

# 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>High Risk Building Safety Policy</b>

<b>Directorate:</b>	Legal Services Directorate
<b>Service:</b>	Neighbourhoods & Housing – Housing Investment Service
<b>Lead Officer:</b>	Vicki Edwards, Practice Manager
<b>Date:</b>	30 July 2025

<b>Section 1. Introduction and Context</b>
<b>What is the aim of the policy, project, service, function, or strategy?</b>
Introduction of a High-Risk Building Safety Policy as required by the Building Safety Regulator. The aim of the Policy is to set out HCC's approach to ensuring buildings within scope are safe and meet regulatory requirements set out in the Building Safety Act.
<b>What outcomes will be achieved with the policy, project, service, function, or strategy?</b>
<ul style="list-style-type: none"> <li>• Effectively manage all risks and hazards identified and to ensure effective action plans are in place to reduce the risks as soon as reasonably practicable for all residents living in these buildings, employees who will work in and around these buildings and members of the public</li> <li>• Develop and introduce effective policies and procedures to help manage and mitigate these risks to ensure HCC complies with its legal requirements and the requirements of the BSR</li> <li>• Effectively engage with all residents and share building safety information with them via a Resident Engagement Strategy</li> <li>• Provide clear lines of responsibility for the effective management of Resident and Building Safety in our High-Risk Buildings</li> <li>• Set out how HCC shall work with the Building Safety Regulator (BSR) and provide them with the information they need</li> </ul>
<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>This policy will be relevant for all residents living in the High-Risk Buildings within the Scope of this Policy (seven or more storeys or, over 18 meters in height).</p> <ul style="list-style-type: none"> <li>• Bathurst Street – Block 1</li> <li>• Bathurst Street – Block 2</li> </ul>

- Bayswater Court
- Cambridge Street (1 to 112)
- Cambridge Street (113 to 224)
- Denaby Court
- Gatwick House (1 to 79)
- Great Thornton Street (226 to 448)
- Great Thornton Street (450 to 672)
- Great Thornton Street (674 to 896)
- Lindsey Place (1 to 112)
- Melville Street – Block 1
- Melville Street – Block 2
- Muswell Court
- New Michael Street
- Padstow House 1 to 179
- Valiant Drive (2 to 96)
- Valiant Drive (98 to 192)
- Valiant Drive (194 to 288)

As at 22 July 2025 HCC 1356 properties within high risk buildings are tenanted, and based on the household information we hold there are a total of 2106 people living in those tenanted properties.

All N&H Staff will be responsible for the application of the Policy in conjunction with contractors delivering Services on HCC behalf.

**Are there any associated/ linked policies, services, or procedures? If yes, please detail: Yes  No**

- HCC Tenancy Agreement
- HCC Neighbourhoods & Housing Serious Incident Policy
- HCC Neighbourhoods & Housing Serious Incident Procedure
- HCC Neighbourhoods & Housing Tenancy Management Procedure (Relevant Section – Removal of Belongings from Communal Parts)
- HCC Neighbourhoods & Housing Mobility Scooter Policy
- HCC Neighbourhoods & Housing Repairs & Maintenance Policy
- City wide Building Safety Resident Engagement Strategy for High Rise Buildings
- Fire Risk Assessments for HRB's [High Rise Fire Risk Assessment | Hull](#)
- Fire Safety in Flats Leaflet

The Policy has highlighted the need for the below formal written procedures to be introduced:

- HCC Neighbourhood & Housing – High Risk Building Relevant Complaint Procedure
- HCC Neighbourhoods & Housing – Fire Risk Assessment Procedure
- HCC Neighbourhoods & Housing – Mandatory Reporting Procedure
- HCC Neighbourhoods & Housing - Personal Emergency Evacuation Plans (PEEPs) Procedure
- HCC Neighbourhoods & Housing - Fire Door Survey & Management Procedure (inc No Access)

