year business model that took account of the long term viability of the properties we manage on behalf of NCC, an intention to build new council housing for rent, the

future needs of residents, and other plans for regeneration across the city. Those residents affected by the proposals were informed and consulted during August and September 2011. There will be more consultation planned as decisions are reached on the programme.

The properties that have been identified for demolition are all non-traditional building designs and have high running costs in terms of repairs and maintenance. They would require very costly investment to refurbish, address design and heat loss issues, and to bring up to the decent homes standard. A Net Present Value calculation that included projected rental income and maintenance costs over 30 years revealed that these properties would cost significantly more than the income they would bring in. It is not economically viable to retain them. NCH believes that it will still meet housing needs with a slightly smaller but improved stock. The City Council has indicated that it wishes to build a mix of new high quality homes, to include flats, bungalows and houses. Although flats and maisonettes are being demolished the new homes will not be a like-for-like replacement. This is due to the demand for family housing and lack of bungalows and larger family housing. NCH has promised tenants and leaseholders who will lose their home that they will all receive help and support. Eligible tenants or leaseholders will receive a statutory Home Loss payment, currently £4,700. All city council tenants will be granted a priority for rehousing once it has been decided to demolish their home and will be visited individually by a Relocation Support Officer to assess their needs and circumstances. The City Council will negotiate with leaseholders to repurchase their home. Tenants and leaseholders will receive a Disturbance Allowance that includes assistance with removals and setting up their new home.

2. Who is this policy, service or function intended to benefit or help?

This programme is intended to benefit Nottingham City Council, Nottingham City Homes, tenants and leaseholders and the wider communities neighbouring the areas of demolition and regeneration. This will be achieved by reducing over provision of some types of housing in certain areas, removing poor quality, outdated housing that is expensive to maintain, and building new homes that better meet the needs of the city's residents. The Council intends to build new homes for rent each year for the next five years, many of them to be built on sites that will become available following demolitions of council owned housing. These new homes will be built to a modern sustainable standard, with a much greater level of insulation meaning they will be more efficient and cheaper to keep warm. The provision of low cost home ownership and shared ownership by other providers will also be encouraged in those areas where there is currently a lack of this choice of housing. An aim of the City is to ensure a better balance and mix of tenures and property types that will meet a range of needs in an area. Demolition of the identified properties should release investment that will be used to make best use of the remaining stock of council housing as well as building new council properties.

### Step Three – Assess for relevance against the Equality Duties

3. Do the general duties of the Equality Act 2010 which requires you to have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010;
- advance equality of opportunity between people from different groups; and
- foster good relations between people from different groups.

Apply to your policy or procedure? **YES**

4. Could this policy, function or service have an adverse impact or disproportionately affect people identified with the protected characteristics in the table below, please tick likely level of impact?

RISK ASSESSMENT					
Equality strand	High	Medium	Low	None	Evidence of any known or perceived equality issues or barriers to the policy, service or function
Age	√				The recommendations include the demolition of Newgate Court sheltered high rise block, all the tenants of which are aged over 60. About 18% of tenants who will be affected are over 60 years. Young tenants are also over represented - over 10% (96) are aged under 25. During the consultation many tenants enquired about the availability of alternative accommodation. Commitments were given that everyone's individual circumstances and needs would be considered and that alternative accommodation would be found for every tenant whose property is demolished. This will be through the reletting of existing accommodation coming available, which would include Housing Association properties, the planned redesignation of some sheltered schemes and new build properties, which may include a mix of property types.
Gender Reassignment			√		Our knowledge of tenants who have undergone gender reassignment is very low. Although this may be due to tenants not wishing to disclose, this lack of awareness means there is a potential risk of rehousing to inappropriate locations away from current support links.
Disability	√				The high representation of older people and the inclusion of a high rise sheltered block mean that the proposals are likely to have a big impact on those tenants with a disability. Our current analysis shows that we have 316 system-records of a declared disability among those tenants who would be affected by demolition. The types of disabilities include (and there will be some tenants who will have multiple disabilities): <ul style="list-style-type: none"> <li>• 43 relating to restricted mobility.</li> </ul>

					<ul style="list-style-type: none"> <li>• 4 who have declared they use a wheelchair.</li> <li>• 48 relate to depressive illness or mental health.</li> </ul> <p>There is also a very significant level of reading and writing difficulties and other communication issues. There are several declarations of drug / alcohol abuse. Where we deal with individuals' housing needs that take account of a tenant's disability we must also be alert to the importance of any care and support that they currently receive and ensure there are processes for appropriate new arrangements to be put in place.</p>
Marriage and Civil Partnerships				√	<p>This characteristic relates to employment circumstances only but we recognise that moving home is a time of significant stress. The loss of their home and the need to move could impact on couple's relationships.</p>
Pregnancy and Maternity			√		<p>The anxieties associated with losing one's home may impact more on women who are pregnant or have young children. They are likely to be receiving midwifery / health visitor support that would need to be maintained. There may be a risk of impacting on other young families in flats wanting rehousing to more appropriate accommodation. A positive impact could be that some families in flats will have the opportunity to move to a house. This will include those not living in a flat or maisonette that is to be demolished but who could receive a direct offer of a house to release accommodation suitable for a tenant whose home is to be demolished.</p>
Sex		√			<p>Our profiling reveals that the level of males affected by the proposals, at 66.1%, is significantly higher than their profile across the stock as a whole, which is about 43%. Commitments were given that everyone's individual circumstances and needs would be considered and that alternative accommodation would be found for every tenant whose property is demolished. This will be through existing accommodation that becomes available for re-letting, which would include Housing Association properties, the planned re-designation of some sheltered schemes and new</p>

