

## Appendix 3 – Housing Strategy Equality Impact Assessment

# Equality Impact Assessment Tool - Introduction

This Equality Impact Assessment tool aims to help you to consider and record how equality issues relate to your policies, projects, services, strategies or functions. It is easy to complete and will help you to understand which communities of identity will be affected by your proposals and how. The tool will help you to:

1. Assess whether a policy, project, service redesign or strategy is relevant to our equality duties and / or different groups in Manchester
2. Identify what the potential impacts of the activity will be for different communities
3. Highlight what actions could be taken to mitigate any negative impacts that you identify

The Equality, Diversity and Inclusion Team – (we give equality advice, guidance and support to all Council Teams)

Role	Contact Details
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# Equality Impact Assessment

## 1. Tell us about your service

My Directorate	Growth & Development
My Service	Housing & Residential Growth
My team / section	Strategic Housing
The name of the function being analysed	Manchester Housing Strategy (2022-2032)
Who is completing the assessment?	Henry Tomsett / Haydn Brown
Who is the lead manager for the assessment?	Nick Cole

## 2. Tell us about the activity that you're analysing

Briefly describe the main aims and objectives of your policy, project, service redesign or strategy, including outlining at a high level if it has implications for other areas of the Council's work and priorities.

The Manchester Housing Strategy (2022-2032) explains the role of housing in the context of the Our Manchester Strategy, it's contribution to the economic recovery of the city and our ambitions towards zero carbon. This strategy sets out our long-term vision to deliver the homes that people want and need. It is built around the following four vision principles:

1. Increase affordable housing supply & build more new homes for all residents
2. Work to end homelessness and ensure housing is affordable & accessible to all
3. Address inequalities & create neighbourhoods where people want to live
4. Address the sustainability & zero carbon challenges in new and existing housing

It is relevant to note that the second principle directly responds to the major challenge of meeting the urgent housing needs of at risk groups in Manchester. The third principle in particular responds to the fact that housing inequality is directly related to the disadvantages suffered by individuals or groups in Manchester because of their characteristics.

Whilst this document sets the vision for housing in Manchester and articulates what we need to do to get there, it is only one element of the full suite of strategies (internal and external) which will deliver on our ambitions. In particular it is important to recognise the role of the forthcoming Enabling Independence Accommodation Strategy which will set out our aspirations around improving care and support at home. In doing so it will increase the supply of housing that meets the needs of people with disabilities and those with a wide range of care and support requirements.

Similarly, the document is clear that this strategy cannot be delivered by the Council working in isolation and success will require working collaboratively with public sector organisations at both the local and national level alongside private sector partners.

A delivery plan will follow this strategy. The delivery plan actions will set out a clear blueprint for how we will realise this strategy's vision and fulfil the commitments that have been set out.

**TIP:** briefly summarise the key points and keep your answer under 500 words.

**TIP:** try not to duplicate information that's available elsewhere; you can easily use this space to signpost to other sources of background information instead of rewriting them here.

### 3. Analysing the impact on equality

Will the policy, strategy, project, service redesign being assessed here... (Tick all that apply):

Remove or minimise disadvantages suffered by individuals or groups because of their characteristics	a
Meet the needs of people from protected or disadvantaged groups where these are different from the needs of other people	a
Promote diversity and encourage people from protected or disadvantaged groups to participate in activities where they are underrepresented	

Describe how you've reached your conclusion and what evidence it's based on (500 words max).

The Housing Strategy has been developed with an acknowledgement that housing inequality in Manchester is directly related to the disadvantages suffered by some individuals or groups because of their characteristics and that this remains a significant issue in the city. These issues were brought to the fore during the pandemic when analysis at the time showed that Manchester residents in older, poorer quality private rented stock were amongst those at the highest risk of infection. Manchester's lowest income households concentrated in the North and East of the city, particularly those dependent on benefits and / or insecure work are disproportionately represented in this sector. This includes a significant number of our black and ethnic minority residents, some of whom have been amongst the hardest hit.

These disadvantages were comprehensively evidenced in the Marmot Report 'Build Back Fairer in Greater Manchester: Health Equity and Dignified Lives' which summarised that:

- Poor quality and overcrowded housing is harmful to health and widens health inequalities.
- Housing conditions in the PRS had deteriorated before the pandemic.
- Housing costs were increasing before the pandemic.
- Young people and those from ethnic minorities are more likely to rent from the private sector.
- Lockdowns resulted in an increased exposure to unhealthy and overcrowded housing conditions which have added to the stress of living in poor quality housing.
- In the aftermath of the pandemic, it is likely that the quality of some poorly managed private rented sector houses will continue to deteriorate.
- Homelessness is a larger problem than rough sleeping and includes those living in temporary accommodation. There currently is not enough affordable accommodation available for people on the Housing Register.
- Poor quality and unaffordable housing remains a critical health equity issue in Manchester.

