

# Hull City Council

## Equality and Human Rights Impact Analysis Form 2022



The purpose of carrying out this equality impact analysis is to provide evidence that you have paid 'due regard' to the different protected characteristics when making your decision upon the policy, service, or function. It is also a tool that will enable you to meet the 3 aims of the general equality duty:

1. **Eliminating unlawful discrimination**
2. **Advancing equality of opportunity**
3. **Fostering good relations**

<b>Title of policy, project, service, function, or strategy?</b>
<b>Serious Incidents Policy</b>

<b>Directorate:</b>	Legal Services and Partnerships
<b>Service:</b>	Neighbourhoods & Housing
<b>Lead Officer:</b>	Head of Service Access and Wellbeing
<b>Date:</b>	23/7/25

## Section 1. Introduction and Context

### What is the aim of the policy, project, service, function, or strategy?

The purpose of the Serious Incidents Policy is to ensure that there is a systematic process for reporting, managing, and learning from serious incidents that occur in Hull City Council's, Neighbourhoods and Housing (N&H) owned and managed stock. The aim is to ensure that all serious incidents are managed in a structured and timely manner, to ensure that lessons are learned and that risks are identified and understood. Without an agreed framework, the response to any serious incident could be disjointed, unfocused, slow, or less effective than needed.

A serious incident is defined as an incident that can be managed utilising the resources in Neighbourhoods and Housing, these resources may cover staff in all or some areas of Neighbourhoods and Housing. This will be dependant both on the type of incident and the number of people affected.

Examples of Serious Incident include but are not limited to:

- A serious incident effecting a single property may be handled by an individual team member focusing on incident resolution and person-centred support
- A serious incident effecting a terrace will need more than one team and / or team members to work together each focussing on their role and liaising with other team members to ensure incident resolution and person-centred support
- A serious incident effecting a group of high-rise flats will need more than one team and / or team members to work together each focussing on their role and liaising with other team members to ensure incident resolution and person-centred support

The Grenfell Tower Phase 2 report made several recommendations that have relevance to this Policy and Procedures including parliament enacting the Social Housing (Regulation) Act 2023, which enables the Regulator of Social Housing to play a more active role in setting appropriate standards and ensuring that they are met by social housing providers. Key recommendations for local authorities that are relevant for N&H are:

- LA's consider the availability of key workers and the role they are expected to play so that suitable contingency arrangements can be made to ensure, as far as possible, continuity of support
- LA's include in their contingency plans arrangements for providing immediate financial assistance to people affected by an emergency
- LA's make effective arrangements for continuing communication with those who need assistance using the most suitable technology and a range of languages appropriate to the area
- LA's include in their plans for responding to emergencies arrangements for providing information to the public by whatever combination of modern methods of communication are likely to be most effective for the areas for which they are responsible
- LA's make such arrangements as are reasonably practicable for enabling them to place people in temporary accommodation at short notice and in ways that meet their personal, religious and cultural requirements

<ul style="list-style-type: none"> <li>LA's as part of preparing for emergencies, identify vulnerable people and identify and ensuring co-operation with voluntary, community and faith groups that is consistent with the Equality Act 2010.</li> </ul> <p>All these recommendations have informed the Policy and Procedures and are supported by the development and implementation of other strategic documents, such as the Knowledge and Information Management and Vulnerability Strategies.</p>
<p><b>What outcomes will be achieved with the policy, project, service, function, or strategy?</b></p>
<p>Development of a Serious Incidents Policy and associated Serious Incident Procedures for use by staff as follows:</p> <p><i>Housing Investment Staff</i> - The main role is when it is safe to, to deal with the property related elements both during and after an incident, including advising where decanting is needed</p> <p><i>Area and Neighbourhood Staff</i> - The main role is to deal with any people related issues (apart from the immediate rehousing issues) both during and after an incident including organising decanting if needed</p> <p><i>Access and Wellbeing Staff</i> - The main role is to deal with any immediate rehousing issues both during and as the result of an incident</p> <p><i>Building Safety Team Staff</i> - The main role is to support any people related issues during and after an incident</p> <p><i>Strategy, Market Intervention and Growth Staff Role</i> - The main role is to support any people related issues after an incident</p> <p><i>Incident Manager / Senior Managers Role</i> - The main role is to be aware that a serious incident is occurring, and to where appropriate take on a managerial role during and / or after the incidents. To support all staff both during and after an incident and ensure an incident debrief to learn lessons is held</p>
<p><b>Please list the main people or groups that this policy, project, service, function, or strategy is designed to benefit and any other stakeholder involvement?</b></p>
<p>Staff, partners, tenants and their families, residents and the wider general public</p>
<p><b>Are there any associated/ linked policies, services, or procedures? If yes, please detail: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></b></p>
<p>Policies, Strategies and Legislation</p> <ul style="list-style-type: none"> <li>Allocations Policy</li> <li>Asset Management Strategy</li> <li>Building Safety in High Rise Policy</li> <li>Compensation Guidelines</li> <li>Cluster Properties / Fire Damage / Flooded Properties / Structural Damaged (Empty Properties Not Arising from the Routine Process)</li> <li>Decanting for Repairs</li> <li>Demolition Procedure</li> <li>Fire Safety Management Plan</li> <li>Grenfell Tower Phase 1 and 2 Reports</li> </ul>

