# Equality Impact Assessment (EIA) Form – Initial Demolition Notices

## 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.

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| **Name of activity or proposal being assessed:** | EIA on the impact of the service of Initial Demolition Notices (IDN), in accordance with Schedule 5A of the Housing Act 1985, in respect of St James's House, (Kemptown), Nettleton Court & Dudeney Lodge (Hollingdean), and Heron, Kestrel, Swallow, Falcon and Kingfisher Courts (collectively the Whitehawk 'Bird Blocks') |
| **Directorate:** | Homes & Adult Social Care |
| **Service:** | Estate Renewal |
| **Team:** | LPS |
| **Is this a new or existing activity?** | New |
| **Are there related EIAs that could help inform this EIA? Yes or No** (If Yes, please use this to inform this assessment) | • HASC-Mar-26-EIA on s105 LLP Rehousing Policy (Housing Register) consultation.docx<br>• Housing-03-Jun-25-EIA-Whitehawk-LPS.docx<br>• Nettleton and Dudeney LPS EIA May 25.docx<br>• St James LPS EIA May 25.docx |

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

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| **Responsible Lead Officer:** | Paul Dalton, Regeneration Programme Manager |
| **Accountable Manager:** | Chantelle Barker, Director of Estate Renewal |
| **Additional stakeholders collaborating or contributing to this assessment:** | Marcus Clack, Estate Regeneration Project Manager<br>Martyn Holmes, Estate Regeneration Project Manager<br>Hemangi Sharma, LPS Community Engagement Manager |

## 3. About the activity

Briefly describe the purpose of the activity being assessed:

On 19th March 2026, Cabinet considered the report on Large Panel System (LPS) Building and Estates Renewal, including the outcomes of consultation, structural assessments and recommended next steps for the future of the eight LPS blocks. Cabinet resolved to approve a suite of measures to support residents and leaseholders and to enable the long-term regeneration of the sites.

As part of that decision, Cabinet delegated authority to the Corporate Director of Homes & Adult Social Care to determine the timing and service of Initial Demolition Notices for secure tenants of each of the eight Large Panel System (LPS) buildings, alongside associated powers relating to rehousing arrangements, leaseholder engagement, and support and compensation offers.

Initial Demolition Notices are served on secure tenants in accordance with the Housing Act 1985. While the notices are issued to secure tenants, this step affects all occupants of the buildings, including

household members, leaseholders, leaseholder's private tenants, and temporary accommodation occupants, as well as the neighbouring community and stakeholders.

The serving of Initial Demolition Notices does not require residents to leave their homes, nor does it authorise demolition works to commence. Rather, it is a statutory step which supports long-term regeneration planning and provides time for the development of future proposals, resident engagement, rehousing arrangements and necessary approvals.

The notices formally communicate the Council's intention to demolish the buildings in the future and once served, suspend tenant's statutory Right to Buy while the notice remains in force. This supports the regeneration objectives for the sites and provides greater certainty regarding future planning. The suspension of Right to Buy also enables the Council to introduce the proposed Home Ownership Pact, a pilot scheme designed to support eligible secure tenants who wish to pursue home ownership through alternative routes.

It is therefore proposed that Initial Demolition Notices are served across all three estates concurrently. This would implement the authority granted by Cabinet and provide a clear, transparent and consistent framework for progressing the Estate Regeneration Programme in a planned and coordinated manner.

While the serving of Initial Demolition Notices represents a significant milestone within the regeneration programme, it does not itself create an immediate requirement for residents to move from their homes, nor does it approve demolition or redevelopment proposals.

Any future decision to proceed with demolition would be subject to separate statutory processes, decision-making approvals and consultation requirements, including the issuing of a Final Demolition Notice. These processes will provide further opportunities for residents, leaseholders and other stakeholders to engage and provide feedback before any demolition activity could take place.

No decision is being taken at this stage regarding the detailed redevelopment proposals for individual sites.

What are the desired outcomes of the activity?

The desired outcome is to implement the decision taken by Cabinet and establish the statutory framework necessary to support the long-term regeneration of the eight LPS buildings.

Service of the Initial Demolition Notices will provide legal and procedural certainty regarding the future of the buildings, enabling the regeneration programme to progress in a planned, transparent and legally compliant manner.

The activity seeks to:

- Implement the authority delegated by Cabinet.
- Establish the statutory framework required to support future regeneration activity.
- Provide clarity and transparency regarding the Council's intentions for the buildings.
- Support the ongoing planning of rehousing, resident support and leaseholder engagement arrangements.
- Enable continued engagement with residents, leaseholders, neighbouring communities and other stakeholders regarding future redevelopment proposals.
- Protect the Council's ability to deliver future regeneration objectives approved by Cabinet.
- Ensure statutory requirements are met while maintaining support for affected residents.

While the notices formally communicate the Council's intention to demolish the buildings in the future, they do not require residents to leave their homes, do not approve demolition works, and do not establish detailed redevelopment proposals. The activity is intended to provide sufficient time for future planning, engagement and support arrangements to be developed and implemented.

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

The residents of the eight LPS buildings are the groups most directly affected by the serving of Initial Demolition Notices. This includes:

- Secure council tenants.
- Leaseholders and shared owners.
- Household members, including children and young people.
- Older people.
- Disabled residents.
- Residents with physical or mental health conditions.
- Residents with caring responsibilities.
- Residents requiring information in alternative formats or languages.
- Residents experiencing financial hardship or other forms of vulnerability.

Residents living near the affected buildings are also likely to be impacted indirectly. While no redevelopment proposals have been finalised, neighbours may experience uncertainty regarding the future of their local area and may have concerns about future development, changes to local services, parking, open space, or construction activity. Wider community engagement beyond the residents of the block's forms part of the communication plan.

Community organisations, local businesses and support services operating within the neighbourhoods may also experience indirect impacts and may wish to join local residents in participating in future engagement activities as redevelopment proposals emerge.

