

## General Equality Impact Assessment (EIA) Form

### 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.

<b>Name of activity or proposal being assessed:</b>	<b>Hate Incident Policy</b>
<b>Directorate:</b>	Housing, Care & Wellbeing
<b>Service:</b>	Housing
<b>Team:</b>	Performance & Improvement Team
<b>Is this a new or existing activity?</b>	New
<b>Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)</b>	Recent ASB Policy does not have an EIA  EIAs from HM10 EIA Tenancy Management and HM04 Anti-social behaviour EIA 2017 FINAL May18, HCW107-12-Sep-2024-Housing-Strategy-24-29 & changes to the Allocations Policy EIA will be taken into consideration.

### 2. Contributors to the assessment (Name and Job title)

<b>Responsible Lead Officer:</b>	<b>Justine Harris, Head of Tenancy Services</b>
<b>Accountable Manager:</b>	<b>Justine Harris, Director of Housing &amp; People Services – Tenancy Services</b>
<b>Additional stakeholders collaborating or contributing to this assessment:</b>	Laura Stanbridge, Business Change Manager Tom Matthews, Housing Performance Analyst Jan Dowdell, Tenancy Services Operations Manager Eric Page, 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:

Housing does not currently have a Hate Incident policy in place and there is limited reference within the existing Anti Social Behaviour (ASB) policy.

The Consumer Standards for Social Housing came into effect on 1 April 2024. Under the Neighbourhood & Community Standard 2.2.2 "*Registered providers must clearly set out their approach for how they deter and tackle hate incidents in neighbourhoods where they provide social housing*".

The new policy is a statement of intent concerning how Housing will tackle hate incidents experienced by its residents. It includes definition of hate incidents, how Housing will respond to reports of hate incidents and ensure that victims receive appropriate support, whilst working with perpetrators to address behaviour using supportive interventions and enforcement. It is not within the scope of the policy to deal with hate incidents against employees.

The final policy will complement the [Anti social behaviour policy](#) and where appropriate should be read in conjunction with it.

What are the desired outcomes of the activity?

To have a hate incident policy and working procedures in place for Housing (general needs, Seniors, Temporary Accommodation & Seaside Homes).

To ensure the policy matches the needs of residents, is implemented in a fair way and any negative impacts on groups with protected characteristics are understood.

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

The policy defines how Housing will manage [hate incidents](#) experienced by residents who live in or regularly visit areas where we own/manage Housing. This includes 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.

##### Consultation carried out:

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. Housing will be developing a revised Tenant Engagement Strategy in 2025 / 2026 to enhance our engagement offer and increase representation to better reflect the demographic of the city.

The development of proposals in the draft hate incident policy was informed by other consultation and engagement exercises that considered housing issues. This included feedback received from ASB policy and Housing Strategy consultations. In addition to working with internal stakeholders, an analysis of complaints concerning ASB / Hate cases between 2022-2024 to identify common trends and areas needing improvement, review of Housing Ombudsman complaints and feedback from Victim Support who responded to a mail out to local third sector organisations inviting initial feedback.

A formal consultation of 11 weeks took place from 9 September to 2 December 2024 using the council's engagement platform, Your Voice. The platform is compatible with international accessibility standards for web content. It also has the option for people to complete a survey in any of the 10 most spoken languages in Brighton & Hove. An Easy Read survey was produced for us by Speak Out, a local organisation with expertise in Easy Read. The guide was made available as hard copy and for download on Your Voice. Large print, hard copy surveys were available on request by email or phone. The option to complete the survey by phone was publicised via the Community Engagement Team, Homing In, Area panel meetings and targeted engagement to tenants. Two in person consultation events were held in

October 2024 to accommodate those who had requested face to face engagement. The consultation was also promoted via a mail out to local third sector organisations and community groups.

#### Headline consultation data

We received 57 responses to the main online consultation survey on the draft policy and 9 responses to a supplementary survey experience of reporting a hate incident to Housing.

91.2% of responses were from individuals and 8.8% of responses were on behalf of a group or organisation.

Most of the proposals within the draft Hate Incident policy received agreement. Agreement with each of the proposals by respondents to the consultation ranged from 53.4% to 73.4%. However, just 31.6% of respondents agreed that the council is doing enough to promote awareness of action Housing can take in response to hate incidents.

For detailed information on the consultation, including details of the stakeholders consulted and detailed feedback on the proposals, see the Consultation Report on [Your Voice](#).

## 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.

(State Yes, No, Not Applicable as appropriate)

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

Homelessness and associated risk and vulnerability	NO
Human Rights	YES
Another relevant group (please specify here and add additional rows as needed)	Not applicable

**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, numeracy and /or digital 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?

While equalities data is collected, this is often incomplete or partial. It is also not done consistently or across all teams within Housing. 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. Whilst due to processes in place, reliable data on ASB is not available for temporary accommodation clients prior to 2025. 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 on NEC. It would also be difficult to keep track of this data during the lifetime of a tenancy. Whilst data is collected on NEC for armed forces, there are currently only 7 council tenants, which is likely to be an undercount. Whilst there are 48 temporary accommodation residents recorded as having served in the armed forces. This figure is more likely to be accurate as the data is collected as part of the homelessness application.

