

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Future St Raphael's Masterplanning
DEPARTMENT:	Housing Supply and Partnerships
TEAM:	Housing
LEAD OFFICER:	Kathryn Eames
DATE:	25/11/2019

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

The Council is to seek approval from the Cabinet to adjust the red line masterplanning area to focus only on the area that is known locally as St Raphael's Estate, which is made up of the following roads:

- Bentham Walk
- Besant Way
- Hardie Way
- Henderson Close
- Lansbury Close
- Lilburne Walk
- Lovett Way
- Owen Way
- Pitfield Way
- Overton Close
- Rainborough Close
- Tillett Close

The areas known locally as the Old Estate bounded by Pitifield Road and the North Circular are recommended to be excluded from the masterplanning red line area. This recommendation is being made on the basis of design and financial viability. A greater understanding of the residents affected by this proposal in the Old Estate will be developed as the engagement progresses through the collation of equalities data.

2 masterplans are in the process of being developed through a co-design or community led approach. They will focus on:

- **Infill development** – This option would build new homes on available land and retain all existing homes.
- **Redevelopment** - This option would re-modelling all or part of the masterplanning area, and involve the demolition of all or some of the existing homes and facilities. This approach would also look to address some of the socio-economic issues affecting

residents on the estate through improvements to the infrastructure on the estate. This would require a ballot.

The detail of these masterplan options have not been developed as this will be done through a comprehensive community led masterplanning process which is currently underway.

The Cabinet report also provides detail of progress to date.

The Council is aware from both the feedback and from its own knowledge of St Raphael's that there are environmental, safety and socio-economic issues. For example, the Community Profile for St Raphael's identifies some specific challenges for its residents:

- 38% of children are living in poverty in St Raphael's compared with 19% across England
- 25% of people have no qualifications in St Raphael's compared with 22% across England, 18% in London and 19% in Brent
- 27% are in full time employment compared with 39% across England, 40% in London and 36% in Brent

The Council also knows that there are other issues.

- St Raphael's is identified as having a low PTAL (public transport accessibility level), and only 56% of households have a car (compared to 74% nationally).
- The nature of the roads and river surrounding St Raphael's can make it feel isolated even although it is relatively close to Wembley, which is exacerbated by the limited retail offer on the Estate.
- There are also issues in regards to the air quality and noise from the North Circular. The parts of the estate immediately beside the North Circular have high poorer air quality (65-90 NO₂ (ug/m³) – reducing down to <30 NO₂ (ug/m³) further into the Estate and there are areas which have noise at 65-75 dB (potentially some properties >75 dB) - reducing down to 0-55 dB further into the Estate.

The Council is also aware that personal robbery is a prevalent crime on St Raphael's estate, which increased by 107% from last year, compared to an increase of 52% in the rest of the borough. Also increasing, but to a lesser extent, are assault of wounding/Grievous Bodily Harm (GBH). There is also recorded gang activity on the estate. The Council's Community Safety and Housing Management teams are working very closely with the Metropolitan Police to try and tackle these issues. However, the design and nature of the estate is likely to be a contributing factor in these crimes.

The Housing Management service carries out annual customer surveys, and as part of the survey in 2018, the Council commissioned a larger sample of St Raphael's residents. The number of people contacted across St Raphael's was 118. The survey revealed that residents living on the St Raphael's estate indicate significantly lower than average levels of satisfaction; 65% are satisfied with their neighbourhood as a place to live (74% on average in the borough) and only 55% are satisfied with the overall appearance of their neighbourhood (73% on average in the borough).

The survey also identified a specific range of issues which may be driving those lower levels of satisfaction, including:

- Rubbish or litter – 52% indicate this is a major problem (33% on average across the borough)
- Disruptive children / teenagers – 47% indicate this is a problem (20% a major problem) - (38% / 12% on average across the borough)
- Abandoned or burnt out vehicles – 33% indicate this is a problem (11% a major problem) - (21% / 6% on average across the borough)
- Other crime – 52% indicate this is a problem (28% major problem) – (39% / 14% on average across the borough)

The West London Alliance Strategic Housing Market Assessment (SHMA) was produced in August 2018 and concluded that there are 12,200 households currently in affordable housing need in Brent who are unable to afford their own housing.

At this time, we have an understanding of how residents on St Raphael's have a different demography to the Brent average, however this information is taken from 2011. This will be updated in early 2020 following a Housing Needs Assessment which will be carried out for those residents and homeowners living within the proposed red line masterplanning area. Information regarding residents who live outside the red line area will be collected through equalities monitoring via public workshops and events, to which they will be invited.

2. Who may be affected by this policy or proposal?

All those who reside or have an interest in St Raphael's Estate.

St Raphael's is made up of 3 distinct areas. Area A is known locally by residents as St Raphael's Estate. It is made up of 759 homes; building heights vary between 1-4 storeys, with a mix of 4 building typologies built in the late 1960's and 70's. c.70% of homes in St Raphael's Estate (Area A) are in council ownership.

Area B and C are known locally by residents as the Old Estate. This area is almost exclusively made up of 2 storey houses built after WW1, between 1918 - 1938. There are 220 homes in Area B, with council ownership of c.48%, and 161 homes in Area C with council ownership of only c.14% of homes.

In summary the area is made up of the following:

- Council tenants, those living in temporary accommodation, private renters, leaseholders, owners, housing association tenants and investor landlords.
- Commercial owners, leaseholders and tenants, and those who frequent these establishments.
- The nurseries - Abracadabra Preschool and Hephzibah Day Nursery – those who own, work and attend/has a child attending.
- Sufra (a community "Food Bank & Kitchen") – those who own, work and use the service
- Phoenix Arch School (a special school for children aged 5 to 11) – those who work and attend/has a child attending.
- The Children's Centre – those who work and attend/has a child attending.
- St Patricks Church – those who work and attend.

There are also a number of activities or groups which takes place on the Estate, where those who run or attend would be affected.

- Unlocking Potential (works within London communities to transform the life chances of marginalised children and young people (4-25yrs) who have social, emotional and mental health needs (SEMH).)
- A council run Employment and Skills project running out of The Living Room

This is not an exhaustive list, and will be developed through consultation going forward.

Council staff may also be affected in terms of where services are being delivered on the St Raphael's and staff working on this project.

3. Is there relevance to equality and the council's public sector equality duty? If your answer is no, you must provide an explanation.

Yes

- Eliminate unlawful discrimination, harassment and victimisation

Through this process we will review decisions to understand the effect on protected groups, to ensure that there are not unintentional effects.

- Advance equality of opportunity between people who share a "protected characteristic" and those who do not

The objective of the Future St Raphael's project is to improve the experience of living on St Raphael's estate, whilst also increasing the amount of affordable housing. Improvements to the area and new housing is to benefit all on St Raphael's including protected groups, but the detail has to be developed to understand what the effects will be.

- Foster good relations between people who share a protected characteristic and those who do not

Consultation and engagement will be a key part of this process and we will encourage an inclusive approach to tackle any prejudice and to promote understanding

- Duty to make reasonable adjustments to remove barriers for disabled people.

This work will provide opportunities to remove barriers for disabled people. Through the design process there will be consideration of how barriers can be removed.

Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Note – at this time until the options are developed we will not know this, but it is the intention that the options will be positive for as many people as possible. Negative impacts, from previous experience, could be along tenure lines or geographically based where an area is not included in the proposals – until options are developed these cannot be known and only once options are developed can these be reviewed to identify if there are negative impacts.

Characteristic	IMPACT
----------------	--------

	Positive	Neutral/None	Negative
Age	x		
Sex	x		
Race	x		
Disability	x		
Sexual orientation	x		
Gender reassignment	x		
Religion or belief	x		
Pregnancy or maternity	x		
Marriage	x		

4. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	x	
Does the policy or proposal relate to an area with known inequalities?	x	
Would the policy or proposal change or remove services used by vulnerable groups of people?	Cannot answer at this time	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	x	
If you have answered YES to ANY of the above, then proceed to section B. If you have answered NO to ALL of the above, then proceed straight to section D.		

SECTION B – IMPACTS ANALYSIS

- Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

To be able to carry out a Full Equality Analysis, we will need to develop the masterplan options so that an analysis can be carried out.

We will also need to further review the equality information we hold through the information gathered via the Housing Needs Assessment and ongoing equalities monitoring.

The judgement to date on the potential impact of the policy or proposal on groups with each protected characteristic, both within and outside the red line masterplanning area, is based on the intention that housing, transport, environmental and community improvements, and development opportunities will on the whole have a positive impact, however until the options are developed this cannot be analysed.

In order to support an inclusive community led process, a Resident Board has been established to input to and shape the process for engagement and communication in particular. The Resident Board, called St Raphael's Voice, is made up of 14 residents, representative of the area both geographically and by tenure. As the group evolves we will support under-represented groups to e.g. Black Africans, to join.

Of 14 Board members, 10 completed ethnicity monitoring forms.

In addition, equality monitoring forms are part of all event feedback forms which all residents attending events are asked to complete. To date 46 forms have been completed. In summary:

Tenancy: social tenant (22), Housing Association tenant (2), leaseholder (5), private owner (4), temporary resident (2)

Age: 19-24 (3), 25-34 (1), 35-44 (7), 45-60 (11), 61+ (13)

Gender: male (3), female (28), prefer not to say (0); has it changed yes(0), no (29), prefer not to say (0)

Ethnicity: white or white British (4), Asian or Asian British (5), mixed background (0), black African, Caribbean or black British (26), other (1)

Religious belief: no religion or belief (1), Muslim (8), Christian (23), Hindu (4), Jewish (0), other (0)

Disability: yes (8), no (24), prefer not to say (3)

Sexual orientation: straight (31), lesbian (0), gay (0), bisexual (0), prefer not to say (3)

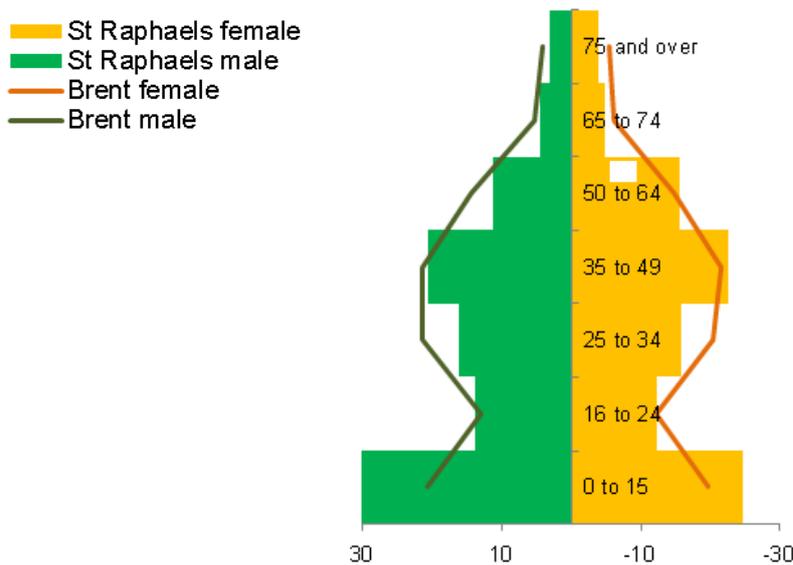
The below is information we have to understand the demographics of the area, but which we will need to further develop.

The following demographic data is extracted from the 2011 census, from LSOAs approximately coinciding with the boundaries of the St Raphael's area, Area A, B and C.

Age

St Raphael's estate has a large proportion of children (under 16); over 27 percent of the population is made up of children, compared to 20 percent in Brent. ¹

Figure One: Age and sex



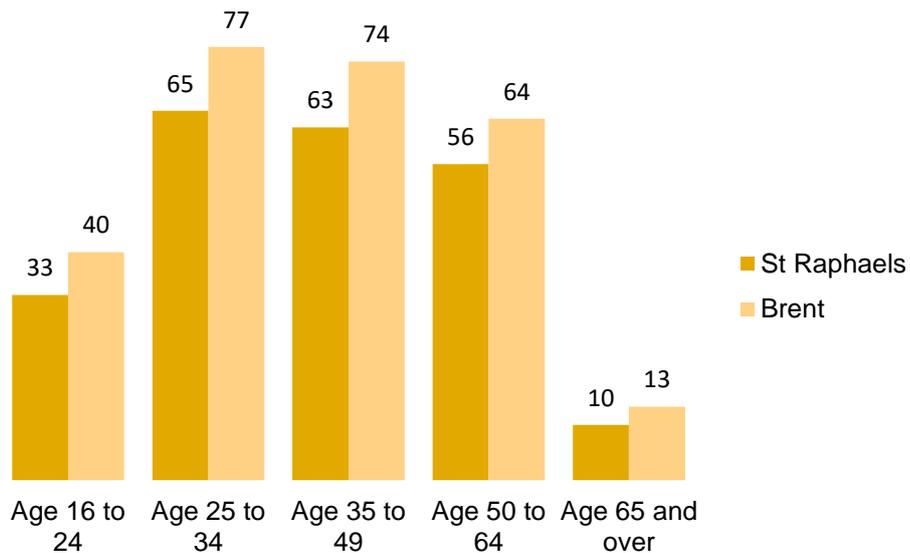
Employment by age

In St Raphael's, 73 percent of the population is working age. This is lower than 80 percent, the average for Brent. The employment rate² for all age groups is lower for St Raphael's than for Brent, except for those aged 65 and over.

¹ Census 2001

² Ratio of the employed to the working age population

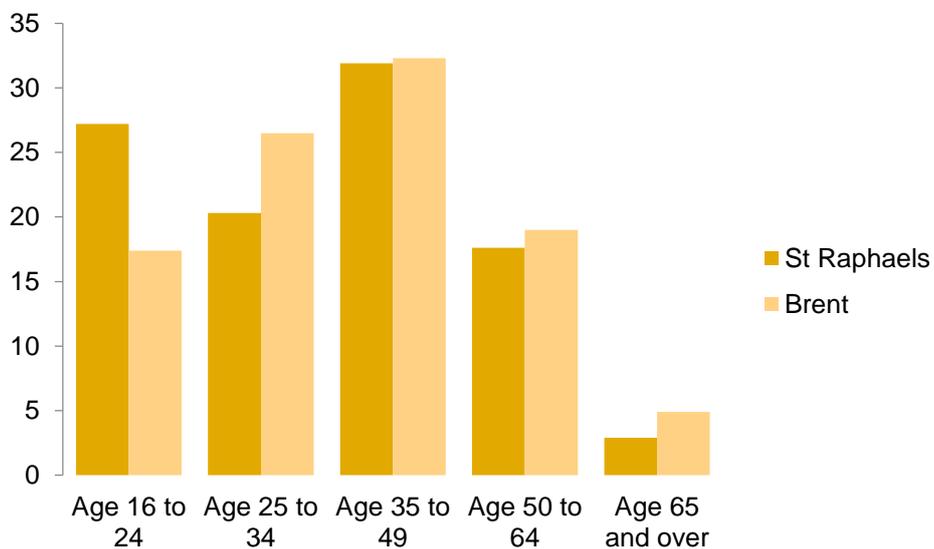
Figure two: Employment rate by age band



Working pattern by age

The proportion of the working population employed part-time is 35 percent, higher than 28 percent, the working population employed part-time in Brent. This proportion varies with age; those aged between 16 and 24 have a much larger proportion employed part-time, 27 percent compared to 17 percent. For all other age groups, the proportion of those employed part-time is lower than that for Brent, with the largest difference in those age between 25 and 34 with 20 percent employed part-time compared to 27 percent in Brent.

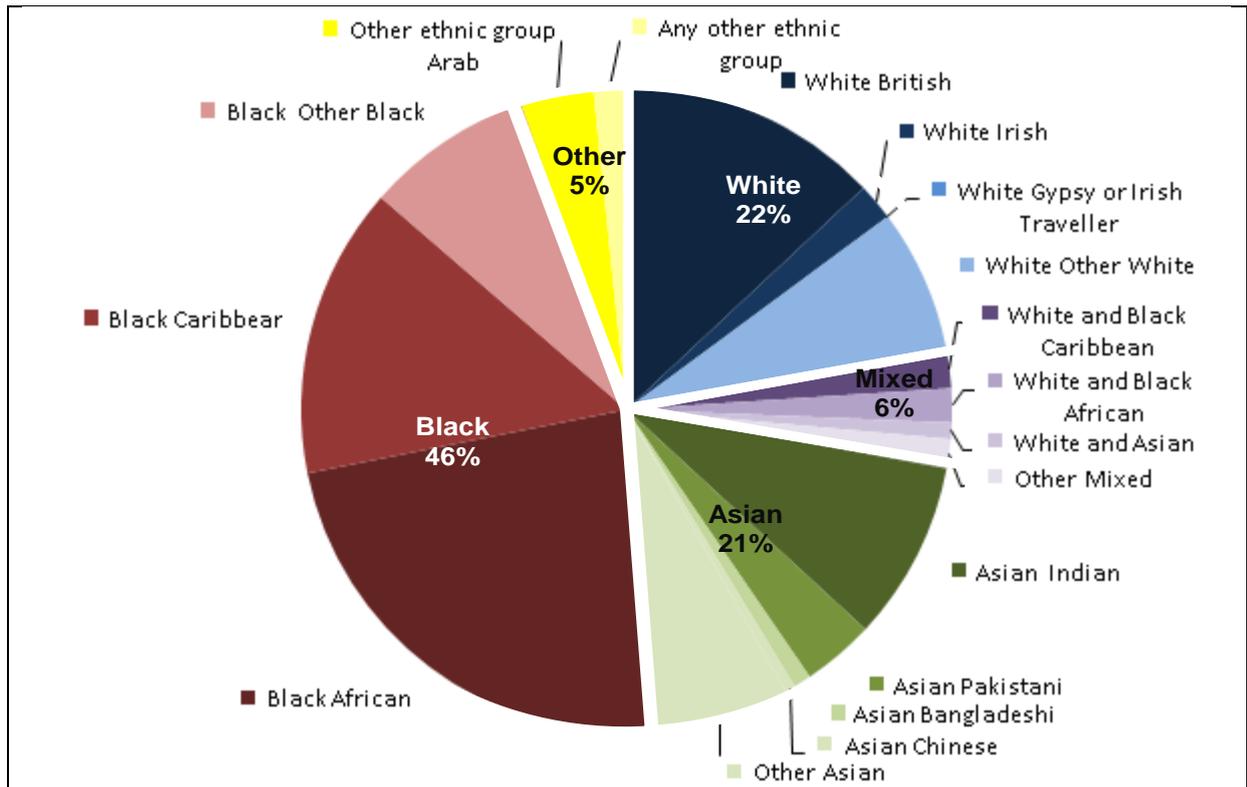
Figure three: Percentage of those working, working part-time by age-group



Ethnicity

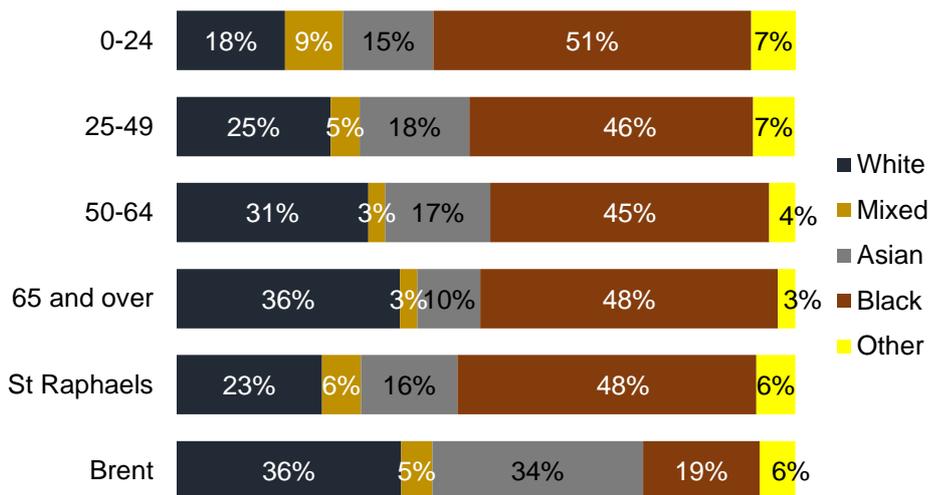
Almost half (46 percent) of St Raphael's estate is black, with black African making up 23 percent of the whole population. The white population is the second largest population group, making up 22 percent of St Raphael's, followed by the Asian population, 21 percent.

Figure four: Ethnic profile



The ethnic profile varies with age; although the black population remains fairly constant comprising around half the population in all age groups, the white population proportion increases with age doubling from 18 percent of the under 25s to 36 percent of the 65 and overs. The mixed population proportion increases as age decreases, tripling from three percent of those aged 50 and over to nine percent of the under 25s.

Figure five: Ethnic profile by age

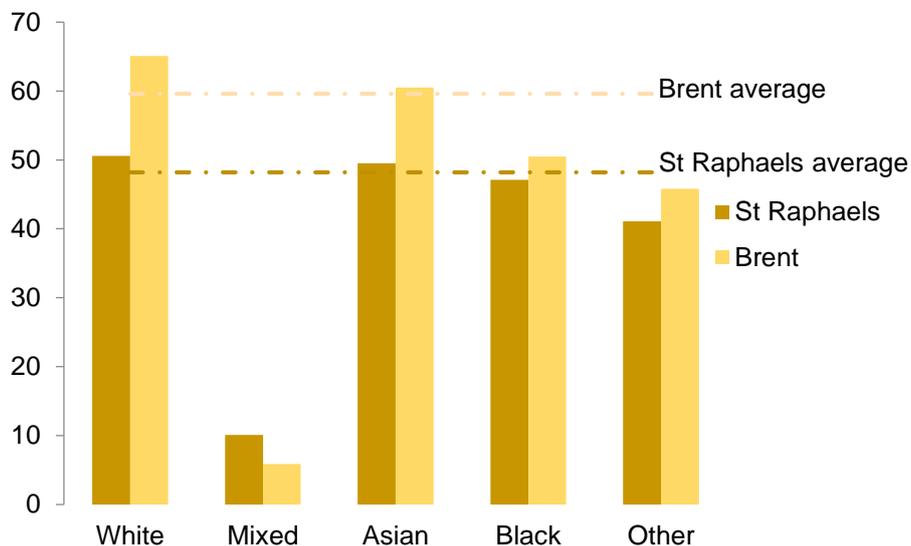


Employment by ethnicity

Employment varies by ethnicity in Brent and in St Raphael's. The employment rate for white and Asian people is higher than average for both Brent and St Raphael's. The employment

rate for black people is slightly lower than average in St Raphael's. In Brent the employment rate for black people is a lot lower than the average employment rate. Employment rates in St Raphael's are lower by ethnicity than the employment rates for Brent except for those with mixed ethnic background.

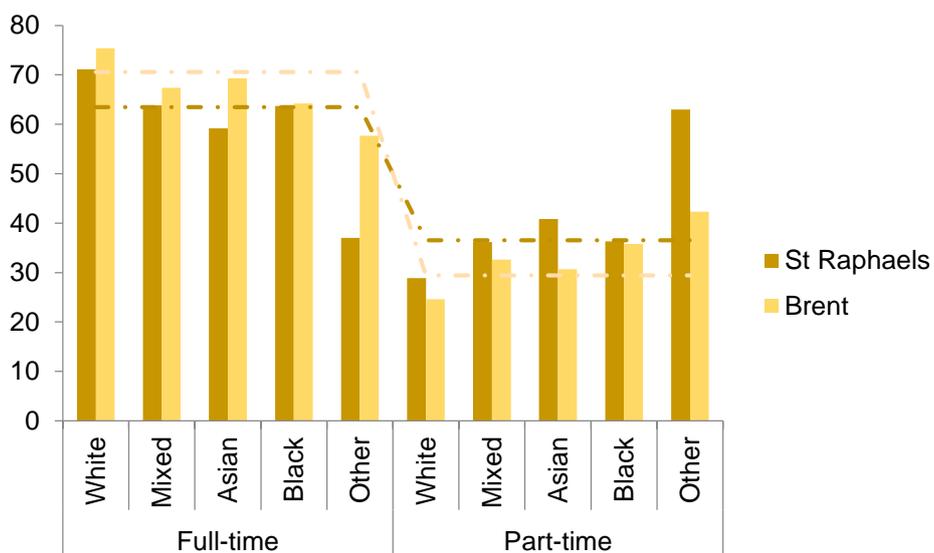
Figure six: Employment rate by ethnicity



Working pattern by ethnicity

For all ethnicities apart from black, there is a lower proportion of people in employment working full-time in St Raphael's than in Brent. White people have a higher than average proportion of full-time workers, and those from other backgrounds have a much lower proportion of full-time workers than the average for St Raphael's. Brent is different with a lower than average proportion of full-time workers from mixed, black and other ethnicities.

Figure seven: Working pattern by ethnicity – dotted line shows the average



Country of birth

Almost half (48 percent) of St Raphael's' residents were born outside the UK, which is less than the 56 percent of Brent residents born outside of the UK.³ Of the 48 percent of St Raphael's residents born outside the UK, 18 percent were born in Africa, and 15 percent in Asia and the Middle East. This differs from the 10 percent of Brent residents born in Africa, and 23 percent born in Asia.

Figure eight: Country of birth

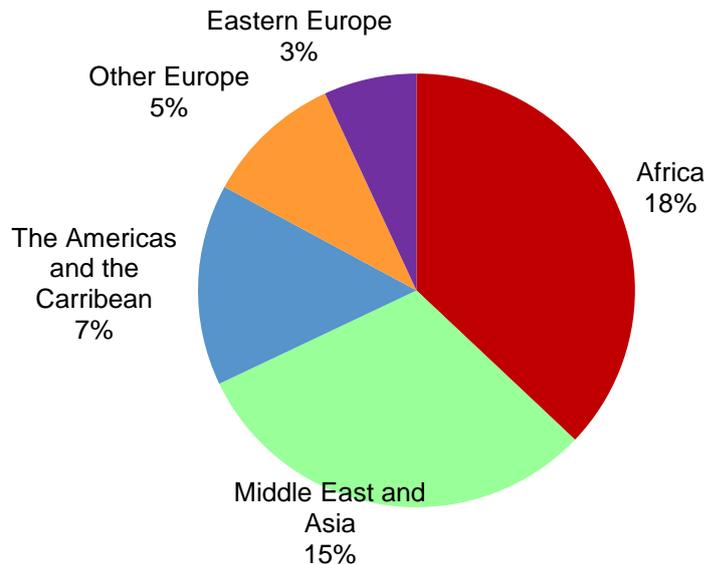
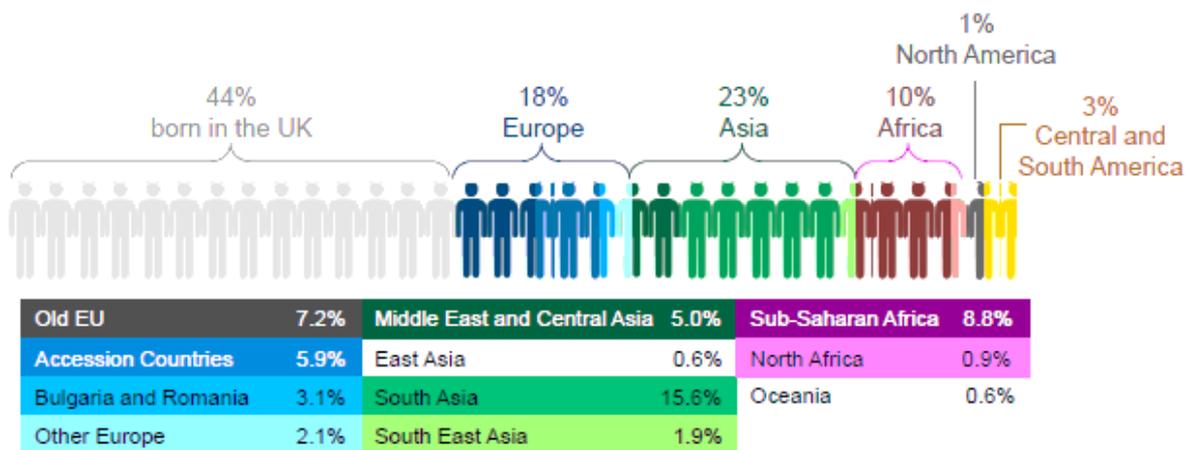


Figure nine: Country of birth - Brent⁴

Country of birth



The majority of people born outside the UK in St Raphael's were under 25 (61 percent). As age increased, the number of people born outside the UK decreased, ranging from 536 children aged under 16 to 17 people aged 65 and over. This differs from the Brent data as the majority (49 percent) of those born outside the UK are between the ages of 25 to 49.

Foreign born people make up 31 percent of the working age population in St Raphael's, lower than the 49 percent, the proportion for Brent.

Figure ten: Age of people born outside the UK in St Raphael's

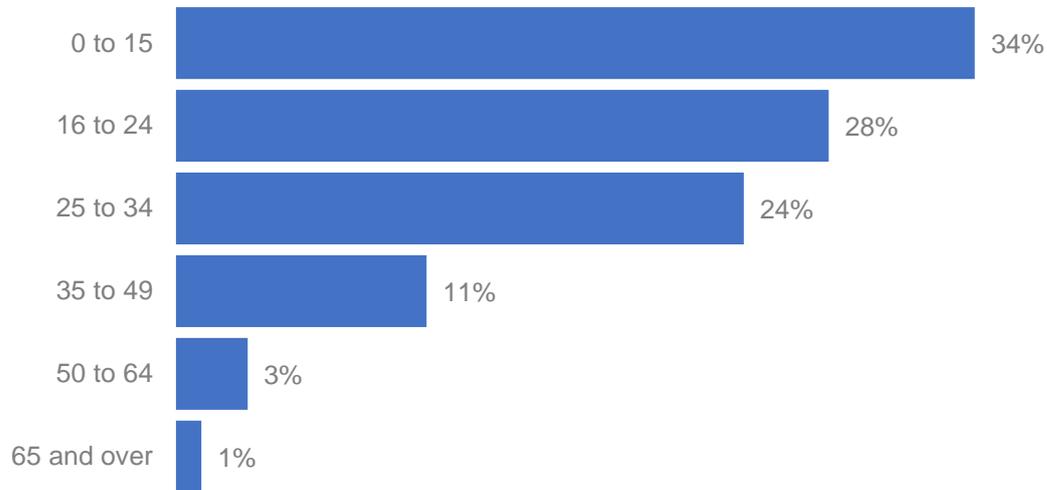
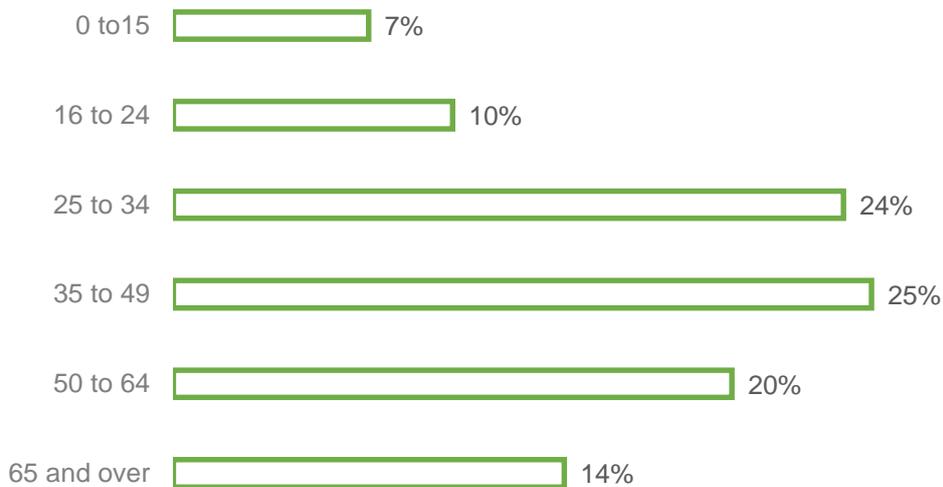


Figure eleven: Age of people born outside the UK in Brent⁵



Time lived in UK

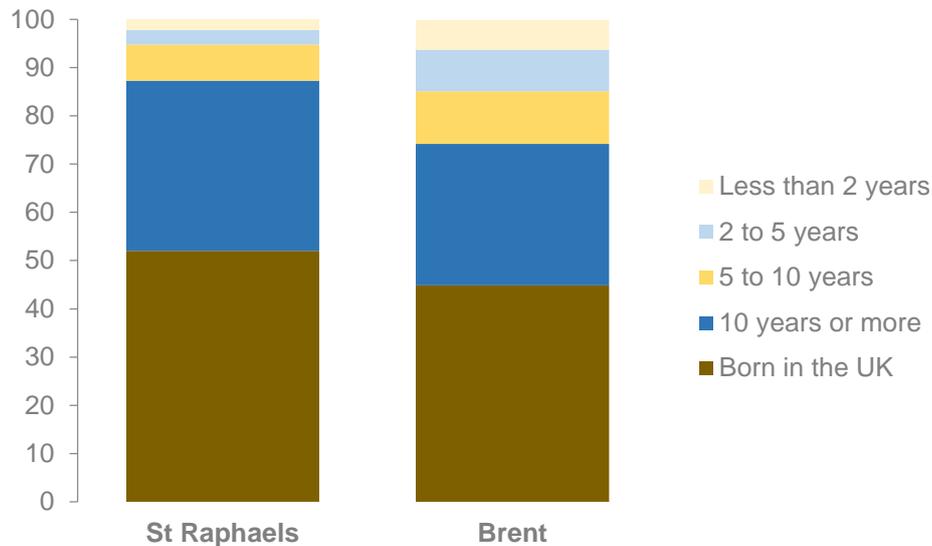
Over a third of St Raphael's residents born abroad had lived in the UK for over 10 years. This is higher than the Brent average of 29 percent. Only 2 percent had been in the UK for less than two years.

³ This information was taken from the 'Diversity in Brent Profile 2017'. This can be found at <https://intelligence.brent.gov.uk/Pages/DocumentDisplayView.aspx?ItemID=668>.

⁴ This information was taken from the 'Diversity in Brent Profile 2017'. This can be found at <https://intelligence.brent.gov.uk/Pages/DocumentDisplayView.aspx?ItemID=668>.

⁵ This information was taken from the London Datastore 'Country of Birth – Population Pyramid tool'. This can be found at <https://data.london.gov.uk/dataset/country-of-birth---population-pyramid-tool>.

Figure twelve: Length of time lived in the UK



Language

In Brent, 8.0 percent of residents cannot speak English. The percentage of people in St Raphael's that cannot speak English is lower at 6.8 percent. The percentage is the same for the working age population, and in numbers, 142 people do not speak English. After English, which is spoken as a main language by 81.5 percent of St Raphael's, the most spoken language is Gujarati (5.9 percent), followed by Arabic (3.7 percent). Similarly in Brent, Gujarati (8 percent) is the most spoken language, followed by Arabic (3 percent) and Polish (3 percent).⁶

Figure thirteen: Main languages spoken in St Raphael's

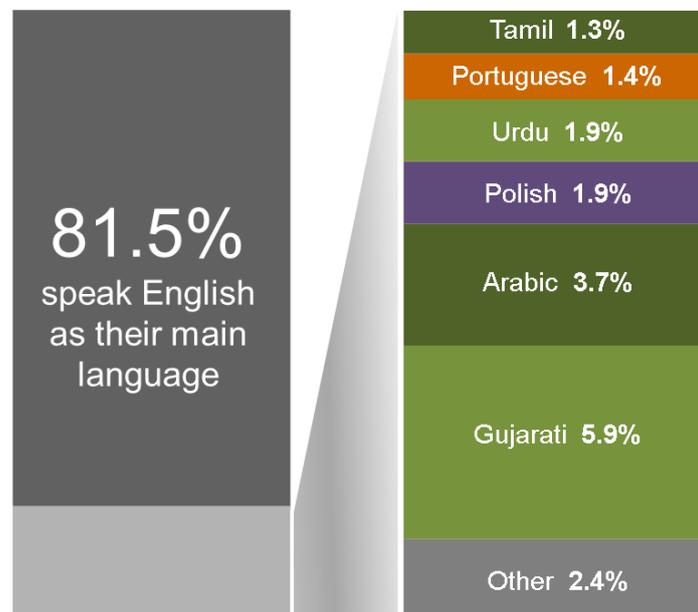
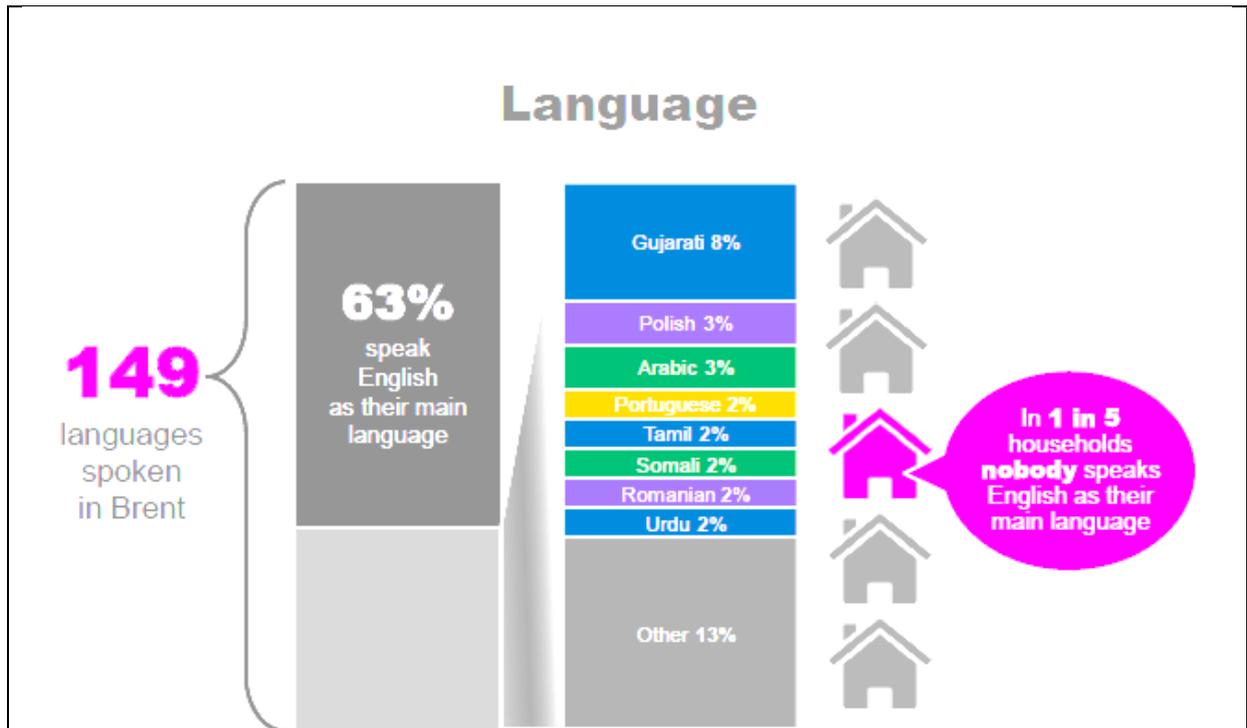


Figure fourteen: Main languages spoken in Brent⁷

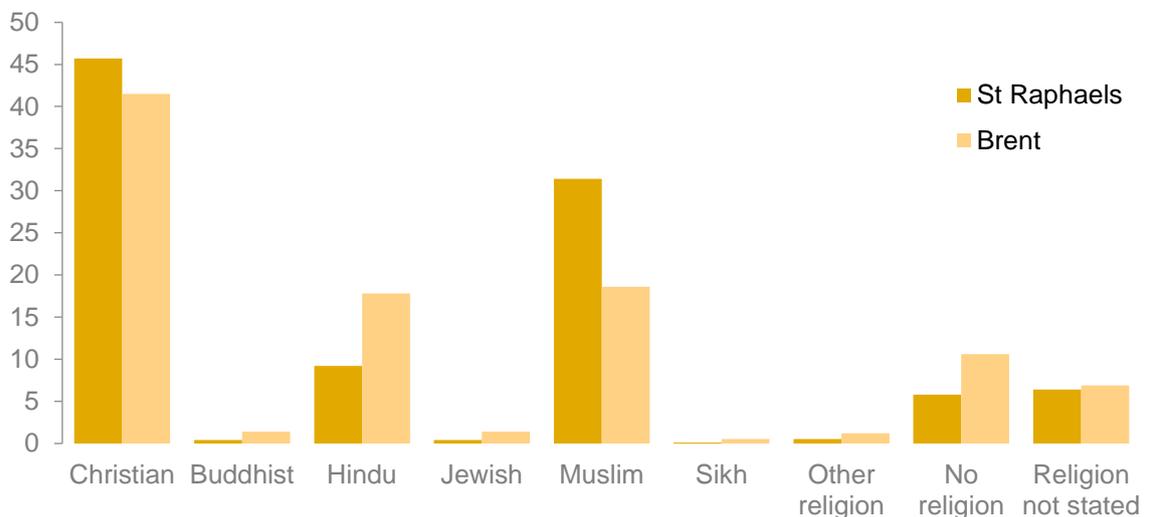
⁶ This information was taken from the 'Diversity in Brent Profile 2017'. This can be found at <https://intelligence.brent.gov.uk/Pages/DocumentDisplayView.aspx?ItemID=668>.

⁷ This information was taken from the 'Diversity in Brent Profile 2017'. This can be found at <https://intelligence.brent.gov.uk/Pages/DocumentDisplayView.aspx?ItemID=668>.



Religion

There is a higher proportion of Muslims and a slightly higher proportion of Christians in St Raphael's than in Brent. There are fewer Hindus and fewer people with no religion.



Household composition

There are 170 single parent households with dependent children on St Raphael's estate. As a proportion of households on the estate, this (16 percent) is almost twice as many as the proportion of single parent households in Brent (9 percent). The majority of these households (95 percent) in St Raphael's are headed up by single female parent, which is similar to the 94 percent of single females making up the single parent households in Brent.

Half (49 percent) of the single parents in St Raphael's do not work and a quarter (25 percent) work part-time, with the remaining quarter (26 percent) working full-time. Likewise for Brent, almost half (46 percent) of the single parent households are not working, a quarter (25 percent) of these parents work full-time, with the remaining (29 percent) working part-time.⁸

Figure fifteen: St Raphael's Single parents with dependent children working pattern

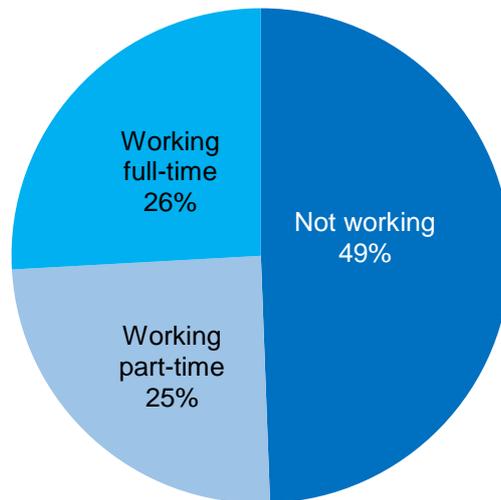
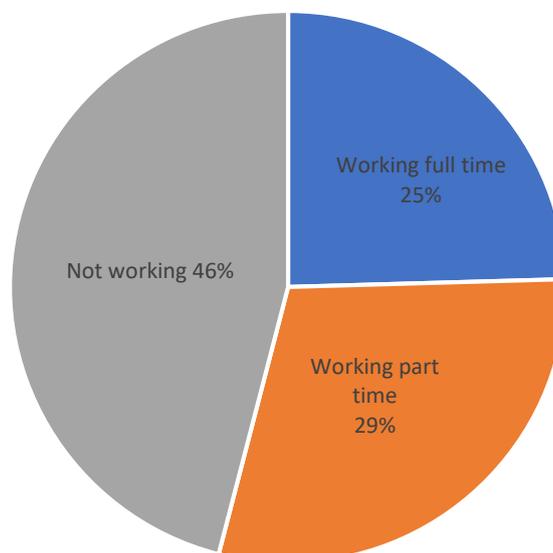


Figure sixteen: Brent's Single parents with dependent children working pattern⁹



Almost a third of the households in St Raphael's comprises of one couple families¹⁰. Of these families, 13 percent do not have children. There are 481 couple families with

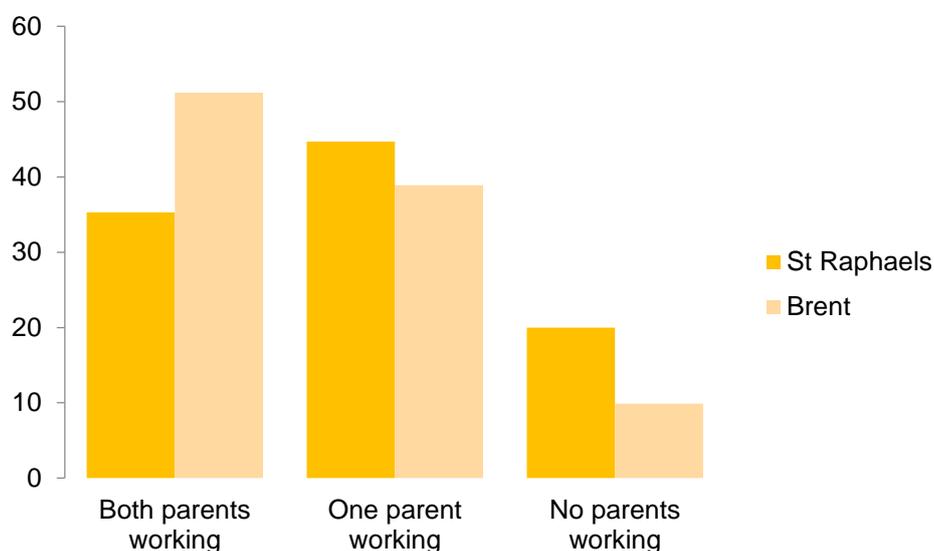
⁸ This information was taken from the '2001 to 2011 Census Borough Lone Parents Households with Dependent Children' report. This can be found at <https://intelligence.brent.gov.uk/Pages/DocumentDisplayView.aspx?ItemID=151>

⁹ This information was taken from the '2001 to 2011 Census Borough Lone Parents Households with Dependent Children' report. This can be found at <https://intelligence.brent.gov.uk/Pages/DocumentDisplayView.aspx?ItemID=151>

¹⁰ A couple here could be married, in a same sex civil partnership, or cohabiting

dependent children in St Raphael's. Of these 20.0 percent have no parents working, more than twice as many as Brent, 9.9 percent. There is a lower percentage of families with both parents working, 35 percent compared to 51 percent in Brent.

Figure seventeen: Families with children and employment status



There are 2,409 residents aged 16 and over on St Raphael's estate. Just over three quarters (76.5 percent) are economically inactive. Of the economically active (124 people), 79.8 percent are in employment and 20.2 percent are unemployed. This is a lower employment rate than for Brent (84.3 percent).

Table one: Employment by disability for St Raphael's and Brent

		In employment	Unemployed	Economically inactive
Activities limited a lot	St Raphael's	8.5	3.1	88.4
	Brent	13.2	2.4	84.5
Activities limited a little	St Raphael's	28.6	6.3	65.1
	Brent	32	6.1	61.9
Activities not limited	St Raphael's	56.5	12	31.6
	Brent	67.4	7.2	25.5

- For each "protected characteristic" provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state "not applicable".

AGE	
Details of impacts identified	The judgement to date on the potential impact of the policy or proposal on groups with each protected characteristic, both within and outside the red line masterplanning area, is based on the intention that housing, transport, environmental and community improvements, and development opportunities will on the whole have a positive impact, however until the options are developed this cannot

	<p>be analysed. Equality monitoring information will be examined for those in areas A, B and C and the needs of groups will be considered throughout the development of the options.</p> <p>We are aware that there are facilities for young people - nurseries and a children's centre on the St Raphael's estate, as well as the Phoenix Arch School. We also know that different age groups can require different facilities both in the community and within the home.</p> <p>We are aware of the feedback to date in regards to young people and the desire for facilities for young which will be fed into our work.</p> <p>We are aware that as at 2011 the population of children was above the Brent average</p> <p>We would seek to ensure that there is representational engagement throughout the process, and are doing this through the establishment of a Youth Engagement Forum, a group of young people who are organising engagement events targeted at young people.</p>
DISABILITY	
<p>Details of impacts identified</p>	<p>The judgement to date on the potential impact of the policy or proposal on groups with each protected characteristic, both within and outside the red line masterplanning area, is based on the intention that housing, transport, environmental and community improvements, and development opportunities will on the whole have a positive impact, however until the options are developed this cannot be analysed. Equality monitoring information will be examined for those in areas A, B and C and the needs of groups will be considered throughout the development of the options.</p> <p>We are aware that Phoenix Arch School is a special school for children aged 5 to 11. We are also aware that different facilities and the way in which individuals are able to carry out their day to day activities need to be considered for those who have disabilities.</p> <p>We would seek to ensure that there is representational engagement throughout the process.</p>
RACE	
<p>Details of impacts identified</p>	<p>The judgement to date on the potential impact of the policy or proposal on groups with each protected characteristic, both within and outside the red line masterplanning area, is based on the intention that housing, transport, environmental and community improvements, and development opportunities will on the whole have a positive impact, however until the options are developed this cannot be analysed. Equality monitoring information will be examined for those in areas A, B and C and the needs of groups will be considered throughout the development of the options.</p> <p>We would seek to ensure that there is representational engagement throughout the process, including considering how the ethnic profile</p>

	<p>changes based on age for some ethnicities. We will be mindful of communication in different languages and providing translation services for all key communications and at public events. To date this offer of translation of documents or meetings has not been taken up. We believe this is due to there being an English speaker/reader within the family.</p>
SEX	
Details of impacts identified	<p>The judgement to date on the potential impact of the policy or proposal on groups with each protected characteristic, both within and outside the red line masterplanning area, is based on the intention that housing, transport, environmental and community improvements, and development opportunities will on the whole have a positive impact, however until the options are developed this cannot be analysed. Equality monitoring information will be examined for those in areas A, B and C and the needs of groups will be considered throughout the development of the options.</p> <p>We would seek to ensure that there is representational engagement throughout the process</p>
SEXUAL ORIENTATION	
Details of impacts identified	<p>The judgement to date on the potential impact of the policy or proposal on groups with each protected characteristic, both within and outside the red line masterplanning area, is based on the intention that housing, transport, environmental and community improvements, and development opportunities will on the whole have a positive impact, however until the options are developed this cannot be analysed. Equality monitoring information will be examined for those in areas A, B and C and the needs of groups will be considered throughout the development of the options.</p> <p>We would seek to ensure that there is representational engagement throughout the process</p>
PREGNANCY AND MATERNITY	
Details of impacts identified	<p>The judgement to date on the potential impact of the policy or proposal on groups with each protected characteristic, both within and outside the red line masterplanning area, is based on the intention that housing, transport, environmental and community improvements, and development opportunities will on the whole have a positive impact, however until the options are developed this cannot be analysed. Equality monitoring information will be examined for those in areas A, B and C and the needs of groups will be considered throughout the development of the options.</p> <p>We would seek to ensure that there is representational engagement throughout the process</p>

	<p>We are aware that there are facilities - nurseries and a children's centre which may be used by those who are pregnant or on maternity leave, or require those facilities in order to return to work.</p>
RELIGION OR BELIEF	
Details of impacts identified	<p>The judgement to date on the potential impact of the policy or proposal on groups with each protected characteristic, both within and outside the red line masterplanning area, is based on the intention that housing, transport, environmental and community improvements, and development opportunities will on the whole have a positive impact, however until the options are developed this cannot be analysed. Equality monitoring information will be examined for those in areas A, B and C and the needs of groups will be considered throughout the development of the options.</p> <p>We would seek to ensure that there is representational engagement throughout the process</p> <p>There is St Patricks Church and we would seek to understand if there were any other religious establishments on St Raphael's. We will be mindful of the religious composition including in regards to when consultation events are held.</p>
GENDER REASSIGNMENT	
Details of impacts identified	<p>The judgement to date on the potential impact of the policy or proposal on groups with each protected characteristic, both within and outside the red line masterplanning area, is based on the intention that housing, transport, environmental and community improvements, and development opportunities will on the whole have a positive impact, however until the options are developed this cannot be analysed. Equality monitoring information will be examined for those in areas A, B and C and the needs of groups will be considered throughout the development of the options.</p> <p>We would seek to ensure that there is representational engagement throughout the process</p>
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	<p>The judgement to date on the potential impact of the policy or proposal on groups with each protected characteristic, both within and outside the red line masterplanning area, is based on the intention that housing, transport, environmental and community improvements, and development opportunities will on the whole have a positive impact, however until the options are developed this cannot be analysed. Equality monitoring information will be examined for those in areas A, B and C and the needs of groups will be considered throughout the development of the options.</p>

	We would seek to ensure that there is representational engagement throughout the process
--	--

3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

We are unable to assess the impact until the masterplan options have been developed.

4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

Equality monitoring forms are part of all event feedback forms which all residents attending events are asked to complete. To date 46 forms have been completed. In summary:

Tenancy: social tenant (22), Housing Association tenant (2), leaseholder (5), private owner (4), temporary resident (2)

Age: 19-24 (3), 25-34 (1), 35-44 (7), 45-60 (11), 61+ (13)

Gender: male (3), female (28), prefer not to say (0); has it changed yes(0), no (29), prefer not to say (0)

Ethnicity: white or white British (4), Asian or Asian British (5), mixed background (0), black African, Caribbean or black British (26), other (1)

Religious belief: no religion or belief (1), Muslim (8), Christian (23), Hindu (4), Jewish (0), other (0)

Disability: yes (8), no (24), prefer not to say (3)

Sexual orientation: straight (31), lesbian (0), gay (0), bisexual (0), prefer not to say (3)

We believe this is representative of the people who will be affected by the proposal, but engagement is ongoing and we will seek that this is representative of the people who will be affected.

5. Please detail any areas identified as requiring further data or detailed analysis.

Equality monitoring forms will be available for completion at all future engagement events to build on the information already gathered. These events will be advertised and open to all residents affected by this proposal (inside and outside the red line area).

The Housing Needs Assessment will be carried out in early 2020; this will provide detailed information for those residents affecting within the red line masterplanning area.

Once the masterplan options are developed, the above information will allow for a full EA to be carried out.

6. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

This is unknown at present

7. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

Equalities information will be collated throughout the engagement in order to ascertain whether there are particular groups that need to be considered in the development of engagement activities.

As we are developing the option we will continually review to see if we are representationally engaging with the community and reviewing how proposals impact on protected characteristics.

Once the masterplan options are agreed, the equalities impact will be assessed.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

Currently there are no masterplan options against which to assess any impact for any residents in Area B and C, or Area A. As such a full EA cannot be completed at this time as the masterplan options need to be developed through continued engagement with the local community needs to take place.

The options have an opportunity to have positive effects on all of the community, but it will be a key part of the process to ensure that there is robust engagement and that we review impacts of proposals on protected characteristics.

Socio-economic considerations are important as part of this work as will be a consideration of engagement with those individuals who do not speak English or English is not the main language

SECTION D – RESULT

Please select one of the following options. Mark with an "X".

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	X
----------	--	----------

B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	
C	CHANGE / ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
To have a full engagement and consultation process with tenants and the local community, that is representational	Final proposal meets the needs of the current and future community as far as possible. We ask as part of consultation processes for personal data in order to monitor if we are engaging representationally	Kathryn Eames (lead)	Ongoing to ballot
To continue to ensure the Resident Board membership is representative of the community as far as possible	That the engagement and communications process is designed to be accessible to all parts of the community, including those with protected characteristics.	PPCR independent advisors (lead)	Ongoing to ballot
To gather more background data to understand the composition of the estate and affected residents via a Housing Needs Assessment and through ongoing equalities monitoring at public events	To understand the composition of the community	Kathryn Eames (lead)	Ongoing to ballot

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Kathryn Eames
-----------------	---------------

REVIEWING OFFICER:	Natalie Gordon
HEAD OF SERVICE:	David Guy