					build properties, which may be a mix of property types.
Race	√				Compared to the city wide tenant profile some BME groups are significantly over represented among those tenants who would be affected by the decommissioning proposals. For example 6.9% of these are Black Caribbean tenants and 10.1% Black African, compared to their general profile of 4.5% and 4.1% respectively. BME groups are more highly represented generally among our younger tenants living in flats. It is also likely that BME tenants will have chosen to live in areas that provide their community needs and will wish to remain in the locality. Issues of integration / segregation of BME tenants in the city need to be carefully considered. We know of 15 tenants of the Lenton high rise blocks whose language is not English. There is a range of nine different languages among these tenants. Analysis of tenants whose first language is not English needs to be carried on the other proposed decommissioning schemes. Commitments were given that everyone's individual circumstances and needs would be considered and that alternative accommodation would be found for every tenant whose property is demolished. This will be through the reletting of existing accommodation coming available, which would include Housing Association properties, the planned redesignation of some sheltered schemes and new build properties, which may be a mix of property types.
Religion/ belief		√			Tenants with a particular religion or belief may be living in an area with easy access to their place of worship. They may have strong links with their local community / parish.
Sexual Orientation			√		Of the tenants affected by the proposals 2.4% (22) have declared they are lesbian or gay, which is higher than our overall profile of less than 1%. LGBT tenants may have links within their community or have chosen a locality where they feel most secure. There is a risk of rehousing LGBT tenants into areas where they feel less secure or are more vulnerable.

Human Rights – Care and Support	√				<p>City Council tenants, leaseholders, sub-tenants of leaseholders and their households will be losing their home due to demolition or decommissioning and will be required to move.</p> <p><b>Article 8: Right to respect for private life, family life and the home</b></p> <p>This is not a right to housing, but is a person's right to access and live in their home without intrusion or interference. It is a qualified right, which does not undermine the decommissioning proposals but care must be taken to act lawfully and as unobtrusively as possible. Tenants and leaseholders may be receiving care and support to help them be independent and live active and healthy lives. This could be through support within the community, employment in an area or receipt of more formal social care support, which could be disrupted by having to leave their current home, area or community.</p>
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5. From questions 1- 6 above, are there any potential areas of adverse impact or known inequalities in relation to the take up of services, satisfaction levels, complaints or how well the service promotes equality? **YES**

If you answered YES to question 7 then move on to **Stage Two – A full Equality Impact Assessment**. If you answered **NO**, identify a date for review, sign off and file. You will need evidence to support this conclusion.

If you have identified any of the above as being **high risk** then please continue with a **full Equality Impact Assessment**. NOTE: policies or services identified as **medium risk** may also require a full EIA. Please seek guidance from your Head of Service and Equality Officer.

**Full Equality Impact Assessment required.**

**Step Four – Full Equality Impact Assessment**

Which individual, group or need is this policy, service or function designed to meet?	Staff profile	
	Users	√
	Stakeholder/Partners	√