**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.

<p><i>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.</i></p>								
<p><b>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.</b></p>								
<p>Due to the fact this Policy is being fast-tracked in order to meet regulatory requirements resident consultation has not yet taken place however, plans for consultation are detailed below.</p>								
<p><b>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.</b></p>								
<p>Consultation on both the Policy and this EIA is set to take place as follows:                  4 August – Multi Storey Living Group (Resident Group)                  6 August – Great Thornton Street Tenants &amp; Residents Association                  14 August – Muswell Tenants &amp; Residents Association                  18 August – Women’s Voice Tenants &amp; Residents Association (Great Thornton Estate)                  20 August – Padstow House Tenants &amp; Residents Association</p>								
<p><b>Please list or link to any relevant service user/ customer or employee monitoring data and what it shows in relation to any Protected Characteristic</b></p>								
Age	<p>As at 22 July 2025 the age profile of our tenants and their households (where we hold this information) whom reside within the buildings in scope were:</p> <table border="1"> <thead> <tr> <th></th> <th>Tenant %</th> <th>Household %</th> </tr> </thead> <tbody> <tr> <td>25 and under</td> <td>4.3</td> <td>3.9</td> </tr> </tbody> </table>			Tenant %	Household %	25 and under	4.3	3.9
	Tenant %	Household %						
25 and under	4.3	3.9						

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	26 – 35	14.8	14.5									
	36 – 45	18.1	21.9									
	46 – 55	22.3	23.3									
	56 – 65	19.8	18.4									
	Over 65	20.6	17.9									
	Unknown	0.1	0.1									
Disability	<p>As at 22 July 2025 the disability profile of our tenants whom reside within the buildings in scope was; 99.1% had answered 'no' and 0.9% (113) 'yes' when asked if they had a disability. The disability profile of their households (where we hold this information was; 92.6% had answered 'no' and 7.4% (155) 'yes'. Of the households answering yes only 97 residents disclosed the nature of the disability which is broken down as follows:</p> <p>Physical – 50.5%</p> <p>Multiple – 19.6%</p> <p>Mental – 13.4%</p> <p>Sensory – 10.3%</p> <p>Learning - 1.1%</p> <p>Other – 5.1%</p>											
Gender (Sex)	<p>As at 22 July 2025 the gender profile of our tenants and their households (where we hold this information) whom reside within the buildings in scope were:</p> <table border="1"> <thead> <tr> <th></th> <th>Tenant %</th> <th>Household %</th> </tr> </thead> <tbody> <tr> <td>Male</td> <td>68.8%</td> <td>67.0%</td> </tr> <tr> <td>Female</td> <td>31.1%</td> <td>32.9%</td> </tr> </tbody> </table>				Tenant %	Household %	Male	68.8%	67.0%	Female	31.1%	32.9%
	Tenant %	Household %										
Male	68.8%	67.0%										
Female	31.1%	32.9%										

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	Other	0.1%	0.1%
Gender reassignment	As at 22 July 2025 whilst 2 individuals answered 'other' to Gender (Sex) no tenants nor their household members whom reside within the buildings in scope identified as transgender.		
Marriage and civil partnership	N & H do not routinely collect information re a tenant's marital status, therefore no information is held in regards to the marital status. However, in Hull in 2021 (ONS 2021) 37.5% of the population were married, more than the 36.8% across Yorkshire and the Humber and less than the 46.6% in England.		
Pregnancy and maternity	This demographic information is not recorded by N&H so a breakdown of this data is not available.		
Race	As at 22 July 2025 the Ethnicity profile of our tenants and their households (where we hold this information) whom reside within the buildings in scope were:		
		Tenant %	Household %
	White British	69.2	65.6
	Other White	8	6.9
	Black & Black British	3.2	3.4
	Arab	3.1	3.6
	Kurdish	8.2	9.7
	Other Asian	2.6	3.5
	Other Ethnicity	2.9	4.1
No Answer/Data	2.8	3.2	