The hate incident policy includes a risk assessment carried out following the first contact, which will be updated to collate the five main protected characteristics covered by the definition. The accompanying procedure will prompt officers to ensure that the data is updated on NEC.

However, we likely need to improve our awareness of intersectionality and barriers due to layers of identities around which today we do not gather or analyse data. Data gathering needs improvement and some of these gaps may be addressed in an updated Allocations Framework EIA, a wider Housing Strategy and EIA actions that result from this policy.

What are the arrangements you and your service have for monitoring, and reviewing the impact of this activity?

Satisfaction surveys are completed upon case closure.

It is proposed that the number of new hate incident cases, including by type and locality, will be publicised on the website quarterly. This will build on the recently introduced TSM, “*Number of anti-social behaviour cases that involve hate incidents opened per 1,000 homes.*”

The policy also proposes a senior oversight role, whereby responsible managers will monitor open hate incident cases and complete an annual review of case outcomes. This will improve our oversight of case handling.

A complaints project is currently underway focused on embedding learning from complaints and assigning oversight responsibilities to a senior manager in Housing who will lead on operational complaints.

## 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](#).

## 6.1 Age

Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: those under 16, young adults, with other 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.

Age is not one of the characteristics/strands protected by hate crime legislation. It is however intrinsically correlated to other protected characteristics particularly around disability and health issues.

According to the 2021 Census data, around a third of residents (aged 16 or over) in Brighton & Hove of all tenures are between the ages of 40 and 64 (36%) which is less than council tenants (53%), therefore the age profile of council housing is generally older than residents of all tenure in city. Whilst data for Temporary Accommodation (TA) reflects that people aged 20–49 are disproportionately in housing need, with 75% of persons living in temporary accommodation from this age group.

Analysis of hate incident cases recorded on our Housing Management system, NEC, between July 2021 to March 2024 shows there tends to be lower proportions of younger and older people among both victims and perpetrators when compared with council tenants. Similar proportions of both victims (64%) and perpetrators (65%) are between the ages of 40 and 64, which is higher when compared with the general population of council tenants (53%). This age group is most likely to be impacted by the policy's proposals. It is worth noting that ASB data for Temporary Accommodation is not available and therefore the lower limit of the age range impacted by hate incidents is likely to be lower.

Staff should therefore have a good understanding of the specific needs and challenges facing these groups. Children are also most likely to be part of households for tenants aged 20-49, which is particularly relevant for households living temporary accommodation.

The consultation on the draft hate incident policy included no responses from children and younger people under the age of 24 or adults 85+. Responses were received from adults aged 25 – 84 years, with 31.5% of responses from adults aged 45 – 64 – the group most likely to be impacted by the policy's proposals. One respondent suggested the definition within the policy is widened to include age, “as some people discriminate against the elderly and very young”.

**See Appendix 1 for data (Tables 1 – 3).**

More intersectional impacts have been discussed in *Section 6.18 Cumulative, intersectional, and complex impacts*.

## 6.2 Disability:

Does your analysis indicate a disproportionate impact relating to <a href="#">Disability</a> , considering our <a href="#">anticipatory duty</a> ?	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.



Disability hate crime is one of the most under reported types of hate crime, despite anecdotal evidence suggesting it is frequently experienced by disabled people. Whilst most disability hate crimes also occur on the street, there is a higher proportion that occur in a dwelling than seen in other types of hate crime, and disability hate crimes are also more likely to be perpetrated by someone who is known to the victim (Community safety and crime reduction strategy 2023 to 2026). Consequently, it is likely that disabled residents will be disproportionality impacted compared to residents with other protected characteristics.

In 2023/24 Sussex Police recorded 68 disability-related hate crimes and incidents, of which 60 were explicitly recorded as crimes - a 21% reduction from the 86 crimes and incidents recorded in 2022/23. In the first six months of 2024/25 a further 32 crimes and incidents were recorded, slightly fewer than the 38 in the same period in the previous year. The overall reduction in disability motivated crimes and incidents is very similar to the 18% reduction seen across England and Wales in 2023/24. Whilst figures are not available for Temporary Accommodation, Council Housing recorded three disability-motivated hate incidents, the same number as in the previous year (Community Safety Team Strategic Assessment, 2024).

When looking at the 2021 Census data, a much lower proportion of residents of Brighton & Hove of all tenures have a long-term health problem or disability (19%) when compared council tenants (49%) and temporary accommodation residents (28%).

An analysis of hate incident cases (all types of hate incident) recorded on our Housing Management system, NEC, between July 2021 to March 2024 shows a lower proportion of victims have a long-term health problem or disability (53%) compared to perpetrators (61%). However, when compared to council tenants as a whole (49%), both victims and perpetrators are more likely to have a long-term health problem or disability.

However, when it comes specifically to disability related hate incidents, all the victims have a long-term health problem or disability (100%) compared to 33% of the perpetrators.

More detailed data from NEC indicates that a significant number of victims and perpetrators report experiencing mental health issues. Perpetrators are significantly more likely to be experiencing mental health issues than victims, which is a notable gap in terms of the proportions. Smaller proportions of both victims and perpetrators are recorded as having learning difficulties, a hearing or speech impairment, substance or alcohol issues. Whilst a small number of victims had a visual impairment recorded, this was not recorded for any perpetrators.

