

General Equality Impact Assessment (EIA) Form

Support:

An [EIA toolkit](#), [workshop content](#), and guidance for completing an [Equality Impact Assessment \(EIA\) form](#) are available on the [EIA page](#) of the [EDI Internal Hub](#). Please read these before completing this form.

For enquiries and further support if the toolkit and guidance do not answer your questions, contact your Equality, Diversity, and Inclusion (EDI) Business Partner as follows:

- Economy, Environment and Culture (EEC) – [Chris Brown](#),
- Families, Children, and Learning (FCL) – [Jamarl Billy](#),
- Governance, People, and Resources (GPR) – [Eric Page](#).
- Health and Adult Social Care (HASC) – [Zofia Danin](#),
- Housing, Neighbourhoods, and Communities (HNC) – [Jamarl Billy](#)

Processing Time:

- EIAs can take up to 10 business days to approve after a completed EIA of a good standard is submitted to the EDI Business Partner. This is not considering unknown and unplanned impacts of capacity, resource constraints, and work pressures on the EDI team at the time your EIA is submitted.
- If your request is urgent, we can explore support exceptionally on request.
- We encourage improved planning and thinking around EIAs to avoid urgent turnarounds as these make EIAs riskier, limiting, and blind spots may remain unaddressed for the 'activity' you are assessing.

Process:

- Once fully completed, submit your EIA to your EDI Business Partner, copying in your Head of Service, Business Improvement Manager (if one exists in your directorate), Equalities inbox, and any other relevant service colleagues to enable EIA communication, tracking and saving.
- When your EIA is reviewed, discussed, and then approved, the EDI Business Partner will assign a reference to it and send the approved EIA form back to you with the EDI Manager or Head of Communities, Equality, and Third Sector (CETS) Service's approval as appropriate.
- Only approved EIAs are to be attached to Committee reports. Unapproved EIAs are invalid.

1. Assessment details

Throughout this form, 'activity' is used to refer to many different types of proposals being assessed.

Read the [EIA toolkit](#) for more information.

Name of activity or proposal being assessed:	Housing Strategy 2024 to 2029
Directorate:	Housing, Care & Wellbeing
Service:	Housing Needs and Supply
Team:	Strategy and Supply
Is this a new or existing activity?	New
Are there related EIAs that could help inform this EIA? Yes or No (If	Yes – see EIA archive Housing, Neighbourhoods & Communities EIAs

Yes, please use this to inform this assessment)	EIA Housing Strategy 2015 on council website here
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2. Contributors to the assessment (Name and Job title)

Responsible Lead Officer:	Martin Reid, Interim Corporate Director, Housing, Care & Wellbeing, Housing lead
Accountable Manager:	Diane Hughes, Head of Strategy & Supply in Housing Needs & Supply
Additional stakeholders collaborating or contributing to this assessment:	Steve Morton, Policy Partnership & Scrutiny Officer Reena Johl, Policy Partnership & Scrutiny Officer Tom Matthews, Housing Performance Analyst David Golding, Public Health Data Specialist Jamarl Billy, Equality, Diversity, and Inclusion (EDI) Officer Sabah Holmes, Equality, Diversity, and Inclusion (EDI) Manager

3. About the activity

Briefly describe the purpose of the activity being assessed:

Although no longer a statutory requirement, the housing strategy is identified in the council's Constitution as part of the council Policy Framework. The strategy identifies the council's strategic priorities for improving housing outcomes in Brighton & Hove between 2024 and 2029.

What are the desired outcomes of the activity?

To deliver the council's vision of a better Brighton and Hove for all, including accessible, affordable, and high-quality homes for all residents. The 3 housing outcomes set out in the [Brighton & Hove City Council plan 2024 to 2027](#) are:

- Improved housing quality
- Increased housing supply
- Improved housing support

Following engagement and public consultation, the final version of the strategy identifies a further two outcomes. The five priority outcomes in Homes for everyone: Housing strategy 2024 to 2029 are as follows:

1. Improve housing quality, safety and sustainability
2. Deliver the homes our city needs
3. Prevent homelessness and meet housing need
4. Support independence and improved health and wellbeing for all
5. Provide resident focused housing services

Which key groups of people do you think are likely to be affected by the activity?

Everyone living in Brighton & Hove and people who would like to live in the city, across all protected characteristics and intersecting groups as set out in the council's [Equality Impact Assessment \(EIA\) Toolkit 2023](#). Specific disproportionate and intersectional impacts to be considered across all protected characteristics and vulnerable groups.

4. Consultation and engagement

What consultations or engagement activities have already happened that you can use to inform this assessment?

- For example, relevant stakeholders, groups, people from within the council and externally consulted and engaged on this assessment. **If no consultation** has been done or it is not enough or in process – state this and describe your plans to address any gaps.

The council consults its tenants and leaseholders through regular engagement activities and surveys e.g. the [STAR survey](#). Their feedback is also collected through complaints and compliments data.

We have a statutory duty to consult tenants and leaseholders on changes that affect them and to take into account the results of those consultations. We have 4 Area Housing Panels which function as formal reference groups for the council's housing services. Their role and other forms of engagement is captured in the [Tenant and Leaseholder Engagement Strategy](#) which highlights the need for different engagement approaches to reach more diverse and a greater number of tenants and leaseholders.

The council also engages and consults on housing and related policy matters, for example,

- proposals for two private sector licensing schemes for the city
- a review of our housing allocations policy
- the City Plan Parts 1 and 2
- specific developments for example, proposals for the development of 77 new council homes as part of the New Homes for Neighbourhoods programme

The development of proposals in the draft housing strategy was informed by other consultation and engagement exercises that considered housing and related issues. This included work to inform:

- Adult Learning Disability Strategy
- Autism Strategy
- Health & Social Care Commissioning Strategy
- Mental Health Housing Action Plan
- Violence Against Women and Girls Strategy (in development)
- Tackling Anti-social Behaviour (in development)
- Community Safety Strategy
- Homelessness & Rough Sleeping Strategy
- Older People's Housing Needs Assessment
- Trans Needs Assessment

A formal consultation of 11 weeks took place from 18 March to 2 June 2024. The consultation was extended by two weeks at the request of members of the Learning Disability Partnership to give them more time to consult their membership and service users. Consultees were encouraged to use the council's online consultation portal but hard copy and Easy Read versions of the survey were also made available.

Consultation responses were reviewed fortnightly by the senior officer group overseeing the development of the strategy. This included actions to reach groups where the response rate was lower than expected, for example, older people. Two in person consultation events were held towards the end of the consultation period to accommodate those who had requested face to face engagement. Some Third Sector organisations organised consultation events for their service users.

A detailed consultation report is available on the council's consultation portal Your Voice. This sets out key themes in consultation feedback and the council's initial response. It also forms an appendix to the report to Cabinet 26 September 2024.

5. Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this activity? Consider all possible intersections.

(Delete and indicate as applicable from the options Yes, No, Not Applicable)

Age	YES
Disability and inclusive adjustments, coverage under equality act and not	YES
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	YES
Religion, Belief, Spirituality, Faith, or Atheism	YES
Gender Identity and Sex (including non-binary and Intersex people)	YES
Gender Reassignment	YES
Sexual Orientation	YES
Marriage and Civil Partnership	YES
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	NO
Armed Forces Personnel, their families, and Veterans	YES
Expatriates, Migrants, Asylum Seekers, and Refugees	YES
Carers	NO
Looked after children, Care Leavers, Care and fostering experienced people	YES
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	YES
Socio-economic Disadvantage	YES
Homelessness and associated risk and vulnerability	YES
Human Rights	NO
Ex-offenders	YES
Lone Parents	YES

Additional relevant groups that may be widely disadvantaged and have intersecting experiences that create exclusion and systemic barriers may include:

- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy and numeracy barriers
- People on a low income and people living in the most deprived areas
- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery

- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

If you answered “NO” to any of the above, how will you gather this data to enable improved monitoring of impact for this activity? What are the arrangements you and your service have for monitoring, and reviewing the impact of this activity?

The final strategy will be accompanied by an annual action plan. Specific projects and programmes will be assessed and monitored for their equality impacts.

While equalities data is collected, this is often incomplete or partial. It is also not done consistently or across all services. There are also gaps in data highlighted above. Much of our equality data collection is partial and our systems and processes do not facilitate the collection and analysis of data for all groups with protected characteristics. For example, data is held on temporary accommodation clients on both NEC Housing and Home Connections systems, information such as someone’s ethnic group may be on one system but not the other. There may also be practical reasons why data is not available or is not reliable. For example, data is not collected on pregnancy, maternity or paternity for housing register applications. It would be difficult to keep track of this data over time as most applicants remain on the register for several years.