Particular consideration should be given to protected characteristic groups who may experience greater impacts from uncertainty, future rehousing requirements or barriers to engagement, including older people, disabled people, people with long-term health conditions, and households with children.

## 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.

Following the comprehensive Section 105 consultation exercise undertaken in relation to the future of the eight LPS buildings, and the subsequent Cabinet decision in March 2026, a further programme of engagement and communication has been developed to support residents, leaseholders and wider stakeholders ahead of the anticipated serving of Initial Demolition Notices.

The impacts associated with the serving of Initial Demolition Notices have previously been referenced within consultation material and resident communications relating to the wider regeneration programme. Residents have therefore been informed throughout the decision-making process that the serving of such notices could form part of the next steps should the Council determine that demolition and redevelopment represented the preferred long-term option for the buildings.

A targeted programme of engagement has been developed specifically in relation to the proposed service of Initial Demolition Notices. The purpose of this engagement is to ensure that residents, leaseholders and neighbouring communities understand what the notices mean, what the implications are, and equally what they do not mean. Particular emphasis is being placed on explaining that the

notices do not require residents to leave their homes immediately, do not authorise demolition works, and do not represent approval of detailed redevelopment proposals.

Engagement and communication activity includes:

- Distribution of September 2026 monthly speical edition newsletters to all residents within the affected buildings focusing on Initial Demolition Notices. The newsletter contains information explaining the purpose of Initial Demolition Notices, the wider regeneration programme and available sources of support.
- Direct communication with non-resident leaseholders through email and other established communication channels.
- Preparation and distribution of community update leaflets for neighbouring residents and the wider local community, providing information on the current status of the programme and anticipated next steps.
- Updates to the Council's website to ensure residents, leaseholders and other stakeholders have access to current information regarding the regeneration programme and Initial Demolition Notices.
- Training for front-line Housing staff to inform them of the council's messaging in relation to Initial Demolition Notices.
- Update at Area Panels.
- Use of Council social media channels to direct residents and community towards further information and engagement opportunities.

A dedicated Community Day has been arranged for each affected site. These events will provide opportunities for residents to ask questions directly to a wide range of project officers, raise concerns, seek clarification and discuss any issues arising from the news that the council is soon to serve the Initial Demolition Notices.

The cohesion days are scheduled as follows:

- 17 September 2026: St James's House.
- 19 September 2026: Whitehawk "Bird Blocks".
- 23 September 2026: Nettleton Court and Dudeney Lodge.

Each event will run from 1:00pm to 7:00pm to maximise accessibility for residents with differing work patterns, caring responsibilities and other commitments.

The Council will monitor participation levels and feedback received through these engagement activities. Where barriers to engagement are identified, reasonable adjustments and alternative communication methods will be considered to ensure that residents with protected characteristics, including disabled residents, older people, residents with sensory impairments, residents whose first language is not English and residents with limited digital access, are able to access information and participate meaningfully in the process.

Feedback received through previous consultation exercises has highlighted the importance of clear communication, early information sharing, transparency regarding timescales and decision-making, and the provision of ongoing support for affected residents. These themes have informed the approach being taken to engagement around the serving of Initial Demolition Notices and the mitigation measures identified within this Equality Impact Assessment.

The September 2026 newsletter and the IDN will be translated where a need has been identified.

## 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)

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| **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 (limited) |
| **Gender Reassignment** | No |
| **Sexual Orientation** | Yes (limited) |
| **Marriage and Civil Partnership** | No |
| **Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)** | No |
| **Armed Forces Personnel, their families, and Veterans** | Yes (limited) |
| **Expatriates, Migrants, Asylum Seekers, and Refugees** | No |
| **Carers** | No |
| **Looked after children, Care Leavers, Care and fostering experienced people** | Yes (limited) |
| **Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)** | No |
| **Socio-economic Disadvantage** | Yes |
| **Homelessness and associated risk and vulnerability** | Yes |
| **Human Rights** | Yes |
| **Children with SEN** | Yes |
| **People with Carelink support** | Yes |
| **People experiencing homelessness** | Yes |
| **People on a low income and people living in the most deprived areas** | Yes |
| **People who have experienced female genital mutilation (FGM)** | No |
| **People who have experienced human trafficking or modern slavery** | No |
| **People with experience of or living with addiction and/ or a substance use disorder (SUD)** | Yes (limited) |

**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?

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| Where specific data is not currently available for the groups identified as "No", impact will be monitored through ongoing resident engagement, consultation activities, feedback mechanisms, equality monitoring data where appropriate, and collaboration with relevant support services and community organisations. This will help identify any emerging disproportionate impacts and inform future assessments and mitigation measures. |

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

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| We have set up regular meetings of Resident Advisory Groups, which is an informal group of residents who have questions about the programme. As part of the group, we invite service managers to attend to review residents’ questions. We have Resident Communications Representatives who review communications to ensure the newsletters and letters are easy to understand.<br><br>We have set up a single point of contact for residents who will capture queries from residents as the programme progresses and help them resolve issues affecting them individually.<br><br>We report to Cabinet and the Cabinet Member for Housing, Area Panel meetings, with data on progress. There is a monthly LPS Strategic meeting plus operational Project Group Meetings.<br><br>The information and feedback from these meetings and stakeholders will be continually assessed and outcomes adjusted to suit the information received.<br><br>The Community Engagement Team will follow up with residents following the issuing of the IDN through personal visits. Weekly drop-ins will continue for each site. Residents and the wider community will be given an email address for any enquiries.<br><br>The team will continue to provide updates to all building occupants at least monthly through the Newsletter. |

## 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):**
        - Population and population groups
            - Census 2021 population groups Infogram: Brighton & Hove by Brighton and Hove City Council
        - 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**

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| **Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: older people, people who may be housebound, those under 16, young adults, with other 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.

