

Appendix B

Equality Impact Assessment / Equality Analysis

Title of service or policy	B&NES Article 4 Direction Feasibility Study. Implementation Option 1: Article 4 Direction and an additional planning policy to control HMOs (incorporating additional planning policy setting out a threshold approach to future HMO management)
Name of directorate and service	Directorate: Service Delivery Service: Planning Service
Name and role of officers completing the EIA	Planning Consultants (Arup) on behalf of Cleo Newcombe-Jones, Planning Policy Officer
Date of assessment	18 th November 2011

Equality Impact Assessment (or ‘Equality Analysis’) is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The primary concern is to identify any discriminatory or negative consequences for a particular group or sector of the community. Equality impact Assessments (EIAs) can be carried out in relation to service delivery as well as employment policies and strategies.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis on a policy, service or function. It is intended that this is used as a working document throughout the process, with a final version including the action plan section being published on the Council’s and NHS Bath and North East Somerset’s websites.

1.	Identify the aims of the policy or service and how it is implemented.	
	Key questions	Answers / Notes
1.1	Briefly describe purpose of the service/policy including <ul style="list-style-type: none"> • How the service/policy is delivered and by whom • If responsibility for its implementation is shared with other departments or organisations • Intended outcomes 	Implementation of the following: <ul style="list-style-type: none"> • A non-immediate Article 4 Direction covering the whole of Bath urban area • Additional policy setting out the approach for determining planning applications made. This includes additional planning policy setting out a threshold approach to the management of future HMO activity. The additional policy would be developed by the planning policy department, and the Article 4 Direction implemented between various departments including, development management, housing and planning enforcement. The enforcement of the Article 4 Direction and additional policy would be overseen by the Planning Service. The intended outcomes include: <ul style="list-style-type: none"> • Removal of Permitted Development Rights for changes of use from family dwellings to HMO’s so that the LPA can more closely monitor and manage the tenure mix across the city. • Residents feeling that their concerns of environmental degradation in specific areas of the City have been addressed;

		<ul style="list-style-type: none"> • More balanced communities; • More affordable housing in some areas for both the rented sector and the to buy market; and • Clear planning policy guidance to help developers assess the potential success of their applications.
1.2	<p>Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> • Is it a new service/policy or review of an existing one? • Is it a national requirement?). • How much room for review is there? 	<p>Houses of Multiple Occupation (HMOs) can be defined as houses with 3 or more people not from the same family living together. High densities of HMOs are often associated with issues such as noise disturbances, litter and parking difficulties.</p> <p>This option is one of four options being considered following a feasibility study by Arup looking at the correlation between these negative issues and high densities of HMOs in Bath.</p> <p>This study was prompted by a change in the law in 1st October 2010, which stated that all change of use from a C3 dwelling (a family home) to a C4 HMO is classed as permitted development and will not require planning permission. The introduction of an Article 4 Direction would mean that express planning permission would be required for a material change of use.</p> <p>This will form an appropriate evidence base to consider, in particular, whether an Article 4 Direction and an accompanying Supplementary Planning Document would be suitable tools to assist in the control of conversion of dwelling houses (i.e. family homes) to HMOs in the City of Bath. Other measures that could be implemented to help create sustainable, balanced communities are also reviewed.</p> <p>The imposition of an HMO Article 4 Direction is at the discretion of Local Authorities. Central Government has made the necessary changes to legislation to facilitate the process. If progressed the Article 4 Direction would be placed on a 12 month notice period before a final decision is made by the Council to proceed with the A4D. Legislation allows for period review of the A4D once in place so the Council has the ability to monitor the impacts of the A4D and review its status.</p>