See Recommendation 1

6. Impacts

Advisory Note:

- **Impact:**
 - Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination), and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
 - These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean:** Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment:** If there is impact on all groups equally, complete **only** the cumulative assessment section.
- **Data analysis and Insights:**
 - In each protected characteristic or group, in answer to the question ‘If “YES”, what are the positive and negative disproportionate impacts?’, describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
 - Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on different, and intersecting populations impacted by your activity, especially considering for [Health inequalities](#), review guidance and inter-related impacts, and the impact of various identities.
 - For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.
- **Data Sources:**
 - **Consider a wide range (including but not limited to):**
 - [Census](#) and [local intelligence data](#)
 - Service specific data
 - Community consultations
 - Insights from customer feedback including complaints and survey results
 - Lived experiences and qualitative data
 - [Joint Strategic Needs Assessment \(JSNA\) data](#)
 - [Health Inequalities data](#)
 - Good practice research
 - National data and reports relevant to the service
 - Workforce, leaver, and recruitment data, surveys, insights
 - Feedback from internal ‘staff as residents’ consultations
 - Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
 - Insights, gaps, and data analyses on ‘who’ the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.
- Learn more about the [Equality Act 2010](#) and about our [Public Sector Equality Duty](#).

5.1 Age

<p>Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: those under 16, young adults, with other intersections.</p>	<p>YES</p>
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references

Data from the 2021 Census shows that compared to neighbouring areas, Brighton & Hove has a higher percentage of residents of working age but fewer people of school age and younger and those aged 55+. Census data also shows that the number of children and households with children has been falling. In 2021 there were 28,700 households with dependent children (23.7% of households) this compares to 29,800 on 2011 (24.6%). There are also wider issues with fertility rates falling. ONS data shows that across England and Wales the number of children per woman in 2012 was around 1.95 and fell to 1.6 in 2020 meaning that it will be almost inevitable that the number of school age children will also fall. Although national fertility rates have shown a recent increase to 1.7 children per woman in 2021. In Brighton and Hove the number of children per woman has always been notably lower than the national average. The city’s fertility rate has fallen from 1.52 in 2008 to 1.07 in 2020.

The SHMA 2023 points out that the proportion of households with dependent children in Brighton & Hove is low with around 24% of all households containing dependent children in 2021 (compared with around 29% regionally and nationally). There are differences between different types of households with married couples with dependent children seeing a high level of owner-occupation, whereas as lone parents are more likely to live in social or private rented accommodation.

The SHMA 2023 points out that GP registrations point to an expected 26% fall in the number of school aged children between 2013 and 2026. This could in part be due to a lack of family housing and/or general affordability issues pricing families out of the city. Giving priority to the delivery of affordable housing as set out in the strategy could mitigate this to some extent. although market pressures are strongly driving the trend alongside the factors identified in the paragraph above.

Brighton & Hove’s population profile based on Census data shows a significantly larger proportion of 18 to 24-year-olds compared to the regional and national averages. This may partly reflect large student numbers in the city. At the 2021 Census, there were around 33,600 people over the age of 16 that were students. Housing needs for dedicated term-term accommodation arise principally from full-time students (with those studying part time typically also living and working locally already or living with parents). The SHMA 2023 indicates that student numbers have been falling at the city’s two universities since 2018/19. The SHMA projects some short-term growth in student numbers before falling again post 2031. The report also highlights issues with the cost of some Purpose-Built Student Accommodation and a reduction in the supply of private rented student accommodation in shared housing. This is also likely to impact costs of accommodation. The SHMA endorses the council’s policy position to encourage the development of affordable purpose build student accommodation. This is reflected in the draft Housing Strategy 2024 to 2029.

The population of older people in the city is increasing, and the SHMA 2023 concludes that this could drive a need for more housing which can meet the needs of this age group. There is a clear link between age and disability and this intersection of characteristics means that this assessment should be read in conjunction with the section below on disability.

Census 2021 data Brighton & Hove has a younger age structure compared to the regional and national average with 14% of the population being aged 65 and over, compared with 19% regionally and 18% nationally. Brighton & Hove is projected to see a significant increase in the 65+ population, with a projected increase of around 46% between 2022 and 2041. The population under 65 is projected to

decrease by 2.5% during this period. In terms of numbers, the projections show an increase in the population aged 65+ of 18,400 people.

The 2021 Census also shows that most 65+ households are owner occupiers (72.3%) with 67% having no mortgage and who may therefore have significant equity. Some 18% of older persons households live in the social rented sector with the proportion living in the private rented sector relatively low at about 10%. Census also data shows that some 16% of individuals in the city have a long-term health problem or disability, with the proportion increasing to 53.7% in the 65+ population. Projections in the SHMA 2023 indicate that there will be large increases in the number of older people with dementia (increasing by 47% from 2022 to 2041 and mobility problems (up 46% over the same period).

The SHMA 2023 concludes that, given the ageing population and higher levels of disability and health problems amongst older people, there is likely to be an increased requirement for specialist housing options in the future. Recommendations for the type and quantity of specialist older people's housing is set out in the SHMA 2023.

The Older People Housing Needs Assessment 2019 commissioned by the council conducted focus groups and a survey of older people (55+) as part of broader research and analysis of housing needs in this group. They identified the following perspectives amongst those taking part:

- Older people are a diverse cohort with different views and aspirations about housing and support services they may need in later life
- There is interest in a mix of housing types to widen choice; this needs to be attractive and affordable for more older people.
- Some older people are interested in and willing to right size/downsize provided that an alternative home meets their needs and requirements, for example, it is located in a town centre, close to amenities, provides a safe and secure environment. (58.25% of respondents to the survey were planning to move at some point in the future. 38.4% were planning to move within the next 5 years and this increases to 56.6% within the next 10 years.
- This cohort are seeking opportunities to move to both specialist housing designated for older people and mainstream housing that is better designed to meet the needs of an ageing population.
- There is also evidence that other older people would like to be supported to remain living independently in their current homes by adapting their current home to make it more accessible and by improving connections to the local community.
- A variety of tenure options needs to be provided to reflect the different financial circumstances of older people seeking alternative housing.

The consultation on the draft Housing Strategy 2024 to 2029 included no responses from children (0-15) or adults 75+. Most responses were from young people and adults of working age (16-64). 13 responses were received from adults aged 65-74. A response was also received from the Older People's Council.

Issues raised in relation to age included:

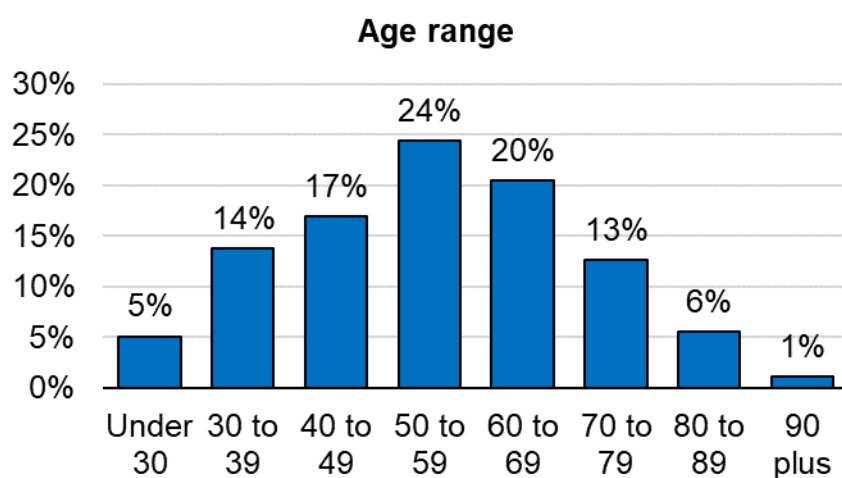
- Affordability and suitability of housing for young people
- Concern about the impact of damp and mould and air pollution on children and young people
- The need for housing suitable for young people with various disabilities and the need for independent living options
- Student housing, including the need for affordable, decent quality accommodation
- Community tensions in areas with a high proportion of young adults, especially living in HMOs
- Need for early prevention and outreach for young homeless and expand focus on temporary accommodation to include young people in transitional housing settings
- Emergency accommodation suitable for young people
- Information and advice that is appropriate for young people

- The need for mixed communities with options for older people to downsize in their local area and to reduce social isolation
- Housing that is suitable and affordable for older people with good quality 'built in' design and community facilities that are easily accessible.
- Impact on cost-of-living crisis and intersection between age and socio-economic disadvantage especially for young people and older adults.

The SHMA 2023 considers the intersections between age, sexual orientation, gender identity and gender reassignment in relation to the city's housing needs. This analysis should therefore be read in conjunction with sections 5.5, 5.6 and 5.7 below. The 2021 Census shows that, compared to the England average of 2.6%, Brighton and Hove have a much higher proportion of the population 65+ identifying as LGBT+ (5.9%). The city also has a higher proportion of trans people (1%) compared to the rest of England (0.5%). The SHMA cites national research which observes that older LGBT+ people are sceptical that those providing housing, care and support will be inclusive of them and that they will be treated with dignity and respect.

The age profile of council tenants in December 2023 is set out in the charts below:

Age range	No. of tenants	% of tenants
Under 30	670	5.1%
30 to 39	1,813	13.8%
40 to 49	2,223	16.9%
50 to 59	3,210	24.4%
60 to 69	2,698	20.5%
70 to 79	1,663	12.6%
80 to 89	732	5.6%
90 plus	145	1.1%
No data	10	0.1%
Total	13,164	100%



The age breakdown of those who made homeless applications to the council and were assessed during the 2022/23 financial year as either threatened with homelessness and owed a prevention duty (712) or already homeless and owed a relief duty (1,040) is set out in the table below. The majority were of working age, with 93.26% (1,634 of 1,752) under the age of 65 years. The median age was 40 years.