Detailed data on whether victims and perpetrators have a physical disability is not available as this is currently not recorded on our IT systems within Housing.

The available data indicates that mental health issues are a significant factor in case referrals, mental health awareness training should be made available to all staff managing cases along with ensuring that they are aware of the local services available.

45.6 % of respondents to the consultation on the draft incident policy reported having a physical or mental health condition or illness lasting or expected to last 12 months or more. Of those who answered, 43.9% indicated that any of their conditions or illnesses reduced their ability to carry out day to day activities. There was also an option to select one or more specific conditions or illnesses, those most chosen in order included: The two categories which 5% or more of respondents selected were long-term physical illnesses or health conditions (14.9%), mental health differences (13.8%), physical differences substantially limiting basic activities (9.2%) and learning differences (5.7%). Suggestions to improve the response of Housing included taking a victim centred approach adapted to the needs of the individual, ensuring those harmed by hate are aware they can use an advocate, tailoring communication to individual's needs and using an independent organisation or person to check that documents and policies are accessible for residents with learning disabilities.

It is recognised that mental, social, and behavioural health issues could create a barrier for accessing the service. Those who have experienced hate incidents may have a reduced level of mental wellbeing generally and as a result of experiencing hate-based behaviour. There are several ways that hate incidents can be reported both electronically, by phone and in person (proposal currently being explored to offer in person contact via housing office surgeries) including through support workers and emergency

services to support victims. It is therefore not anticipated that there will be any differential experience or impact of the policy itself based on disability.

The policy is likely to have an overall positive impact on disabled residents because we take a victim centred approach adapted to the needs of the individual and work with perpetrators to identify support needs which may address the underlying causes of their behaviour.

Data analysis conducted as part of the recent Housing Strategy identified collection of data on disability within housing services is not consistent and there is evidence of under-reporting. This requires improvement and is addressed within the recommendations within the [Housing Strategy EIA](#).

**See Appendix 1 for data (Tables 4 – 10).**

More intersectional impacts have been discussed in section 6.18 *Cumulative, intersectional, and complex impacts*. Mitigating actions will be added section 7.

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).

The policy aims are not expected to adversely affect any protected characteristic. The policy is expected to have a positive impact on all protected groups through the provision of a robust and consistent approach which is victim centred and considers the needs and vulnerabilities of those experiencing and perpetrating hate incidents. By taking the individuals requirements into consideration, any adjustments mentioned above will be made as required.

Relevant proposals identified in the hate incident policy include:

- Victim centred & trauma informed approach
- Referral or signposting victims to other organisations for support, such as Victim Support
- Working with perpetrators to identify unmet support needs
- Senior oversight of all hate incident cases
- Seek to support external advocacy

Therefore, it is anticipated that measures set out in hate incident policy are likely to have a positive impact on disabled people.

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

<b>Does your analysis indicate a disproportionate impact relating to ethnicity?</b>	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.

Home Office figures show that religious hate crime recorded by police in England and Wales has risen by 25% between 2023 – 2024 compared with the previous year, driven mainly by a rise in offences since the beginning of the Israel-Hamas conflict. 140,561 of the hate crime offences recorded, 7 in 10 are shown to have been motivated by race (see [Resolve, Community cohesion and hate crime amidst growing worldwide tensions, Oct 2024](#)).

This national trend is reflected locally. In 2023/24 Sussex Police recorded 606 racially motivated hate crimes and incidents in the Brighton & Hove. Over this same period, there were 119 police-recorded



religiously motivated hate crimes and incidents in the city in 2023/24, nearly twice as many as the 63 recorded in the previous year. A substantial increase in recorded cases was observed at the beginning of the Israel-Palestine conflict in October 2023; 15 and 24 religiously motivated crimes and incidents were reported in the city in October and November 2023 respectively. Numbers of cases recorded each month reduced substantially following then, however recorded cases remain higher each month than before the beginning of this conflict.” (Community Safety Team Strategic Assessment 2024). Less than five religiously motivated hate incident cases were reported to council housing for 2023/24, however it was an increase compared to the previous year, when none were recorded.

Research from Sussex University has shown, that knowing other people who have experienced hate crime increased individuals’ perceptions of threat, which in turn was linked to increased feelings of vulnerability, anxiety and anger ([The Sussex Hate Crime Project: final report, 2023](#)). Despite this, hate crime is under-reported, there are various reasons for this, however some common reasons are lack of confidence in authorities, lack of knowledge about how to report, fear of retaliation and a lack of insight into what constitutes a criminal offence (see [Resolve, Community cohesion and hate crime amidst growing worldwide tensions, Oct 2024](#) ).

Data from the Census 2021 indicates more than a quarter of residents, 26% are non-White UK/British from Black and racially minoritised groups. Higher than seen in the South-East (21%) but similar what is found in England (27%).

When looking at the 2021 Census data, a higher proportion of residents of Brighton & Hove of all tenures are Black and Racially Minoritised (26%) than council tenants (16%) although data is not held on this characteristic for 9% of council tenants (of which 8% prefer not to say and 1% with no data). Whereas Temporary Accommodation residents, when compared to all residents of Brighton & Hove, are less likely to be White British or White Minoritised, and more likely to be Black or Black British or categorised as part of another ethnic group.