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	<p>The first language of our tenants and their households (where we hold this information) whom reside within the buildings in scope is:</p>		
	Tenant %	Household %	
English	62.8	56.6	
Polish	2.5	3.1	
Kurdish	7.6	9.0	
Arabic	2.0	2.8	
Russian	1.1	1.6	
Lithuanian	0.8	1.0	
Other	4.6	5.8	
No Answer/Data	18.6	20.1	
<p>Religion and belief including non-belief</p>	<p>As at 22 July 2025 the Religion profile of our tenants and their households (where we hold this information) whom reside within the buildings in scope were:</p>		
	Tenant %	Household %	
No Religion	33.4	31.5	
Christian	36.3	35.5	
Muslim	16.7	20.2	
Other	2.1	2.1	
No Answer/Data	11.5	10.7	

<p>Sexual orientation</p>	<p>As at 22 July 2025 the Religion profile of our tenants and their households (where we hold this information) whom reside within the buildings in scope were:</p>																
	<table border="1"> <thead> <tr> <th data-bbox="439 304 947 352"></th> <th data-bbox="969 304 1478 352">Tenant %</th> <th data-bbox="1489 304 2022 352">Household %</th> </tr> </thead> <tbody> <tr> <td data-bbox="439 360 947 416">Heterosexual</td> <td data-bbox="969 360 1478 416">64.6</td> <td data-bbox="1489 360 2022 416">66.8</td> </tr> <tr> <td data-bbox="439 424 947 480">Bisexual</td> <td data-bbox="969 424 1478 480">1.1</td> <td data-bbox="1489 424 2022 480">1.0</td> </tr> <tr> <td data-bbox="439 488 947 544">Same sex relationship</td> <td data-bbox="969 488 1478 544">1.9</td> <td data-bbox="1489 488 2022 544">1.6</td> </tr> <tr> <td data-bbox="439 552 947 584">No Answer / Data</td> <td data-bbox="969 552 1478 584">32.4</td> <td data-bbox="1489 552 2022 584">30.6</td> </tr> </tbody> </table>		Tenant %	Household %	Heterosexual	64.6	66.8	Bisexual	1.1	1.0	Same sex relationship	1.9	1.6	No Answer / Data	32.4	30.6	
	Tenant %	Household %															
Heterosexual	64.6	66.8															
Bisexual	1.1	1.0															
Same sex relationship	1.9	1.6															
No Answer / Data	32.4	30.6															
<p>Non-Statutory – Socio Economic</p>	<p>This demographic information is not recorded by N&amp;H so a breakdown of this data is not available. However, the Annual Population Survey (APS), a combined survey of households in Great Britain for 2021 shows that in Hull 77.4% of people aged 16 – 64 were economically active, this is lower than the 77.8% across Yorkshire and the Humber and England as a whole. The information for males in Hull aged 16 – 64 shows 74.3% were economically active however in Yorkshire and the Humber this figure rose to 81.8% and 82.8% in England. The average for females in Hull was much closer to the all England percentage at 74.6% for Hull and 75.9% for England.</p> <p>DWP stats for 2022 for Universal Credit (a single payment for each household to help with living costs for those on a low income or out of work) show that 21.6% of people in Hull claim this benefit compared to 14.9% of people in Yorkshire and the Humber and 14.1% of people across in England.</p>																

**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.*

<b>Protected Characteristic or Group</b>	<b>Actual or potential positive outcome/ impact</b>	<b>Actual or potential negative outcome/ impact</b>
<p>Age: 20.6% of our tenants residing within the buildings in scope and 17.9% of the Households are aged 65 and over</p>	<p>Older residents may be unable to exit the building unaided in the event of an emergency.</p> <p>This Policy asks that residents self-refer disabilities, impairments and vulnerabilities relating to the ability to self-evacuate a higher risk building if required to do so. Where HCC are informed of this, HCC will complete a Personal Emergency Evacuation Plan (PEEP).</p>	<p>Implementation of a PEEP relies on residents to self-refer to HCC.</p> <p>There are likely to be gaps in household information as such, the overall percentage of over 65's in a household may be higher than 17.9%</p> <p>Younger residents may be more likely to use/keep E-Scooters/Bikes in the property and older residents may be more likely to</p>