1.3	Do the aims of this policy link to or conflict with any other policies of the Council?	The Option 1 proposals fit with the saved Local Plan Policy HG12 which regulates larger HMO conversions. It also fits with the overarching objective for balanced communities as detailed in the emerging Core Strategy and the Housing and Well Being Strategy.
2. Consideration of available data, research and information		
<p>Monitoring data and other information should be used to help you analyse whether you are delivering a fair and equal service. Please consider the availability of the following as potential sources:</p> <ul style="list-style-type: none"> • Demographic data and other statistics, including census findings • Recent research findings (local and national) • Results from consultation or engagement you have undertaken • Service user monitoring data (including ethnicity, gender, disability, religion/belief, sexual orientation and age) • Information from relevant groups or agencies, for example trade unions and voluntary/community organisations • Analysis of records of enquiries about your service, or complaints or compliments about them • Recommendations of external inspections or audit reports 		
	Key questions	Data, research and information that you can refer to
2.1	What is the equalities profile of the team delivering the service/policy?	Wide range of service deliverers including public, private and voluntary sectors.
2.2	What equalities training have staff received?	Planning policy team have received corporate equalities training and EQIA training. A number of the service deliverers within the Council will have received corporate equalities training.
2.3	What is the equalities profile of service users?	Through equalities mapping and population profile analysis (B&NES Equality Profile 2009) we now know more about the wider groups of user who will benefit from any improvements to services

		<p>Students make up the largest proportion of occupants of HMO's in Bath. Data is available from the Higher Education Statistics Agency, on the age, gender and socio-economic profile of students at the Higher Education Institutions in Bath http://www.hesa.ac.uk/index.php?option=com_content&task=view&id=2060&Itemid=141</p> <p>The B&NES Residential Review 2007 provides data across the B&NES wards on items such as population age profile, tenure profile, affordable housing profile and location of accredited properties.</p>
2.4	What other data do you have in terms of service users or staff? (e.g results of customer satisfaction surveys, consultation findings). Are there any gaps?	<p>All data is referred to above.</p> <p>The total number of HMO's in the City based on existing data is considered to be Data on the profile of landlords/HMO developers is lacking.</p> <p>Data on the profile of other HMO residents other than students is lacking.</p>
2.5	What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	<p>As part of the feasibility study a workshop was held on Monday 24th October 2011 in the Guildhall, Bath to scope stakeholders' views on the issues. The aims of the workshop were:</p> <ul style="list-style-type: none"> • to bring stakeholders together to share and understand different perspectives related to HMOs in Bath; to share the data related to both need for HMOs and impacts of HMOs; and • to test potential interventions that might help to create balance and sustainable communities <p>A wide range of stakeholders were represented at the workshop, including:</p> <ul style="list-style-type: none"> • Ward Councillors from across Bath • Planning Officers, B&NES Council • Housing, Transport, Research, Community and Economic Development Officers, B&NES Council • University of Bath • Bath Spa University • Royal United Hospital

		<ul style="list-style-type: none"> • Bath Spa University Students' Union • University of Bath Students' Union • HMO Landlords • HMO Developers • Estate Agents • Local Residents • Avon and Somerset Police <p>The results included analysis of the benefits and challenges of implementing an Article 4 direction. It was concluded that the majority of stakeholders felt that that should an Article 4 Direction be implemented a city wide approach should be taken and that a threshold policy approach include as an new planning policy.</p>
2.6	If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?	If the option is taken forward a full consultation process would be undertaken targeting all groups of user who would be affected by the proposals. The recommendation is for a non immediate Article 4 Direction which means that the intention to introduce the direction is consulted upon for a period of 12months before a decision to proceed is made by B&NES.
3. Assessment of impact: 'Equality analysis'		
	<p>Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:</p> <ul style="list-style-type: none"> • Meets any particular needs of equalities groups or helps promote equality in some way. • Could have a negative or adverse impact for any of the equalities groups 	
		<p>Examples of what the service has done to promote equality</p> <p>Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this</p>
3.1	Gender – identify the impact/potential impact of the	<p>The process of requiring a planning application often</p> <p>An A4D would potentially lead to a more dispersed pattern of HMO's in the City with students in particular</p>

	policy on women and men. (Are there any issues regarding pregnancy and maternity?)	<p>means that action will have to be taken to resolve hazards and ensure higher standards of development in the public environment (particularly for energy efficiency and security). NB these positive impacts will apply to all the groups considered below.</p> <p>The intended outcome of the option is to support the ability of B&NES as the housing authority to encourage and maintain a balanced and sustainable housing market that provides housing choice for all equalities groups.</p>	<p>living in a wider range of neighbourhoods than currently experienced. The intention of the A4D and the threshold policy is to encourage and maintain balanced and mixed communities that support the needs of all groups in society.</p> <p>Potential negative impacts of a more dispersed set of students or young professionals over a larger area could lead to feelings of isolation for individuals who are forced to live further out with less access to public transport and may feel unsafe travelling at night, this could impact on some equalities groups more than others e.g. women.</p> <p>Note this will apply to all the groups considered below</p> <p>Action</p> <p>Ensure the provision of good public transport and amenity in all areas where there is likely to be a high proportion of HMOs.</p>
3.2	Transgender – – identify the impact/potential impact of the policy on transgender people	As above	As above
3.3	Disability - identify the impact/potential impact of the policy on disabled people (ensure consideration of a range of impairments including both physical and mental impairments)	As above	As above
3.4	Age – identify the	As above	May push up rental prices in some areas (particularly