An analysis of hate incident cases recorded on our Housing Management system, NEC, between July 2021 to March 2024 shows when it comes to ethnic group, a higher proportion of victims are Black and Racially Minoritised (59%) compared to perpetrators (4%) and council tenants generally (16%). When it comes specifically to racial hate incidents, a much higher proportion of victims are Black and Racially Minoritised (74%) compared to perpetrators (4%).

Although a distinct category to ethnicity, data is also recorded which indicates whether someone has English as a second language, which applies to less than five victims (6%) and less than five perpetrators (6%). Of these, none of the victims and less than five of the perpetrators were recorded as requiring translation.

Whilst 42.2% of respondents to the consultation on the draft hate incident policy chose not to specify their ethnicity, of those who responded, 14.2% of respondents identified as Black and Racially Minoritised and 7% who identified as ‘White: Other’. One consultation respondent disclosed that they felt discriminated against by a council officer when making their report of a hate incident, suggesting there should be measures in place to protect against this.

Feedback received from Victim Support highlighted a perceived disparity in the level of service provided to residents from black and racially minoritised communities *“We have been told by victims from an ethnic background - Race/Nationality, often where there are multiple victims in the same surrounding location, that they are not in receipt of a named officer, or that they have been told there will be a named officer to whom they report to or will be contacted by, having the responsibility for coordinating and maintaining communication with residents and other agencies. We would absolutely welcome a named officer who has overall coordination and responsibility of maintaining communication with residents.”*

This was echoed within responses to the Housing Strategy consultation, received on behalf of Brighton & Hove Community Voices and Bridging Change, groups working to challenge systemic barriers to Black, Asian and racially minoritised 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:

- 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

Feedback received as part of the consultation on the draft hate incident policy included suggestions for accommodations where English is not spoken as a first language, including ensuring information is accessible, provided in a variety of formats and languages. One respondent wrote *“At present, aside from emailing or calling Housing Customer Services it is not clear how someone whose first language is not English and they are not fluent can easily be signposted to contact the Council. They may not even read/write their own language so trying to understand different groups who could make contact would be helpful.”*

The policy proposes to create a support plan (RA2) for all victims of hate incidents, which details agreed frequency and method of communication between the victim and a named officer (single point of contact, SPOC). The procedure will also prompt officers to offer referrals as appropriate. Cases will be overseen by a senior oversight role to check that offers of referrals and communication preferences are recorded.

**See Appendix 1 for data (Tables 11 – 15).**

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. More intersectional impacts have been discussed in *section 6.18 Cumulative, intersectional, and complex impacts*. Mitigating actions will be added section 7.

#### 6.4 Religion, Belief, Spirituality, Faith, or Atheism:

**Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?**

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.

As mentioned above, religious discrimination and hate crime has significant intersections with ethnicity, ‘race’ and ethnic heritage. There has been a significant increase in religiously motivated crimes and incidents in the city. This is also reflected nationally, whilst there was an overall decrease in hate crime the year ending 2024), religious hate crimes increased by 25% compared with the previous year ([Home Office, Hate crime, England and Wales, year ending March 2024](#)).

When looking at the 2021 Census data, over half of residents of Brighton & Hove of all tenures have no religion or belief (55%) which is more than for council tenants (23%) and higher than the England average (36.7%). Of the council tenants with data recorded about their religion or belief, 46% were Christian and 40% had no religion or belief, so it is likely than a higher proportion of council tenants have a religion compared to citywide residents. Information on religion or belief is not recorded for temporary accommodation residents.

An analysis of hate incident cases (all types of hate incident) recorded on our Housing Management system, NEC, between July 2021 to March 2024 shows people with no data for religion or belief (including those who prefer not to say) made up around half of both victims (48%) and perpetrators (51%), both of which are higher than for council tenants more generally (41%).

Of those with a religion, a higher proportion of victims are Christian (35%) than are perpetrators (18%) or council tenants generally (27%). A higher proportion of perpetrators have no religion or beliefs (27%) when compared to victims (4%). A higher proportion of Muslim residents are victims (6%) when compared to council tenants generally (4%). The same can also be said for Jewish residents where there are a higher proportion of victims (4%) than council tenants generally (0.3%). Whilst there are no hate incidents where Muslim or Jewish residents are the perpetrators.

42.1% of respondents to the consultation on the draft hate incident policy chose not to specify their Religion, faith or belief. Of those who did respond, the most common categories selected were: ‘No

religion' (24.6%), 'Christian' (15.8%), 'Muslim' (3.5%), 'Spiritual' (3.5%) and 'Another religion, faith or philosophical belief.' There were several other categories chosen by 1.8% of respondents: 'Agnostic', 'Buddhist', 'I do not follow any faith, religion or belief.'

Housing staff need to be aware of the impact of cultural considerations such as dates of significance limiting customer's availability or conservative household systems that need culturally sensitive engagement and management, particularly when working with victims. As a result, the procedure will prompt staff to consider cultural considerations.

Data shows an increase in religiously motivated hate crimes & incidents in the city in response to the recent Israel-Hamas conflict. The policy recognises external factors may place certain people at heightened risk. As a result, a question has been added to Part B of the risk assessment to ensure that officers consider the impact of media and global conflicts.

There is a need to improve data collection and analysis by housing services (particularly within Temporary Accommodation) in relation to religion or belief as set out in the recommendations in section 7.