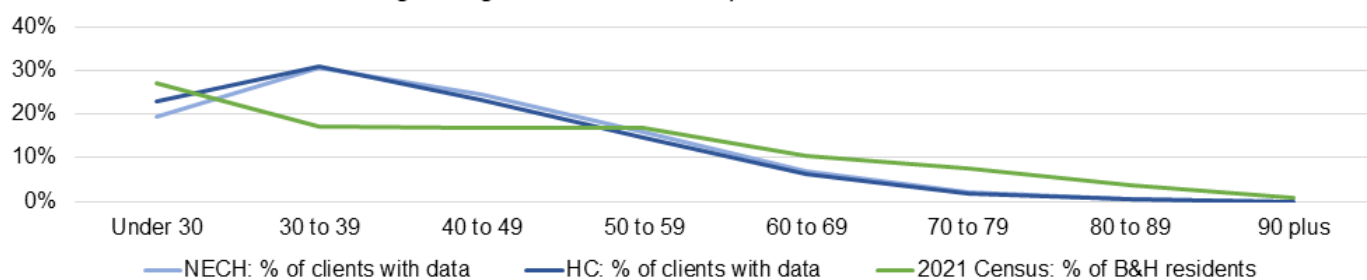
Age group of clients	No. of clients	% of clients
17-19	19	1.08%
20-24	150	8.56%
25-29	201	11.47%
30-34	267	15.24%
35-39	202	11.53%
40-44	245	13.98%
45-49	209	11.93%
50-54	151	8.62%
55-59	109	6.22%
60-64	81	4.62%
65-69	53	3.03%
70-74	33	1.88%
75+	32	1.83%
Total	1,752	100.00%

C, they are more likely to be in their 30s and 40s, about as likely to be in their 50s, and less likely to under 30 or 60 and over. Some possible factors behind this are higher rates of home ownership and lower rates of private renting with increased age, shorter life expectancy of homeless people, the increasing likelihood with length of stay (and therefore age) that clients in temporary accommodation will eventually move into social housing. The age breakdown and comparative data is shown below.

Age range	NECH: No. of clients	NECH: % of clients	HC: No. of clients	HC: % of clients	2021 Census: No. of B&H residents	2021 Census: % of B&H residents
Under 30	347	19.37%	422	22.77%	63,888	27.1%
30 to 39	548	30.60%	574	30.98%	39,966	17.0%
40 to 49	440	24.57%	430	23.21%	39,633	16.8%
50 to 59	285	15.91%	271	14.62%	39,276	16.7%
60 to 69	124	6.92%	114	6.15%	24,547	10.4%
70 to 79	36	2.01%	32	1.73%	17,385	7.4%
80 to 89	10	0.56%	10	0.54%	8,499	3.6%
90 plus	0	0.00%	0	0.00%	2,178	0.9%
No data	1	0.06%	0	0.00%	-	-
Total	1,791	100.00 %	1,853	100.00 %	235,372	100.0%

Please note all data in this table is available by single year of age, so can be presented in pretty much any different grouping. Also, the 2021 Census data (green headed columns) is for usual residents aged 16 and over.

Age Range of TA Clients compared to B&H Residents



Local and national data shows that people of working age are disproportionately in housing need. Children are most likely to be part of households where the adult(s) are aged 20–49. Plans to improve homelessness prevention and support for those who are homeless are therefore likely to have a positive impact on both these age groups.

See recommendation 2

5.2 Disability:

Does your analysis indicate a disproportionate impact relating to Disability , considering our anticipatory duty ?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The 2021 census indicates that 29% of households in the city have a member with a long-term health problem or disability. The council commissioned Strategic Housing Market Assessment (SHMA) 2023 indicates that the number of residents with disabilities is likely to increase substantially between 2022 and 2041 due to a forecast 46% increase in the population aged 65+ (whereas under 65s will remain static or decrease). There are also projected increases in the number of people with dementia and mobility issues which are likely to be concentrated in older age groups. The SHMA also indicates a future increase in demand for housing suitable for people with autism.

Demographic projections in the SHMA show:

- Significant increases in all areas of need and increasing complexity of need in the younger disabled adult population.
- People aged 18-64 predicted to have impaired mobility is estimated to increase by 9% from 2019 – 2030 in Brighton & Hove. This is significantly higher than the average in other areas where it is estimated to increase by 2%.
- It is predicted that there will be 11% more people between 18 and 64 with a moderate disability and a 15% increase in people with a serious disability by 2030. This equates to 580 more people out of a total of 1,047 more people with moderate to serious disabilities with personal care needs.
- 22% of adults in Brighton & Hove have two or more long term health conditions and this is expected to grow by 20% or 10,500 more people by 2030.
- There are more people aged 18 to 64 in residential and nursing care in comparison with most other local authorities, with around half of these placed out of area.

Analysis of housing service in December 2023 indicated that 6,411 or 48.7% of council tenants have a long-term health problem or disability. A more detailed breakdown is below:

Specific long term health problem or disability	No. of tenants	% of tenants
Other Health	3,660	27.8%
Mental Health	3,208	24.4%
Mobility	2,199	16.7%
Literacy	692	5.3%
Hearing	604	4.6%
Learning	493	3.8%
Sight	339	2.6%
Speech	142	1.1%
At least one of the above	6,411	48.7%
None of the above	6,753	51.3%
Total council tenants	13,164	100%

Additional vulnerabilities	No. of tenants	% of tenants
Alcohol	282	2.1%
Substance	238	1.8%
Gambling	17	0.1%

Detailed information on mobility	No. of tenants	% of tenants
Mobility 1 – Full-time wheelchair user	95	0.7%
Mobility 2 – Part-time wheelchair user	169	1.3%
Mobility 3 – Can only manage 1-3 steps	694	5.3%
Mobility issues other than the above	1,241	9.4%
Total mobility	2,199	16.7%

Disabled households are more likely to be in housing need than non-disabled households. For example, the 2021 Census showed that 44.1% of people identified as homeless were disabled. A breakdown of those who made homelessness applications to the council in 2022/23 indicated the following additional support needs:

- Physical ill health and disability: 24.94% (437 of 1,752)
- History of mental health problems: 35.33% (619 of 1,752)
- Learning disability: 4.62% (81 of 1,752)

Please note these are overlapping categories, so the percentages cannot be added together. However, 541 clients are recorded as having no support needs, so 69.12% (1,211 of 1,752) have at least one support need, so are potentially vulnerable in some way.

Analysis of people in temporary accommodation suggests that there is significant under-recording of disability on NEC Housing when compared to the Home Connection system, given that 8% are recorded as having a long-term health problem on NEC Housing and 28% are recorded as such on Home Connection. The profile of people placed into temporary accommodation as presented at the weekly EA/TA Reduction meetings also points to this under-recording. Nonetheless, the data from Home Connection still indicates that people in temporary accommodation, when compared to all residents of Brighton & Hove, are more likely to have a long-term health problem or disability (28% compared to 19%).

Long term health problem or disability	NECH: No. of clients	NECH: % of clients	HC: No. of clients	HC: % of clients	2021 Census: No. of B&H residents	2021 Census: % of B&H residents
Yes	143	7.98%	528	28.49%	51,797	18.7%
No or unknown	1,648	92.02%	1,325	71.51%	225,306	81.3%
Total	1,791	100.00%	1,853	100.00%	277,103	100.0%

Please note the 2021 Census data (green headed columns) is for usual residents of all ages. Also, the data from NECH and HC is only 'Yes' where the TA client had a disability recorded on either system, so the absence of this is not necessarily confirmation of no disabilities, hence the 'unknown' part of the wording here (by contrast, the Census question did have an option which would indicate someone does not have a disability).

53 people who responded to the 2024 housing strategy consultation indicated that they had a long-term health problem or disability. Of these 27 had a mental health condition, 23 had a physical disability, 13 were autistic, 10 had a sensory impairment and 9 had a learning disability. Issues raised included the need for supported housing, accessible housing, lack of suitable placements in the city, hate crime, accessible design, support to live at home, affordability, improved standards across tenures, independent living (including move on for young people from family to independent or supported housing), vulnerability and risk of exploitation.

An Equalities Impact Assessment and Needs Assessment carried out by the council's Health and Social Care Commissioning Team shows that there is a particular need for housing and support for:

- Young people aged 18-25 leaving the family home, residential colleges or other care settings with conditions such as Cerebral Palsy, other disabilities or brain injuries.
- People with brain Injuries that have some behavioural / complex needs which could put themselves or others at risk.
- People with conditions such as Multiple Sclerosis, Motor Neurone Disease, Huntington's, who have experienced a stroke, a spinal injury or have an Acquired Brain Injury (ABI) who continue to live at home and need a suitable property

Engagement with people with physical disabilities and their carers as part of the development of the Health and Social Care Commissioning Strategy in 2020 identified that people would like to be able to stay in their own home with adaptations if necessary for as long as possible and in some cases to the end of their lives

The SHMA 2023 found that whilst there are some socially rented wheelchair accessible flats across the city, most do not have support available on site or are clustered together geographically to enable support to be shared. There are also other needs, for example, there is a need for bariatric accommodation that can house and support people who weigh up to 55 stone. Council commissioners have identified a need for people with complex needs resulting from substance misuse, for example those with an acquired brain injury due to alcohol use.

