Equality Impact Assessment (EIA) Form – Demolition/Redevelopment of Nettleton Court & Dudeney Lodge, Hollingdean

1. Assessment details

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

Read the EIA toolkit for more information.

Name of activity or proposal being assessed:	**Regeneration/demolition of Nettleton Court and Dudeney Lodge, Hollingdean and wider masterplan site**
Directorate:	Homes and Adult Social Care
Service:	Housing
Team:	Estate Renewal
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)	Yes – Decant Oakley House, Nettleton Court & Dudeney Lodge EIA May 25

2. Contributors to the assessment

Responsible Lead Officer:	Paul Dalton, Regeneration Programme Manager
Accountable Manager:	Chantelle Barker, Director of Estate Renewal
Additional stakeholders collaborating or contributing to this assessment:	Equality Diversity and Inclusion Team

3. About the activity

Briefly describe the purpose of the activity being assessed:

Nettleton Court and Dudeney Lodge - Regeneration of these blocks would mean rehousing of all current tenants, and buyback of leasehold properties. Secure tenants would be made an offer of an alternative property, with the option to return to the new accommodation on the same site once it is built. Wider masterplan and land assembly consideration is being assessed.

What are the desired outcomes of the activity?

To ensure vacant possession of these two buildings without undue inconvenience to the residents, and to provide secure tenants with homes on the new site or elsewhere in the city, with tenures no less secure than present.

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

Council secure councils, Temporary Accommodation and Seaside Homes tenants, resident and non resident leaseholders (and their tenants)

4. Consultation and engagement

We have carried out consultation with residents through door-to-door surveys, individual resident interviews, an online consultation platform, and face-to-face meetings conducted in Nettleton Court and Dudeney Lodge between March and May 2025. Residents were asked comprehensive questions covering housing preferences, concerns about potential changes, current satisfaction, wellbeing impacts, desired improvements, community priorities, and specific needs for future housing.

From the outset of the consultation process, residents were informed that the Council was considering three options for their buildings: strengthening works only, strengthening with comprehensive refurbishment, or complete demolition and redevelopment with new homes.
How Residents Were Informed: Early public meetings: · Community-led discussions: · Extensive face-to-face engagement: Six drop-in sessions, individual tenancy visits. Your Voice Survey: Included a specific question asking residents to choose between "building new homes to replace your current block" and "comprehensive refurbishment of your current block"
Individual consultations: One-to-one appointments where demolition was explicitly discussed as one of the three potential approaches and this was reviewed as part of s105 consultation

- Nettleton Court - 15% response rate, this is 13 individual residents
- Dudeney Lodge - 15% response rate, also 13 individual residents
- Nettleton Court 65% of respondents prefer refurbishment Respondents state: "Strong as Tower of London – don't knock down"
- Dudeney Lodge 65% of respondents prefer refurbishment Strong attachment: "Lived here for 22 years and love it"

These two blocks showed the strongest community attachment out of eight blocks being considered for demolition.

As part of consideration of extending the redevelopment area, a secure council tenant has been consulted.

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)

Age	YES
Disability and inclusive adjustments, coverage under equality act and not	YES
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	YES
Religion, Belief, Spirituality, Faith, or Atheism	YES
Gender Identity and Sex (including non-binary and Intersex people)	YES
Gender Reassignment	NO
Sexual Orientation	YES
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	NO
Expatriates, Migrants, Asylum Seekers, and Refugees	NO
Carers	YES
Looked after children, Care Leavers, Care and fostering experienced people	YES
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	NO
Socio-economic Disadvantage	YES
Homelessness and associated risk and vulnerability	YES
Human Rights	YES
Another relevant group (please specify here and add additional rows as needed)	NO

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?

Information relating to additional vulnerabilities and protected characteristics will be gathered through individual tenant engagement, including home visits, housing needs assessments, decant planning discussions, and ongoing case management throughout the relocation process. This engagement will enable officers to identify circumstances such as pregnancy or maternity status, caring responsibilities, digital exclusion, health needs, and other factors that may influence the impact of relocation, ensuring appropriate support and mitigations are put in place.

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

Through regular programme monitoring reports and project group meetings

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

Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: 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.