Data drawn from the ONS 2024 Mid-Year Population Estimates indicates that Brighton & Hove has a resident population of approximately 283,870 people, including:

- 40,350 children aged 0 to 15 years (14%)
- 203,000 working-age adults aged 16 to 66 years (72%)
- 40,520 people aged over 66 years (14%)

When compared to citywide demographics, council housing residents living within the eight LPS blocks have an older age profile.

Housing management data indicates that residents of St James's House include comparatively higher proportions of people aged 40 to 59 (34%) and 60 and over (26%), with a lower proportion of people aged 18 to 39. The proportion of occupants aged under 18 is broadly comparable with council housing and citywide averages.

Occupants of Nettleton Court and Dudeney Lodge have a significantly older age profile, with approximately 50% of occupants aged 65 or over, including around 7% aged over 80. There are no occupants aged under 18 recorded within these buildings.

Occupants of the Whitehawk LPS buildings have comparatively higher proportions of residents aged under 18 and residents aged 60 and over than other age groups.

There is also a clear relationship between age and mobility needs across the affected buildings. Housing data demonstrates that mobility requirements increase significantly amongst older residents. In the affected LPS blocks:

- 56% of St James's House tenants with identified mobility needs are aged 60 or over.
- 74% of Whitehawk LPS tenants with identified mobility needs are aged 60 or over.
- 82% of Nettleton Court and Dudeney Lodge tenants with identified mobility needs are aged 60 or over.

The serving of Initial Demolition Notices may have a disproportionate impact on older residents. While the notices do not require residents to leave their homes and do not authorise demolition works, they formally communicate the Council's intention to demolish the buildings in the future. This may create greater uncertainty and anxiety amongst some older residents, particularly those with long-standing connections to their homes, neighbourhoods and support networks.

Older residents may require additional support to understand the purpose and implications of the notices and may have concerns regarding the future of their housing circumstances. Residents over 80 years of age and residents with mobility limitations may be particularly affected by uncertainty associated with long-term regeneration proposals.

Children and young people may also be indirectly affected. Although no immediate rehousing is required as a result of the notices, households with children may have concerns regarding future housing arrangements, schooling continuity and maintaining local support networks.

Working-age residents may similarly experience concerns regarding future housing arrangements and any long-term implications for employment, caring responsibilities and travel patterns.

### Mitigating Actions

The Council has established a comprehensive resident engagement and support programme to help minimise these impacts.

**SMART Action:** Each secure tenant household has a dedicated Single Point of Contact (SPOC) who will provide tailored advice and support throughout the regeneration programme. This includes:

- Providing information and clarification regarding the regeneration programme and future processes.
- Assisting residents to understand their housing options and rights.
- Providing referrals to support services where additional needs are identified.
- Arranging interpreters and accessible communications where required.
- Supporting residents with mobility, health and accessibility needs.
- Liaising with existing support agencies and professionals where appropriate.
- Providing practical assistance with any future rehousing process should this become necessary.

Additional mitigation measures include:

- Multi-format communication including face-to-face engagement, letters, newsletters, email communications and website updates.
- Home visits where required for residents unable to attend engagement events.
- Interpreter and translation support where required.
- Appointment-based engagement opportunities for residents with anxiety, mental health needs or complex support requirements.
- Flexible engagement opportunities across different times, locations and communication channels.
- Dedicated resident engagement events focused on explaining the purpose and implications of Initial Demolition Notices.

These measures are designed to ensure that residents of all ages can access information, understand the implications of the notices and engage meaningfully with the regeneration programme.

There is also a planned tour of Senior's Housing schemes in the city for interested tenants, with interested residents providing their names to the Community Engagement Team in September.

**6.2 Disability:**

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| **Does your analysis indicate a disproportionate impact relating to Disability, considering our anticipatory duty?** | 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.

ONS Census 2021 data indicates that approximately 19% of Brighton & Hove residents are disabled under the Equality Act 2010 definition.

Housing Management System data suggests that the proportion of residents within the affected LPS buildings with support needs that would meet the definition of disability under the Equality Act 2010 is significantly higher than both the citywide population and the wider council housing population.

| Disabled under Equality Act definition | Whitehawk LPS | Nettleton & Dudeney | St James's House | All Council Housing | B&H Census 2021 |
|---|---|---|---|---|---|
| Yes | 30% | 58% | 29% | 22% | 19% |
| No or not recorded | 70% | 42% | 71% | 78% | 81% |

In particular, Nettleton Court and Dudeney Lodge contain a substantially higher proportion of residents with identified disabilities and support needs than the city average.

Further evidence from Health Counts 2024 suggests that the proportion of disabled adults within Brighton & Hove may be higher than that identified through the Census, with 37% of adults reporting that their day-to-day activities are limited by a long-term physical or mental health condition or illness.

The serving of Initial Demolition Notices may therefore have a disproportionate impact on disabled residents because disabled people are significantly overrepresented within the affected buildings.

While the notices do not require residents to leave their homes, do not authorise demolition works, and do not trigger immediate rehousing activity, they formally communicate the Council's intention to demolish the buildings in the future. This may create uncertainty, anxiety and concern for some disabled residents, particularly those who rely on established support networks, local healthcare provision, formal care arrangements, adaptations within their homes, or familiar environments that support independent living.

Data held by the Council indicates that approximately 43% of occupants across the affected buildings are identified as having potential additional support needs. These include:

- Physical disabilities.
- Sensory impairments.
- Mental health conditions.
- Learning disabilities and learning difficulties.
- Neurodivergent conditions.
- Speech and communication needs.
- Children with Special Educational Needs (SEN).
- Long-term health conditions.

Residents with sensory impairments, learning disabilities, cognitive impairments or limited literacy may experience greater difficulty understanding the legal purpose and implications of Initial Demolition Notices. There is therefore a risk that some residents may misunderstand the notices as indicating an immediate requirement to move or an immediate risk associated with the buildings.

Residents with mental health conditions may experience increased anxiety or distress arising from uncertainty regarding their future housing circumstances, even where no immediate action is required.