Feedback from disabled people included in the 2015 housing strategy EIA included: lack of suitable housing supply (particularly family housing). Isolation on urban fringe for those reliant on public transport. Properties that are new built and considered as accessible often need radical adaptations including removing the adaptations put in prior to the client being identified. Social housing offers sometimes must be declined as the properties are either unsuitable due to access issues or location. Flats can be an issue when lifts break down.

The Brighton & Hove Learning Disability Strategy estimates that 5,031 adults in the city have a learning disability, of whom 1,259 have a moderate or severe learning disability. The strategy projects a total of 6,414 adults with a learning disability by 2035, most of whom (5,254) will be of working age.

Engagement conducted as part of the strategy development highlighted the need for a growth in all services. Attendees highlighted the increasing need for more individualised accommodation to address compatibility issues and those with challenging behaviours. There is also limited accommodation to meet the needs of those with physical needs alongside their learning disability. Due to the lack of vacancies in the city, some individuals are placed out of area away from family and friends.

The SHMA 2023 projects an increase of 2.9% in people 18-64 with autistic spectrum disorders (from 1,429 individuals in 2022 to 1,470 in 2041). Council data shows a rise in the demand for supported accommodation for autistic people.

Consultation with autistic adults to inform the Autism Strategy 2024 identified the following areas of need:

- appropriate and accessible information about housing options and housing support
- inclusive adjustments to enable autistic people to access housing support

- the provision of safe, stable and accessible housing that meets sensory needs across all types of tenure
- if homeless, that support is offered by staff that understand the needs of autistic people
- Emergency and temporary accommodation is not suitable for many autistic people
- Autistic people are at greater risk of conflict with neighbours

The Autism Strategy identifies a significant need for supported living accommodation for autistic people, many of whom also have access needs, a need for accommodation that takes account of sensory needs and physical health conditions. It also identifies a need for suitable provision for autistic adults with significant mental health conditions.

National Housing Benefit policy is based on adults under 35 sharing with others, and this is often not accessible for autistic people who need their own space. There is also a lack of appropriate supported living options for young autistic adults to develop their independence. These factors mean that autistic people are likely to remain living with their family or guardians for longer. Relationships can often break down and the autistic person can need to move out of the local area and away from their support networks or become homeless.

The housing strategy consultation in 2024 received 13 responses from individuals who identified as autistic. Issues raised included:

- Ensuring reasonable adjustments are made for autistic people
- Design standards to ensure suitability of housing for autistic people
- Targeted homelessness prevention and housing support for autistic people
- Training about autism for staff and contractors

The SHMA 2023 gives figures for adults with mental health issues in the city in 2022. This includes people with common mental health disorders (36,613), borderline personality disorder (4,648), antisocial personality disorder (6,428), and psychotic disorder (1,352). 13,913 adults have more than one psychiatric disorder. All these figures are projected to increase by 2041, with the largest projected increase (2.1%) in people with antisocial personality disorder.

The Sussex Partnership Foundation Trust Mental Health Discharge Improvement Plan for Sussex identified that between February and July 2021 there were 20 patients whose discharge was delayed. The main reasons for the delayed transfer of care in Brighton & Hove was a lack of available space in a residential home (5 persons) or supported accommodation (5 Persons).

The majority of those waiting for supported accommodation are homeless, i.e. the accommodation is not being provided in place of less suitable existing accommodation but to meet both support and housing need. The Government's information service on homelessness (H-CLIC) suggests that around 15% of all homelessness presentations to Brighton and Hove City Council had a support need due to a history of mental health problems.

In March 2022 the embedded Homeless Prevention Officer had a case load of 20 in-patients, all of whom were suitable for supported or general needs accommodation, and all of whom were homeless. Adult Social Care data shows that as of October 2021 there were 175 people placed in Mental Health Care homes by the council. 54% were placed out of area. For most (70%) this was due to a lack of appropriate placement rather than through choice.

Council data also shows that 16 people (9%) of those placed in Residential Care Homes would have been better placed in a supported living service if a service had been available. It also shows that around 17% of individuals placed in Mental Health residential care homes required nursing care, many of whom had needs around alcohol or substance misuse. On average people wait 3 months for a placement but this can be longer for people with specific needs such as substance misuse and mental health. Waiting lists for supported accommodation for those with mental health needs are very long and show that the current capacity is not sufficient to meet demand, especially for self-contained accommodation.

In October 2021 there were 15 people waiting for supported accommodation with 11 of those waiting for self-contained accommodation. The SHMA 2023 concludes that there is a lack of provision of supported living and residential care accommodation. Feedback from professionals as part of the engagement for the Brighton & Hove Mental Health & Housing Plan May 2022 found that 70% of respondents believed their clients would not be able to access accommodation suitable for their mental health needs.

Collection of data on disability within housing services is not consistent and there is evidence of under-reporting. This requires improvement. **See recommendations 1. and 2**

What [inclusive adjustments](#) are you making for diverse disabled people impacted? For example: D/deaf, deafened, hard of hearing, blind, neurodivergent people, those with non-visible disabilities, and with access requirements that may not identify as disabled or meet the legal definition of disability, and have various intersections (Black and disabled, LGBTQIA+ and disabled).

It is anticipated that measures set out in the Housing Strategy 2024 to 2029 are likely to have a positive impact on disabled people.

Early engagement identified a need for a strategic priority which explicitly addressed the role of housing in promoting resilience, independence and improved health and wellbeing for all, including people with disabilities. This was included as priority 4 in the draft housing strategy for consultation. This priority was supported by 82.7% of those who responded to this question (313/347). There were similar levels of support for the proposed areas for focused action

Relevant actions identified in the Housing Strategy 2024 to 2029 include:

- Tackling hate crime, including crime against people with disabilities
- Increasing support to vulnerable clients
- Support people to live independently through investment in adaptations to existing homes.
- Review the provision of exempt supported accommodation in the city and develop a Supported Housing Strategy to ensure we meet the needs of vulnerable households who need our services.
- Commission supported housing which addresses the needs of people with complex needs.
- Deliver new supported housing for people with physical disabilities.
- Prioritise support for the most vulnerable households to help them manage their tenancy, prevent debt and remain in their homes.
- Continue to improve our work across housing, adults' and children's services to design and commission services jointly.
- Take forward jointly agreed actions in our learning disability, autism and mental health housing action plans.
- Provide accessible information and advice to people who want to find accommodation which is best suited to their needs.

Furthermore, the accompanying Year 1 action plan includes actions in (2024/25) to:

- Support people with additional support needs to be independent and resilient (HS22) with specific deliverables relating to people with physical disabilities, people with learning disabilities, people with autism and people with mental health needs.
- Develop a Supported Housing Strategy to ensure we meet the needs of vulnerable households who need support (HS23)
- Enable people to live independently in their homes by providing housing adaptations (HS25)

- Provide housing information and advice appropriate to the needs of our diverse communities (HS31)
- Ensure that our housing workforce has the relevant skills and competencies to deliver an effective service to all residents (HS32). This action has specific deliverables around understanding the support needs of people with learning disabilities and people with autism.

Other actions that are likely to have a positive impact are:

- Align the commissioning of housing, children's, social care and health services to improve outcomes for residents (HS24) to address issues such as the transition between children's and adults' services
- Work with NHS and other partners to improve services and support for people with multiple, compound needs (HS34)

5.3 Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers):

Does your analysis indicate a disproportionate impact relating to ethnicity?	YES
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If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Data from the Census 2021 indicates that 4.8% of the population of the city identify as Asian or Asian British, 2% as Black or Black British, 4.8% as Mixed ethnic group and 3.1% as Other ethnic group. 85.4% of the population identify as White. This is higher than the national average of 81% White.

The table below breaks down data from the 2021 Census of household reference persons (the person who completed the form) by their ethnic group and housing tenure. Black and racially minoritised residents across the city were significantly more likely to be in the 'Private rented or lives rent free' category (51.3%) when compared with total citywide residents of all ethnic groups (32.9%).

2021 Census: Tenure by ethnic group - Household Reference Persons	Owned: Owns outright	Owned: Owns with a mortgage or loan or shared ownership	Private rented or lives rent free	Rented: Social rented	Total
Asian, Asian British or Asian Welsh	17.1% 827	25.1% 1,211	44.9% 2,166	12.9% 623	100% 4,827
Black, Black British, Black Welsh, Caribbean or African	7.1% 155	14.5% 319	48.2% 1,058	30.2% 662	100% 2,194
Mixed or Multiple ethnic groups	12.5% 460	24.6% 907	47.7% 1,762	15.2% 563	100% 3,692
Other ethnic group	11.8% 402	19.5% 666	48.6% 1,661	20.1% 687	100% 3,416
White: English, Welsh, Scottish, Northern Irish or British	28.5% 26,466	28.7% 26,599	27.2% 25,272	15.6% 14,456	100% 92,793
	12.9%	20.9%	59.6%	6.6%	100%

White: Gypsy or Irish Traveller, Roma or Other White	1,594	2,578	7,340	811	12,323
White: Irish	25.0% 539	32.0% 689	31.5% 679	11.5% 249	100% 2,156
Total	25.1% 30,443	27.2% 32,969	32.9% 39,938	14.9% 18,051	100% 121,401
Black and Racially Minoritised	13.9% 3,977	22.3% 6,370	51.3% 14,666	12.6% 3,595	100% 28,608

We have not been able to identify any local assessment of housing needs in relation to ethnicity, 'race' or ethnic heritage.