	Public/citizens	√
	Community	√
Do you need to involve other services, departments or partners? Do you need to make any links with other EIA's? Please specify	<ul style="list-style-type: none"> <li>• Link to sheltered housing EIA, consider any impacts of decommissioning.</li> <li>• Homelink / choice based lettings scheme.</li> <li>• Lettings.</li> <li>• EIA identifies impacts on service users / prospective tenants registered for housing who are likely to be negatively impacted on waiting time. For example single hostel dwellers registered in Band 3. Seek views of voluntary sector.</li> </ul>	
How do you think your policy, service or function meets the needs of the diverse communities of Nottingham?	<p>The decommissioning programme is intended to benefit the City Council's tenants and leaseholders and the wider communities neighbouring the areas of demolition and regeneration by reducing over provision of some types of housing and removing poor quality, outdated housing. The remaining stock following demolition and especially new build properties will be much better insulated and heated, and will help to tackle fuel poverty. Displaced tenants will be granted an urgent priority and will be assisted to find alternative accommodation according to their needs and circumstances. They may be given a preference over other applicants in Band 2 that do not have a "clearance" priority. Support will be offered to vulnerable tenants. National studies and NCH's own research indicates that improved housing conditions have a positive impact on occupants' health and well being. A mix of new property types are to be built that will help to meet the diverse needs across applicants on the housing register. This will include accommodation for older tenants and family housing which is in high demand, in particular larger family housing which is in short supply.</p>	
Do you think your policy/service contributes to promoting equality, diversity & community cohesion across the protected characteristics in Nottingham? If so, how?	<p>BME citizens, young men and some older and disabled tenants may be more affected by the decommissioning as they are statistically over represented among tenants of some of the blocks of flats and maisonettes that are affected. This means that they are more likely to be living in poor, outdated accommodation when compared to other Council housing stock. The programme may therefore have a positive impact because the alternative accommodation should meet the decent homes standard, be energy efficient and have an up to date heating system, bathroom and kitchen. One to one support is provided to affected tenants following the formal decision that demolition is to proceed and well in advance of the work commencing. Choice of areas of rehousing and the type of property they are eligible for is discussed with each tenant and individual needs and requirements identified. The needs of those areas affected by the decommissioning will be considered by the City Council, which intends to seek to redevelop areas following demolition directly and in partnership with other agencies that would provide high quality sustainable housing in safe neighbourhoods where people want to live.</p>	
Is there any evidence of higher or lower take up of services by any group or community? If so, how is this explained?	<p>BME representation across the schemes - 42.3% - is significantly higher relative to the city wide BME tenant profile (23.4%). Young tenants are over represented within the programme – 10.7% compared to 7.4% generally. Although within the overall tenant profile 57% of tenants are female and 42.9% are male it is men who are most impacted by all the schemes except the Meadows Q block properties. Across the schemes 66.1% are male and 33% female. The most likely explanation is that the properties being decommissioned are primarily flats and maisonettes occupied by single people and couples. Also, most new lettings each year are made to this type of accommodation. For the year 2010/2011 nearly 40% of all new tenants were from BME groups and 25% were aged under 25 years. The Q blocks are an exception to this because they are family type accommodation.</p>	

If external providers partly or wholly deliver your policy, service or function, then outline how equality is addressed via procurement, contracting & monitoring arrangements.

NCH is the management agent for Nottingham City Council. As the primary partner responsible for managing and maintaining Nottingham City Council's council homes, we will comply with the requirements of the Public Sector Equality Duty of the Equality Act 2010 and the Human Rights Act 1998. Our current Equality and Diversity Policy statement says, "Nottingham City Homes is committed to work in partnership with Nottingham City Council, partners and stakeholders to discharge our responsibilities in accordance with the Equality Act 2010 and related equality legislation and European Directives, Public Sector Equality Duty and the Code of Practice for Employment. A new equality and diversity strategy has been drafted and is being consulted on. It will make reference to the need to ensure that providers of goods and services which are procured by Nottingham City Homes operate in accordance with our equality policy.

Our procurement procedures require external contractors to agree to work with our policies on equality and diversity. Our Equality and Diversity Policy statement says that we will:

- Require any company or business that wishes to be one of our contractors or suppliers to have developed policies on equalities in relation to employment and service delivery.
- Monitor the practices of any contractor or business we employ, contract or purchase from to ensure they act in accordance with our policies on equality and diversity.
- Cease issuing contracts to, purchasing from or commissioning any contractor, business or organisation, where we believe they fail to comply with our values in relation to equality and diversity

It is anticipated that the only external provider that will be used during the decommissioning programme will be a removal company (currently Pickfords).

## Step Five – Assess relevant information and data

<p><b>Consider existing knowledge, information &amp; data about the policy, service or function. (Consider for all protected characteristics)</b></p> <p><i>Demographics, user profiles, complaints, customer feedback, user groups or forums, surveys, focus groups, questionnaires, anecdotal evidence, research, consultations, staff equality groups, trade unions, inspections, performance data etc</i></p>	
Customer feedback & complaints	<p>Following a previous decommissioning scheme during 2010, High Cross Court in Radford, a VMS satisfaction survey was carried out of all tenants who had to move to alternative accommodation. The overall VMS outcome was 8.5 out of 10, against a target of 7. Comments were generally appreciative about the support received. Complaints related to the actual removals (furniture damaged, lack of packing boxes) or relet repairs (boiler / central heating not working).</p>
Information available on take up of the service to date	<ul style="list-style-type: none"> <li>• All tenants, leaseholders and their households of the affected properties will be affected by the decommissioning programme.</li> <li>• Information is available through Homelink on the numbers of applicants requesting rehousing, their needs banding and average waiting time.</li> <li>• The Relocation Support team maintain a weekly summary of visits conducted, offers made, tenants housed or who have successfully bid for alternative accommodation and of any legal action proceeding.</li> </ul>
Performance data including Internal and external indicators (targets)	<p>Decommissioning and demolition is programmed to be fully completed by 31 March 2017.</p> <p>A timeline for each scheme has been developed and there are ongoing discussions about the monitoring and performance throughout the scheme. There will be targets and specified time scales for visiting tenants, making offers of rehousing and ensuring transfers. Satisfaction of tenants with the decommissioning process will be monitored and measured through VMS.</p>