	<p>Older residents may have difficulty with communication/unable to understand what is happening during an incident requiring evacuation.</p> <p>Fire Safety information is available within 4 blocks via the TV Channels within the block.</p> <p>Fire Risk Assessments (FRA's) are available on HCC website for each building within scope and these detail evacuation strategies in order that residents can be informed before an incident occurs. As above, where a resident has self referred a PEEP can be put in place which sets out what a resident should do in the event of a fire/emergency situation.</p> <p>Ultimately in the event of a fire, escape will be led by Humberside Fire and Rescue Service (HFRS). HCC shall share information with HFRS so they</p>	<p>use/keep Mobility Scooters in the property, all of which come with an increased risk of fire and dependent upon where the item is stored this could hinder means of escape/rescue.</p> <p>Where small children form part of the household, the family may use prams which dependent upon where the item is stored could hinder means of escape/rescue.</p>
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	<p>know where the most vulnerable residents live and can support their evacuation or rescue.</p> <p>At the time of signing up a new resident / family, HCC provide a site-specific document that highlights building safety information, along with providing detailed information of how to report any concerns to HCC if a Fire Safety Asset is not working.</p> <p>Once a year, HCC write to all residents in blocks that are in scope and provide building safety information along with a fire safety leaflet.</p> <p>Young children have not been explicitly mentioned however, in the event the person(s) with parental responsibility feel they would be unable to self-evacuate both themselves and their children, such person may self-refer and a PEEP can be put in place.</p>	
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<p>Disability</p> <p>0.9% of our tenants residing within the buildings in scope and 7.4% of the Households are recorded as having a disability.</p>	<p>Residents with physical disabilities may be unable to exit the building unaided in the event of an emergency.</p> <p>As above; This Policy asks that residents self refer disabilities, impairments and vulnerabilities relating to the ability to self evacuate a higher risk building if required to do so. Where HCC are informed of this, HCC will complete a Personal Emergency Evacuation Plan (PEEP) which shall also be shared with HFRS.</p> <p>Flags can be also be applied to the Housing System to alert staff to disabilities.</p> <p>Information/Letters can be provided in easy read format/ large print and audio where requested.</p> <p>Fire Safety information is available within 4 blocks via the TV Channels within the block.</p>	<p>Implementation of a PEEP relies on residents to self-refer to HCC.</p> <p>There are likely to be gaps data as:</p> <ul style="list-style-type: none"> <li>• HCC may not hold full household information as such, the overall percentage with a disability in a household may be higher than 7.4%</li> <li>• Some residents may choose not to inform HCC of a disability due to concerns around perception, stigma and/or to avoid being 'labelled' for example; disclosing mental health issues</li> <li>• Disability can be a dynamic state which can change over time i.e. a long standing tenant may not have had a disability at the outset of the tenancy but a medical condition/disability may have</li> </ul>
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	<p>Fire Risk Assessments (FRA's) are available on HCC website for each building within scope and these detail evacuation strategies in order that residents can be informed before an incident occurs. As above, where a resident has self referred a PEEP can be put in place which sets out what a resident should do in the event of a fire/emergency situation.</p> <p>Ultimately, in the event of a fire escape will be led by Humberside Fire and Rescue Service (HFRS). HCC shall share PEEP's with HFRS so they know where the most vulnerable residents live and can support their evacuation or rescue.</p> <p>At the time of signing up a new resident / family, HCC provide a site-specific document that highlights building safety information, along with providing detailed information of how to report any concerns to HCC if a Fire Safety Asset is not working.</p>	<p>developed over time or, a condition may improve over time.</p> <p>Residents whom abuse Substances / have a substance dependency which could be a manifestation of a disability (i.e. a mental health condition) may require additional support.</p> <p>Disabled residents are more likely to use Mobility Scooters which can come with an increased risk of fire and dependent upon where the item is stored this could hinder means of escape/rescue.</p> <p>Disabled residents may have assistance/support dogs which could hinder means of escape. Although, it is expected that any assistance dogs are likely highly trained</p>
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	<p>Once a year, HCC write to all residents in blocks that are in scope and provide building safety information along with a fire safety leaflet.</p> <p>Where a disabled resident has indicated they would be unable to self-evacuate, support is provided to explore more suitable alternative accommodation to meet the residents needs.</p>	
<p>Gender (Sex) Tenants residing within the buildings in scope are predominantly male. With only 31.1% of tenants being female.</p>	<p>Females are disproportionately affected by Gender Based Violence. HCC are committed to providing a safe living environment and supporting victims of domestic abuse. Where repairs/works are necessary to maintain the integrity of the building or a safety item (i.e. holes in fire doors) due to domestic abuse, the Council will not charge the tenant for the works. However, where a perpetrator has been identified as being responsible for any such damage, HCC may take action to recover costs incurred from them</p>	<p>N/A</p>