Housing service data from December 2023 indicates that council tenants were 81.4% White, 3.5% Black or Black British 3.2% Asian or Asian British, 1.8% Mixed and 2.1% another ethnic group, 8% prefer not to say / no data.

1,752 people made homeless applications and were assessed during the 2022/23 financial year. Of these, 27.79% (487 of 1,752) were Black and Racially Minoritised (non-White UK/British), 48.69% (853 of 1,752) were White UK/British and 23.52% (412 of 1752) do not have their ethnic group recorded. Of just those with their ethnic group recorded, 36.34% (487 of 1,340) are Black and Racially Minoritised and 63.66% (853 of 1,340) are White UK/British. This indicates that people who are Black and Racially Minoritised are more likely to become homeless than those who are White UK/British.

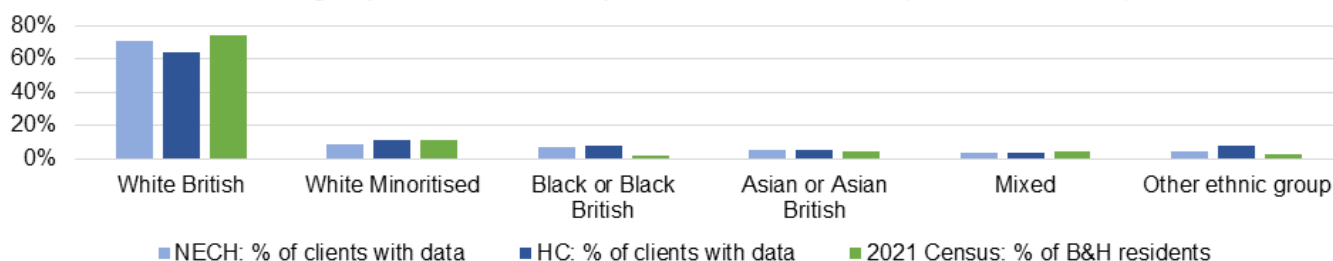
The table and chart below indicate that people in temporary accommodation, when compared to all residents of Brighton & Hove, are more likely to be Black or Black British or categorised as part of another ethnic group.

Ethnic group	NECH: No. of clients	NECH: % of clients	NECH: % of clients with data	HC: No. of clients	HC: % of clients	HC: % of clients with data	2021 Census: No. of B&H residents	2021 Census: % of B&H residents
White British	827	46.18%	70.93%	899	48.52%	64.17%	204,831	73.9%
White Minoritised	104	5.81%	8.92%	153	8.26%	10.92%	31,740	11.5%
Black or Black British	82	4.58%	7.03%	109	5.88%	7.78%	5,458	2.0%
Asian or Asian British	62	3.46%	5.32%	78	4.21%	5.57%	13,217	4.8%
Mixed	41	2.29%	3.52%	47	2.54%	3.35%	13,228	4.8%
Other ethnic group	50	2.79%	4.29%	115	6.21%	8.21%	8,629	3.1%
Prefer not to say	281	15.69%	-	368	19.86%	-	-	-
No data	344	19.21%		84	4.53%	-		
Total	1,791	100.00%	100.00%	1,853	100.00%	100.00%	277,103	100.0%
... of which Black and	339	18.93%	29.08%	502	27.10%	35.83%	72,272	26.20%

Racially
Minoritised
(BRM)

Please note the data in the table above is available for more specific ethnic groups, broadly in line with the categories used for the 2021 Census. Also, the 2021 Census data (green headed columns) is for usual residents of all ages.

Ethnic group of TA Clients compared to B&H Residents (of those with data)



Analysis of council data for people in temporary accommodation conducted in December 2023 looked at the reasons why people had become homeless. The analysis indicated that Black and racially minoritised (BRM) clients were more likely than non-BRM to be 'Domestic Abuse – Victim' (10.6% compared to 7.5%). They were more likely (11.8% compared to 7.3%) to be 'Friends no longer willing or able to accommodate'. More likely (6.6% compared to 0.1%) to be 'Required to leave accommodation provided by Home Office as asylum support'. They were slightly more likely (16.9% compared to 14.4%) to be 'End of private rented tenancy – assured shorthold tenancy'. Much less likely (9.4% compared to 19.5%) to be 'Family no longer willing or able to accommodate'.

The consultation on the draft Housing Strategy 2024 to 2029 received no responses from people who identify as Black or Black British, 3 responses were received from people who were Asian or Asian British and 5 responses from people reporting Mixed ethnicity. Responses were received on behalf of Brighton & Hove Community Voices and Bridging Change, groups working to challenge systemic barriers to Black, Asian and minoritised ethnic groups. Voices in Exile representing refugees and asylum seekers and SJOG Hospitaller Services who work with victims of trafficking and modern-day slavery also responded. Issues identified by respondents included:

- Being placed in accommodation in an area hostile to Black and racialised minorities
- Communication issues when English is not first language
- Perceived lack of support from the council and other statutory services when dealing with racism and other forms of hate crime
- Perceived discrimination by private sector landlords
- The needs of van and caravan dwellers

Following close of the public consultation on the draft housing strategy, a representation was received to consider the housing needs of gypsies, Roma and travellers with attention drawn to the 2022 briefing produced by Friends, Families & Travellers, *Accommodation issues facing Gypsies and Travellers in England*. This highlights a national problem with many local authorities failing to meet the needs of this group. The briefing recommends that local (and national) government should switch from an enforcement approach to encampments to an approach of provision, including permanent and transit sites and the promotion and adoption of negotiated stopping agreements. It also calls for the Government to reintroduce pitch targets and a statutory duty onto local authorities to meet the assessed need for Gypsy and Traveller sites, adopt a definition of a Traveller in planning terms that incorporates all Gypsies and Travellers who need a pitch to live on, and introduce a rolling programme of ring-fenced funding for local authorities to build Gypsy and Traveller sites.

Ethnicity, 'race' and ethnic heritage as a protected characteristic has many possible intersections including but not limited to religion, expatriates, migrants, asylum seekers, and refugees. This section should therefore be read in conjunction with sections 5.4 and 5.11 with other intersections also considered.

See recommendations 2, 3, 4 and 5

5.4 Religion, Belief, Spirituality, Faith, or Atheism:

Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?	YES
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If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Data from the 2021 Census. The figure in brackets is the England average.

No religion 55.2% (36.7%), Christian 30.9% (46.3%), Muslim 3.1% (6.7%), Buddhist 0.9% (0.5%), Jewish 0.9% (0.5%), Hindu 0.8% (1.8%), Sikh 0.1% (0.9%), Other religion 1.0% (0.6%), Not answered 7.1% (6.0%)

Some religious practices may require specific housing arrangements, such as communal living or adherence to specific architectural styles. Different cultural traditions within faith groups may also have certain housing preferences or needs. The age, family size, and socioeconomic status of members within a faith group can influence their housing requirements. Faith-based organisations make a significant contribution to addressing housing need, providing practical, spiritual and moral support to those in need.

Profiling of council tenants by faith conducted in December 2023 is as follows:

Religion or belief	No. of tenants	% of tenants	% of tenants with data
Christian	3,514	26.7%	45.8%
No religion	3,087	23.5%	40.3%
Muslim	493	3.8%	6.4%
Buddhist	75	0.6%	1.0%
Jewish	33	0.3%	0.4%
Hindu	22	0.2%	0.3%
Sikh	6	0.05%	0.1%
Another religion or belief	439	3.3%	5.7%
Prefer not to say	1,226	9.3%	-
No data	4,269	32.4%	-
Total	13,164	100%	100.00%

Information about faith is not recorded on homelessness applications, nor is it available for people living in temporary accommodation.

There are many intersections between faith and other protected characteristics, including but not limited to, ethnicity, 'race' and ethnic heritage and human rights. This section should therefore be read in conjunction with others.

5.5 Gender Identity and Sex:

Does your analysis indicate a disproportionate impact relating to Gender Identity and Sex (including non-binary and intersex people)?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The profile of Brighton & Hove mirrors that of England for Sex in the 2021 Census. The figure in brackets is for England. Female 51.1% (51.0%) Male 48.9% (49.0%)
Gender identity refers to a person's sense of their own gender, whether male, female or another category such as non-binary. This may or may not be the same as their sex registered at birth. The question on gender identity was new for Census 2021. The question was voluntary and was only asked of people aged 16 years and over. People were asked “Is the gender you identify with the same as your sex registered at birth?”, and they had the option of selecting either “Yes”, or selecting “No” and writing in their gender identity.

In Brighton & Hove 92.79% of those asked this question answered that their gender identity was the same as their sex registered at birth. The England average was 93.47%. In Brighton & Hove, 0.2% of those asked this question said that their gender identity was different from that registered at birth. Of these 476 gave no specific identity, 329 gave trans woman, 362 gave trans man, 835 gave non-binary, 339 gave another gender identity.