When compared with 2021 Census data, the age profile for Council housing occupants is generally similar to citywide Brighton & Hove residents of all tenures, but occupants of Nettleton and Dudeney tend to be older than both. As at 15th October 2026, 48.31% of occupants in Dudeney Court and 52.69% of occupants at Nettleton Court are over 65 years old, with 5.39% over 80 at Nettleton Court and 7.86% over 80 at Dudeney Lodge with no children under 14 in the blocks. The term 'occupants' here is broader than just tenants and includes other household members such as partners and children. Council tenants themselves tend to be older than other occupants and citywide residents.

We recognise that the needs of older residents may change over the course of the rehousing programme. Rehousing and support plans will therefore be reviewed regularly to ensure they remain appropriate and responsive to changing circumstances. Where appropriate, and with the resident's consent, family members, carers, advocates, health professionals, social workers and other support providers will be involved in discussions to help identify needs and support decision-making. Particular consideration will be given to older disabled residents whose needs may change over time, including those experiencing dementia, cognitive impairment, sensory impairments, frailty, or increasing reliance on formal or informal care and support networks. This will help ensure that rehousing solutions remain suitable, accessible and sustainable in the longer term.

Age Group	Nettleton and Dudeney LPS occupants October 2026	All council housing occupants June 2025	B&H Census 2021
Under 18	0.5%	16%	17%
18 to 39	9.5%	34%	36%
40 to 54	8.2%	20%	22%
55 to 64	26%	14%	12%
65 to 79	43.6%	12%	10%
80 and over	12.2%	4%	4%
Total	100%	100%	100%

Some of the residents in these two blocks may want to explore moving into one of the Council's 24 Seniors Housing Schemes. We will give the residents options around going out to view schemes and where wanted we will try and enable friends and neighbours to move into the same scheme. In 2023/24 we let 116 Seniors Housing flats, in 2024/25 we let 90 homes in Seniors Schemes.

We will ensure mobility needs are met when carrying out assessments for rehousing options. This will take into account mobility needs when agreeing with the secure tenant levels of support with the practical aspects of the move.

Each secure tenant will receive a tailored support package to relocate to another home. Given the broader regeneration plans for the estate, local lettings strategies will be developed to facilitate moves within the wider community with the option of a move back to the newly developed blocks.

We will ensure individual needs are identified and addressed when carrying out assessments for rehousing options. This will include consideration of mobility requirements, physical and mental health needs, sensory impairments, language and interpretation requirements, evacuation and safety needs, and any adjustments required to support independent living. The level of support provided with the practical aspects of the move will be tailored to each secure tenant's circumstances.

Each secure tenant will receive a tailored support package to relocate to another home. This package will take account of a range of factors, including disability, age-related needs, cognitive impairments such as dementia, caring responsibilities, and the support provided by family members, carers and other support networks. We recognise that some residents, particularly older people and those who have lived in their homes for many years, may experience increased stress, anxiety or emotional distress associated with moving. Where required, engagement will be ongoing rather than a one-off process to ensure changing needs and circumstances are identified and appropriate support and accommodation solutions are provided.

While these five blocks remain occupied, investment in them will continue. Secure tenants will be entitled to the same level of compensation and financial support if they move to a new home, as tenants in the other LPS blocks at any point after a Cabinet decision is made regarding development of this site.

SMART ACTION: Each secure tenanted household will have a single point of contact (SPOC). Their role will be to provide practical advice and support. The SPOC will identify additional support as required during the moving process. This may include help with:

- Understanding legal rights.
- Assisting with bidding for properties on Homemove.
- Filling out forms.
- Support with maintaining benefits, accessing discretionary funding.
- Linking into support services
- Providing interpreters.
- Decluttering/downsizing
- Help with removals.
- Arranging utilities.
- Ensuring mobility and adaptation needs are met.
- Disconnection and reconnection of appliances.
- Help with packing and unpacking
- Registering with a GP/local health services
- Viewing properties.

Linking in with other agencies or family members providing support with agreement by the tenant.

6.2 Disability:

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.

The table below compares the proportion of occupants with a disability record on our Housing Management system which would meet the definition of disability under the Equality Act 2010, which does not include all recorded support needs, for example addiction to non–prescribed drugs or alcohol. This applies to 58% of occupants at Nettleton and Dudeney, which is higher than for all council housing occupants (22%) and citywide residents (19%). The 2021 Census figure is taken from a question which was designed to closely align with the same definition of disability.