**See Appendix 1 for data (Tables 16 – 18).**

More intersectional impacts have been discussed in *section 6.18 Cumulative, intersectional, and complex impacts*. Mitigating actions will be added section 7.

## 6.5 Gender Identity and Sex:

**Does your analysis indicate a disproportionate impact relating to [Gender Identity](#) and [Sex](#) (including non-binary and intersex people)?**

YES

### 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.

Sex/gender like age is not recognised within the strands protected by hate crime legislation. People may, however, have more than one characteristic which could make them more vulnerable and could increase the risk of being harassed or abused. 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.

Victims are more often male for racist or religiously motivated and homophobic hate crimes, but this is different for both disability and transphobic offences, which are more likely to have a female victim (Community safety and crime reduction strategy 2023 to 2026).

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%).

The proportion of female residents in temporary accommodation and council properties is significantly higher than for adult residents of Brighton & Hove as a whole, 61% for temporary accommodation and 60% for council housing. A factor which is apparent here is the likelier presence of children in a household, which gives a household priority need under the main housing duty. Further analysis on this for Temporary Accommodation is available within Appendix 1, table 21.

An analysis of hate incident cases recorded on our Housing Management system, NEC, between July 2021 – March 2024 shows there are equal numbers of male (49%) and female (49%) victims, with a slightly higher proportion of perpetrators are female (52%) than male (48%). By contrast, both groups have a smaller proportion of females when compared to tenants generally (60%), meaning females are underrepresented among both victims and perpetrators of hate incidents.

Marginally more females than males responded to the consultation on the draft hate incident policy (29.8% & 26.3% respectively). A high number of respondents gave no answer or chose 'prefer not to say' when asked to describe their gender (42.2%).

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 and 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 and 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. NEC & Home Connections currently records whether tenant/residents are transgender, with no further breakdown (i.e. trans woman / trans man) or option of selecting another gender identity. Our records indicate that currently 42 tenants in council housing and 10 residents in temporary accommodation identify as transgender.

The Trans Needs Assessment undertaken by the council in 2015 identified the need to improve data collection in relation to gender reassignment and gender identity in relation to Housing. Data gaps were acknowledged within the [Housing Strategy EIA](#) and as a result, recommends that the year 2 action plan contains an explicit action to improve data collection (across all protected characteristics).

**See Appendix 1 for data (Tables 19 – 22).**

More intersectional impacts have been discussed in *section 6.18 Cumulative, intersectional, and complex impacts*. Mitigating actions will be added section 7.

## 6.6 Gender Reassignment:

<b>Does your analysis indicate a disproportionate impact relating to <a href="#">Gender Reassignment</a>?</b>	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 and replaced with a broader umbrella term like "trans" (written evidence submitted by [Stonewall to the Transgender Equality Inquiry, 2015](#)).

In October 2022, a [Home Office report](#) said that hate crimes targeting trans people had increased by 56% in the previous year, holding discourse on social media partly responsible.

Research from the University of Surrey ([The Safe Housing Study, 2017](#)) indicated trans respondents were particularly concerned about safety in their neighbourhood, due to transphobia and transphobic hate crime. This is reflected within the feedback received from the recent consultation on the Housing Strategy which identified the following issues in relation to gender reassignment:



- 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

The data from the Census 2021 and service data in section 6.5 above give some indication of the numbers of people in the city and those using housing services who have this protected characteristic.

An analysis of hate incident cases recorded on our Housing Management system, NEC, between July 2021 – March 2024 shows there were less than five trans victims, of which the majority were victims of transphobic hate incidents. There were less than five trans perpetrators. 52 tenants identify as trans across the whole of Housing (council housing & temporary accommodation).

3.5% of respondents to the draft hate incident policy disclosed they consider themselves trans or have a trans history (42.2% gave no answer or chose 'Prefer not to say'). One respondent, when answering the question "Is there anything else you think we should offer to make sure people harmed by hate feel supported or do you have any further comments on supporting people harmed by hate?" wrote "*Don't presume that a person...would not face hate from another member of that minority group*", and carried on to explain that whether or not a trans person has undergone reassignment could result in harassment from another trans person.

**See Appendix 1 for data (Table 23).**

More intersectional impacts have been discussed in *section 6.18 Cumulative, intersectional, and complex impacts*. Mitigating actions will be added section 7.

## 6.7 Sexual Orientation:

<b>Does your analysis indicate a disproportionate impact relating to <a href="#">Sexual Orientation</a>?</b>	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.

2021 Census data shows that more than one in ten residents aged 16 or over in the city (12%, 25,250 people) who chose to state their sexual orientation identify with a sexual orientation other than Straight or Heterosexual (Gay, Lesbian, Bisexual or another sexual orientation). The equivalent proportions were lower among council tenants (10%) and people in temporary accommodation (9%). These percentages exclude people who preferred not to answer the question, or for whom data was not held (9% of Census residents, 45% of council tenants and 42% of people in temporary accommodation).

An analysis of hate incident cases (all types) recorded on our Housing Management system, NEC, between July 2021 – March 2024 shows high numbers of victims (56%) and perpetrators (52%) without any data (including prefer not to say), both of which are higher than for council tenants more generally (45%).