Equalities profiling of council tenants in 2023 gave the following breakdown:

Gender	No. of tenants	% of tenants
Female	7,925	60.2%
Male	5,230	39.7%
Non-Binary	2	0.02%
Other	4	0.03%
None	3	0.02%
Total	13,164	100%

Figures include 41 transgender tenants (of whom 22 female, 18 male and 1 other for gender).

The table below breaks down the sex (the term used in the data analysis) of council homelessness applicants of 1,752 clients in 2022/23.

Sex of clients	No. of clients	% of clients
Female	810	46.23%
Male	806	46.00%
Other	9	0.51%
Prefer not to say	117	6.68%
Unknown	10	0.57%
Total	1,752	100.00%

The table below shows that 1.43% (25 of 1,752) council homelessness applicants said their gender identity is not the same as their sex registered at birth.

Gender identity of clients ('Is your gender the same as the sex you were registered at birth?')	No. of clients	% of clients
No	25	1.43%
Prefer not to say	295	16.84%
Yes	1,411	80.54%
Unknown	21	1.20%
Total	1,752	100.00%

Analysis of people living in temporary accommodation undertaken in December 2023 shows that the proportion of female clients in temporary accommodation (59% using NECH data and 61% using HC data) is higher than for adult residents of Brighton & Hove as a whole (51%). A factor which is apparent here is the likely presence of children in a household, which gives a household priority need under the main housing duty. Data from Home Connections indicates that 921 (50%) were in households with children. Of the main applicants in households with children:

- 71% were female (651 of 921) compared to 52% of all clients (961 of 1,853)
- 17% were male (114 of 921) compared to 33% of all clients (607 of 1,853)
- 12% did not have their gender recorded or preferred not to say (114 of 921) compared to 13% of all clients (281 of 921).

Gender and Sex	NECH: No. of clients	NECH: % of clients	HC: No. of clients	HC: % of clients	HC: % of clients with data	2021 Census: no. of B&H residents	2021 Census: % of B&H residents
Female	1,058	59.07%	961	51.86%	61.13%	121,095	51.4%
Male	726	40.54%	607	32.76%	38.61%	114,280	48.6%
Non-Binary	4	0.22%	0	0.00%	0.00%	-	-
Other	3	0.17%	4	0.22%	0.25%	-	-
None or prefer not to say	0	0.00%	281	15.16%	-	-	-
Total	1,791	100.00 %	1,853	100.00 %	100.00 %	235,375	100.0%

Please note the 2021 Census data (green headed columns) is for usual residents aged 16 and over and was taken from the dataset for sex registered at birth.

Of those who responded to this question (137/347) in the consultation on the draft Housing Strategy 2024 to 2029, 77 said they were Female, 43 Male, 4 Non-binary and 3 preferring to self-describe. Issues raised in relation to this protected characteristic included:

- There may be a conflict of rights in relation to inclusion and different protected characteristics. Need for balance and proportionality and use of exceptions in relation to the Equality Act.
- Women are disproportionately impacted by homelessness and there is a need to fund services supporting women at risk of becoming homeless and homeless women.
- Need to address specific needs of homeless and insecurely housed women who are experiencing, at risk of or traumatised by abuse, trafficking, being prostituted etc.
- Urgent need for a single sex and specialist women's refuge.

This protected characteristic has several intersections including, but not limited to, gender reassignment, sexual orientation, marriage and civil partnership, pregnancy and domestic and/or sexual abuse. This section should be read in conjunction with these other sections.

See recommendation 2.

5.6 Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Reassignment?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

To undergo gender reassignment usually means to undergo some sort of medical intervention, but it can also mean changing names, pronouns, dressing differently and living in their self-identified gender.

Gender reassignment is a characteristic that is protected by the Equality Act 2010, and it is further interpreted in the Equality Act 2010 approved code of practice. It is a term of much contention and is one that Stonewall's Trans Advisory Group feels should be reviewed.

The data from the Census 2021 and service data in section 5.5 above give some indication of the numbers of people in the city and those using housing services who have this protected characteristic.

The Trans Needs Assessment undertaken by the council in 2015 identified the following issues in relation to housing:

- Trans people have a high risk of homelessness
- There are significant gaps in knowledge amongst trans people and support organisations around their rights and eligibility for housing services
- Some trans people report poor experience of some homeless services, including safety concerns
- Training needs are indicated for housing staff
- A high proportion of trans people live in the private rented sector and many report poor experiences with letting agents
- Need to improve data collection in relation to gender reassignment and gender identity

Consultation on the housing strategy identified the following issues:

- Hate crime against trans people and the need for a zero -tolerance policy in social housing
- Safety issues in emergency and temporary accommodation
- Fear of discrimination when approaching services for support
- A clearer pathway for trans survivors of domestic abuse and sexual violence
- Needs of older trans people in residential and care settings
- The need for trans friendly housing in the city

This protected characteristic has several intersections including, but not limited to, gender reassignment, sexual orientation, marriage and civil partnership, pregnancy and domestic and/or sexual abuse. This section should be read in conjunction with these.

See recommendation 2

5.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation ?	YES / NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

2021 Census data shows that more than one in ten residents aged 16 or over (10.6%, 25,375 people) identify with an LGB+ sexual orientation.

Profiling of council housing tenants in December 2023 is shown in the table below:

Sexual orientation	No. of tenants	% of tenants	% of tenants with data
Heterosexual/'Straight'	6,598	50.1%	90.4%
Gay	312	2.4%	4.3%
Bisexual	193	1.5%	2.6%
Lesbian	97	0.7%	1.3%
Another sexual orientation	100	0.8%	1.4%
Prefer not to say	1,438	10.9%	-
No data	4,426	33.6%	-
Total	13,164	100.00%	100.00%

The table below examines council data held on homelessness applications and assessments in 2022/23. Of these, 7.13% (125 of 1,752) had a sexual orientation other than Heterosexual / Straight.

Sexual orientation of client	No. of clients	% of clients
Applicant Prefers not to say	531	30.31%
Bisexual	11	0.63%
Gay / Lesbian	71	4.05%
Heterosexual / Straight	1,096	62.56%
Other sexual orientation	43	2.45%
Grand Total	1,752	100.00%

The table below looks at the sexual orientation of people in temporary accommodation. The analysis indicates that there are significant data gaps in reporting of sexual orientation on NEC Housing (72% have no data) and while the data is more comprehensive on Home Connection (5% have no data) the proportion who preferred not to say (37%) was much higher for clients recorded on HC when compared to all residents of Brighton & Hove.

Sexual orientation	NECH : No. of clients	NECH : % of clients	NECH : % of clients with data	HC: No. of clients	HC: % of clients	HC: % of clients with data	2021 Census: No. of B&H residents	2021 Census: % of B&H residents

Straight or Heterosexual	396	22.11 %	79.04 %	986	53.21 %	55.93 %	189,745	80.60%
Gay or Lesbian	18	1.01%	3.59%	46	2.48%	2.61%	13,726	5.83%
Bisexual	17	0.95%	3.39%	4	0.22%	0.23%	8,916	3.80%
Another sexual orientation	5	0.28%	1.00%	43	2.32%	2.44%	2,608	1.10%
Prefer not to say	65	3.63%	12.97 %	684	36.91 %	38.80 %	20,375	8.70%
No data	1,290	72.03 %	-	90	4.86%	-	-	-
Total	1,791	100.0 0%	100.0 0%	1,853	100.0 0%	100.0 0%	235,370	100.0%

Please note the 2021 Census data (green headed columns) is for usual residents aged 16 and over.

There is a need to improve data collection and analysis by housing services in relation to sexual orientation as set out in Recommendation 1.

Of those who responded to the housing strategy consultation 122 people described their sexual orientation as Heterosexual/straight, 22 as Gay, 24 as Bisexual, 2 as Lesbian, 6 preferred to use another terms. A response was also received from Brighton & Hove LGBT Switchboard. Issues raised in relation to sexual orientation included:

- Low priority given to LGBTQ+ housing needs, safety and health/wellbeing
- Impact of hate crime and the need for a zero-tolerance approach
- LGBTQ+ training for housing services staff
- Better engagement and consultation with LGBTQ+ communities
- Safety in emergency and temporary accommodation
- Specialist housing support and clearer pathways for LGBTQ+ people
- Understanding and consideration of impact of intersectionalities with other protected characteristics e.g Age, Disability or Ethnicity

Attention was drawn to the 2009-14 LGBT Housing Strategy and the 2023 LGBT Housing Manifesto, with a call for the priorities to be reflected in the new housing strategy. The LGBT Housing Manifesto calls for

- LGBT specific housing for all life stages
- LGBT specific housing information and support
- Awareness training for commissioners and a quality standard for inclusive providers
- Embedding intersectional needs in future planning
- High quality data monitoring around sexual orientation and trans status

This protected characteristic has many intersections including. This section should therefore be read in conjunction with other parts of this EIA.

See recommendation 2.

5.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Data from the Census 2021 indicates that when the census was taken, 115,815 adults in the city had never married or entered a civil partnership, 76,927 were married, 4699 were separated but still legally married or in a civil partnership, 20,382 had divorced or civil partnership dissolved, and 9,352 were widowed or a surviving civil partner.

Housing service data was not available for this protected characteristic.

The council's equality monitoring does not require collection of data in relation to this protected characteristic.