On the basis of this evidence elements of the new Housing Strategy has been drafted to explicitly address housing inequalities suffered by individuals or groups because of their characteristics. Key to this will be leveraging the city's evidence base (including data from Manchester Move, Council Tax data, housing market analytics and data and intel on our residents and communities) to ensure that we are building the right homes in the right places to meet the needs of all groups and individuals. However, the strategy also recognises that addressing inequalities and creating neighbourhoods is not just about buildings homes. It is about place-making and working closely with local groups to recognise community heritage will be integral to this. It is also about improving the

quality and the management of the homes we already have – particularly in the private rented sector where housing inequality is most acute.

In addition to this the strategy, along with the accompanying Enabling Independence Accommodation Strategy (EIAS), aims to directly meet the needs of people from protected or disadvantaged groups where these are different from the needs of other people by increasing the supply of suitable accommodation. Fundamental to achieving this is understanding the nature and scale of the different needs of our residents so that we can respond to that demand. This process has been begun via both strategies by working with commissioners and trusted providers (utilising the extensive data and evidence they hold) to understand demand. We have also sought to understand the needs of people from protected or disadvantaged groups, where these are different from the needs of other people, via the extensive consultation exercise which has accompanied the development of both documents.

Considering which group/s you have identified the policy, project, strategy or service redesign as being relevant to, complete the table below. Be brief with your answers and only complete them for the group/s relevant to your activity.

	<b>1. What is the impact of your proposal on this group?</b>	<b>2. What evidence have you used to reach this assessment?</b>	<b>3. What actions could be taken to address the impacts?</b>
<b>Age (older people)</b>	<p>The Housing Strategy (and its partner Enabling Independence Accommodation Strategy) aim to enable older people to live as independently as possible within their community via care and support at home services, supported, supported housing and appropriate move on accommodation.</p>	<p>Manchester has been working on a long-term of programme of change in Adult Social care focused on maximising independence – Better Outcomes, Better Lives.</p> <p>This has informed the Housing Strategy (and the associated Enabling Independence Accommodation Strategy) alongside information from commissioners and trusted partners.</p>	<p>A key action identified in the strategy will be ensuring that we continue to develop our extra care and specialist older peoples housing offer.</p> <p>More broadly than that the strategy commits us to diversifying the older people’s housing offer – including in the city centre – so that there is the right home at the right time when people are ready to move.</p>

<p><b>Age (children and young people)</b></p>	<p>There are increased risks to the physical and mental health of children which arise from poor housing conditions. This negatively impacts upon the development and educational achievement of our young people.</p> <p>The Housing Strategy seeks to address this issue where it arises in the city.</p>	<p>The negative impacts of poor housing on children and young people are very clearly highlighted and evidenced in a recent study by the Building Research Establishment – “The Cost of Poor Housing in England” (2021).</p> <p>We also know through work on the Family Poverty Strategy and the more recent Build Back Fairer Marmot Review, that poor quality and overcrowded housing is harmful to health and widens inequalities for residents.</p> <p>Larger families represent the biggest cohort in Priority Bands on the Housing Register with many spending significant periods of time waiting for a suitable property.</p> <p>Young people are more likely to rent from the private sector where housing conditions are more likely to be low quality</p> <p>Higher levels of children in care means we need more supported and move on housing for care leavers.</p>	<p>The Private Rented Sector Strategy seeks to address poor quality management and housing condition in rented properties, predominately in the older terraced stock in the north, east and central areas of the city. It is these locations where the relationship between poor housing and health outcomes is most acute.</p> <p>Selective Licensing and HMO Licensing Schemes are assisting landlords to meet their individual responsibilities to tenants and improve housing conditions</p> <p>One of the key ambitions of the Housing Strategy is to increase the delivery of affordable family houses by over 3,000 by 2032 to meet demand from the housing register and address overcrowding in areas where average household sizes are the highest</p> <p>RP partners have developed both permanent and short term supported housing models for care leavers – however current commissioning strategies can make bringing forward such housing challenging. Something we will</p>
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			address over the lifetime of the strategy
<b>Disability</b>	<p>Suitable homes for some of our most at risk residents, including those with disabilities, have been in very short supply.</p> <p>This strategy seeks to increase the supply of suitable accommodation to meet demand from disabled residents.</p>	<p>Manchester is working on a long-term of programme of change in Adult Social care focused on maximising independence – Better Outcomes, Better Lives. This has informed the Housing Strategy.</p> <p>We also know from growing numbers of inquiries from residents and Councillors that there are many disabled people living in the private rented sector in poor quality accommodation, unable to either get the adaptations they need to continue living in that property (because landlords refuse them) or move to an alternative suitable accommodation (because there isn't one available)</p>	<p>We will find more housing solutions for disabled households and families who are currently living in inappropriate homes.</p> <p>The Housing Strategy and EIAS commits us to strengthening the development of supported housing options for younger adults and wider move-on and independent living options for those who need our support.</p> <p>We are also committing to remodelling our homecare and adaptations services to overcome some of the barriers disabled people are facing when it comes to continuing to live in their existing homes. There will be a focus on doing things earlier and better.</p>