The Council also recognises that disability may intersect with other protected characteristics and vulnerabilities, including age, caring responsibilities, deprivation, ethnicity and language barriers, potentially increasing the impact experienced by some individuals.

The serving of Initial Demolition Notices provides residents with formal and transparent information regarding the Council's intentions for the buildings and establishes a clear framework for future planning.

The regeneration programme includes significant support arrangements designed to identify and respond to individual needs at an early stage. This enables the Council to better understand residents' circumstances and plan future housing and support provision accordingly.

The Council has adopted an anticipatory approach to accessibility and support for disabled residents.

**SMART Action:** Every secure tenant household has been allocated a dedicated Single Point of Contact (SPOC) who will provide ongoing support throughout the regeneration programme and act as a consistent point of contact for questions, concerns and support needs.

The SPOC model enables:

- Early identification of disability-related needs and reasonable adjustments.
- Individual discussions regarding concerns arising from the notices.
- Liaison with family members, carers and support agencies where appropriate.
- Support in accessing wider council and partner services.
- Tailored communication based on individual circumstances.

Additional mitigation measures include:

- Multi-format communication including letters, newsletters, email, telephone and face-to-face engagement.
- Home visits for residents who are unable to attend engagement events.
- Large print, Easy Read, Braille, translation and interpretation services where required.
- Flexible engagement opportunities across different times and locations.
- One-to-one engagement sessions for residents with complex needs or heightened anxiety.
- Dedicated resident engagement events focused on explaining the purpose and implications of Initial Demolition Notices.
- Ongoing review of reasonable adjustments to ensure disabled residents can access information and participate fully in engagement activity.

Where future rehousing becomes necessary as part of subsequent regeneration decisions, additional support arrangements are already established through the approved rehousing policy, including assistance relating to accessibility requirements, property adaptations, removals support and maintaining access to essential services.

For leaseholders, there is a potential future risk that suitable replacement accommodation meeting specific accessibility needs may be more difficult to secure. To mitigate this, the Council's compensation and support arrangements include provision for the reasonable costs of reinstating essential adaptations where appropriate.

A disproportionate impact on disabled residents is identified because disabled people are significantly overrepresented within the affected buildings. The principal impact associated with the serving of Initial Demolition Notices relates to communication, understanding, anxiety and uncertainty regarding future housing circumstances rather than any immediate physical change to residents' living arrangements. The extensive communication, engagement and support measures outlined above are intended to minimise these impacts and ensure disabled residents are able to understand, access and engage with the process on an equitable basis.

What inclusive adjustments are you making for diverse disabled people impacted? For example: those who are housebound due to disability or disabling circumstances, 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 Council will provide information through a range of accessible formats and communication channels, including face-to-face engagement, telephone, email, letters and home visits where required. Reasonable adjustments will be made on an individual basis and may include large print, Easy Read, translation and interpretation services, BSL support, and engagement tailored to residents with sensory impairments, learning disabilities, neurodivergence, mental health conditions or other non-visible disabilities. Each secure tenant household has a dedicated Single Point of Contact (SPOC) who can identify support needs, coordinate adjustments and ensure residents can access information and engage meaningfully with the process.

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

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| **Does your analysis indicate a disproportionate impact relating to ethnicity?** | 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.

Housing Management System data indicates that St James's House has a significantly higher proportion of Black and Racially Minoritised occupants (39%) than both the wider council housing population (20%) and the citywide population recorded in the 2021 Census (26%). Whitehawk LPS blocks and Nettleton Court/Dudeney Lodge have proportions broadly comparable to the wider council housing population at around 20%.

The data also indicates that a number of residents across the affected buildings have a first language other than English, including Arabic, Bengali, Farsi, Italian, Latvian, Mandarin, Polish, Portuguese, Russian, Spanish, Swahili and Thai. This may create barriers to understanding the purpose and implications of Initial Demolition Notices if information is not communicated clearly and accessibly.

The serving of Initial Demolition Notices may therefore have a disproportionate impact on some Black and Racially Minoritised residents and residents for whom English is not their first language. There is a risk that residents may be less able to access information, misunderstand the legal purpose of the notices, or face barriers to participation in engagement activities without appropriate support.

The Council recognises that residents from ethnically diverse backgrounds may have differing experiences of public services, housing systems and statutory processes. Clear, transparent and culturally sensitive communication will therefore be important to ensure residents understand that the notices do not require anyone to move from their home immediately and do not authorise demolition works.

To mitigate these potential impacts, information will be provided through multiple communication channels including written correspondence, newsletters, engagement events, home visits and one-to-one discussions. Translation and interpretation services will be available where required and residents will be able to discuss concerns with their dedicated Single Point of Contact (SPOC). Resident engagement events will also provide opportunities to ask questions and seek clarification regarding the notices and the wider regeneration programme.

These measures are intended to ensure residents from all ethnic backgrounds can access information, understand the implications of the notices and participate meaningfully in the process.

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

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| **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.

Housing Management System data indicates that residents across the affected LPS buildings represent a diverse range of religious beliefs and faiths, including Christian, Muslim, Buddhist, Hindu and other faith communities, alongside residents who identify as having no religion.

Compared with citywide Census data, the affected buildings generally have a higher proportion of residents identifying as Christian, Muslim and other faith groups, and a lower proportion reporting no religion. St James's House has a particularly higher proportion of Muslim residents (11%) compared with the city average (3%).

The serving of Initial Demolition Notices is not expected to have a direct impact on residents because of their religion, belief or faith. However, there may be an indirect disproportionate impact if communication and engagement activities do not adequately consider religious observance, cultural practices or significant faith dates which could affect residents' ability to engage with the process.

The Council recognises that residents from different faith communities may have specific requirements relating to communication, household arrangements, caring responsibilities or availability to attend engagement events. There may also be cultural sensitivities that require a flexible and respectful approach to engagement.