5.9 Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum):

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	YES
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If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The Census does not collect data on this protected characteristic nor is data routinely collected by council housing services. Analysis of case notes for homelessness applications and assessments during 2022/23, indicate that 1.94% of applicants have references to pregnancy associated with their application. The council's equality monitoring does not require collection of data in relation to this protected characteristic.

During informal engagement during the development of the housing strategy 2024 to 2029 our attention was drawn to the lack of local temporary accommodation for young pregnant women. This results in placements out of area with loss of family and other support networks.

See recommendation 2

5.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	YES
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If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The 2021 Census estimates that there are 5,618 people in Brighton and Hove who have previously served in the armed forces. This is around 2.4% of the population.

Analysis of data on homelessness applicants in 2022/23 indicates that 0.17% of applicants were recorded as having served in the armed forces.

There are no military establishments in the Brighton and Hove and only around 10 MOD employees stationed in the city. The SHMA 2023 includes anecdotal evidence that the city attracts a number of

LGBTQ+ service leavers. It argues that the most acute and pressing housing issue is likely to be finding accommodation for those transitioning out of the forces.

A review of the literature on homelessness amongst veterans conducted by the Royal British Legion indicates falling numbers of former service personnel in the homeless population, however the percentage of homeless veterans is still higher than for the general population. Homeless veterans have been found on average to be older, be sleeping rough and have slept rough for longer, be less likely to use drugs and more likely to have alcohol-related problems. Post Traumatic Stress Disorder (PTSD) has been found among a small number of homeless veterans although other non-military related mental health problems were more common.

Of those responding to the housing strategy consultation 1 respondent indicated they had served in the armed forces. Issues raised relating to this protected characteristic included:

- Need for dedicated transitional and permanent supportive housing for veterans
- Increased priority on council housing waiting lists for former service members
- Housing assistance and homelessness prevention services specifically for veterans
- Coordinated support between veteran service organizations, NHS services, and housing providers
- Community integration programs to prevent isolation and enable independent living

See recommendation 2.

5.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The Census 2021 indicates that 54,342 residents of Brighton & Hove were born outside the United Kingdom. This is 19.6% of the usual resident population of the city. Of these, most (28,524) had lived in the UK for 10 years or more. 7,926 had lived in the UK for less than 2 years.

Analysis of homelessness applicants from 2022/23 examines the nationality of the 1,752 clients. Of these, 18.37% (322 of 1,752) were nationals of a country other than the UK. In addition, the data held on support needs identifies 1.08% (19 of 1,752) clients as former asylum seekers.

Housing for asylum seekers is the responsibility of the Home Office. Once granted leave to remain, refugees are expected to find their own accommodation within 28 days. As a rule, refugees fall into a class of persons subject to immigration control who are eligible for housing assistance. Individuals leaving Home Office accommodation may not have sufficient funds to secure private rented housing without additional help. Because asylum seekers are not permitted to work, saving for a deposit may act as a barrier. Processing benefit applications can take longer than 28 days. Furthermore, it can take time to receive a National Insurance number and this can delay entry to the workforce. These factors mean that refugees can be at increased risk of homelessness.

Under the Children Act 1989, local authorities are responsible for asylum applicants below the age of 18 who arrive in the UK unaccompanied and do not have adult close family members already in the UK whom they could join. Support may involve the provision of food, accommodation, foster carers, leisure, language assistance and trauma counselling.

The consultation on the draft housing strategy identified specific vulnerabilities in this group including the risk of trafficking and modern-day slavery.

As well as the intersections identified in the header of this section, consideration should also be given to homelessness, domestic and/or sexual abuse and violence survivors, people in vulnerable situations and human rights and this section should be read in conjunction with these.

The needs of Expatriates, Migrants, Asylum Seekers, and Refugees should be explicitly considered in the implementation of the strategy with a particular emphasis on the needs of refugees and asylum-seeking children in relation to Priority 3 Prevent homelessness and meet housing need.

See recommendation 2.

5.12 [Carers](#):

Does your analysis indicate a disproportionate impact relating to Carers (Especially considering for age, ethnicity, language, and various intersections).	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Data from the Census 2021 indicates that 20,804 people in the city provide unpaid care for someone who has long-term physical or mental ill-health conditions, illness or problems related to old age. Carers can include people who have care needs themselves or be young carers looking after a parent or other family member.

Data on this protected characteristic is not recorded in the data held on homelessness applications and assessments in a structured way that can readily be analysed. However, 1.43% of clients (25 of 1,752) appear to have references to carers in the notes associated with their application. Other services do not hold relevant data.

20 people who responded to the housing strategy consultation said that they were a carer. One respondent pointed out that without unpaid carers, many people with support needs would not manage to live independently with the limited offer available from statutory services.

This protected characteristic has intersections with those identified in the header as well as others. Many unpaid carers face financial hardship and socio-economic disadvantage as caring may limit their ability to fully take part in the labour market.

5.13 Looked after children, Care Leavers, Care and fostering experienced people:

Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections). Also consider our Corporate Parenting Responsibility in connection to your activity.	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Some 360 children and young people are looked after by the council. There are many others in the city who are care and fostering-experienced. Analysis of housing register data for the SHMA 2023 indicated that some 72 households (1.6%) on the housing register were care leavers.

Analysis of homelessness applicants support needs (at the time of their assessment in 2022/23) includes two categories identifying care leavers (the latter is no longer be in use).

- Care leaver aged 18-20 years: 1.14% (20 of 1,752)
- Care leaver aged 21+ years: 1.48% (26 of 1,752)

Research undertaken by Centrepoin in 2017 indicates that care leavers experience additional challenges on leaving care including:

- Difficulty managing money
- They are unable to afford to rent
- They may have to move to an unfamiliar area
- They have to get used to less support
- Higher risk of losing their tenancy and becoming homeless

8 people who responded to the housing strategy consultation indicated that they had been looked after by a local authority. Issues raised in relation to care experience included:

- Importance of the council’s corporate parenting role
- Risk of care leavers being deemed intentionally homeless when their behaviours and trauma impact relationships and management of tenancies.
- Calls for care leavers to maintain their priority until they are 25

See recommendation 2

5.14 Homelessness:

Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)

YES

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

In February 2024 more than 1,700 households were living in temporary and emergency accommodation in the city. 472 households were prevented from becoming homeless in 2023. 52 people were sleeping rough on official count night in November 2023

Intersections between homelessness and protected characteristics are identified in other sections of this equality impact assessment. Two categories of risk in relation to protected characteristics and their intersections need to be highlighted here: the risk of becoming homeless and increased risk when homeless. Other factors, not related to characteristics protected under the Equality Act 2010, are also likely to compound risk, for example, substance misuse, educational achievement, and personal circumstances. A **data led approach** to risk profiling and service development means that measures to

improve and use equalities and other data as set out **Recommendation 1** will be key to successful delivery.

14 people who responded to the housing strategy consultation identified themselves as living in temporary or emergency accommodation, staying with friends and other forms of short term or insecure housing. Responses were also received from a number of organisations who provide support to people who are homeless or at risk of becoming homeless. Issues raised in the consultation included:

- Need for financial and benefits advice to help prevent financial difficulties resulting in homelessness
- Identification of risk of homelessness plus early intervention / prevention
- Need for trauma/psychologically informed practice and training for staff
- Funding for organisations working with homeless people being reduced
- Support for innovative approaches to housing homeless people
- Systems and processes e.g. bidding for housing are complex and hard to understand for many people
- Intersection of homelessness with protected characteristics e.g. LGBTQ+
- Importance of partnership working to tackle increasing homelessness

Measures set out in the Housing Strategy 2024 to 2029 are likely to positively impact this group. Work to strengthen and improve homelessness services and the development of a new homelessness and rough sleeping strategy offer further opportunities for improvement.

See recommendations 6 and 7

5.15 Domestic and/or Sexual Abuse and Violence Survivors, people in vulnerable situations:

Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Analysis conducted in December 2023 on people living in temporary accommodation in the city indicated that 8.3% of all clients stated that the main reason for loss of settled accommodation was being the victim of domestic abuse. This percentage was higher (10.6%) amongst Black or racially minoritised clients.

The consultation on the draft housing strategy 2024 to 2029

- Lack of provision for survivors and people fleeing domestic abuse locally.

Consultees also pointed out that the draft strategy failed to refer to the Domestic Abuse Act (2021), which requires local housing authorities to provide support and safe accommodation for victims of domestic abuse. The strategy has been amended to reflect this statutory duty.

See recommendations 2 and 9

5.16 Socio-economic Disadvantage:

Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for	YES
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age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections)

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Lack of affordable housing in the city negatively impacts people at socio-economic disadvantage. Poor housing conditions also impact the health and wellbeing of low-income households. Inadequate insulation contributes to higher energy bills. This is likely to intersect with other characteristics (e.g. older people, young people, people from racially minoritised groups and people with disabilities amongst others are more likely to have lower household income). Proposals in the strategy are likely to have positive impacts, for example, measures to increase the energy efficiency of properties are likely to reduce or mitigate energy bills.

5.17 Human Rights:

Will your activity have a disproportionate impact relating to Human Rights?