Demographics (local, regional or national)	<p><b>The residents of NCH and the City are a diverse range of BME communities, men and women, mainly older residents, smaller numbers of gay residents, with high levels of poverty and deprivation.</b></p> <p><b>Key makeup figures (Main tenants only March 2012)</b></p> <ul style="list-style-type: none"> <li>➤ Race statistics show over 6733 (24.6%) customers are Black Asian and Minority Ethnic. This is primarily made up of Black Caribbean (1,301), Black African (1,193), Mixed White and Black Caribbean (1020) and White Other (717). Of the 737 White Other these are a number of Eastern European Communities such as Polish and Czech. We currently have over 21,000 White British tenants (66.3%)</li> <li>➤ Gender statistics show we have nearly 16000 (57.6%) tenants who are female and 11,600 tenants who are male (42.5%)</li> <li>➤ Disability Statistics show over 3,500 tenants (12.6%) have a long term illness or disability. Of these the main disabilities are Restricted Mobility (2,240), Long Term Illness (1,894), Arthritis (1,639), Depression or Mental Health Condition (1,075) and breathing difficulties (988). Other high areas include Heart Problems, Deaf or hearing impairment and sight impairments.</li> <li>➤ Age statistics show we have over 1,953 (7.1%) of tenants aged 16-24, over 16,878 (61.5%) aged 25-59 and 7,150 (26.1%) over the age of 60.</li> <li>➤ We currently have Sexual Orientation information for 14,797 (53.9%) tenants of which 113 (0.8%) are gay men, 86 (0.6%) are bisexual and 49 (0.3%) are lesbian.</li> <li>➤ We currently have Religion and Belief information for 18,829 (68.6%) tenants with 8400 (44.9%) being Christian, 995 (5.3%) being Muslim, and small numbers being Buddhist, Jewish, Sikh and Hindu. There are nearly 6,400 tenants who do not have any religion and 2,300 who do not wish to give this information.</li> </ul>																		
Workforce profile	<p><b>At end December 2011</b></p> <table border="0"> <tr> <td>➤ Black and Minority Ethnic(BME) – 17%</td> <td>➤ Male – 65.7%</td> <td>➤ 16-25 – 5.3%</td> </tr> <tr> <td>➤ Non-BAME – 83%</td> <td>➤ Female – 34.3%</td> <td>➤ 26-35 – 17.7%</td> </tr> <tr> <td></td> <td>➤</td> <td>➤ 36-50 – 45.5%</td> </tr> <tr> <td>➤ Disabled – 11.3%</td> <td>➤ LGBT 1%</td> <td>➤ 51-55 – 16.7%</td> </tr> <tr> <td>➤ Non Disabled – 88.7%</td> <td>➤ Heterosexual 32.5%</td> <td>➤ 56+ -- 14.7%</td> </tr> <tr> <td></td> <td>➤ Not declared 64.2%</td> <td></td> </tr> </table>	➤ Black and Minority Ethnic(BME) – 17%	➤ Male – 65.7%	➤ 16-25 – 5.3%	➤ Non-BAME – 83%	➤ Female – 34.3%	➤ 26-35 – 17.7%		➤	➤ 36-50 – 45.5%	➤ Disabled – 11.3%	➤ LGBT 1%	➤ 51-55 – 16.7%	➤ Non Disabled – 88.7%	➤ Heterosexual 32.5%	➤ 56+ -- 14.7%		➤ Not declared 64.2%	
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Other data, evidence or findings from research	<p><b>See tables attached.</b></p>																		

## Step Six – Assessment of adverse or positive impact

Does the policy, service or function have a negative (adverse) impact or a positive effect on the following:				
Protected Characteristics	Negative effect (adverse impact) Yes/ No/ NA	Positive effect Yes/ No/ NA	Key Findings/Evidence	Proposed Action to address adverse impact
Age	Yes.	Yes.	<ul style="list-style-type: none"> <li>The majority of tenants affected by decommissioning will be rehoused into existing provision as the Council's properties become available for re-letting during the course of the programme.</li> <li>There are 162 tenants across all the schemes that are aged over 60 years. Many are likely to find alternative accommodation in other sheltered schemes across the city. It is planned to build bungalows, sheltered and age designated flats in Lenton and tenants displaced from the Newgate Court will be given preference for housing into these.</li> <li>10.7% (96) of tenants affected by decommissioning are young tenants aged under 25 years. These primarily occupy single person accommodation and new provision of this type of accommodation may not match the numbers that are to be demolished. Projections of the turnover of single persons' accommodation across the city show that there will be sufficient properties available to rehouse all single person households (and couples).</li> <li>Responses from the decommissioning surveys included that there are 154 children and young people aged 17 years or under living in the affected accommodation.</li> <li>Although the majority of tenants affected by the decommissioning programme were supportive of the proposals for demolition they did express their anxieties at public meetings and through the surveys about the availability of suitable alternative accommodation given the large scale of the decommissioning programme. Assurances were given that projected turnover of current council housing stock would be sufficient to house every tenant displaced by the decommissioning over a five year programme. Other social landlord</li> </ul>	<ul style="list-style-type: none"> <li>The programme has been phased over 5 years and turnover analysis has indicated that every affected tenant can be rehoused to appropriate accommodation, mostly within the Council's stock but also that managed by Housing Associations.</li> <li>The Council's mix of new build properties will take account of the relative low numbers of family houses and bungalows across the city to ease the demand on the housing register but would also provide accommodation for tenants affected by decommissioning where the programming makes this possible. Tenants have been given assurances that they may be considered for new properties that are built and for which they are eligible.</li> <li>In Lenton there are proposals to build bungalows, sheltered flats and other age-restricted</li> </ul>