To mitigate these potential impacts, engagement opportunities will be offered through a range of channels, including newsletters, letters, home visits, one-to-one meetings and resident engagement events. Officers will seek to understand any cultural, religious or faith-related considerations on an individual basis, and residents will be able to discuss any requirements with their dedicated Single Point of Contact (SPOC).

These measures are intended to ensure residents of all religions, beliefs and faith backgrounds, as well as those with no religion, can access information, understand the purpose of the Initial Demolition Notices and engage meaningfully with the process.

### 6.5 Gender Identity and Sex:

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| **Does your analysis indicate a disproportionate impact relating to Gender Identity and Sex (including non-binary and intersex people)?** | Yes (limited) |

**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 Management System data identifies some variation in the gender profile of residents across the affected LPS buildings. Whitehawk LPS blocks have a slightly higher proportion of female occupants (55%), whilst Nettleton Court and Dudeney Lodge have a higher proportion of male occupants (70%). St James's House has a broadly even gender profile.

The Council does not currently hold sufficient evidence to indicate that the serving of Initial Demolition Notices will have a disproportionate impact on residents because of their sex or gender identity.

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| The notices apply equally to all residents regardless of sex, gender identity, non-binary status or intersex status. They do not require residents to leave their homes, alter tenancy arrangements or authorise demolition works.<br><br>The Council recognises that some residents may face barriers to engagement arising from caring responsibilities, confidence in engaging with services or other intersecting characteristics. To mitigate this, information and engagement opportunities will be made available through a range of channels and formats, ensuring all residents can access information and advice as required.<br><br>Equality information will continue to be monitored throughout the regeneration programme and this EIA will be reviewed if any disproportionate impacts emerge. |

**6.6 Gender Reassignment:**

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| **Does your analysis indicate a disproportionate impact relating to Gender Reassignment?** | 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.

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| The Council does not hold sufficient evidence to indicate that the serving of Initial Demolition Notices will have a disproportionate impact on residents undergoing, proposing to undergo, or having undergone gender reassignment.<br><br>The notices apply equally to all residents regardless of gender reassignment status and do not require residents to leave their homes or alter any existing tenancy arrangements.<br><br>The Council recognises that the absence of recorded data does not necessarily mean transgender residents are not represented within the affected buildings. Engagement activities and support arrangements will therefore be delivered in an inclusive, respectful and person-centred manner, ensuring all residents can access information and engage meaningfully with the process.<br><br>Equality monitoring information will continue to be reviewed throughout the regeneration programme and any emerging impacts will be assessed through future reviews of this EIA. |

**6.7 Sexual Orientation:**

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|---|---|
| **Does your analysis indicate a disproportionate impact relating to Sexual Orientation?** | Yes (limited) |

**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.

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| Available Housing Management System data indicates that St James's House and Nettleton Court/Dudeney Lodge have higher proportions of residents recorded as Gay or Lesbian than both the wider council housing population and Brighton & Hove residents overall. However, sexual orientation data is not available for all occupants and the Council recognises that under-reporting is common. The absence of recorded data does not indicate there are no LGBTQ+ residents living within the affected buildings.<br><br>Health Counts 2024 data further highlights that Brighton & Hove has a relatively large LGBTQ+ population compared to many areas nationally. This means it is likely that LGBTQ+ residents are |

represented across the affected buildings and should be considered within engagement and support planning.

The serving of Initial Demolition Notices is not expected to have a direct impact based on a person's sexual orientation. However, LGBTQ+ residents may experience disproportionate impacts where previous experiences of discrimination, exclusion or mistrust of services create barriers to engagement or accessing support. Some residents may be less likely to seek assistance or participate in engagement activities without reassurance that services are inclusive and welcoming.

To mitigate these potential impacts, the Council will ensure engagement activities are delivered in an inclusive and respectful manner, with multiple opportunities for residents to ask questions, seek clarification and access support. Residents will be able to discuss individual circumstances with their dedicated Single Point of Contact (SPOC) and access support through a range of communication channels.

The Council recognises the importance of ensuring that all residents, including LGBTQ+ residents, can access information, understand the purpose and implications of Initial Demolition Notices and engage meaningfully with the regeneration programme. Equality monitoring data will continue to be reviewed where appropriate to help inform future engagement activity and support arrangements.

**Conclusion:** While no direct impact arising from sexual orientation has been identified, a potential disproportionate impact exists due to the higher representation of LGBTQ+ residents within some of the affected buildings and the importance of ensuring engagement and support arrangements are inclusive and accessible to all residents.

**6.8 Marriage and Civil Partnership:**

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| **Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?** | 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.

Health Counts 2024 data indicates that Brighton & Hove residents have a diverse range of marital and partnership statuses, including people who are married, in civil partnerships, divorced, separated, widowed, or have never married.

The Council holds limited data regarding marriage and civil partnership status for residents living within the affected LPS buildings. As a result, there is insufficient evidence to identify a disproportionate impact arising from the serving of Initial Demolition Notices based on this protected characteristic.

The serving of Initial Demolition Notices applies equally to all secure council tenants regardless of their marital status or whether they are in a civil partnership. The notices do not require residents to leave their homes, change existing tenancy arrangements, or alter legal rights associated with marriage or civil partnership.

While future rehousing or regeneration proposals may require consideration of household composition, caring arrangements and housing requirements, no disproportionate impact relating specifically to Marriage and Civil Partnership has been identified at this stage.

The Council recognises that the absence of recorded data does not necessarily mean there are no residents with this characteristic, and engagement and support arrangements will remain available equally to all residents and households throughout the regeneration programme.

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

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| **Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?** | 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 drawn from ONS population and births data indicates that there are significant numbers of people of childbearing age living across Brighton & Hove, and it is therefore likely that some residents living within the affected LPS buildings may be pregnant, have very young children, be adoptive parents, or have caring responsibilities associated with maternity or paternity.

However, the Council does not routinely collect data on pregnancy, maternity, paternity, adoption, menopause or fertility status, and no disproportionate impact relating to these characteristics has been identified through engagement activity undertaken to date.

The serving of Initial Demolition Notices does not require residents to move from their homes immediately, does not change existing tenancy arrangements, and does not result in any immediate physical changes to residents' living circumstances. As such, no direct disproportionate impact associated with pregnancy, maternity, paternity, adoption, menopause or fertility has been identified.

The Council recognises that some residents within these groups may nevertheless experience concerns regarding future housing circumstances and the long-term implications of the regeneration programme. Information and support will therefore be made available through a range of communication channels, and residents will be able to discuss individual circumstances with their dedicated Single Point of Contact (SPOC).

The Council also recognises that the absence of recorded data does not mean that residents with these characteristics are not present within the affected buildings. Equality impacts will continue to be monitored throughout the regeneration programme, particularly if future decisions relating to rehousing or redevelopment are brought forward.

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

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| **Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?** | Yes (limited) |

**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 Management System data identifies a small number of residents within the affected LPS buildings who are recorded as current or former Armed Forces personnel. However, the Council does not hold sufficient data to determine whether Armed Forces personnel, veterans or their families are disproportionately represented within the affected buildings.

No evidence has been identified through engagement activities, resident feedback or available data to suggest that the serving of Initial Demolition Notices will have a disproportionate impact on residents because of their Armed Forces status.

The serving of Initial Demolition Notices applies equally to all residents regardless of whether they are serving personnel, veterans or family members of the Armed Forces. The notices do not require residents to leave their homes, alter tenancy arrangements or affect access to existing support services.

The Council recognises that some residents may nevertheless identify as veterans or members of Armed Forces families and that the absence of recorded data does not necessarily mean that no impacts exist. Information and support will continue to be made available through a range of communication channels, and any individual needs identified through ongoing engagement will be considered on a case-by-case basis.

The Council will continue to monitor available data and feedback throughout the regeneration programme to ensure any emerging impacts on Armed Forces personnel, veterans or their families are identified and addressed where appropriate.

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

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| **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)** | 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.

Home Office data indicates that Brighton & Hove is home to a number of asylum seekers, refugees and people participating in resettlement schemes. However, the Council does not currently hold sufficient data to determine the extent to which these groups are represented within the affected LPS buildings.

Housing Management System data does identify residents within the affected buildings whose first language is not English, including speakers of Arabic, Bengali, Farsi, Italian, Latvian, Mandarin, Polish, Portuguese, Russian, Spanish, Swahili and Thai. This suggests that some residents may face language barriers or may be less familiar with UK housing systems and legal processes.

The serving of Initial Demolition Notices may therefore have a disproportionate impact on some migrants, refugees, people new to the UK and residents for whom English is not their first language. There is a risk that residents may misunderstand the legal purpose of the notices, be uncertain about how they affect their housing circumstances, or experience increased anxiety where statutory housing processes are unfamiliar.

The Council recognises that some residents may also have experienced displacement, trauma or housing insecurity prior to arriving in the UK, which may make communications regarding demolition and regeneration proposals particularly sensitive.

To mitigate these potential impacts, information will be provided through a variety of communication channels, including written correspondence, newsletters, resident engagement events, home visits and one-to-one discussions. Translation and interpretation services will be available where required, and residents will be able to discuss any concerns with their dedicated Single Point of Contact (SPOC).

The Council will continue to monitor available data and feedback received through engagement activity and will seek to identify and address any barriers experienced by residents who are migrants, refugees, asylum seekers, expatriates or otherwise new to the UK. These measures are intended to ensure all residents can access information, understand the implications of the Initial Demolition Notices and engage meaningfully in the process regardless of nationality, language or immigration background.

**6.12 Carers:**

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|---|---|
| **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.

The Council does not currently hold comprehensive data on unpaid carers living within the affected LPS buildings. However, given the high proportion of older residents, disabled residents and residents with support needs across the buildings, it is likely that some occupants undertake caring responsibilities for partners, family members, neighbours or friends.

The serving of Initial Demolition Notices does not require residents to move from their homes and therefore does not create any immediate impact on caring arrangements. However, carers may experience disproportionate impacts arising from uncertainty about future housing circumstances and concerns regarding the continuity of care, support networks and accessibility of local services.

Carers may also face practical barriers to engaging with consultation and engagement activities due to caring responsibilities, limited availability and competing demands on their time. These challenges may be more pronounced where caring responsibilities intersect with disability, older age, language barriers or financial hardship.

To mitigate these potential impacts, the Council is providing a range of engagement opportunities, including resident events, one-to-one discussions, telephone contact, written communications and home visits where required. Flexible engagement arrangements will help ensure carers can access information and participate in the process in a way that accommodates their circumstances.

Each secure tenant household has a dedicated Single Point of Contact (SPOC) who can identify caring responsibilities and ensure any support needs are considered as the regeneration programme progresses. Residents will also be able to discuss any concerns regarding caring arrangements, support networks or accessibility requirements throughout the process.

The Council recognises that not all carers are formally identified and will continue to monitor feedback and information gathered through engagement activity to ensure carers are appropriately supported and able to engage meaningfully with the process.

**6.13 Looked after children, Care Leavers, Care and fostering experienced people:**

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|---|---|
| **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).**<br>**Also consider our Corporate Parenting Responsibility in connection to your activity.** | Yes (limited) |

**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 Management System data identifies a small number of residents within the affected LPS buildings who are recorded as care leavers. The Council recognises that care-experienced people may

be more likely to experience housing insecurity, reduced support networks and additional vulnerabilities when compared with the wider population.

Whilst the serving of Initial Demolition Notices does not require residents to move from their homes and does not result in any immediate changes to housing arrangements, some care-experienced residents may experience increased anxiety or uncertainty regarding their future housing circumstances and support arrangements.