	<p>(irrespective of whether or not they hold a tenancy with HCC).</p> <p>Whilst not explicit in the policy, existing procedures allow for tenants to request a female member of staff (for example when undertaking a fire door survey or, carrying out a PEEP) and in the event a female operative is not available, it can be requested that a female member of staff attend any appointment.</p> <p>Females are often the primary carer of their children as such female tenant households are more likely to include young children. As above (see age) this group can self-refer in order that a PEEP can be put in place.</p>	
<p>Gender reassignment</p>	<p>Those whom have undergone gender reassignment can experience hate-related incidents. HCC are committed to providing a safe</p>	<p>Whilst there are currently 0 residents or households in this profile, this may change in the future. Transgender people may not be</p>

<p>Zero tenants or their households are recorded as Transgender</p>	<p>living environment and supporting victims of hate crime. Where repairs/works are necessary to maintain the integrity of the building or a safety item (i.e. holes in fire doors) due to hate related incidents, the Council will not charge the tenant for the works. However, where a perpetrator has been identified as being responsible for any such damage, HCC may take action to recover costs incurred from them (irrespective of whether or not they hold a tenancy with HCC).</p> <p>Residents could be undergoing gender re-affirming surgery which may hinder their ability to self-evacuate. As above; This Policy asks that residents self refer disabilities, impairments and vulnerabilities relating to the ability to self evacuate a higher risk building if required to do so. Where HCC are informed of this, HCC will complete a Personal Emergency Evacuation Plan (PEEP) which shall also be shared with HFRS.</p>	<p>as likely to report Building Safety issues due to concerns over transphobia.</p> <p>There are likely to be gaps data as:</p> <ul style="list-style-type: none"> <li>• HCC may not hold full household information</li> <li>• Some residents may choose not to inform HCC of Gender Reassignment due to concerns around Transphobia</li> <li>• This may also be a dynamic state i.e. a tenant may go through a long period of transition which may not be complete until years after the commencement of the tenancy.</li> </ul>
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<p>Marriage and civil partnership</p>	<p>N/A</p>	<p>No anticipated negative impact</p>
<p>Pregnancy and maternity</p>	<p>Heavily pregnant residents and/or those whom have recently given birth may be unable to exit the building unaided in the event of an emergency.</p> <p>This Policy asks that residents self refer disabilities, impairments and vulnerabilities relating to the ability to self evacuate a higher risk building if required to do so. Where HCC are informed of this, HCC will complete a Personal Emergency Evacuation Plan (PEEP).</p> <p>Ultimately, in the event of a fire escape will be led by Humberside Fire and Rescue Service (HFRS). HCC shall share PEEP's with HFRS so they know where the most vulnerable residents live and can support their evacuation or rescue.</p>	<p>In some instances N&amp;H do record this information where this is known however, this is generally reliant upon the resident notifying N&amp;H and as such this is a gap in data.</p> <p>Implementation of a PEEP relies on residents to self-refer to HCC.</p> <p>Where N&amp;H do record that a resident or household member is pregnant this is not currently done by way of a flag which is easily identifiable to all staff accessing the record.</p>