			<p>providers in the City would also be asked to make their lettable properties available for housing tenants affected by decommissioning.</p> <ul style="list-style-type: none"> <li>• Although many tenants are longstanding and expressed that they are happy where they currently live, other tenants were less happy with their accommodation in particular heating costs for system build properties with poor levels of insulation.</li> <li>• Some families with children are likely to be offered more appropriate accommodation more quickly than they might otherwise have done.</li> </ul>	<p>flats for which tenants of Newgate Court would be given preference.</p> <ul style="list-style-type: none"> <li>• Garage sites in Lenton and the Meadows are to be demolished to increase the size of sites to be redeveloped.</li> <li>• Tenants being displaced by the decommissioning will be given an urgent (Band 2) priority, giving them greater choice of getting alternative accommodation of their choice.</li> <li>• It is intended to re-designate some existing sheltered schemes. Some would become available to applicants aged over 50 years, and others would become general needs accommodation. This will increase the numbers of properties suitable for and available to single people and couples including younger tenants affected by the decommissioning programme.</li> <li>• Approval has been granted by the Portfolio Holder for direct offers of rehousing to be made to families in flats wanting to move, which will release suitable</li> </ul>
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				<p>accommodation being requested by tenants affected by the decommissioning.</p> <ul style="list-style-type: none"> <li>• Links are being made with schools and the education service to help minimise disruption for families.</li> </ul>
Gender	Yes	Yes	<p>There are significantly more men than woman affected by the decommissioning programme.</p> <ul style="list-style-type: none"> <li>• 66.1% (593) tenants are male.</li> <li>• 33% (296) tenants are female.</li> </ul> <p>Given the type of accommodation of the Meadows Q blocks and the eligibility of families, more women are affected here – 52.5% (96), whereas over 70% of affected tenants of Radford, Lenton and Meadows crosswall properties are men.</p> <ul style="list-style-type: none"> <li>• These primarily occupy single person accommodation Projections of the turnover of single persons' accommodation across the city show that there will be sufficient properties available to rehouse all single person households (and couples).</li> </ul>	<ul style="list-style-type: none"> <li>• Tenants being displaced by the decommissioning will be given an urgent (Band 2) priority, giving them greater choice of getting alternative accommodation of their choice.</li> <li>• New build re-provision may include a range of property types appropriate to all household types including single person accommodation.</li> <li>• The reduction in the amount of single person accommodation as a result of the decommissioning will be mitigated by the re-designation of some sheltered schemes.</li> <li>• Home visits by the Relocation Support team has been proceeding for tenants of the Radford blocks, Meadows crosswall flats (phase 1) and Lenton Court and many tenants have been rehoused or have accepted</li> </ul>

				an offer of rehousing.
Disability (Physical, visual, hearing, mental)	Yes	Yes	<p>The incidence of disability among tenants within the decommissioning schemes is lower than that of the general tenant profile available through Northgate.</p> <ul style="list-style-type: none"> <li>• 9.4% of tenants in decommissioning schemes have declared a disability. This compares to 12.4% among tenants generally.</li> <li>• Lenton high rise has the highest level of declared disability, 11.8%, which no doubt reflects a greater number of older tenants because of Newgate Court, a sheltered scheme.</li> <li>• Of the number of declared disabilities among tenants affected by decommissioning 15.4% relate to depressive illness or a mental health condition and 14.8% to restricted mobility.</li> </ul> <p>The decommissioning survey asked respondents to indicate if they considered themselves or any member of their household to have a disability or special needs and the outcomes indicate a potentially high level of "hidden" disability or special need.</p> <ul style="list-style-type: none"> <li>• 39.1% (245) occupants overall are considered to have a disability or a special need.</li> <li>• Over 20% of occupants within each of the schemes.</li> </ul> <p>These figures refer to all occupants whereas Northgate records tenant profile information only, but may highlight a level of under recording.</p> <p>Disabled tenants affected by decommissioning may have adaptations installed at their property. Disabled tenants whose homes may not be due to be demolished for several years may require adaptations in the meantime.</p> <p>The issue of the potential impact of decommissioning on Band 3 hostel dwellers, many of whom may have a disability or a history of substance abuse, or are otherwise vulnerable, was identified.</p>	<p>Re-provision may include some new build bungalows suitable for physically disabled tenants. New build properties will be much more thermally efficient than the properties that are being demolished, offering warmer homes and cheaper heating costs.</p> <p>There is evidence nationally and locally that improved housing conditions have a positive impact on health and wellbeing. Regeneration by the City Council would also seek to improve the environment of neighbourhoods.</p> <p>The Relocation Support Team will:</p> <ul style="list-style-type: none"> <li>• Identify the needs and requirements of tenants and their households during one-to-one interviews and support them in seeking suitable accommodation.</li> <li>• Assist – or help to arrange assistance – for a tenant with a disability, by for example, helping them to prepare for a move or making a move to new accommodation.</li> <li>• Liaise with a tenant's support worker or other advocate.</li> </ul>