The Council has ongoing corporate parenting responsibilities and recognises the importance of ensuring that care-experienced people, children in need and any looked after children connected to affected households receive appropriate support throughout the regeneration programme.

Where care-experienced residents, children in need, SEND children or other vulnerable young people are identified, officers will continue to work closely with Families, Children and Wellbeing services and other relevant agencies to ensure individual circumstances are understood and support needs are met.

Each secure tenant household has a dedicated Single Point of Contact (SPOC) who can identify additional support requirements, liaise with social workers and other professionals where appropriate, and ensure residents receive information and support in a way that meets their individual needs.

The Council already has established protocols and support mechanisms for care-experienced people through its wider housing policies and will continue to monitor data and engagement feedback throughout the regeneration programme. The Council recognises that the absence of recorded data does not necessarily mean there are no residents with care experience living within the affected buildings and will seek to identify and address any emerging impacts as the programme progresses.

A potential disproportionate impact has been identified due to the additional vulnerabilities that can be experienced by care-experienced people and the Council's Corporate Parenting responsibilities. Ongoing partnership working and tailored support arrangements are intended to mitigate these impacts.

**6.14 Homelessness:**

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| **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.

Housing data indicates that a proportion of occupants within the affected LPS buildings are living in temporary accommodation under the Council's statutory homelessness duties. Approximately 12% of occupants within the Whitehawk LPS blocks, 12% within Nettleton Court and Dudeney Lodge, and 15% within St James's House are in temporary accommodation.

The serving of Initial Demolition Notices may have a disproportionate impact on residents who have experienced homelessness or housing instability, as these residents may be more likely to experience anxiety or uncertainty regarding their future housing circumstances. This may be particularly relevant for residents who have previously experienced periods of homelessness, displacement or insecure housing.

Whilst the notices do not require residents to move from their homes and do not result in any immediate change to accommodation arrangements, some residents may have concerns about how the regeneration programme could affect their future housing situation.

The Council has a dedicated housing team in place to support residents occupying temporary accommodation within the affected buildings. Temporary accommodation residents have been included

in engagement and communication activity and will continue to receive information regarding the programme through a range of channels.

Where leaseholders have rented properties to private tenants, efforts have been made to include those households within engagement activity, communications and home visits where possible. Private tenants requiring housing advice or support will be signposted to the Council's Housing Options and Homelessness Service.

Engagement arrangements, including resident events, written communications, home visits and one-to-one discussions, are intended to ensure that residents experiencing homelessness or housing vulnerability are able to access information, understand the purpose of the Initial Demolition Notices and obtain support where required.

The Council will continue to monitor the needs of residents who are homeless, living in temporary accommodation, or otherwise vulnerable to housing insecurity as the regeneration programme progresses.

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

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|---|---|
| **Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and 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.

Some residents may be survivors of domestic abuse, sexual violence or other forms of trauma and may experience greater anxiety or uncertainty as a result of receiving an Initial Demolition Notice. The Council will take a trauma-informed approach to engagement and communication, with support tailored to individual circumstances. Where vulnerabilities are identified, residents will be supported through their dedicated Single Point of Contact (SPOC) and, where appropriate, linked with specialist services including IDVAs and other support agencies. This will help ensure residents can access information, understand the implications of the notices and engage safely with the process.

**6.16 Socio-economic Disadvantage:**

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| **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)** | 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.

Housing data indicates that a significant proportion of residents across the affected LPS buildings experience financial hardship, including rent arrears and reliance on Universal Credit. As a result, some residents may be more vulnerable to uncertainty arising from the serving of Initial Demolition Notices and may have concerns regarding the future impact on their housing circumstances.

Residents experiencing socio-economic disadvantage may face additional barriers to accessing information and engaging with the regeneration programme due to financial pressures, caring responsibilities, digital exclusion or other vulnerabilities.

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| To mitigate these impacts, the Council is providing information through multiple channels, including newsletters, letters, resident engagement events, home visits and one-to-one discussions. Each secure tenant household has a dedicated Single Point of Contact (SPOC) who can provide advice, identify additional support needs and signpost residents to relevant financial, housing and welfare support services where required.<br><br>The Council will continue to engage with residents throughout the regeneration programme and ensure support arrangements remain accessible to those experiencing financial hardship or other forms of socio-economic disadvantage.<br><br>A disproportionate impact is identified because residents experiencing financial hardship may be more affected by uncertainty regarding future housing arrangements and may face greater barriers to engagement. Ongoing communication, support and targeted assistance will help mitigate these impacts. |

**6.17 Human Rights:**

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|---|---|
| **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.

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|---|
| The serving of Initial Demolition Notices has the potential to engage Article 8 of the Human Rights Act 1998, which protects the right to respect for private and family life, home and correspondence. Residents may experience anxiety or uncertainty arising from the formal notification of the Council's intention to demolish the buildings in the future.<br><br>However, the serving of an Initial Demolition Notice does not require residents to leave their homes, does not authorise demolition works, and does not remove existing tenancy rights. Any future decision to demolish the buildings would be subject to further statutory processes, consultation and decision making.<br><br>To mitigate potential impacts, the Council will continue to provide clear communication, ongoing engagement opportunities and tailored support through dedicated Single Points of Contact (SPOCs). Existing tenants continue to be eligible for support through the approved rehousing arrangements, including the opportunity to return to a new home on the redeveloped site where this forms part of future regeneration proposals. Support and compensation arrangements for leaseholders have also been developed to help minimise adverse impacts.<br><br>The Council considers that any interference with Article 8 rights is proportionate, justified and balanced against the legitimate aim of ensuring the long-term safety, sustainability and regeneration of the affected buildings and estates. |

**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 being housebound due to disabilities or disabling circumstances
- Environmental barriers or mobility barriers impacting those with sight loss, D/deafness, sensory requirements, neurodivergence, various complex disabilities
- 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

The serving of Initial Demolition Notices may have a greater impact on residents who experience multiple forms of disadvantage or who hold multiple protected characteristics. While the notices do not require residents to move from their homes and do not authorise demolition works, some residents may experience heightened anxiety, uncertainty or barriers to understanding and engaging with the process.