Nonetheless, a lower proportion of victims are Straight or Heterosexual (29%) than perpetrators (39%) and both groups are lower than council tenants more generally (50%).

When it comes specifically to homophobic hate incidents, a much higher proportion of victims are Gay or Lesbian (50%) compared to perpetrators (0%). A sizeable number of victims identified as straight (20%) and it is not clear without further analysis as to whether they were targeted due to association with another LGB person or that they were perceived by the perpetrator to be LGB.

Feedback received from the recent consultation on the Housing Strategy raised the following issues in relation to sexual orientation:

- Impact of hate crime and the need for a zero-tolerance approach
- LGBTQ+ training for housing services staff
- Safety in emergency and temporary accommodation
- Understanding and consideration of impact of intersectional ties with other protected characteristics e.g. Age, Disability or Ethnicity

The [2009-14 LGBT Housing Strategy](#) and the [2023 LGBT Housing Manifesto](#), calls for 'high quality data monitoring around sexual orientation and trans status' in relation to Housing. Data gaps for sexual orientation were acknowledged within the [Housing Strategy EIA](#) and as a result, recommends that the year 2 action plan contains an explicit action to improve data collection (across all protected characteristics).

40.4% of respondents to the consultation on the draft hate incident policy chose not to specify their sexual orientation. Of those who responded, 26.3% identified as 'Heterosexual or straight' and 24.7% as LGB (gender data is reported on within section 6.6), whilst 7% chose 'Prefer not to say'.

Consultation feedback on the draft hate incident policy included suggestions for improvements to the council's webpages, including creating a clear support link on the homepage for LGBTQ+ individuals to report hate crimes and ensuring all links are functional.

**See Appendix 1 for data (Tables 24 – 27).**

More intersectional impacts have been discussed in *section 6.18 Cumulative, intersectional, and complex impacts*. Mitigating actions will be added section 7.

## 6.8 Marriage and Civil Partnership:

<b>Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?</b>	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.

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

<b>Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?</b>	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.



The Census does not collect data on this protected characteristic nor is data routinely collected by council housing services.

#### 6.10 Armed Forces Personnel, their families, and Veterans:

<b>Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?</b>	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.

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.

Only seven council tenants are currently recorded on the Housing Management system, NEC, which is likely to be an undercount. Whilst 48 residents in temporary accommodation are recorded as having served in the armed forces, which is more likely to be accurate as it forms part of the homeless application.

#### 6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

<b>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)</b>	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.

Looking at national & anecdotal data, this group often face increased risk of hate incidents due to their ethnicity, nationality, religion, or perceived cultural differences. Race and religion are two of the hate crime categories which are most likely to affect asylum seekers and refugees ([Migrant Help, 2020](#)).

Barriers to reporting and fear of authorities can make it difficult for victims to seek help. One study found that the most frequently cited barrier was fear of the authorities based on experiences in their country of origin. Other barriers include language barriers, fear of negative repercussions (including negative impact on their immigration status), lack of awareness of what a hate crime is and lack of trust and confidence in policing systems or reporting mechanisms ([Hate Crime experiences of Refugees & Asylum Seekers, British Red Cross, 2019](#)). To ensure equal access to the service, housing staff need to be aware of the importance of organising interpreters or other language support and have some knowledge about the additional barriers faced by migrants to reporting hate incidents.

0.3% (36 of 1,853) of persons in temporary accommodation were former asylum seekers. 17.3% (320 of 1,853) were recorded as non-UK nationals at the time of their homelessness application, including the former asylum seekers. This data is recorded on Home Connections and is not collected on NEC (for council tenants), therefore is not part of the analysis of council housing hate incident cases.

Resettlement support currently commissioned by the council for migrant communities includes an intense casework service for families arriving on government resettlement programmes. Around 17 of these Afghan families are in Temporary Accommodation. There is also a dedicated small team working in homelessness prevention which works with refugees and migrants.

#### 6.12 [Carers](#):

**Does your analysis indicate a disproportionate impact relating to [Carers](#) (Especially considering for age, ethnicity, language, and various intersections).**

No

#### 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.

Housing service data was not available for this protected characteristic.

#### 6.13 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).**

No

**Also consider our [Corporate Parenting Responsibility](#) in connection to your activity.**

#### 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.

There are currently 192 council tenants recorded as care leavers on NEC and 31 temporary accommodation clients recorded as care leavers on Home Connections.

#### 6.14 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)**

No

#### 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.

### 6.15 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)?	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.

### 6.16 Socio-economic Disadvantage:

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

Certain areas, like Hangleton and Knoll, Kemptown, Whitehawk, and Moulsecoomb, face disproportionate impacts due to low average earnings, limited access to essential services, and poorer quality housing ([Brighton & Hove Economic Evidence report, 2024](#)).

*“Socio-economic disadvantage is highly intersectional... The intersectionality between deprivation and other characteristics can be thought of as a web, where different areas connect, compounding and exacerbating each other”* (Mills, C., [A review of evidence on socio-economic disadvantage and inequalities of outcome, 2021](#)).

*“The 2015 Crime Survey for England and Wales also found that single parents, those renting social housing and people in lower income brackets were more likely to be victims of household hate crime”* (Hambly, JR., Singh, S. & Wedlake-James, T., [Hate Crime: a thematic review of current evidence, Home Office 2018](#)).