				<ul style="list-style-type: none"> <li>• Work with the City's aids and adaptations service to ensure any adaptations are installed at the new property.</li> <li>• Relocation Support team liaise with NCC's Aids and Adaptations team to identify tenants with adaptations installed and ensure appropriate rehousing / transfer arrangements.</li> <li>• Check with the Adaptations Team their process for dealing with applications for adaptations from a disabled tenant affected by the decommissioning.</li> <li>• Arrange for meeting with Homelink, housing aid and voluntary / hostels sector to discuss issues and agree possible actions.</li> </ul>
Gender Reassignment	Yes	Yes	Although the risk of disproportionately impacting on tenants or occupants who have undergone or are in the process of undergoing gender reassignment was considered to be low, it is acknowledged that our awareness is low. This lack of awareness means there is a potential risk of rehousing to inappropriate locations away from current support links.	<ul style="list-style-type: none"> <li>• All tenants' rehousing options and choices are fully discussed by the Relocation Support Team and every effort is made to ensure tenants secure accommodation in their area of choice.</li> <li>• Advice to be sought from the sector on the right kinds of questions that could be asked and / or information given that would help to ensure tenants are</li> </ul>

				comfortable to declare gender reassignment if they wish and are fully informed of their options.															
Marriage and Civil Partnership	n/a	n/a	n/a																
Maternity and Pregnancy	Yes	Yes	The anxieties associated with losing one's home and being forced to move may impact more on women who are pregnant or have young children. They are likely to be receiving midwifery / health visitor support that would need to be maintained. There may be a risk of impacting on other young families in flats wanting rehousing to more appropriate accommodation.	<ul style="list-style-type: none"> <li>• Pregnancy is identified during individual interview / completion of housing registration form.</li> <li>• Relocation Support Officers will provide additional support and advice.</li> <li>• Households with children or who are expecting a child will be eligible for a family house.</li> </ul>															
Race	Yes	Yes	<p>There is higher BME representation among tenants affected by decommissioning, compared to the overall tenant profile, across all the schemes. BlackAfrican representation is significantly greater than their tenant profile overall. especially for individual schemes:</p> <p>Lenton: 11.3%; Radford: 19.4%; St Anns: 18.2%</p> <p>These primarily occupy single person accommodation and new provision of this type of accommodation may not match the numbers that are to be demolished.</p> <p>It is also likely that BME tenants will have chosen to live in areas that provide their community needs and may wish to remain in the locality. Issues of integration / segregation of BME tenants in the city need to be carefully considered.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th rowspan="2"></th> <th colspan="2">Schemes</th> <th>Ten.</th> </tr> <tr> <th>No.</th> <th>%</th> <th>Prof. %</th> </tr> </thead> <tbody> <tr> <td>Indian</td> <td>5</td> <td>0.6%</td> <td>0.4%</td> </tr> <tr> <td>Pakistani</td> <td>16</td> <td>1.8%</td> <td>1.4%</td> </tr> </tbody> </table>		Schemes		Ten.	No.	%	Prof. %	Indian	5	0.6%	0.4%	Pakistani	16	1.8%	1.4%	<ul style="list-style-type: none"> <li>• Tenants being displaced by the decommissioning will be given an urgent (Band 2) priority, giving them greater choice of getting alternative accommodation of their choice.</li> <li>• All tenants' rehousing options and choices are fully discussed by the Relocation Support Team and every effort is made to ensure tenants secure accommodation in their area of choice.</li> <li>• Re provision may include some new build flats / single person's accommodation.</li> <li>• Scheme based EIAs to</li> </ul>
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Religion & faith	Yes	Yes	<p>Tenants who are going to be displaced from their current home with a particular religion or belief could be moved to an area away from their place of worship and / or their local community.</p> <p>10.2% of tenants affected by decommissioning have declared they are Muslim compared to the general tenant profile of 3.4%.</p>	<ul style="list-style-type: none"> <li>Relocation Support team to consider specific questions that identify tenant's religion / faith and how this might link to their rehousing options.</li> </ul>																																																												
Sexual Orientation	Yes	Yes	<p>Of the tenants affected by the proposals 2.4% (22) have declared they are lesbian or gay, which is higher than our overall profile of less than 1%. There is a risk that LGBT tenants may be displaced away from their chosen locality where they feel most secure into an area where they feel less secure or are more vulnerable.</p>	<ul style="list-style-type: none"> <li>Relocation Support team to consider specific questions relating to tenant's sexual orientation and how this might link to their rehousing options.</li> </ul>																																																												
Human Rights	Yes	Yes	<p><b>Article 8: Right to respect for private life, family life and the home</b>  <b>Article 14 of ECHR states:</b>  "a difference in treatment is discriminatory if 'it has no objective and reasonable justification', that is if it does not pursue a 'legitimate aim' or if there is not a 'reasonable</p>	<ul style="list-style-type: none"> <li>The Relocation Support team includes longstanding, experienced members of staff.</li> <li>Tenants will be visited</li> </ul>																																																												