Particular consideration has been given to:

- Older disabled residents, particularly those with mobility, sensory, cognitive or mental health needs.
- Residents with disabilities whose first language is not English.
- Black and Racially Minoritised residents who may also experience socio-economic disadvantage, disability, caring responsibilities or digital exclusion.
- Carers who are supporting older people, disabled people or children with additional needs.
- Residents experiencing financial hardship, rent arrears or housing insecurity.
- Residents in temporary accommodation or who have previously experienced homelessness.
- Residents who are digitally excluded, have low literacy levels or require information in alternative formats.
- Survivors of domestic abuse, trauma, exploitation or other vulnerable circumstances.
- Care-experienced residents and those with limited support networks.

Residents with multiple protected characteristics may face compounded barriers when accessing information, understanding statutory processes or engaging in consultation activities. For example, an older disabled resident with limited English proficiency may require additional support to understand the implications of the notices and participate meaningfully in engagement opportunities.

The Council has sought to mitigate these risks through a trauma-informed and person-centred approach. Information is being provided through multiple communication channels, including newsletters, letters, resident events, home visits, telephone contact and one-to-one discussions. Translation services, interpretation, accessible formats and reasonable adjustments will be provided where required.

Each secure tenant household has a dedicated Single Point of Contact (SPOC) who can identify individual needs, coordinate support and ensure barriers to engagement are addressed. The SPOC approach allows support to be tailored to residents' individual circumstances and recognises that impacts are often shaped by a combination of personal, social and economic factors rather than a single characteristic in isolation.

The Council will continue to gather feedback through engagement activities and monitor emerging equalities impacts throughout the regeneration programme. This will help ensure that support arrangements remain proportionate, inclusive and responsive to the needs of residents experiencing multiple and intersecting forms of disadvantage.

The greatest potential impact arising from the serving of Initial Demolition Notices relates to residents experiencing multiple vulnerabilities or protected characteristics, particularly where these affect communication, access to information, confidence in engagement processes or understanding of future housing implications. The programme's communication, engagement and support arrangements are intended to minimise these impacts and ensure all residents can participate on an equitable basis.

## 7. Action planning

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

**Ensure residents understand the purpose and implications of Initial Demolition Notices.**

Activities:

- Deliver resident engagement events at all three sites before notices are served.
- Provide information through newsletters, letters, website updates and home visits where necessary.
- Monitor resident enquiries and misconceptions and update communications accordingly.
- Provide translated information where required

Success measure: All affected households receive communications prior to service of notices.

Target date: September 2026.

1. **Ensure residents requiring additional support can access information and engagement opportunities.**

Activities:

- SPOCs to identify residents requiring reasonable adjustments.
- Provide translations, interpretation, Easy Read and alternative formats where required.
- Undertake targeted engagement with vulnerable households.

Success measure: All identified support requests actioned within agreed timescales.

Target date: Ongoing throughout programme.

**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 actions identified through this EIA will be incorporated into the LPS Regeneration Programme Plan, associated resident engagement and communications plans, and monitored through the Directorate EIA Tracker in line with the Council's Fair and Inclusive Action Plan (FIAP) requirements.

The key actions are to:

- Maintain a dedicated Single Point of Contact (SPOC) for each secure tenant household to identify support needs, coordinate reasonable adjustments and provide ongoing support throughout the regeneration programme.
- Undertake targeted engagement with residents who may experience disproportionate impacts, including older people, disabled residents, residents with mental health needs, carers, residents with limited English proficiency, and residents experiencing financial hardship or other vulnerabilities.
- Deliver a clear and accessible communications strategy using multiple formats and channels, including newsletters, letters, email, telephone contact, home visits, website updates, resident engagement events, translation services, interpretation support, Easy Read and large-print formats where required.
- Continue resident engagement activity before and after the serving of Initial Demolition Notices, including dedicated resident events, drop-in sessions and one-to-one discussions to ensure residents understand the purpose and implications of the notices.
- Monitor participation and engagement levels across protected characteristic groups and take action where underrepresentation or barriers to engagement are identified.
- Ensure residents have clear routes to raise concerns, ask questions, make complaints and receive timely responses.
- Continue a trauma-informed and person-centred approach to engagement, recognising that uncertainty relating to future regeneration proposals may affect residents differently depending on their circumstances.
- Maintain ongoing liaison with relevant council services, support agencies and community organisations where additional support needs are identified.
- Monitor equalities impacts throughout the regeneration programme and update this EIA where significant new information, risks or impacts emerge.
- Ensure future decision-making stages relating to rehousing, demolition and redevelopment proposals are supported by appropriate consultation, engagement and equality impact assessment activity.

## 8. Outcome of your assessment

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

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|---|---|
| **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. | |
| **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. | **X** |

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

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

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| The decision to issue the Initial Demolition Notices was made at Cabinet in March 2026. The timing and process of issue was delegated to the Corporate Director of Homes & Adult Social Care. |

## 9. Publication

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

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## 10. Directorate and Service Approval

| **Signatory:** | **Name and Job Title:** | **Date:** DD-MMM-YY |
|---|---|---|
| **Responsible Lead Officer:** | Paul Dalton - Programme Manager | 03-09-2026 |
| **Accountable Manager:** | Chantelle Barker – Director Estate Renewal | 09-09-2026 |

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

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# EDI Review, Actions, and Approval:

### Equality Impact Assessment sign-off

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 Officer has considered the equalities impact to provide 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. Budget and Staffing EIAs secure approval via different templates.

| **Signatory:** | **Name:** | **Date:** DD-MMM-YY |
|---|---|---|
| **EDI Business Partner:** | | |
| **EDI Manager:** | | |

**Notes and recommendations from EDI Business Partner reviewing this assessment:**

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

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