NEC Housing has the amount of arrears recorded for each household and an “Economic Status” field for both council tenants and TA clients. However, the data doesn’t appear to be up-to-date and the information is stored in a way which makes it difficult to analyse.

No Housing service data available to link specifically to hate incidents.

### 6.17 Human Rights:

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

Housing service data is not available, of the six evictions which took place between July 2021 – March 2024, none of these were related to a hate incident.

To evict someone from their home will always involve an interference with rights under Article 8. The test is whether the eviction is a proportionate means of achieving a legitimate aim. To make sure that perpetrators with protected characteristics are not disadvantaged by the policy, the procedure ensures that appropriate support is offered and / or adjustments made, and alternatives to eviction are considered.

Officers are required to complete a proportionality statement before proceeding with legal action, which is checked and signed by a manager.

#### 6.18 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, numeracy and/or digital 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

Victims of hate incidents who have a protected characteristic can be at greater risk of impact and harm than another member of the community as that factor may lead them to be more vulnerable or more impacted. This is echoed within the Community Safety and Crime Reduction Strategy 2023-26 which states “*Those harmed by incidents and crimes where people are targeted because of a disability, their ethnicity or race, religion or faith, sexual orientation or transgender identity tell us that it has a significant effect on their quality of life, wellbeing and feelings of safety.*” (p.34).

‘Intersectionality’ adds to the complexity of hate crime - victims may be targeted due to more than one of their identity characteristics. The policy recognises the impact of intersectionality, para 8.3 states “*Victims may also experience compounded trauma due to the intersection of multiple marginalized identities, such as race, gender, sexual orientation, disability, or religion. This intersectionality can result in more severe and complex consequences, affecting not only the immediate victims but also their communities. As a result, ripple effects of hate crimes extend beyond the initial incident, significantly diminishing the quality of life for affected individuals and groups.*”

Research has shown how the experience of disability is compounded when disabled individuals belong to multiple minority groups. Therefore, in order to capture the entirety of a victim experience, it is important officers do not assume that one element of identity is dominant over others and to consider the multiple identities involved (Healy, J, 2019) [Thinking outside the box: intersectionality as a hate crime research framework](#).

The supporting procedure will ensure that officers take an intersectional approach when working with victims, providing targeted support and resources, recognizing their unique needs and experiences. The procedure will also highlight that someone can be a victim of **more than one** type of hate crime and the impact of this.

Often people with substance misuse issues, unemployed people, ex-offenders and people with certain mental health needs are disproportionately represented in the perpetrator group, and therefore more likely to be targeted with formal intervention processes (see also Hambly, JR., Singh, S. & Wedlake-James, T., [Hate Crime: a thematic review of current evidence, Home Office 2018](#)). Therefore, the policy could be seen as having adverse impacts on groups more likely to perpetrate anti-social behaviour – however this is justifiable as the purpose of the policy is to intervene and prevent further hate incidents. The policy promotes positive intervention, working with partner agencies to address any support unmet needs, rather than immediate enforcement action. This includes referring cases to HASBRAC, the monthly Hate & ASB Risk Assessment conference, which addresses the harm caused to victims of hate incidents and crimes through supportive interventions and management of behaviour of priority and repeat perpetrators. Perpetrators will be offered appropriate interventions to address their behaviour and enforcement will be used when necessary. Cases that go to court must have been carefully evaluated by completing a proportionality assessment. This ensures that due regard is given to the Equalities Act when enforcement action is taken. A copy of this assessment is attached as Appendix 2.

Recognising that language and literacy barriers may prevent some people from accessing the service. The procedure will ensure all officers are aware how to obtain translation and interpretation services, whilst raising awareness of literacy barriers and promote the use of alternatives.

The service is process driven and involves formal action with high evidential requirements. Members of some groups may be less likely to engage because of inability to communicate on a formal basis and/or negative perception of statutory agencies. As a result, the supporting procedure will highlight the need for officers to assess communication ability and provide alternatives and/or support where required.

There is a lack of comprehensive data on certain groups, including expatriates, migrants, asylum seekers, refugees, care leavers, sex workers, people with experience of or living with addiction and/ or a substance use disorder, lone parents and young adults with intersections. Data is also not available to carry out detailed analysis on how multiple characteristics interact to create unique vulnerabilities and the resulting intersectional impacts, such as how race and disability might affect someone's experience of hate incidents.

## 7. Action planning

**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)

### Activity 1:

**Specific: Improve data collection methods to capture detailed demographic information for Housing.**

**Measurable: 75% of people involved in hate incident cases to have their equalities strand data recorded on NEC.**

**Achievable: Procedure in place prompting officers to ensure that equalities data is updated on NEC following each risk assessment. Briefings to staff on importance of gathering data during tenancy visits. Exploring proposal to expand person fields on NEC. This will also be supported by the Year 2 (2025/26) action plan for the Housing Strategy to implement improvements to the collection and analysis of equalities data.**



Relevant: Ensure data informs policy decisions.

Time-bound: Complete data collection improvements within one year.