<p>Race</p> <p>For 18.6% of residents within the buildings in scope and 23.3% of their households English is not their spoken/first language.</p>	<p>This could be a barrier to understanding important communications around building safety, engaging with the Resident Engagement Strategy and reporting building safety issues.</p> <p>When known a flag can be applied to the Housing System to alert staff to this and HCC can provide translation services.</p> <p>This group may experience hate-related incidents. HCC are committed to providing a safe living environment and supporting victims of hate crime. Where repairs/works are necessary to maintain the integrity of the building or a safety item (i.e. holes in fire doors) due to hate related incidents, the Council will not charge the tenant for the works. However, where a perpetrator has been identified as being responsible for any such damage, HCC may take action to recover costs incurred from them (irrespective of whether or not they hold a tenancy with HCC).</p>	<p>There are likely to be gaps data as:</p> <ul style="list-style-type: none"> <li>• HCC may not hold full household information</li> </ul> <p>Anecdotal information suggests that this group are more likely not to self-refer a vulnerability and/or report building safety</p> <p>HCC do not currently create flags for household members whom their first/spoken language is not English. This may be problematic particularly in respect of Resident Engagement Strategies which are required to be provided to all household members aged 16 and over.</p>
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<p>Religion and belief including non-belief</p>	<p>Some religions may require specific adjustments to service, for example it may be frowned upon for a muslim female (18.6% of tenants and 20.2% of households) to be alone in a property with a male member of staff for example whom may be carrying out a Fire Door Survey or PEEP.</p> <p>Whilst not explicit in the policy, existing procedures allow for tenants to request a female member of staff and in the event a female member of staff with the necessary skills is not available, it can be requested that a female member of staff attend any appointment with a male staff member.</p>	<p>Anecdotal information suggests that this group are more likely not to self-refer a vulnerability and/or report building safety</p> <p>Some cultures with roots in traditional patriarchal societies may be dismissive should building safety information be delivered by females.</p>
<p>Sexual orientation</p>	<p>N/A</p>	<p>No anticipated negative impact</p>
<p>Non-Statutory – Socio Economic</p>	<p>Education/literacy levels may affect how a resident is able to communicate/receive</p>	<p>No anticipated negative impact</p>

	<p>communications regarding building safety information.</p> <p>Where it is known that a resident is unable to read/write a flag is applied to the system to indicate this and how N&amp;H should adjust its service to meet the needs of the individual.</p> <p>Communications can also be requested in an alternative format which includes audio.</p>	
Human Rights	N/A	No anticipated negative impact

<b>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.</b>	
<b>Gaps in Data</b>	<b>Action to deal with this</b>
<p>As highlighted above there are gaps in data relating to household information which might provide us with information around vulnerabilities i.e:</p> <ul style="list-style-type: none"> <li>- Households with over 65's (where they are not the tenant)</li> <li>- Households with a disabled person (where they are not the tenant)</li> </ul>	<p>HCC Neighbourhoods and Housing operate a Person Information Alerts Policy and Procedure to advise staff, partners and contractors of vulnerabilities and disabilities for which we are aware of. Although, this does not currently include the recording of pregnancy for tenants or household members or, household members aged 16+ for</p>