	<p>impact/potential impact of the policy on different age groups</p>	<p>Current issues associated with HMOs include isolation/ feelings of vulnerability among the elderly, the proposal should lead to more balanced communities with proportions of family housing within neighbourhoods being maintained as the A4D and the threshold planning policy provide tools for the regulation of the proportion of HMO's within all neighbourhoods in the City. as more students move into purpose built accommodation.</p> <p>Family housing in areas of high density of HMOs/high HMO demand are likely to become more affordable to new entrants to the housing market.</p> <p>More choice of high quality HMOs will make it easier to attract and retain young professionals/lower paid employees who require flexible accommodation in Bath.</p>	<p>Oldfield Park, Westmoreland and Widcombe area) that will affect those with lower salaries and students, both groups tend to be younger people.</p> <p>Ensure the provision of good public transport and amenity in all areas where there is likely to be a high proportion of HMOs.</p>
3.5	<p>Race – identify the impact/potential impact on different black and minority ethnic</p>	<p>As in 3.1 above and</p> <p>The planning application</p>	<p>Wards with highest proportion of BME populations Bathwick with 16% and Abbey with 15%, also have high proportions of HMOs, so these groups may be</p>

	groups	process will assist in the implementation of a framework for good management, the provision of a good basic level of standard amenities and the subsequent remedying of actionable hazards in HMOs has a positive impact for all ethnic groups. This would particularly be the case where a property is used for asylum seekers. Any cultural issues will be considered before enforcing standards.	adversely affected by the potential inflated rental prices in existing HMO's that arise out of the policy. Action Ensure other areas where people may end up living, have good levels of public transport and amenity.
		Examples of what the service has done to promote equality	Examples of potential negative or adverse impact and what steps have been or could be taken to address this
3.6	Sexual orientation - identify the impact/potential impact of the policy on lesbians, gay, bisexual & heterosexual people	The Article 4 Direction and additional policy are unlikely to create an impact on individuals because of their sexual orientation.	
3.7	Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	Potentially increasing the choice in areas to live.	None identified
3.8	Socio-economically disadvantaged – identify the impact on people who are	Potentially increasing the choice in areas to live.	May push up rental prices in some areas (particularly Oldfield Park, Westmoreland and Widcombe area) that will affect those with lower salaries.

	disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances	Family housing in areas of high density of HMOs/ high HMO demand may become cheaper, meaning it could become easier for new entrants to the housing market.	Action Ensure other areas where people may end up living, have good levels of public transport and amenity
3.9	Rural communities – identify the impact / potential impact on people living in rural communities	Potentially increasing the choice in areas to live within the city, although potentially increasing their price e.g. young people living at home in rural areas, may not be able to afford to move out.	

4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
Ensure the consultation on the draft Article 4 direction and additional policy is accompanied by appropriate summary information and guidance and that additional support is	Ensure equalities is included in the plan for the formal consultation on the Article 4 direction and additional policy	Preparation of appropriate summary information and guidance in time for the consultation.	Planning Policy Team	In time for consultation

available for equalities groups.				
HMO occupants encouraged to live in other areas, due to rising prices in certain areas.	Ensure good levels of amenity and public transport in the alternative areas where people may end up living	Review in conjunction with local transport policy and proposals.	Planning Policy, Development Management. All officers dealing with public transport.	
Potential feelings of isolation for students and other HMO residents who live in less accessible areas	Information provision, e.g. on transport access, local amenities, safety measures, and support help lines	Included within student information and housing packs	Student Community Liaison Officer	To coincide with students arriving at University and during housing week

5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team (equality@bathnes.gov.uk), who will publish it on the Council's and/or NHS B&NES' website. Keep a copy for your own records.

