

Appendix 3 – EIA Form

Equality Impact Assessment

The purpose of an assessment is to understand the impact of the Council's activities* on people from protected groups and to assess whether unlawful discrimination may occur. It also helps to identify key equality issues and highlight opportunities to promote equality across the Council and the community. The assessment should be carried out during the initial stages of the planning process so that any findings can be incorporated into the final proposals and, where appropriate, have a bearing on the outcome.

(*Activity can mean strategy, practice, function, policy, procedure, decision, project or service)

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| Name of person completing the assessment | Sean Grady | Date of assessment | 09.03.2023 |
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| Name of the proposed activity being assessed | HMO related data collection & analysis | Is this a new or existing activity? | New |
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| Who will implement the activity and who will be responsible for it? | Sean Grady |
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1. Determining the relevance to equality

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| What are the aims, objectives and purpose of the activity? | To analyse data and identify if further house in multiple occupation (HMO) controls are required in GBC. |
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| Is this a major activity that significantly affects how services or | Yes | Who will benefit from this activity and how? | The public, the report presents the argument that planning policy |
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| functions are delivered? | | | may need to consider extra ways (Article 4) to control HMO densification in 4x streets. <u>This report does not introduce any HMO controls.</u> |
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| Does it relate to a function that has been identified as being important to people with particular protected characteristics? | Yes, People with protected characteristics reside in HMOs. | Who are the stakeholders? Does the activity affect employees, service users or the wider community? | Council, Landlords, Residents/community, Letting Agents, employees & resourcing |
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Based on the above information, is the activity relevant to equality?

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| <p>Yes – continue to section 2</p> <p>No – please record your reasons why the activity is not relevant to equality</p> | <p>Yes – HMOs are occupied by all parts of society. HMOs often provide affordable housing for some of the most marginalised groups and individuals.</p> |
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2. Is the proposed activity accessible for all the protected groups listed below?
(Consider in what ways the activity might create difficulties or barriers to parts of the workforce, community or protected groups. How might one or more groups be excluded because of the activity?)

| Protected groups | Yes | No | Evidence |
|--------------------------------|-----|----|-----------------|
| Disability | x | | Reduced housing |
| Race | x | | Reduced housing |
| Gender | x | | Reduced housing |
| Sexual orientation | | x | N/A |
| Age | x | | Reduced housing |
| Religion or belief | | x | N/A |
| Transgender or transsexual | | x | N/A |
| Marriage and civil partnership | | x | N/A |
| Pregnancy or maternity | | x | N/A |

3. Is it likely the proposed activity will have a negative impact on one or more protected groups?

| Protected groups | Yes | No | Evidence |
|------------------|-----|----|---|
| Disability | x | | <p>HMOs can be an important source of specialist housing for co-living adults with physical or mental impairments. There may also be a link between disability and income: Poverty and disability - GSDRC</p> <p>Reducing the number of HMOs that can be created in specific locations, may negatively impact upon this protected characteristic in terms of an</p> |

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| | | | <p>ability to find affordable housing. However, the proposed 4x streets (the area) covered by the recommendation of the Direction is very small compared to the size of the city as a whole, therefore it is considered any negative impact will be low.</p> |
| Race | x | | <p>Race and ethnicity (including Gypsies and Travellers; migrant workers; asylum seekers). HMOs are a source of affordable housing for households on low incomes and there may be a relationship between income and race/ethnicity across the Country and in Guildford - Persistent low income - GOV.UK Ethnicity facts and figures (ethnicity-facts-figures.service.gov.uk). Reducing the number of HMOs that can be created in specific locations, may negatively impact upon this protected characteristic in terms of an ability to find affordable housing. However, the proposed 4x streets (the area) covered by the recommendation of the Direction is very small compared to the size of the city as a whole, therefore it is considered any negative impact will be low.</p> |
| Gender | x | | <p>HMOs can be an important source of specialist housing for women requiring respite and safety from domestic abuse. Reducing the number of HMOs that can be created in specific locations, may negatively impact upon this protected characteristic in terms of an ability to find affordable housing. However, the proposed 4x streets (the area) covered by the recommendation of the Direction is very small compared</p> |

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| | | | to the size of the city as a whole, therefore it is considered any negative impact will be low. |
| Sexual orientation | | x | The recommendation for Article 4 Direction in 4x streets is not expected to impact this protected characteristic. |
| Age | x | | HMOs are often occupied by young-professionals and students. At least 50% of the HMOs in GBC are occupied by students. Reducing the number of HMOs that can be created in specific locations, may negatively impact upon this protected characteristic in terms of an ability to find affordable housing. However, the proposed 4x streets (the area) covered by the recommendation of the Direction is very small compared to the size of the city as a whole, therefore it is considered any negative impact will be low. |
| Religion or belief | | x | The recommendation for Article 4 Direction in 4x streets is not expected to impact this protected characteristic. |
| Transgender or transsexual | | x | The recommendation for Article 4 Direction in 4x streets is not expected to impact this protected characteristic. |
| Marriage and civil partnership | | x | The recommendation for Article 4 Direction in 4x streets is not expected to impact this protected characteristic. |
| Pregnancy or maternity | | x | The recommendation for Article 4 Direction in 4x streets is not expected to impact this protected characteristic. |

4. What action can be taken to address any negative impact? What measures could be included to promote a positive impact? *(Consider whether it is possible to amend or change the activity due to the likely adverse impact whilst still delivering the objective. Is it possible to consider a different activity which still achieves the aims but avoids an*

adverse impact? Is an action plan required to reduce any actual or potential adverse impact?)

5. What are the main sources of evidence that have been used to identify the likely impacts on the different protected groups? (*Use relevant quantitative and qualitative information that is available from sources such as previous EIA's, engagement with staff and service users, equality monitoring, complaints, comments, customer equality profiles, feedback, issues raised at previous consultations and known inequalities*).

The literature base on the protected characteristics Vs income ie: ability to find housing (as seen in the links). Previous HMO committee reports. Known national housing/HMO related inequalities from HMO/housing literature base.

6. Has any consultation been carried out (e.g. with employees, service users or the wider community)? Please provide details NO

7. Is further consultation required as a result of any negative impact identified? If so, what groups do you intend to engage with and how?

As per point 6.

8. Conclusion of Equality Impact Assessment - please summarise your findings

This report does not directly require a decision or introduce anything.