- Health & Safety at Work Act 1974 – As amended
- Health and Safety Warning Alerts
- High Risk Building Safety Policy
- Housing Fire Management Plan
- Knowledge and Information Management Strategy
- Leasehold Management Protocol
- Mobility Scooter Policy
- Person Information Alerts
- Repairs and Maintenance Policy
- Safeguarding Adults Policy
- Safeguarding Children Policy
- Vulnerability Strategy

Linked Services

- Hull City Council / Humber Emergency Forum Major Incident Policy and Procedures

Linked Consumer Standards

- Neighbourhood and Community
- Safety and Quality
- Tenancy
- Transparency Influence and Accountability

**Section 2. Data and Consultation Feedback**

This section forms a critical part of your equality analysis in meeting the requirements of the Equality Act 2010. Therefore, please ensure that there has been adequate and meaningful consultation undertaken with customers from protected groups. Please ensure that when consulting people are fully informed of any decisions that will change, reduce, or withdraw a service or benefit. *Please remember to contact the Corporate Business Intelligence Team to register with them any consultation you may wish to undertake, and to find any existing consultation and sources of data that the council may have which could assist your equality analysis.*

**Please list and/or link to any recent and relevant consultation and engagement that can be used to demonstrate clear understanding of those with a legitimate interest in the policy / service and the relevant findings.**

It is expected that there will be deviations within how Serious Incident Procedures are implemented, because no two serious incidents are identical and everyone has differing needs and will require different levels of support, which may involve other services both within and external to the Council. In many situations N&H will be led and work with blue light services. No consultation with those who could potentially be affected has therefore taken place.

**If there is insufficient consultation or engagement information, please explain what action is being taken to obtain this information and when this consultation / engagement will be completed and available.**

As this is a service wide Policy and is mostly designed to ensure staff are clear on their roles and responsibilities and will only come into effect during a Serious Incident, consultation has not been undertaken. If, during and after a serious incident tenants and their families cannot stay in their property because it is deemed not safe to do so, they will require immediate and potentially longer-term accommodation. Consultation on other relevant Strategies and Policies mentioned in this document will take place (for example, during the development of Knowledge and Information Management and Vulnerability Strategies and the High Risk Building Safety Policy and during the review of Allocations and Decants Policies.

**Please list or link to any relevant service user/ customer or employee monitoring data and what it shows in relation to any Protected Characteristic (as at 18/7/25)**

Characteristic	All People	People in flats 3 storeys and over
<b>Age</b>	Percentage	Percentage
18 to 25	3.42%	4.46%
26 to 35	18.12%	16.60%
36 to 45	27.63%	23.23%
46 to 55	20.12%	20.22%
56 to 65	15.62%	13.82%
65+	15.01%	21.65%