<ul style="list-style-type: none"><li>- Households with members aged 16+ for whom English is not their First/Spoken Language</li><li>- Tenants and/or Household members that are pregnant</li></ul> <p>Some tenants may choose not to inform us of a disability due to concerns around perception, stigma and/or to avoid being 'labelled' for example; disclosing mental health issues</p> <p>Disability can also be a dynamic state which can change over time i.e. a long standing tenant may not have had a disability at the outset of the tenancy but a medical condition/disability may have developed over time or, a condition may improve over time.</p> <p>Gender reassignment, tenants may not inform us that they have transitioned due to concerns around transphobia.</p>	<p>whom English is not their First/Spoken Language. See action plan below which addresses this.</p> <p>Routine tenancy visits are being undertaken at every property over a 3-year rolling period. This is a visit undertaken by the High Rise Team in order to carry out a welfare check of the tenant and inspection of the property. Through these visits; household information is being updated.</p> <p>Regular contacts are also being carried out through Day-to-Day general housing management functions and by other Council Departments such as Social Services, whom are able to report back any concerns in regards to individual vulnerabilities.</p> <p>Across 2022/23 an exercise took place by High Rise Team to engage with every household in order to gain information about the household and any vulnerabilities. (see action plan, plan to continue this on rolling basis)</p>
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<p>Implementation of a PEEP relies on residents to self-refer a vulnerability, impairment or disability to HCC which may hinder their self evacuation.</p>	<p>A City-Wide Resident Engagement Strategy for residents within the buildings in scope, is currently in place. This Strategy encourages residents to contact HCC to make such a self referral.</p> <p>As above Routine tenancy visits are being undertaken at every property over a 3-year rolling period. As part of this visit, the requirement for a Evacuation plan and/or referral to HFRS is discussed</p> <p>As above, regular contacts are also being carried out through Day-to-Day operations, whom are able to report back any concerns in regards to individual vulnerabilities.</p> <p>Across 2022/23 an exercise took place by High Rise Team to engage with every household in order to gain information about the household and any vulnerabilities. (see action plan, plan to continue this on rolling basis)</p>
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	<p>Where appropriate High Rise Team have supported residents with relocation to more suitable property and provided advice around evacuation.</p>
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<p><b>Summary of key findings, likely impacts and any mitigation</b></p>
<p>The Neighbourhoods &amp; Housing Service (N&amp;H) are required to introduce a Building Safety Policy for all High-Rise Buildings which meet the definition of a ‘High Risk Building’ (these are identified as being seven or more storeys or, over 18 meters in height) to formalise its duties and meet current legal requirements. The Building Safety Regulator (BSR), Regulator of Social Housing (RSH) and the Housing Ombudsman Service (HOS) expect the Council to have a policy in place</p> <p>The consequence of failing to comply with BSR, RSH and a HOS requirement may involve receiving financial penalties, enforcement action, a detrimental inspection rating by the RSH and reputational damage.</p> <p>The proposed Policy reflects many existing / established processes and is reflective of the standard Tenancy Agreement which has been in place since 2011. However, the Policy highlights the need for additional formalised procedures including; a Relevant Complaint Procedure, and PEEPs Procedure (see below action plan). Whilst there is a need for the procedures to be formalised, in the main the Policy does not bring any significant changes to current practices or tenant/landlord responsibilities.</p>

A number of gaps have been identified around resident data, this is due to the fact we currently do not hold this, it may be out of date or, the customer may choose to withhold this information. However, actions are already taking place to improve the data we hold such as the rolling programmes of RTV's and actions resulting from the Resident Engagement Strategy.

There are three specific vulnerabilities which have been identified via this EIA as a gap requiring action; Pregnancy/Maternity, Household Members aged 16+ for whom English is not their first/spoken language, and Communication Generally for those residents for whom English is not their first/spoken language.

Additionally, there are a number of ongoing/upcoming projects relating to this Policy which are detailed in the below action plan.

**Section 4 – Equality Impact Action Plan**

(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
Gaps in data	Implementation of a Knowledge & Information Management (KIM) Strategy and Associated Policies and Procedures.	A KIM Strategy has been developed, the associated action plan is a 3 year plan.  The Sponsor is Emma Warwick, Head of	N&H SMT are to receive quarterly updates as to progress on the development of the Strategy.

	This will be a long term plan (3 years) to address data management across the N&H service.	Business Development & Change	KIM monitoring arrangements are set out in the Strategy and shall also be set out in the subsequent Policy once implemented
Identification and recording of vulnerabilities, and Gaps in data	Vulnerability Strategy and Associated Policies and Procedures to include a Reasonable Adjustment policy and procedure	This links heavily with and should follow KIM, The Sponsor is Ria Toutountzi, Head of Access & Wellbeing	N&H SMT are to receive quarterly updates as to progress on the development of the Strategy.  Vulnerability monitoring arrangements shall be set out in the Strategy and subsequent Policy once implemented
Recording of vulnerabilities – General	Review of Personal Alerts Policy/Procedure  Development and implementation of a vulnerability and disability module within NEC	The review will need to follow the KIM and Vulnerability Strategies as this is heavily linked. The Sponsor is Emma Warwick, Head of	Currently there is Assurance monitoring taking place around the quality of existing alerts relating to vulnerabilities which is carried out by the Practice