			<p>relationship of proportionality between the means employed and the aim sought to be realised'."</p> <p>Tenants and leaseholders (or their tenants) will be losing their home and will be required to move. Should a tenant not accept any offer of alternative accommodation they may face the threat of possession proceedings. The City will take compulsory purchase proceedings if a leaseholder does not agree voluntarily to a sale.</p> <p>Tenants and leaseholders may be receiving care and support to help them be independent and live active and healthy lives. This could be through support within the community, employment in an area or receipt of more formal social care support, which could be disrupted by having to leave their current home, area or community.</p>	<p>individually and given an urgent level of priority on the housing register. They will be advised, encouraged and supported to make bids within Homelink procedures.</p> <ul style="list-style-type: none"> <li>• NCH will seek to identify ways to be proactive to identify alternative accommodation for tenants affected by decommissioning. There is no specified limit to the number of offers that could be made.</li> <li>• NCC will negotiate with leaseholders to repurchase their property at market value. Advice will be available on finding and securing other accommodation.</li> <li>• NCC will consider if it is possible to finance negotiating with leaseholders as soon as possible, rather than within designated financial periods or pending the formal decision to proceed with decommissioning specific schemes.</li> <li>• Eligible tenants and leaseholders will receive a homeloss payment, currently £4,700 and all will receive</li> </ul>
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				removal and relocation costs.
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### Step Seven – Differential Impact

<p>Has your assessment identified a differential impact for a particular group(s)?</p>	<p>All groups will be impacted by the programme of decommissioning / demolition. Some groups, such as BME, Muslim, young tenants under 25 years and older tenants over 60 years are over represented among those affected by the programme compared to the general tenant profile.</p>
<p>Can this differential impact be justified or does it amount to unlawful discrimination?</p>	<p>The impact on certain groups can be justified and is not unlawful discrimination. The decisions to decommission the properties in this programme were objective and reasoned, relating to the financing of the 30 year business plan and the demolition of properties that have been identified as poor quality, at or approaching the end of their useful life and too expensive or difficult to bring up to a decent standard.</p> <p>The groups being affected by decommissioning will be given higher priority of rehousing, will receive one-to-one support where required and, if they choose to remain in council housing or other social rented housing, any alternative accommodation will be of a higher standard than the property they previously occupied. The demolition of outdated housing that is not viable to retain may free investment and provide opportunities to build a more balanced mix of tenure and high quality property types that could include flats, bungalows and houses.</p>

### Step Eight – Unmet Needs

<p>Are there any unmet needs or issues for your service emerging out of the assessment?</p>	<ul style="list-style-type: none"> <li>• Impact on other applicants on the housing register, who may have to wait longer for rehousing.</li> <li>• Impact on Band 3 applicants living in a hostel with a move-on package.</li> <li>• This overarching decommissioning EIA may have missed or overlooked issues, needs or actions particular to a specific scheme or locality. This will be monitored over the five years of the decommissioning programme.</li> </ul>
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## Step Nine – Consultation and Research

<p>If there is insufficient information or gaps in data on the Protected Characteristics then please outline what further research or consultation activities you will be undertaking?</p> <p><i>A brief summary of planned consultations is sufficient here</i></p>	<ul style="list-style-type: none"> <li>• Consultation with all potential affected groups.</li> <li>• More detailed analysis of tenants of individual schemes, such as language issues.</li> <li>• Carry out scheme based EIAs involving local representation to identify any local issues and needs.</li> <li>• Consider potential impact on different groups registered for housing through Homelink e.g. single people residing in temporary hostel accommodation with identified support.</li> </ul>
<p>Please provide a brief summary of what the key findings were from your consultation activities outlined above?</p> <p><i>Do you need to revisit <b>Step 6</b> and add new information or actions in light of these findings</i></p>	<ul style="list-style-type: none"> <li>• Some groups will be impacted disproportionately compared to the general tenant profile.</li> <li>• The decommissioning surveys indicate there may be a high level of hidden, undisclosed / unrecorded level of disability or special needs of tenants or members of their household.</li> <li>• A need to ensure that during individual interviews with tenants and leaseholders specific questions are asked relating to the protected characteristics and how these may relate to housing options.</li> </ul> <p>All tenants, leaseholders and other residents of the proposed decommissioning schemes, except those occupying the Q block properties, were invited to attend a public meeting during August and September 2011. The proposals were also discussed at a number of tenant and resident meetings and coffee mornings.</p> <p>At the public meetings residents were encouraged to complete a decommissioning survey. Subsequently, all affected residents including residents of the Q blocks, were visited and the proposals discussed or information left together with the decommissioning survey.</p> <p>Once the formal decision to proceed with decommissioning has been made all tenants are visited by a member of NCH's Relocation Support Team.</p>

## Step Ten – Monitoring arrangements

<p>What are your arrangements for carrying out regular checks to monitor the policy? How often?</p>	<ul style="list-style-type: none"> <li>• Monitored at set periods by the NCH Decommissioning Operational Group.</li> <li>• Local, scheme based EIAs to be monitored at Area Panels.</li> <li>• Develop and carry out a programme of assessment of tenant satisfaction with the decommissioning process.</li> </ul>
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**Step Eleven – Publishing Results**

<p>What are your arrangements for publishing the results of your completed EIA?</p> <p>When, where &amp; how will you make the findings available &amp; to whom</p>	<p>Publish overarching EIA on NCH website.</p>
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**Step twelve – Action Planning – Improvement Plan**

Equality issues or adverse impact identified	Proposed Actions	Target/Measure	Lead Officer	Timescale/Deadline
<p>All protected groups</p>	<ul style="list-style-type: none"> <li>• For all affected tenants to receive information pro-actively on properties as they come available through the choice based lettings scheme.</li> <li>• All affected tenants to be given an urgent (Band 2) priority. This will alleviate some of the impact on affected groups such as young, BME and male tenants who are unlikely to be eligible for certain property types of new build properties.</li> <li>• Customer surveys to be carried out throughout the programme for each of the schemes to monitor</li> </ul>			

	satisfaction with the service and support provided.			
Age 1 (list below)	<ul style="list-style-type: none"> <li>• Reprovision to take account of the rehousing needs of tenants without children.</li> <li>• Reprovision to take account of the housing needs of older tenants over 60, especially those currently in Newgate Court sheltered scheme.</li> <li>• Liaise with schools / Education Service to best manage impact on schools of decommissioning and transfers of children between schools.</li> <li>• Carry out scheme based EIAs to identify any local issues and needs and any actions required.</li> </ul>			
Gender reassignment	<ul style="list-style-type: none"> <li>• Ensure that during individual interviews with tenants and leaseholders specific questions are asked relating to the protected characteristics and how these may relate to housing options.</li> </ul>			
Disability	<ul style="list-style-type: none"> <li>• Ensure that during individual interviews with tenants and leaseholders specific questions are asked relating to any disabilities or special needs of the tenant and their household.</li> <li>• Consider how best vulnerable tenants and those with a history of drug or alcohol abuse might be supported, and in particular how homelessness payment could be managed sensitively.</li> <li>• Arrange to meet with housing aid and hostel / refuge sector to discuss and agree position regarding hostel dwellers and their housing options.</li> <li>• Carry out scheme based EIAs to identify any local issues and needs and any actions required.</li> </ul>			
Marriage and Civil Partnership	n/a			
Maternity and Pregnancy	<ul style="list-style-type: none"> <li>• Liaise with midwifery service to seek advice and</li> </ul>			



	<p>information to provide to pregnant tenants and those with very young children affected by decommissioning.</p> <ul style="list-style-type: none"> <li>• Develop links with Children's Centres to help support pregnant women and tenants with families.</li> <li>• Carry out scheme based EIAs to identify any local issues and needs and any actions required.</li> </ul>			
Sex	<ul style="list-style-type: none"> <li>• Carry out scheme based EIAs to identify any local issues and needs and any actions required.</li> </ul>			
Sexual Orientation	<ul style="list-style-type: none"> <li>• Ensure that during individual interviews with tenants and leaseholder's specific questions are asked relating to a tenant or leaseholder's sexual orientation and how this may relate to their housing options.</li> <li>• Carry out scheme based EIAs to identify any local issues and needs and any actions required.</li> </ul>			
Race	<ul style="list-style-type: none"> <li>• Ensure that during individual interviews with tenants and leaseholders specific questions are asked relating to the protected characteristics and how these may relate to housing options.</li> <li>• Carry out scheme based EIAs to identify any local issues and needs and any actions required.</li> </ul>			
Religion and Belief	<ul style="list-style-type: none"> <li>• Ensure that during individual interviews with tenants and leaseholders specific questions are asked relating to the protected characteristics and how these may relate to housing options.</li> <li>• Carry out scheme based EIAs to identify any local issues and needs and any actions required.</li> </ul>			
Human Rights – care and support	<ul style="list-style-type: none"> <li>• Ensure the programme continues to be phased over several years to help maximise opportunities for tenants to</li> </ul>			

	<p>be housed in areas of their choice as far as practicable.</p> <ul style="list-style-type: none"> <li>• Planning for new building to consider developing property types on land released by demolition for reprovion where possible.</li> <li>• Develop decommissioning plans / protocols with other agencies, e.g. schools, social care, Aids and Adaptations</li> <li>• Possession proceedings will be taken as a last resort.</li> <li>• Carry out scheme based EIAs to identify any local issues and needs and any actions required.</li> </ul>			
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