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Unknown	0.08%	0.02%
<b>Disability</b>	Percentage	Percentage
Yes	7.75%	5.12%
No	92.25%	94.88%
<b>Disability Type</b>	Number	Number
Physical	1318	71
Multiple	329	23
Mental	170	17
Sensory	99	16
Other	62	7
Learning	39	1
Old and Frail	37	1
Total	2054	136
<b>Gender (Sex)</b>	Percentage	Percentage
Female	69.73%	42.44%
Male	30.21%	57.50%
Other	0.06%	0.06%
<b>Sexuality</b>	Percentage	Percentage
Heterosexual	60.01%	69.19%
Not Answered / No Data	38.63%	28.15%
Bisexual	0.81%	1.49%
Gay Man	0.21%	0.89%
Lesbian Woman	0.34%	0.28%
<b>Gender Reassignment</b>	Not Collected	Not Collected
<b>Marriage and Civil Partnership</b>	Not Collected	Not Collected
<b>Pregnancy and Maternity</b>	Not Collected	Not Collected
<b>Ethnic Origin</b>	Percentage	Percentage
White British	84.18%	62.66%
Other White	6.46%	14.05%
Not Answered / No Data	2.20%	2.97%

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Black / Black British	2.45%	5.80%
Kurdish	1.57%	6.04%
Arab	1.25%	2.73%
Other Asian	1.05%	2.49%
Other Ethnicity	0.84%	3.26%
<b>Language Spoken</b>	<b>Percentage</b>	<b>Percentage</b>
English	78.34%	58.46%
Not Answered / No Data	15.02%	20.68%
Polish	2.92%	4.32%
Other	1.61%	5.13%
Kurdish	1.13%	6.11%
Arabic	0.56%	2.08%
Russian	0.42%	2.10%
Lithuanian		1.12%
<b>Religion and Belief</b>	<b>Percentage</b>	<b>Percentage</b>
No Religion	45.62%	33.74%
Christian	35.58%	36.40%
Not Answered / No Data	11.38%	11.70%
Muslim	5.85%	15.85%
Any Other Religion	1.57%	2.31%

### Section 3. Analysing the Impacts

Use service information, customer feedback and other evidence to determine upon who the policy / service and any proposed changes will impact upon and how, highlighting where these are negative or positive, including where this could constitute unfair treatment, additional inequality or disadvantage or result in hardship and exclusion.

Against any identified negative potential impacts you must provide details of any action or options which could mitigate against this, and in serious cases, you should highlight where the Council would be advised not to proceed with a new or changing policy or service, including any proposals which are being considered.

*Please use your action plan attached to this analysis to record the action and the monitoring which will take place to deliver such mitigation.*

#### Preamble

There are two key elements to dealing with a serious incident, namely taking actions during the incident to deal with the incident and taking actions to help and support those effected during and after the incident.

The most important activities when dealing with an incident are to ensure the health and safety of any people caught up in the incident is paramount and that the incident is assessed and managed. In some serious incidents, N&H will work with and to the instructions of blue light services and in others they will take the lead and blue light services may not be involved.

N&H most important actions when helping and supporting those effected by serious incidents is to provide practical assistance through the provision of accommodation, either temporarily, longer term or permanently depending on the outcome of the serious incident and if the home is fit for habitation. In such cases N&H will refer to the Allocations and Decants Policies to guide their actions.

In both sets of activities, the following Grenfell Tower recommendations provide guidance:

1. The responsible person for a general needs residential building should collect sufficient information about vulnerable occupants to enable appropriate measures to be taken to assist their **ESCAPE** in the event of a fire.
2. Local authorities make effective arrangements for continuing **COMMUNICATION** with those who need assistance using the most suitable technology and a range of languages appropriate to the area
3. Local authorities make such arrangements as are reasonably practicable for enabling them to place people in temporary **ACCOMMODATION** at short notice and in ways that meet their personal, religious and cultural requirements.
4. All local authorities devise methods of obtaining and **RECORDING INFORMATION** of displaced people if possible, in electronic form, and practise putting them into operation under a variety of different circumstances.