Long term health problem or disability	Nettleton and Dudeney LPS occupants October 2026	All council housing occupants June 2025	B&H Census 2021
Yes	58%	22%	19%
No or not recorded	42%	78%	81%
Total	100%	100%	100%

Occupants with disabilities health and safety are at increased risk if they remain in these blocks due to issues with prompt evacuation in an emergency. Our Housing Management system and data collected from site visits indicate 24% of occupants have mobility issues, and 17% self-reported that they would require assistance in an evacuation. The table below presents mobility needs for occupants of Nettleton & Dudeney compared to all council housing occupants, including mobility group where held:

Mobility issues	Nettleton and Dudeney LPS occupants October 2026	All council housing occupants June 2025
Any mobility issues	24%	7%
None recorded	76%	93%

We will ensure individual needs are identified and addressed when carrying out assessments for rehousing options. This will include consideration of mobility requirements, physical and mental health needs, sensory impairments, language and interpretation requirements, evacuation and safety needs, and any adjustments required to support independent living. The level of support provided with the practical aspects of the move will be tailored to each secure tenant's circumstances.

Each secure tenant will receive a tailored support package to relocate to another home. This package will take account of a range of factors, including disability, age-related needs, cognitive impairments such as dementia, caring responsibilities, and the support provided by family members, carers and other support networks. We recognise that some residents, particularly older people and those who have lived in their homes for many years, may experience increased stress, anxiety or emotional distress associated with moving. Where required, engagement will be ongoing rather than a one-off process to ensure changing needs and circumstances are identified and appropriate support and accommodation solutions are provided. Given the broader regeneration plans for the estate, local lettings strategies will be developed to facilitate moves within the wider community, with the option of a move back to the newly developed blocks.

While these five blocks remain occupied, investment in them will continue. Secure tenants will be entitled to the same level of compensation and financial support if they move to a new home, as tenants in the other LPS blocks at any point after a Cabinet decision is made regarding development of this site.

SMART ACTION: Each secure tenanted household will have a single point of contact (SPOC). Their role will be to provide practical advice and support. The SPOC will identify additional support as required during the moving process. This may include help with:

- Understanding legal rights.
- Assisting with bidding for properties on Homemove.
- Filling out forms.

- Support with maintaining benefits, accessing discretionary funding.
- Linking into support services
- Providing interpreters.
- Decluttering/downsizing
- Help with removals.
- Arranging utilities.
- Ensuring mobility and adaptation needs are met.
- Disconnection and reconnection of appliances.
- Help with packing and unpacking
- Registering with a GP/local health services
- Viewing properties.
- Help to identify a Housing parking space at their new property is needed.
- Linking in with other agencies or family members providing support with agreement by the tenant.

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).

To ensure an inclusive and accessible moving process, we will make adjustments tailored to diverse disabled residents, including those who are housebound, D/deaf, blind, neurodivergent, or have non-visible disabilities.

We will provide home-based consultations, alternative communication formats (BSL interpreters, captioning, braille, and audio), sensory-friendly engagement, and specialised mobility support. Housing officers will offer assistance to ensure tenants receive guidance on relocation options, tenancy rights, and financial support.

Recognising intersectionality, we will partner with community organisations to support residents Our approach is to prioritise maintaining social networks, access to essential services, and reducing disruption, ensuring a respectful and equitable transition for all affected households.

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

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.

The table below demonstrates that, there is a lower proportion of residents 19.4% who are Black and Racially Minoritised when compared to the 2021 Census data. While Black and Racially Minoritised residents are not overrepresented within the LPS blocks compared with the wider city population, the council recognises that relocation may affect residents differently. Impacts may be compounded where ethnicity intersects with other characteristics or circumstances, including age, disability, faith or religion, socioeconomic disadvantage, homelessness, or language barriers. Relocation may also affect access to important cultural, faith and community networks. Through ongoing engagement, the council will seek to understand individual circumstances and ensure appropriate support, including interpretation and translation services where required, to mitigate any disproportionate impacts.

Please note that, to allow for comparison with the Census data, the data in the table only reflects occupants with an ethnicity recorded on our Housing Management system: data is not held on this characteristic for around 20% of occupants. Generally, rates of recording of this characteristic are higher for council tenants than for other occupants.