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		<p>Business Development &amp; Change</p> <p>Implementation of Module expected by end of 2025 subject to Systems Team capacity</p>	<p>Management Team and reported on to SMT periodically.</p>
<p>Identification and recording of vulnerabilities – Pregnancy</p>	<p>Development and implementation of a vulnerability and disability module within NEC – this module will provide for short term markers to be applied</p> <p>High Rise Team to actively ask for pregnancy information and record any pregnancy disclosed by way of a Personal Information Alert</p>	<p>Implementation of Module expected by end of 2025 subject to Systems Team capacity – Vulnerability Task and Finish Group</p> <p>HRT Action – Sue Houlton, Housing Tenancy Manager</p>	<p>Currently there is Assurance monitoring taking place around the quality of existing alerts relating to vulnerabilities which is carried out by the Practice Management Team and reported on to SMT periodically.</p>
<p>Identification of vulnerabilities - household members aged</p>	<p>It is unclear at this stage if this information shall be recorded within the above mentioned vulnerability</p>	<p>Implementation of Module expected by end of 2025 subject to Systems Team</p>	<p>Currently there is Assurance monitoring taking place around the quality of alerts</p>


<p>16+ for whom English is not their First/Spoken Language</p>	<p>module within NEC or elsewhere within NEC.</p> <p>Until a decision is made and in any event until the module is implemented, High Rise Team should record any household members aged 16+ for whom English is not their First/Spoken language by way of a Personal Information Alert</p>	<p>capacity – Vulnerability Task and Finish Group</p> <p>HRT Action – Sue Houlton, Housing Tenancy Manager</p>	<p>relating to vulnerabilities which is carried out by the Practice Management Team and reported on to SMT periodically.</p>
<p>Identification of vulnerabilities</p>	<p>An individual Resident Engagement Strategy for each block within scope is to be developed which shall:</p> <ul style="list-style-type: none"> <li>• encourage self-referral of vulnerabilities</li> <li>• see the recommencement of the annual household contact</li> <li>• Creation of Community Hubs to increase engagement with</li> </ul>	<p>Becky Franks – Building Safety Manager</p>	


	<p>residents and record vulnerability information</p> <ul style="list-style-type: none"> <li>• Communication channel to receive updates on building safety via mobile devices</li> </ul>		
Customer feedback in relation to building safety concerns	Implementation of formal High-Risk Building – Relevant Complaint Procedure	<p>Sponsor: Mark Nearney – Assistant Director N&amp;H</p> <p>Holder: Becky Franks – Building Safety Manager</p> <p>Co-ordinator: Vicki Edwards – Practice Manager</p>	Monitoring of these complaints to be picked up by the N&H Customer Feedback Manager
Implementation of PEEP's	Implementation of a formal PEEP Procedure (Note: this will be subject to a separate EIA)	<p>Becky Franks – Building Safety Manager/Sue Houlton – Housing Tenancy Manager</p>	Assurance monitoring is taking place which is to include PEEPs, this is carried out by the Practice Management Team and reported on to SMT periodically.

Communication for 1 in 5 household members English is not their First/Spoken Language	Translation into the top 5 languages (Polish, Kurdish, Arabic, Russian, Lithuanian) of key standard documents such as; Evacuation and Fire Door Information Flyers	Becky Franks – Building Safety Manager	
Building/Fire Safety	Policy/Procedure – update Mobility Scooter Policy to include E-bikes and E-Scooters	Becky Franks – Building Safety Manager	

**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.

Senior Officer	Rebecca Franks – Building Safety Manager  	Date:	30/07/2025
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Equality Officer	Ash Holich – Equality Officer 	Date:	31-07-2025
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