The above is referenced in the negative impacts for each protected characteristic and mitigations are similarly referenced

<p>If N&amp;H believe that a serious incident has the potential to become a major incident an Incident Manager will advise as appropriate and the Major Incidents Policy will be enacted. It is within this context that the analysis of impacts in this EIA are undertaken.</p>		
<b>Protected Characteristic or Group</b>	<b>Actual or potential positive or negative impact</b>	<b>Mitigations</b>
Age	<p><b>Negative Impact –</b> 1 – Escape – unable to escape during a serious incident</p> <p>2 – Communication – unable to understand what is happening and what will happen during and after a serious incident</p> <p>3 – Accommodation – Is unable to source alternative immediate, temporary or permanent accommodation</p>	<p>1 – Escape will be led either by blue light services using information provided by N&amp;H as detailed in its Building Safety for High Rise Policy or by N&amp;H staff or done by individuals. This will be done in line with data collected (see Section 2 above) in line with N&amp;H's Knowledge and Information and Vulnerability Strategies</p> <p>2 – Communication will be done when practical both during and after a serious incident in line with collected protected characteristic needs (see section 2 above) and will advise that: a) a serious incident is being dealt with, what to do and who to contact b) that those effected cannot stay in their home and what can be done for them c) What can be done to provide pastoral support to all those effected (who are allowed to stay put or have to move out)</p> <p>3 – Should alternative immediate, temporary or permanent accommodation be needed this will be done in line with N&amp;H Allocations and Decants Policies. All alternative immediate</p>

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		and temporary accommodation will look to be provided in line with any specific protected characteristic related needs (see section 2 above).
Disability	<p><b>Negative Impact –</b>            1 – Escape – unable to escape during a serious incident            2 – Communication – unable to understand what is happening and what will happen during and after a serious incident            3 – Accommodation – Is unable to source alternative immediate, temporary or permanent accommodation</p>	1 – As Age 2 – As Age 3 – As Age
Gender (Sex)	<p><b>Negative Impact -</b>            3 – Accommodation – Is unable to source alternative immediate, temporary or permanent accommodation</p>	3 – As Age
Gender reassignment	<p><b>Negative Impact -</b>            3 – Accommodation – Is unable to source alternative immediate, temporary or permanent accommodation</p>	3 – As Age
Marriage and civil partnership	<p><b>Negative Impact -</b>            3 – Accommodation – Is unable to source alternative immediate, temporary or permanent accommodation</p>	3 – As Age
Pregnancy and maternity	<p><b>Negative Impact – Not collected</b>            1 – Escape – unable to escape during a serious incident            3 – Accommodation – Is unable to source alternative immediate, temporary or permanent accommodation</p>	1 – As Age 3 – As Age

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Race	<p><b>Negative Impact –</b>                  2 – Communication – unable to understand what is happening and what will happen during and after a serious incident                  3 – Accommodation – Is unable to source alternative immediate, temporary or permanent accommodation</p>	<p>2 – As Age  3 – As Age</p>
Religion and belief including non-belief	<p><b>Negative Impact –</b>                  3 – Accommodation – Is unable to source alternative immediate, temporary or permanent accommodation</p>	<p>3 – As Age</p>
Sexual orientation	<p><b>Negative Impact -</b>                  3 – Accommodation – Is unable to source alternative immediate, temporary or permanent accommodation</p>	<p>3 – As Age</p>
Language Spoken	<p><b>Negative Impact –</b>                  2 – Communication – unable to understand what is happening and what will happen during and after a serious incident                  3 – Accommodation – Is unable to source alternative immediate, temporary or permanent accommodation</p>	<p>2 – As Age  3 – As Age</p>

Have any gaps been identified and understanding of the impact of your changes to policy/function/service on customers? Please indicate whether you have identified ways of filling these gaps.	
Gaps in Data	Action to deal with this
All missing data related to protected characteristics should be collected and concerted efforts made to collect in particular missing key characteristic data (disability, race, pregnancy, and maternity). All missing first language data should also be collected as this impact upon mitigations	<p><b>Disability</b> and <b>Pregnancy and Maternity</b> are dynamic states and N&amp;H recognise that collecting information in this area needs to be better developed, particularly with reference to <u>Escape</u> and less so <u>Accommodation</u> (which will be based on an assessed need at the time accommodation is needed). This will be done in line with the Knowledge and Information Management and Vulnerability Strategy and the needs of this Serious Incident Policy and the High Rise Building Safety Policy.</p> <p>Similarly, there are gaps in data around <b>Religion and Belief</b> (over 11% missing) and <b>Language Spoken</b> (over 15% missing generally and over 20% in flats over 3 storeys high) and N&amp;H recognise that collecting information in this area needs to be better developed, particularly with reference to <u>Communication</u>, less so to <u>Accommodation</u> (which will be based on an assessed need at the time accommodation is needed).</p>


<b>Summary of key findings, likely impacts and any mitigation</b>		
Below are examples of issues that are more likely to be considered based on the number of properties effected.		
<p><b>A serious incident effecting a single property:</b></p> <ul style="list-style-type: none"> <li>• Likely to be handled by an individual member of N&amp;H staff / small number of N&amp;H staff</li> <li>• May include blue light involvement</li> <li>• Small number may need to escape</li> </ul> <ul style="list-style-type: none"> <li>• Small number to communicate with</li> <li>• Small number to potentially accommodate</li> </ul> <p><b>Unlikely to be declared a Major Incident</b></p>	<p><b>A serious incident effecting a terrace:</b></p> <ul style="list-style-type: none"> <li>• Likely to be handled by a small team of N&amp;H staff</li> <li>• Likely include blue light involvement</li> <li>• Larger number may need to escape (age, disability and pregnancy and maternity to consider)</li> <li>• Larger number to communicate with (age, disability, language spoken to consider)</li> <li>• Larger number to potentially accommodate (all protected characteristics to consider)</li> </ul> <p><b>Potential to be declared a Major Incident</b></p>	<p><b>A serious incident effecting a group of high-rise flats:</b></p> <ul style="list-style-type: none"> <li>• Likely to be handled by a large team of N&amp;H staff</li> <li>• Likely include blue light involvement</li> <li>• Large number may need to escape (age, disability and pregnancy and maternity to consider)</li> <li>• Large number to communicate with (age, disability, language spoken to consider)</li> <li>• Large number to potentially accommodate (all protected characteristics to consider)</li> </ul> <p><b>Likely to be declared a Major Incident</b></p>

<b>Section 4 – Equality Impact Action Plan</b>			
(Please complete this Action Plan for any negative or unknown impacts identified in the Analysis above).			
Issue identified	Action required to reduce impact/mitigate	Timescale and responsibility	Monitoring and review arrangements
Fill in gaps in protected characteristic data and develop associated Knowledge and Information and Vulnerability Strategies	Develop and implement the following and their Action Plans 1 - N&H Knowledge and Information Strategy – This will provide a framework for capturing property and person information and data and recording information and data on appropriate IT systems for use across all service areas including during serious incidents and 2 - Vulnerability Strategy – This supports the Knowledge and Information Strategy and will provide a framework for the recognition, recording and responses to vulnerabilities including during serious incidents	Strategy Sponsor, Holder and Co-ordinator in line with N&H Policy and Procedure development templates	SMT Reports, contained within Strategies / Policies as a key component of the Compliance and Monitoring Sections N&H Policy and Procedure development templates. Review dates for each Policy is agreed.
Ensure staff are clear on their individual roles and responsibilities	Provide training for cohorts of staff on their specific roles and responsibilities in managing serious incidents and the use of documentation that has been developed.	Strategy Sponsor, Holder and Co-ordinator and the Professional Practice Co-ordinator – By January 2026 (following agreement at Cabinet)	Following a serious incident the Lessons Learnt Log for the serious incident will be assessed and change to Policy, Procedure, Letters and templates will be amended if needed.

<p>Ensure staff can work effectively together during a serious incident</p>	<p>Undertake scenario training to test how N&amp;H respond as a whole to a serious incident, to include where situations are dynamic, and staff need to respond within their individual roles and collectively quickly and effectively</p>	<p>Strategy Sponsor, Holder and Co-ordinator and the Professional Practice Co-ordinator – By March 2026 (following agreement at Cabinet and training on individual roles and responsibilities)</p>	<p>Following the scenario training, the Lessons Learnt Log for the serious incident will be assessed and change to Policy, Procedure, Letters and templates will be amended if needed. The training can be repeated if necessary</p>
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**Section 5. Quality assurance and publishing**

Please ensure that before the finalised analysis is signed off by an officer of at least Assistant Head of Service level that it has been quality assured by a member of the Equality Team.

<p>Senior Officer</p>		<p>Date:</p>	<p>20/8/25</p>
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<p>Equality Officer</p>		<p>Date:</p>	<p>20/08/2025</p>
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