Signed off by:

(Divisional Director or nominated senior officer)

Date:

Equality Impact Assessment / Equality Analysis

Title of service or policy	B&NES Article 4 Direction Feasibility Study. Implementation Option 2: Planning Policy promoting purpose built student accommodation & Additional Licensing
Name of directorate and service	Directorate: Service Delivery Service: Planning Service
Name and role of officers completing the EIA	Planning consultants (Arup) on behalf of Cleo Newcombe-Jones, Planning Policy Officer
Date of assessment	18 th November 2011

Equality Impact Assessment (or 'Equality Analysis') is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The primary concern is to identify any discriminatory or negative consequences for a particular group or sector of the community. Equality impact Assessments (EIAs) can be carried out in relation to service delivery as well as employment policies and strategies.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis on a policy, service or function. It is intended that this is used as a working document throughout the process, with a final version including the action plan section being published on the Council's and NHS Bath and North East Somerset's websites.

1.	Identify the aims of the policy or service and how it is implemented.	
	Key questions	Answers / Notes
1.1	<p>Briefly describe purpose of the service/policy including</p> <ul style="list-style-type: none"> • How the service/policy is delivered and by whom • If responsibility for its implementation is shared with other departments or organisations • Intended outcomes 	<p>Implementation of the following:</p> <ul style="list-style-type: none"> • Pro Purpose-Built Accommodation Policy (Linking growth in academic space to purpose built accommodation). • Additional HMO Licensing (All HMOs in Oldfield Park, Westmoreland and Widcombe as initial phase. Consider extending to the whole city thereafter). <p>The responsibility for regulating the pro-purpose-built accommodation policy would be with the planning policy & development management teams, the additional HMO Licensing scheme would be managed and enforced by the Housing team.</p> <p>The intended outcomes of this option include:</p> <ul style="list-style-type: none"> • To ensure all HMOs comply with higher standards; • To provide a wider range of options for purpose built student accommodation to relieve the pressure on the private student accommodation (HMOs) in the city; • Provide wider choice in HMOs for non-students, if students have the option to move into purpose-built accommodation; • Licensing will address real and perceived problems associated with the quality of existing HMOs ; and • Higher quality HMOs may make it easier to attract employees to Bath.

1.2	<p>Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> • Is it a new service/policy or review of an existing one? • Is it a national requirement?). • How much room for review is there? 	<p>Houses of Multiple Occupation (HMOs) can be defined as houses with 3 or more people not from the same family living together. High densities of HMOs are often associated with issues such as noise disturbances, litter and parking difficulties.</p> <p>This option is one of four options being considered following a feasibility study by Arup looking at the correlation between these negative issues and high concentrations of HMOs in Bath.</p> <p>This study was prompted by a change in the law in 1st October 2010, which stated that all change of use from a C3 dwelling (a family home) to a C4 HMO is classed as permitted development and will not require planning permission.</p> <p>The imposition of an HMO Article 4 Direction would not have an impact on the quality of existing HMOs. The study assesses whether the provision of additional licensing along with a pro-purpose built student accommodation policy will address the environmental concerns associated with existing HMOs.</p> <p>It is recommended that an additional licensing scheme is put in place for the wards of Oldfield Park, Westmoreland and Widcombe. Additional licensing is used to tackle specific problems in specific areas, rather than covering all HMOs across a local authority area.</p> <p>Other measures that could be implemented to help create sustainable, balanced communities have also been reviewed.</p>
1.3	<p>Do the aims of this policy link to or conflict with any other policies of the Council?</p>	<p>The benefits of this option are highlighted in section 1.1. Several challenges have been identified with this option including that:</p> <ul style="list-style-type: none"> • The costs of additional licensing to landlords may push up rental prices marginally if landlords see an opportunity to pass on costs to the tenants; • It may result in a loss in trade in some areas, where HMOs are left unoccupied as students move into purpose built accommodation.