<p><b>Race</b></p>	<p>Housing inequality in Manchester is directly related to the disadvantages suffered by some individuals or groups because of their characteristics (including race).</p> <p>This inequality remains a significant issue in the city and something the Housing Strategy seeks to address directly.</p>	<p>Marmot’s Build Back Fairer Report for GM highlights how levels of social, environmental and economic inequalities in society are damaging health and wellbeing, how those disadvantages have been exposed and magnified by the COVID-19 pandemic and how closely they are connected to housing inequalities.</p> <p>Ethnic minority residents are more likely to rent from the private sector where housing conditions are more likely to be low quality</p> <p>Black and Asian residents on the Housing Register, generally require larger family housing, which remains severely undersupplied. This is leading to overcrowding and other housing issues for those residents.</p>	<p>Addressing overcrowding and bringing forward housing which better meets the needs of Manchester’s diverse communities will be required to meet the identified challenges and address ingrained inequalities, poverty and polarisation in the city. This is one of the priorities of the new Housing Strategy.</p> <p>This includes the ambition to deliver 3,000 affordable family houses by 2032 to address overcrowding in areas where average household sizes are highest.</p> <p>Recognising community heritage and local identity in proposals to improve existing stock and build new homes will be integral to the place-based approach articulated in the forthcoming Housing Strategy. This will include proposals to bring forward a housing scheme celebrating the history and culture of the many communities who have made Moss Side their home on the site of the former Reno nightclub, a place where Black people were welcomed at a time when many</p>
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			<p>night clubs unofficially barred Black people</p> <p>Similarly, we also need to improve the safety, quality &amp; management of private rented sector homes – a key ambition of both the Housing Strategy and the Private Rented Sector strategy.</p>
<b>Sex</b>			
<b>Sexual Orientation</b>	<p>The Housing Strategy commits to ensuring that appropriate &amp; accessible housing is available to cement the city's reputation as an inclusive and welcoming city for all including members of the LGBTQ+ community</p>	<p>Following consultation it was identified that older members of the LGBTQ+ community were facing prejudices in existing Extra Care schemes across Manchester</p>	<p>MCC have also worked with the LGBT Foundation and RP partners to develop a Pride in Ageing standard within older people's housing schemes and the building of UK's first an LGBT Majority Extra Care scheme to create safe celebratory spaces for LGBT residents to live.</p> <p>We are in the process of developing a strategic statement of intent in partnership with the LGBT Foundation and MHPP regarding LGBT housing.</p>
<b>Marriage / civil partnership</b>			

<b>Pregnancy / maternity</b>			
<b>Gender Reassignment</b>	The Housing Strategy commits to ensuring that appropriate & accessible housing is available to cement the city's reputation as an inclusive and welcoming city for all including members of the LGBTQ+ community	Following consultation, it was identified that older members of the LGBTQ+ community were facing prejudices in existing Extra Care schemes across Manchester	MCC have also worked with the LGBT Foundation and RP partners to develop a Pride in Ageing standard within older people's housing schemes and the building of UK's first an LGBT Majority Extra Care scheme to create safe celebratory spaces for LGBT residents to live  We are in the process of developing a strategic statement of intent in partnership with the LGBT Foundation and MHPP regarding LGBT housing.
<b>Faith / religion / belief</b>			
<b>Additional / Optional Characteristics</b>			

<p><b>Families living in Poverty</b></p>	<p>The Housing Strategy sets out our priorities aimed at improving the housing options for lower income families and families in Temporary Accommodation</p>	<p>There are too many people living in Temporary Accommodation often for far too long (c.2,800 households incl. 1,900 families).</p> <p>The city is becoming increasingly reliant on private sector dispersed accommodation (which currently houses over 90% of all households in TA) and we are having to accommodate people outside of the city away from family networks due to demand and lack of supply.</p> <p>Similarly, c.40% of households in Priority Need on the Housing Register require 3 or more bedrooms</p> <p>We know through work on the Family Poverty Strategy and the more recent Build Back Fairer Marmot Review, that poor quality and overcrowded housing is harmful to health and widens inequalities for residents.</p>	<p>MCC will work with partners in the Manchester Housing Provider Partnership to ensure that new homes built in the city are designed to meet the needs of families in poverty to reduce the numbers in overcrowded properties, on the Housing Register and in TA</p> <p>This strategy is supported by the recent review of the city's Allocations Scheme - where access for those in greatest need, including people who are living in temporary accommodation, has been improved. Whilst this will not solve the Temporary Accommodation crisis fully, it will enable some people to access accommodation more quickly and offer a greater opportunity and flow through the allocation system.</p>
<p><b>Carers</b></p>			

<p><b>Homelessness</b></p>	<p>The level of homelessness in the city is unacceptably high.</p> <p>Accordingly, one of the main vision principles of the Housing Strategy is to 'Work to end Homelessness...'</p>	<p>The number of people presenting as homeless is continuing to increase (over 9,500 presentations in 2020-21 – 60% more than in 2017-18).</p> <p>This is costing the Council c.£15m annually.</p> <p>Evidence from the Manchester Homelessness Partnership highlights the difficulty of finding suitable homes in the private sector – especially larger family properties where competition for limited stock is high.</p>	<p>The strategy commits us to increase the supply of appropriate housing for homeless households to reduce the time spent in Temporary Accommodation</p> <p>MCC will work with partners in the Manchester Housing Provider Partnership to ensure that new homes built in the city are designed to meet the needs of households experiencing the various forms of homelessness</p> <p>This strategy is supported by the recent review of the city's Allocations Scheme - where access for those in greatest need, including people who are living in temporary accommodation, has been improved. Whilst this will not solve the Temporary Accommodation crisis fully, it will enable some people to access accommodation more quickly and offer a greater opportunity and flow through the allocation system.</p> <p>Innovative solutions led by the city's Housing and Homelessness Services will also be reflected in the</p>
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			<p>forthcoming Homelessness Strategy.</p> <p>The key priorities are likely to focus around increasing prevention, ending rough sleeping and reducing the use of B&amp;B &amp; temporary accommodation through more affordable and appropriate housing solutions linked to Better Outcomes, Better Lives</p>
<p><b>Ex-Armed Forces</b></p>	<p>The Armed Forces community should not face disadvantage compared to other citizens in the provision of public and commercial services.</p> <p>Special consideration is appropriate in some cases, especially for those who have given most such as the injured and the bereaved.</p>	<p>MCC is signed up to the Armed Forces Covenant.</p> <p>The purpose of this Covenant is to encourage support for the Armed Forces Community working and residing in Manchester and to recognise and remember the sacrifices made by members of this Armed Forces Community, particularly those who have given the most.</p> <p>This includes in-Service and ex-Service personnel their families and widow(er)s in Manchester</p>	<p>MCC's commitments, as a member of the Covenant, will be upheld as part of the delivery of the Housing Strategy and associated policies.</p>

#### 4. Quality Assurance - Equality, Diversity and Inclusion Team

Send your draft EqIA to the EDI Team inbox - [equalitiesteam@manchester.gov.uk](mailto:equalitiesteam@manchester.gov.uk) using **EqIA Advice – Your Service Name.** in the subject line.

<b>EDI Team: Name</b>		<b>Date reviewed:</b>	
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#### 5. Head of Service Approval

Your completed analysis needs to be signed off by your Head of Service.

<b>Name:</b>		<b>Date:</b>	
<b>Job title:</b>		<b>Signature:</b>	

#### Annex 1 – Actions Log

Use this table to list the actions you have identified to mitigate and adverse risks, detailing who will be responsible for completing these and setting clear timescales for delivery. Your actions will be reviewed at 6 months and 12 months to assess progress.

<b>Actions identified in your EqIA</b>	<b>Responsible officer / team for delivery</b>	<b>Timescale for delivery</b>	<b>Comments</b>