YES

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The right to adequate housing is a human right recognized in international human rights law. Without a right to housing, many other basic rights are compromised, including the right to family life and privacy, the right to freedom of movement, the right to assembly and association, the right to health, and the right to development. Adequate housing is essential for human survival with dignity. The right to adequate housing is defined by the United Nations as the right to live somewhere in security, peace, and dignity.

The vision of ‘Homes for everyone’ and the council’s goal to deliver accessible, affordable and high-quality homes for everyone in Brighton & Hove are set out in the Council Plan 2023 to 2027 and the Housing Strategy 2024 to 2029. These articulate the council’s commitment to housing as a human right. Specific measures in the strategy to improve the quality of housing, to prevent homelessness and to support those in housing need are therefore likely to have a positive impact on human rights.

5.17 Cumulative, multiple intersectional, and complex impacts (including on additional relevant groups):

What cumulative or complex impacts might the activity have on people who are members of multiple Minoritised groups?

- For example: people belonging to the Gypsy, Roma, and/or Traveller community who are also disabled, LGBTQIA+, older disabled trans and non-binary people, older Black and Racially Minoritised disabled people of faith, young autistic people.
- Also consider wider disadvantaged and intersecting experiences that create exclusion and systemic barriers:
 - People experiencing homelessness
 - People on a low income and people living in the most deprived areas
 - People facing literacy and numeracy barriers

- Lone parents
- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers
- Ex-offenders and people with unrelated convictions
- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery

Intersections and complex impacts are considered in the sections above. Given the nature of such a wide-ranging strategy, it has not been possible to identify and consider all such intersections. A number of key issues not considered above include:

Compound multiple needs – An assessment carried out as part of the Joint Strategic Needs Assessment programme in 2020 identifies that around 90% of this population are homeless, with most having a significant history of rough sleeping. The SHMA 2023 identifies a gap in accommodation for people with multiple complex/compound needs, noting that this is an extremely challenging cohort to house. The strategy and Y1 action plan commit the council to work with partners to improve services and support for people with multiple, compound needs (HS34)

People with some protected characteristics and intersections are at higher risk of exploitation and harm, for example, cuckooing or modern slavery. This includes, but is not limited to, care leavers, people with learning disabilities, or people with mental health issues. The increased complexity and level of need of those placed in social housing or living in the private rented sector is noted in the SHMA 2023 and was also raised by respondents to the housing strategy consultation.

See recommendations 8 and 9

7. Action planning

Which action plans have the actions identified in the previous section been transferred to?

- For example: FIAP (Fair and Inclusive Action Plan) – mandatory noting of the EIA on the Directorate EIA Tracker to enable monitoring of all equalities related actions identified in this EIA. This is done as part of FIAP performance reporting and auditing. Speak to your Directorate's Business Improvement Manager (if one exists for your Directorate) or to the Head of Service/ lead who enters actions and performance updates on FIAP and seek support from your Directorate's EDI Business Partner.

Actions to address the recommendations of this equality impact assessment have been included in the action plan for the housing strategy 2024 to 2029. They are identified in this EIA using their ID number in the action plan.

See also recommendation 10: to ensure that the recommendations of this EIA are reflected in the action plan to deliver the Social Housing Regulator's Transparency, Influence and Accountability Consumer Standard.

What SMART actions will be taken to address the disproportionate and cumulative impacts you have identified?

- Summarise relevant SMART actions from your data insights and disproportionate impacts below for this assessment, listing appropriate activities per action as bullets. (This will help your Business Manager or Fair and Inclusive Action Plan (FIAP) Service representative to add these to the Directorate FIAP, discuss success measures and timelines with you, and monitor this EIA's progress as part of quarterly and regular internal and external auditing and monitoring)

Recommendation 1: The collection and analysis of equality data by housing services should be reviewed and, where required, improved. This included reviewing the systems used to collect and analyse equalities data. The Year 2 (2025/26) action plan for the strategy should contain an explicit action to ensure that this is addressed.

Recommendation 2: In implementing the strategy, and in planning and delivering housing and support services, particular consideration should be given to impacts on:

older adults

children, young people and their families

disabled people with additional focus on disabled children and young adults and disabled people 65+ (Y1 action plan actions are identified in the relevant section)

people from Black and racially minoritised groups including gypsies, Roma and travellers

Gender Identity and Sex

Gender Reassignment

LGBT+ people

Pregnant people

Current and former armed forces personnel

Refugees and asylum-seeking children

Domestic and/or Sexual Abuse and Violence Survivors and people in vulnerable situations

Specific issues, considerations and key intersections are identified in the relevant sections

Recommendation 3: that the housing needs of the city's Black and racially minoritised groups (including Gypsy, Roma and Travellers) are assessed in year 2 of the strategy action plan and plans put in place to address any negative disproportionate impacts identified.

Recommendation 4: When future housing needs assessments are commissioned, consideration of ethnicity, 'Race', ethnic heritage and its intersections should be included in the specification.

Recommendation 5: that Black and racially minoritised groups are explicitly considered in the development of the new homelessness and rough sleeping strategy identified as action HS17 in the Year 1 action plan for the housing strategy.

Recommendation 6: that the findings of this equality impact assessment and the data and needs assessments that have informed it are incorporated into the needs assessment for the new homelessness and rough sleeping strategy (HS17 in Y1 action plan).

Recommendation 7: use the development of a new homelessness and rough sleeping strategy to review and strengthen partnership arrangements for tackling homelessness in the city (HS17 and HS35 in the Y1 action plan).

Recommendation 8: that the needs of people with multiple, compound needs are explicitly considered in the implementation of the strategy with a particular emphasis on Priority 3 Prevent homelessness and meet housing need. This is identified as action HS34 in the Y1 action plan.

Recommendation 9: that risk of exploitation and harm is explicitly considered in the implementation of the strategy and in the development of services for people at higher risk due to specific or intersecting characteristics.

Recommendation 10: ensure that the recommendations in this EIA are reflected in the action plan to deliver the Social Housing Regulator’s Transparency, Influence and Accountability Consumer Standard.

8. Outcome of your assessment

What decision have you reached upon completing this Equality Impact Assessment? (Mark ‘X’ for any ONE option below)

Stop or pause the activity due to unmitigable disproportionate impacts because the evidence shows bias towards one or more groups.	
Adapt or change the activity to eliminate or mitigate disproportionate impacts and/or bias.	
Proceed with the activity as currently planned – no disproportionate impacts have been identified, or impacts will be mitigated by specified SMART actions.	X
Proceed with caution – disproportionate impacts have been identified but having considered all available options there are no other or proportionate ways to achieve the aim of the activity (for example, in extreme cases or where positive action is taken). Therefore, you are going to proceed with caution with this policy or practice knowing that it may favour some people less than others, providing justification for this decision.	

If your decision is to “Proceed with caution”, please provide a reasoning for this:

Summarise your overall equality impact assessment recommendations to include in any committee papers to help guide and support councillor decision-making:

This equality impact assessment considers the implications of proposals set out in the draft housing strategy 2024 to 2029. The strategy is intended to be a high-level document, setting out the principles and priorities to achieve the council’s ambitious goal to deliver accessible, affordable and high-quality homes for everyone in Brighton & Hove. If that goal is achieved, then the strategy will have a positive impact on people with the protected and other characteristics considered in this EIA.

The EIA identifies several factors relating to protected characteristics and their intersections which impact housing need. The council can directly influence those factors relating to its statutory duties and its other services. There are other factors where it needs to work in partnership to deliver improved outcomes. Given the breadth and nature of the strategy, it has not been possible to identify the equality impact of specific proposals therefore separate equality impact assessments will need to be undertaken in line with

council policy on all service development and change proposals undertaken as part of the implementation of the strategy.

9. Publication

All Equality Impact Assessments will be published. If you are recommending, and choosing not to publish your EIA, please provide a reason:

10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Martin Reid, Interim Corporate Director, Housing, Care & Wellbeing, Housing lead	12-Sep-24
Accountable Manager:	Diane Hughes, Head of Strategy & Supply	12-Sep-24

Notes, relevant information, and requests (if any) from Responsible Lead Officer and Accountable Manager submitting this assessment:

EDI Review, Actions, and Approval:

Equality Impact Assessment checklist and sign-off

EIA Reference number assigned: HCW107-12-Sep-2024-Housing-Strategy-24-29

EDI Business Partner to cross-check against aims of the equality duty, public sector duty and our civic responsibilities the activity considers and refer to relevant internal checklists and guidance prior to recommending sign-off.

Once the EDI Business Partner has considered the equalities impact to provide first level approval for by those submitting the EIA, they will get the EIA signed off and sent to the requester copying the Head of Service, Business Improvement Manager, [Equalities inbox](#), any other service colleagues as appropriate to enable EIA tracking, accountability, and saving for publishing.

Signatory:	Name:	Date: DD-MMM-YY
EDI Business Partner:	Jamarl Billy	Reviewed prior to leaving the organisation
EDI Manager:	Sabah Holmes	12-Sep-24
Head of Communities, Equality, and Third Sector (CETS) Service: <i>(For Budget EIAs/ in absence of EDI Manager/ as final approver)</i>	N/A	

Notes and recommendations from EDI Business Partner reviewing this assessment:

Notes and recommendations (if any) from EDI Manager reviewing this assessment:

Notes and recommendations (if any) from Head of CETS Service reviewing this assessment:

