

APPENDIX 4.

PART B – Equality Analysis Form

As a public authority we need to ensure that all our strategies, policies, service and functions, both current and proposed have given proper consideration to equality and diversity.

This form:

- Can be used to prompt discussions, ensure that due regard has been given and remove or minimise disadvantage for an individual or group with a protected characteristic
- Involves looking at what steps can be taken to advance and maximise equality as well as eliminate discrimination and negative consequences
- Should be completed before decisions are made, this will remove the need for remedial actions.

Note – An Initial Equality Screening Assessment (Part A) should be completed prior to this form.

When completing this form consider the Equality Act 2010 protected characteristics Age, Disability, Sex, Gender Reassignment, Race, Religion or Belief, Sexual Orientation, Civil Partnerships and Marriage, Pregnancy and Maternity and other socio-economic groups e.g. parents, single parents and guardians, carers, looked after children, unemployed and people on low incomes, ex-offenders, victims of domestic violence, homeless people etc. – see page 11 of Equality Screening and Analysis Guidance.

1. Title	
Equality Analysis title: Draft Housing Strategy 2025 – 2030	
Date of Equality Analysis (EA): 17 th February 2025	
Directorate: Adult Care, Housing & Public Health	Service area: Strategic Housing & Development Service, Housing Services
Lead Manager: Sarah Watts	Contact number: 01709 336476
Is this a:	
☒ Strategy / Policy ☐ Service / Function ☐ Other	
If other, please specify	

2. Names of those involved in the Equality Analysis (Should include minimum of three people) - see page 7 of Equality Screening and Analysis Guidance

Name	Organisation	Role (eg service user, managers, service specialist)
Sarah Watts	RMBC	Strategic Housing Manager
Daisy Wardle	RMBC	Strategic Housing Coordinator
Garry Newton	RMBC	Housing Development Intelligence Coordinator

3. What is already known? - see page 10 of Equality Screening and Analysis Guidance

Aim/Scope (who the Policy/Service affects and intended outcomes if known)

This may include a group/s identified by a protected characteristic, others groups or stakeholder/s e.g. service users, employees, partners, members, suppliers etc.)

Rotherham's 30-year Housing Strategy was published in December 2012 and set out our long-term vision for housing in the borough until 2043:

- People living in high quality homes
- Rotherham Council being the best housing provider in the country
- Reducing the gap between the most and least deprived neighbourhoods, so that everyone can live in safe, healthy and vibrant communities
- Households living in energy efficient homes
- A revitalised town centre with a new urban community

The Housing Strategy is refreshed every three to five years, to ensure it remains up to date and addresses the most recent challenges and opportunities and references the latest statistical evidence. The next refresh is due to be published in 2025.

The Strategy sets out the Council's priorities and ambitions for housing across the Borough with the primary aim to increase housing supply and reduce any barriers residents face in accessing safe and secure housing that is suitable for their needs.

What equality information is available? (Include any engagement undertaken)

There is a range of housing data available that is used by all housing service areas, including information captured from our tenants and data regarding the wider population. Protected characteristic information is collected by the council in order to fairly allocate homes. Some groups with protected characteristics are more likely to need affordable housing, for example those with physical disabilities. BAME groups are more likely to live in poorer quality, private rented properties and are more likely to live in overcrowded properties. Single parents and older people are more likely to live in fuel poverty. The Housing Strategy seeks to address these issues by increasing the supply of accessible

housing, improving low-quality housing in the private rented sector and reducing fuel poverty. The following list comprises of sources of equality information:

- Strategic Housing Market Assessment (SHMA) - The SHMA identified a widening problem of housing that is inadequate to meet the needs of a range of specific population groups. The SHMA considers the housing requirements of specific households - those containing people with disabilities or long-term limiting illnesses, those containing BME residents, and households containing older people, with separate studies assessing the needs of other groups. This points to the need to ensure that policies and plans going forward considers the need for improvements, repairs and adaptations to the existing stock, the provision of space for those mobility and caring needs, and properties of the appropriate size and quality to address the concerns of BME households and older people whose needs are less well served by the general needs housing system.
- Area Housing Profiles – these ensure that council homes are prioritised in areas of the borough with highest demand.
- Joint Strategic Needs Assessment / Rotherham Data Hub – this contains data on the local population, including age, disabilities, gender orientation, religion and ethnicity. Datasets on homelessness and fuel poverty can help identify trends and specific areas to target intervention. Neighbourhood level rates of fuel poverty range from 5.1% to 52.4% across the Borough, with an average rate in Rotherham of 16.6%. In 2023-24, 1,444 households were assessed as owed a homelessness prevention or relief duty by the Council. Of these, over 32% of households had dependent children. 42% were single men, more than double the number of single women. 10.8% had physical ill health or disability and 22.2% had mental health problems. 12.1% were in full time employment and 6.8% in part-time work.
- Indices of Multiple Deprivation – although no LSOA in Rotherham is ranked in the most deprived decile for access to housing, the IMD 2019 shows that 57,560 Rotherham residents (22%) live in areas within the most deprived 10% of England overall. Therefore the provision of affordable housing is needed for a large number of Rotherham residents.
- RMBC Housing Register – the Housing Register captures all protected characteristic data of those registering to bid on council homes. Council homes are allocated on a priority need basis, which includes allocating some homes based on the age and disability protected characteristics. If the resident's current house is unsuitable for their medical needs, the resident will receive a priority. Some council homes, e.g. bungalows are restricted for bids from over 55s.
- Intelligence from partners e.g. registered providers – this will ensure that we work with housing associations to ensure that we are delivering affordable homes across the Borough.
- We maintain a profile of existing council tenants, from data in the Northgate data management system:
 - 27.8% of tenants have a disability
 - 35.2% of tenants are Christian, 2.5% Muslim, and less than 0.1% Buddhist, Hindu, Jewish or Sikh. 34.2% of tenants have no religious faith. 23.4% of tenants are listed as faith unknown.
 - 74.5% of tenants are heterosexual or straight, 0.9% lesbian or gay, 0.5% bisexual, 20.3% unknown.

- 85.3% of tenants are white, 2.3% Asian or Asian British, 1.7% Black African, Caribbean or Black British and 0.5% mixed or multiple ethnic groups. • Census 2021 - Local population demographic data is available to identify housing need, which considers protected characteristics groups. - Almost a fifth of the population is over 65 years old (19.6%). The population of Rotherham is ageing which increases the need for older persons' housing, extra care and supported housing. - 21.3% of people in Rotherham identify as disabled, where daily activities are limited a little or a lot, compared to a national level of 17.7%. Adaptations to existing properties to enable residents to live in their homes comfortably and for longer, as well as building new homes that are accessible, remains a key priority. - 28% of households in Rotherham have dependent children; almost a fifth of the population is under 16 years old (18.9%). Along with high levels of demand for larger council homes, increasing the number of family homes remains a priority, • Information received directly from other Council services identifying demand e.g. Adult Social Care, Children's Services reflects the data in the Census and the need to build more homes with specialist need. • The Strategic Housing and Development Service work closely with partners via the Strategic Housing Forum who represent different groups e.g. homelessness, young people etc to ensure data and intelligence remains up to date.	
Are there any gaps in the information that you are aware of? The Housing Service aim to improve the data held about tenants and address any gaps as part of preparation for the Housing Inspection.	
What monitoring arrangements have you made to monitor the impact of the policy or service on communities/groups according to their protected characteristics? An action plan will be created to accompany the Strategy, and annual updates will be provided to the Strategic Housing Forum and Improving Places Select Commission. Partnership is key to the delivery of the strategy so a joint monitoring approach will keep the Council and agencies accountable. The Strategy intends to be the overarching plan from which other strategies and frameworks will disseminate work in more detail. Each strategy/framework will be subject to its own monitoring arrangements. The key document to ensure housing is accessible will be through the Housing Allocations Policy which is subject to review and scrutiny. Surveys will be carried out with the occupants of new Council homes and homes for shared ownership, and equality and diversity results analysed. This will allow the Council to understand whether any protected characteristic groups are over or under-represented in new build homes and take appropriate action if required.	
Engagement undertaken with customers. (date and group(s) consulted and key findings)	The following activities took place during the twelve-week consultation period between 19th August 2024 and 11th November 2024:

	• Online survey via RMBC website, running between 19th August and 11th November 2024. • The survey was promoted via social media, council and stakeholder bulletins and a press release issued. • Rotherham Show – Housing Strategy tent – September 2024 • Rother Fed network; shared via all resident and tenant newsletters and groups • Press release (subsequent article in the Rotherham Advertiser) • Attendance at the Housing Involvement Panel - October 2024 and January 2024 • Attendance and presentation at the Tenant - Open Day October 2024 • Employment Solutions event – Housing Strategy stall – October 2024 A full consultation summary has been produced to include both resident, stakeholder and staff feedback and was shared at: • Presentation at the Strategic Housing Forum - January 2025 • Presentation at the Health and Wellbeing Board - January 2025 • Focus Group with residents – January 2025 Key findings: • Feedback was supportive of the Council's existing housing priorities from the 2022-25 Housing Strategy. 'Affordable housing to meet local need' was consistency the number one priority in survey responses and when talking with residents. • Affordability is a major concern, not just in terms of housing costs (mortgage, rent) but also in terms of fuel poverty and overall cost of living. A number of responses to the survey and people that we spoke to were concerned about their children and grandchildren's chances of getting on the property ladder or getting a council home to rent due to affordability issues and housing costs.
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	• Many respondents also talked about empty homes in relation to addressing homelessness and bringing homes back into use as affordable housing. • Respondents were concerned about anti-social behaviour in their neighbourhoods. • There was concern that renters from private landlords did not have the same voice and rights as social tenants
Engagement undertaken with staff (date and group(s) consulted and key findings)	• Housing Service-wide events at Rockingham to outline priorities and action plan • Housing officer working group with representatives from each Housing service • Promotion of online survey in internal emails • Presentations at ACHPH, CYPS, R&E and People and Policy DLTs Staff sessions were well attended, and the key priorities were supported.

4. The Analysis - of the actual or likely effect of the Policy or Service (Identify by protected characteristics)

How does the Policy/Service meet the needs of different communities and groups? (Protected characteristics of Age, Disability, Sex, Gender Reassignment, Race, Religion or Belief, Sexual Orientation, Civil Partnerships and Marriage, Pregnancy and Maternity) - see glossary on page 14 of the Equality Screening and Analysis Guidance)

Age

Young people at risk of Homelessness – this will be addressed through the Homelessness and Rough Sleeper Strategy but by increasing the supply of homes and investment in existing homes through the strategy, there should be increased opportunities for young people to access the homes that they need.

Younger people are less likely to have savings and or the income required for home ownership. The provision of social rent and affordable home ownership products such as shared ownership are important and are outlined in the Strategy.

Care leavers – there are already projects which support care leavers into the right homes, and these are regularly monitored through housing service plans. Also, by increasing supply and investing in existing homes, there should be increased opportunities for young people to access the homes that they need.

Older people - by increasing the supply of homes and investment in existing homes through the strategy, there should be increased opportunities for older people to access

the homes that they need. There is also a dedicated section in the strategy which considers how housing can support people to live independently with the right support.

Disability

People with a disability or health condition – health can determine the type of home an individual needs. By increasing the supply of homes and adapting existing homes, there should be increased opportunities for people who have health conditions to access the homes that they need. The strategy recognises the increasing need for the right types of homes to help people to live well.

Poor stock condition, including damp and mould and excess cold, can have a negative impact on health outcomes, in particular for those with existing respiratory illness e.g. asthma. The Strategy aims to deliver support for residents with poor quality housing.

Race

Housing need data is monitored to ensure barriers to accessing housing are reduced. It is recognised that some minority ethnic communities may have an increased need for larger family accommodation, and this is being addressed through the strategy as we seek to increase the number of larger homes available across the borough.

Gypsy and traveller accommodation – Allocation is made based on the Local Plan (planning process) as and when a proposal for accommodation is submitted.

There are no known specific property requirements for the below protected characteristics;

- sex
- pregnancy and maternity
- gender reassignment
- sexual orientation
- civil partnerships and marriage

There is also evidence to suggest that a higher proportion of people with disabilities will be reliant on welfare benefits and therefore more likely to require access to affordable housing and support. The Strategy's aim is to increase overall housing supply and in turn bring forward more affordable housing to assist such groups in reducing their overall housing costs.

Although, not protected characteristics as such, recognition has also been given to other groups of people who may have specific housing needs or who have difficulty accessing the right accommodation, including;

- families where a member gives or needs full time care, foster care
- armed forces and veterans.
- a person/family fleeing domestic abuse

The Strategy team will develop a better understanding of such groups and plan how best to assist in terms of policy and procedure review.

Does your Policy/Service present any problems or barriers to communities or Groups?

The Strategy aims to remove barriers and have a positive impact to communities and those with protected characteristics.

Does the Service/Policy provide any positive impact/s including improvements or remove barriers?

The Strategy makes a commitment to providing housing that is accessible to people with a specific housing need – this includes people with a disability, people who are vulnerable because of health issues and those who are disadvantaged because of current housing market conditions such as first-time buyers, young people, older people and people in receipt of benefits and affected by welfare reform.

What affect will the Policy/Service have on community relations? (may also need to consider activity which may be perceived as benefiting one group at the expense of another)

The introduction of new housing and additional support services will provide a level of regeneration in communities. The Strategy is closely aligned with various other strategies including;

- Thriving Neighbourhoods Strategy
- Health and Wellbeing Strategy
- Homelessness and Rough Sleeper Prevention Strategy
- The Housing Allocations Policy

Each of these strategies and policies will be subject to an individual Equality Analysis.

One of the priorities of the refreshed strategy is “Ensuring that our neighbourhoods are safe, happy and thriving” which considers the wider impact of housing development, to ensure that we maximise the economic, social, and environmental benefits. Each new development has the potential to bring community benefits such as employment and training opportunities, and local projects. Some of the benefits are agreed during the planning process. Then ward plans are used to influence where the social currency of contracts is spent at a more local level.

No negative impacts have been identified.

Please list any **actions and targets** that need to be taken as a consequence of this assessment on the action plan below and ensure that they are added into your service plan for monitoring purposes – see page 12 of the Equality Screening and Analysis Guidance.

5. Summary of findings and Equality Analysis Action Plan

If the analysis is done at the right time, i.e. early before decisions are made, changes should be built in before the policy or change is signed off. This will remove the need for remedial actions. Where this is achieved, the only action required will be to monitor the impact of the policy/service/change on communities or groups according to their protected characteristic - See page 11 of the Equality Screening and Analysis guidance

Title of analysis: Draft Housing Strategy 2025 – 2030
Directorate and service area: Adult Care, Housing & Public Health
Lead Manager: Sarah Watts
Summary of findings:
No negative impacts have been identified/are anticipated.

Action/Target	State Protected Characteristics as listed below	Target date (MM/YY)
Analysis of all new developments, to understand the impact of development of those with protected characteristics: - Carry out completion reports at the end of each project - Satisfaction survey to all new residents	ALL	After each housing development
Continue to understand the housing needs of different groups, including those with protected characteristics: - update of housing profiles - update housing need tracker - Tenant profiling - Waiting list analysis	ALL	Annually

Scope and conduct a housing needs survey e.g. Strategic Housing Market Assessment	ALL	12/27
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*A = Age, D= Disability, S = Sex, GR Gender Reassignment, RE= Race/ Ethnicity, RoB= Religion or Belief, SO= Sexual Orientation, PM= Pregnancy/Maternity, CPM = Civil Partnership or Marriage. C= Carers, O= other groups

6. Governance, ownership and approval

Please state those that have approved the Equality Analysis. Approval should be obtained by the Director and approval sought from DLT and the relevant Cabinet Member.

Name	Job title	Date
James Clark	Assistant Director of Housing	
Cllr Allen	Cabinet Member for Housing	

7. Publishing

The Equality Analysis will act as evidence that due regard to equality and diversity has been given.

If this Equality Analysis relates to a **Cabinet, key delegated officer decision, Council, other committee or a significant operational decision** a copy of the completed document should be attached as an appendix and published alongside the relevant report.

A copy should also be sent to equality@rotherham.gov.uk For record keeping purposes it will be kept on file and also published on the Council's Equality and Diversity Internet page.

Date Equality Analysis completed	27/02/25
Report title and date	Draft Housing Strategy 2025 – 2030 / September 2025
Date report sent for publication	September 2025
Date Equality Analysis sent to Performance, Intelligence and Improvement equality@rotherham.gov.uk	28/02/25