Ethnicity (where provided/recorded)	Nettleton and Dudeney LPS occupants October 2026	All council housing occupants June 2025	B&H Census 2021
White: English, Welsh, Scottish, Northern Irish or British	80.6%	80%	74%
Black and Racially Minoritised (all other ethnic groups)	19.4%	20%	26%

Of the current occupants of Nettleton Court & Dudeney Lodge, around 8% recorded languages other than English on our Housing Management system. These languages include Arabic, Farsi, Italian, Polish, Russian and Thai. To ensure residents are able to fully participate in the decant and rehousing processes, interpretation and translation services will be made available where required. Information will be provided in accessible formats and officers will work with residents to identify and respond to any language, communication or cultural barriers that may affect engagement. This will include consideration of intersecting needs, such as disability, age, digital exclusion or literacy needs, to ensure residents can access information, understand their housing options and make informed decisions throughout the process.

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

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

Housing staff will be made aware of the need to provide culturally sensitive engagement and support throughout the rehousing process. This may include consideration of religious festivals and observances, family and household arrangements, privacy requirements, and any faith-related requirements

associated with the design or suitability of future accommodation. The assigned Single Point of Contact (SPOC) will discuss these needs with each tenant to ensure they are understood and, where possible, accommodated within rehousing options.

The table below demonstrates that the religion profile of occupants of Nettleton Court and Dudeney Lodge differs from that of all council housing occupants and the wider Brighton & Hove population. There are comparatively higher proportions of Buddhists, Christians and people with other religions, and a lower proportion of people with no religion. The council will work with affected residents to understand any faith-related requirements and ensure these are considered as part of the rehousing process.

Please note that, to allow for comparison with the Census data, the data in the table only reflects occupants with their religion or belief recorded on our Housing Management system or responded that they preferred not to say: data is held on this characteristic for only around one third of council housing occupants (although the rate of recording is higher for just council tenants, at two thirds).

Religion or belief	Nettleton and Dudeney LPS occupants October 2026	All council housing occupants June 2025	B&H Census 2021
Buddhist	5%	1%	1%
Christian	41%	37%	31%
Muslim	4%	6%	3%
Other	7%	5%	1%
No Religion	34%	37%	55%
Prefer not to say	9%	14%	7%
Total	100%	100%	100%

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 / 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 table below shows that a much higher proportion of occupants at Nettleton and Dudeney are male (71%) when compared with all council housing occupants and 2021 Census data for residents of Brighton & Hove of all tenures (both 49%).

While a higher proportion of occupants are male, the council recognises that impacts are more likely to arise through the interaction of sex with other characteristics and circumstances, including older age, disability, long-term health conditions, living alone and low levels of social support. A higher proportion of single-person households may mean some residents have less practical or emotional support available during the rehousing process and may be more vulnerable to stress, anxiety or social isolation associated with moving home. Through individual assessments and ongoing engagement, the council will identify support needs, including where assistance from family members, carers or other support networks may be required, to ensure residents are appropriately supported throughout the relocation process.

Gender (Housing data) and Sex (Census data)	Nettleton and Dudeney LPS occupants October 2026	All council housing occupants June 2025	B&H Census 2021

Female	29%	51%	51%
Male	71%	49%	49%
Non-binary	None	0.03%	-
Total	100%	100%	100%

6.6 Gender Reassignment:

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.

6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation?	YES / 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 proportion of residents identifying as Gay or Lesbian is higher (16.6%) within Nettleton Court and Dudeney Lodge than amongst both council housing tenants (4%) and the wider Brighton & Hove population (6%). The proportion recorded as heterosexual (69.6%) is also lower when compared to all council housing occupants (77%) and citywide residents (81%). The council recognises that relocation may affect LGBTQ+ residents differently, particularly where sexual orientation intersects with other characteristics such as older age, disability, living alone, or long-term health conditions. For some residents, established friendship groups, community networks and access to LGBTQ+ inclusive services may be important sources of support and wellbeing. Through individual engagement and rehousing assessments, the council will seek to understand these needs and minimise disruption to support networks wherever possible, ensuring residents can access appropriate accommodation and support throughout the rehousing process.

Please note that, to allow for comparison with the Census data, the data in the table only reflects occupants with their sexual orientation recorded on our Housing Management system or responded that they preferred not to say: data is held on this characteristic for only around half of council housing occupants (although the rate of recording is higher for just council tenants, at two thirds).

Sexual orientation	Nettleton and Dudeney LPS occupants October 2026	All council housing occupants June 2025	B&H Census 2021
Bisexual	2.94%	2%	4%

Gay or Lesbian	16.6%	4%	6%
Heterosexual	69.6%	77%	81%
Other	0%	1%	1%
Prefer not to say	10.86%	15%	9%
Total	100%	100%	100%

6.8 Marriage and Civil Partnership:

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.

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

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

6.10 Armed Forces Personnel, their families, and Veterans:

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

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)	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.

6.12 Carers:

Does your analysis indicate a disproportionate impact relating to Carers (Especially considering for age, 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.

Rehousing assessments will consider caring responsibilities and the importance of maintaining proximity to cared-for people, carers and established support networks wherever possible.

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). **Also consider our Corporate Parenting Responsibility in connection to your activity.**	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.

Rehousing assessments will consider caring responsibilities and the importance of maintaining proximity to cared-for people, carers and established support networks wherever possible.

6.14 Homelessness:

Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk	YES

and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)	

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

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

12% of the occupants of Nettleton Court and Dudeney Lodge are living in temporary accommodation under statutory homelessness duties. This will increase as secure tenants move out, and leaseholders sell their properties back to the council, enabling additional homes to be used as temporary accommodation in the medium term. This will provide good quality temporary accommodation for households awaiting permanent housing. A dedicated housing team will support these households throughout their occupation of the buildings and will work with them to plan their move when vacant possession is required. We recognise that a future move may cause disruption, uncertainty, stress and anxiety for some households, particularly those who have already experienced homelessness or housing instability. Early planning, clear communication and tailored support will be provided from the outset to minimise the impact of future moves and ensure households understand their housing options, timescales and available support. The council will seek to maximise notice periods wherever possible and will work with affected households to identify suitable alternative accommodation in accordance with homelessness legislation and relevant statutory guidance.

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

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)	YES / 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.

When the process of planning to move starts each household will have a single point of contact (SPOC), they will remain in place until the move is complete and the new tenancy is established. Their role will be to provide practical advice and support, and they will ensure that any communication, interpretation and accessibility needs are identified and met throughout the rehousing process, including for residents experiencing language barriers, disability, sensory impairments, literacy difficulties, age-related needs or digital exclusion.

Non-digital engagement routes will remain available throughout the programme to ensure residents are not disadvantaged by digital exclusion. Information and support will be provided through a range of accessible channels, including face-to-face meetings, telephone contact and written correspondence, to ensure all residents can engage with the rehousing process regardless of their access to, or confidence with, digital technology.

They will provide advice on statutory entitlements to compensation for Home Loss payments for the secure tenants. This mandatory lump sum payment is fixed by Section 30 of the Land Compensation Act 1973. The Government reviews the figure annually. Tenants become eligible for Home Loss payment following a formal decision to demolish, remove or dispose of their homes having been made by Cabinet. In addition, they may get a Disturbance Allowances to cover 'reasonable expenses' involved in moving.

Due to the level of compensation tenants will be entitled to, and the vulnerabilities identified within some households, additional financial support measures will be implemented.

To ensure tenants can make informed financial decisions, we will provide tailored financial advice, offering guidance on managing compensation effectively, understanding rights, and accessing secure financial services. Information will also be provided on identifying financial exploitation, recognising scams, and safeguarding personal assets.

We recognise that some residents may face additional challenges in making financial and housing decisions, including older people, people with disabilities, those with cognitive impairments, and households on low or fixed incomes. Where appropriate and with the tenant's consent, family members, carers and other support networks will be involved in discussions and decision-making. Rehousing assessments will take account of affordability, accessibility, support needs and the suitability of future accommodation to minimise the risk of residents moving to homes that do not meet their needs or leave them financially disadvantaged. Ongoing support will be available throughout the rehousing process to ensure changing circumstances and vulnerabilities are identified and addressed. An enhanced voluntary buy-back offer for leaseholders, resident or non-resident, in the eight LPS blocks was agreed at Cabinet 20 March 2025. Agenda Item 177.

6.17 Human Rights:

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

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

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

The council recognises that relocation engages residents' rights to respect for home and family life. Individual engagement, rehousing support, access to advocacy and opportunities to influence housing options will help ensure these rights are considered throughout the programme.

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

We acknowledge that the displacement may have a significant adverse effect on individuals with multiple protected characteristics. Some tenants may experience a disproportionately negative impact due to intersecting factors such as being racially minoritised, socio-economically disadvantaged, disabled, older, LGBTQ+, or having English as an additional language. Particular consideration will be given to older disabled residents who may experience overlapping impacts relating to mobility, cognition, sensory impairment, long-term health conditions, digital exclusion, and reliance on family, carers or support networks. These intersecting factors may increase the risk of stress, anxiety, social isolation and difficulties accessing information or services during the rehousing process, requiring enhanced and tailored support.

A person's home is deeply connected to their sense of community, personal interests, extracurricular activities, and access to essential resources. As such, relocation may disrupt access to vital services, including education, transportation, religious gatherings, and places of worship, all of which contribute to an individual’s sense of belonging and wellbeing. Relocation can also have implications for mental health, with uncertainty and change potentially leading to increased stress, anxiety, and emotional distress. This issue is closely intertwined with socioeconomic status, ethnicity, faith or religion, and disability.

The location tenants are being moved to, and the accessibility of resources in their new environment, are critical considerations. While financial reimbursement is intended to help alleviate some of these impacts by enabling necessary inclusive adjustments, those affected by multiple protected characteristics may require distinct accommodations that could affect how financial support is utilised.

We will also consider impacts on the wider community unique to this area, such as the disturbance building works may cause to places and groups such as schools, places of worship and healthcare providers.

We remain committed to using the insights gained through consultation to develop a clearer approach to supporting tenants during this transition.

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)

1. Provide tailored rehousing support for all affected households

Activities:

- Complete a housing needs and support assessment for households before any move is agreed.
- Develop and review individual rehousing plans, including mobility, disability, health, language, caring responsibilities and support network requirements.
- Monitor progress through case reviews and programme reporting, ensuring any emerging support needs are identified and addressed.
- Achieve SPOC allocation and completed assessments for all tenants

2. Minimise disproportionate impacts on older people, disabled residents and other vulnerable households.

Activities:

- Undertake accessibility, mobility and support needs assessments for all affected households.
- Ensure appropriate property adaptations, parking requirements, assistive technology and support arrangements are considered before a move takes place.
- Provide practical moving support, including packing, removals, utility transfers and liaison with health and care services where required.
- Report quarterly on suitability outcomes, complaints and reasonable adjustments provided.

3. Ensure accessible and inclusive engagement throughout the programme.

Activities:

- Offer translation, interpretation, large print, audio, braille and other accessible formats where required.
- Record communication preferences and accessibility requirements for all affected households.
- Undertake regular engagement with residents who may face barriers due to disability, language, literacy, digital exclusion or other vulnerabilities.
- Review engagement data quarterly to identify and address any groups that are underrepresented in consultation or decision-making processes.

4. Monitor and mitigate cumulative and intersectional impacts.

Activities:

- Maintain and update equality monitoring information gathered through rehousing assessments and ongoing engagement.
- Present quarterly equality monitoring reports to the project governance group, highlighting emerging risks and mitigation measures.
- Review support arrangements for residents experiencing multiple disadvantages, including older disabled residents, LGBTQ+ residents, carers, residents with language barriers and households experiencing financial hardship.
- Update the Equality Impact Assessment annually, or sooner where significant changes to the programme occur.

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.

8. Outcome of your assessment

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

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

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

9. Publication

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

10. Directorate and Service Approval

Signatory:	**Name and Job Title:**	**Date:** DD-MMM-YY
Responsible Lead Officer:	Justine Harris, Head of Tenancy Services	October 28th 2026
Accountable Manager:	Chantelle Barker – Director of Estate Renewal	October 28th 2026

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

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 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 EDI Manager and Head of Service level approval via different templates.

Signatory:	**Name:**	**Date:** DD-MMM-YY
EDI Business Partner:	Eric Page	October 28th 2026
EDI Manager:	Lindsey Pearce	October 27th 2026

Notes and recommendations from EDI Business Partner reviewing this assessment:

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