### Activity 2:

Specific: Introduce **senior oversight role for all hate incident cases to improve case handling.**

Measurable: All case records to include: 1) completed risk assessment (including consideration of external factors increasing risk) 2) a tailor-made action plan including preferred communication method & agreed frequency of contact, 3) offer of referrals to appropriate support for both victims & perpetrators, 4) use of template letters as appropriate, 5) referral to multi-agency forums, e.g. HASBRAC, as appropriate, 6) completion of proportionality assessment where enforcement action is being taken.

Achievable: Manager with senior oversight responsibility to monitor all active hate incident cases and review outcomes of cases on an annual basis.

Relevant: Ensure hate incident cases are actively managed taking a victim centred approach, with regard for the potentially disproportionate impact on persons with protected characteristics.

Time-bound: Implement within first three months of policy.

### Activity 3:

Specific: Provide **hate incident training to frontline staff within Housing, including proportionality, mental health and a module on intersectionality and its effects.**

Measurable: Track attendance and feedback from training sessions.

Achievable: Collaborate with Learning Development Team, Community Safety & Equalities Teams to create training modules. Senior oversight role to have ongoing responsibility to identify future training needs and co-ordinate training.

Relevant: Ensure training addresses the unique needs of intersecting characteristics.

Time-bound: Implement training within first six months of policy.

### Activity 4:

Specific: **Review implementation of the new policy.**

Measurable: Review 1) satisfaction surveys, 2) review complaints & identify areas of key learning, 3) case outcomes – checking communication preferences have been taking into consideration & referrals offered, 4) Success of training and identify any gaps, 5) Identify trends (case type & location), 6) Seek feedback from key agencies e.g. Victim Support

Achievable: To be completed alongside manager with senior oversight responsibility during their first annual review.

Relevant: To ensure the policy is implemented in a fair way, any negative impacts on groups with protected characteristics are understood and any necessary amendments are identified (e.g. further training for staff).

Time-bound: After first year of implementation.

### Activity 5:

Specific: **Improve access to service.**

Measurable: 1) enabling third party reporting 2) supporting advocacy 3) alternative formats (easy read, large print, SMS text messaging & WhatsApp, translation services) 4) procedure to ensuring any service adjustments recorded on RA2 support plan (e.g. large print letters, document translation).

Achievable: Supporting procedure to ensure officers implement the above adjustments and senior oversight role to monitor adjustments recorded on RA2 support plan.



**Relevant:** To ensure that a variety of options are available to ensure that all persons harmed by hate are able to report hate incidents.

**Time-bound:** Implement within first three months of policy.

### Which action plans will the identified actions be transferred to?

- For example: Team or Service Plan, Local Implementation Plan, a project plan related to this EIA, 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.

The above monitoring will be included in the Fair and Inclusive Action Plan reporting and auditing for Tenancy Services and Temporary Accommodation, which is monitored by the Directory Equality Delivery Group.

## 8. Outcome of your assessment

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

<b>Stop or pause</b> the activity due to unmitigable disproportionate impacts because the evidence shows bias towards one or more groups.	
<b>Adapt or change</b> the activity to eliminate or mitigate disproportionate impacts and/or bias.	
<b>Proceed</b> with the activity as currently planned – no disproportionate impacts have been identified, or impacts will be mitigated by specified SMART actions.	
<b>Proceed with caution</b> – 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.	<b>X</b>

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

More learning needed to understand the mitigations needed for intersectional identities, which as a result may increase any disproportionate impacts.

### 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 new hate incident policy for Housing.

The policy defines how Housing will manage [hate incidents](#) experienced by residents who live in or regularly visit areas where we own/manage Housing. This includes all protected characteristics and intersecting groups as set out in the council's Equality Impact Assessment (EIA) Toolkit 2023. The EIA identifies several factors relating to protected characteristics and their intersections which impact how residents affected by hate incidents may access support from Housing.

The policy aims are not expected to adversely affect any protected characteristic. The policy is expected to have a positive impact on all protected groups through the provision of a robust and consistent approach that is victim-centred, considering the needs and vulnerabilities of those experiencing and perpetrating Hate Incidents.

Five actions have been identified to address potential disproportionate and cumulative impacts identified within the EIA:

1. Improve data collection methods to capture detailed demographic information for Housing.
2. Introduce senior oversight role for all hate incident cases to improve case handling.
3. Provide hate incident training to frontline staff within Housing, including proportionality, mental health and a module on intersectionality and its effects.
4. Review implementation of the new policy.
5. Improve access to service.

## 9. Publication

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

If the EIA is published, some of the protected characteristic data will need to be hidden with \* to avoid identifying tenants as the data sets are so small.

## 10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Justine Harris, Head of Tenancy Services	
Accountable Manager:	Justine Harris, Director of Housing & People Services – Tenancy Services	

**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 sign-off](#)

**EIA Reference number assigned: DIRNAME##-DD-MMM-YY-EIA-Name**

For example, HNC##-25-Dec-23-EIA-Home-Energy-Saving-Landlord-Scheme

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.

<b>Signatory:</b>	<b>Name:</b>	<b>Date: DD-MMM-YY</b>
<b>EDI Business Partner:</b>	Eric Page	04-April-25
<b>EDI Manager:</b>	Sabah Holmes	04-Apr-25
<b>Head of Communities, Equality, and Third Sector (CETS) Service:</b> <i>(For Budget EIAs/ in absence of EDI Manager/ as final approver)</i>	Not in post – EDI approval sufficient.	

**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:**