2. Consideration of available data, research and information

Monitoring data and other information should be used to help you analyse whether you are delivering a fair and equal service. Please consider the availability of the following as potential sources:

- **Demographic** data and other statistics, including census findings
- Recent **research** findings (local and national)
- Results from **consultation or engagement** you have undertaken
- Service user **monitoring data** (including ethnicity, gender, disability, religion/belief, sexual orientation and age)
- Information from **relevant groups** or agencies, for example trade unions and voluntary/community organisations
- Analysis of records of enquiries about your service, or **complaints** or **compliments** about them
- Recommendations of **external inspections** or audit reports

	Key questions	Data, research and information that you can refer to
2.1	What is the equalities profile of the team delivering the service/policy?	Wide range of service deliverers including public, private and voluntary sectors and the Universities.
2.2	What equalities training have staff received?	Planning policy team have received corporate equalities training and EQIA training. A number of the service deliverers within the Council will have received corporate equalities training.
2.3	What is the equalities profile of service users?	Through equalities mapping and population profile analysis (B&NES Equality Profile 2009) we now know more about the wider groups of user who will benefit from any improvements to services Students make up the largest proportion of occupants of HMO's in Bath. Data is available from the Higher Education Statistics Agency, on the age, gender and socio-economic profile of students at the Higher Education Institutions in Bath http://www.hesa.ac.uk/index.php?option=com_content&task=view&id=2060&Itemid=141

		The B&NES Residential Review 2007 provides data across the B&NES wards on items such as population age profile, tenure profile, affordable housing profile and location of accredited properties
2.4	What other data do you have in terms of service users or staff? (e.g results of customer satisfaction surveys, consultation findings). Are there any gaps?	<p>All data is referred to above.</p> <p>The total number of HMO's in the City based on existing data is considered to be an underestimate of the real level of provision.</p> <p>Data on the profile of landlords/HMO developers is lacking.</p> <p>Data on the profile of other HMO residents than students is lacking.</p>
2.5	What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	<p>As part of the feasibility study a workshop was held on Monday 24th October 2011 in the Guildhall, Bath to scope stakeholder's views on the issues. The aims of the workshop were:</p> <ul style="list-style-type: none"> • to bring stakeholders together to share and understand different perspectives related to HMOs in Bath; • to share the data related to both need for HMOs and impacts of HMOs; and • to test potential interventions that might help to create balance and sustainable communities <p>A wide range of stakeholders were represented at the workshop, including:</p> <ul style="list-style-type: none"> • Ward Councillors from across Bath • Planning Officers, B&NES Council • Housing, Transport, Research, Community and Economic Development Officers, B&NES Council • University of Bath • Bath Spa University • Royal United Hospital

		<ul style="list-style-type: none"> • Bath Spa University Students Union • University of Bath Students Union • HMO Landlords • HMO Developers • Estate Agents • Local Residents • Avon and Somerset Police <p>The results included broad support for the introduction of additional or selective licensing (possibly selective licensing for the whole private rented sector). There was a feeling that in many parts of Bath there are smaller HMOs than will currently be included in the licensing scheme, so a change would deal with some of the existing issues in a way that an Article 4 Direction would not.</p>	
2.6	If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?	If the option is taken forward a consultation process would be undertaken targeting all groups of users who would be affected by the proposals.	
3. Assessment of impact: 'Equality analysis'			
	<p>Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:</p> <ul style="list-style-type: none"> • Meets any particular needs of equalities groups or helps promote equality in some way. • Could have a negative or adverse impact for any of the equalities groups 		
		Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this

3.1	Gender – identify the impact/potential impact of the policy on women and men. (Are there any issues regarding pregnancy and maternity?)	<p>The process of requiring a license will mean that action will be taken to raise the quality of private rented accommodation, resolve hazards and ensure higher standards (particularly for energy efficiency and security).</p> <p>Purpose built accommodation, will provide safety and security for those living in the accommodation.</p> <p>Providing greater choice in areas to live.</p> <p>NB these positive impacts will apply to all the groups considered below.</p>	None identified
3.2	Transgender – – identify the impact/potential impact of the policy on transgender people	As in 3.1 above	None identified
3.3	Disability - identify the impact/potential impact of the policy on disabled people (ensure consideration of a range of impairments including both physical and mental impairments)	<p>As in 3.1 above; and</p> <p>The higher standards applied with the additional licensing will mean that provision with respect to disabled persons is improved.</p> <p>New purpose built accommodation will ensure that new buildings provide good facilities for disabled persons.</p>	<p>The completion of a complicated licence application form can be difficult for those with certain impairments. There can also be communication difficulties if legal action is taken for noncompliance with the HMO licence provisions.</p> <p>Action <i>Assistance to be offered to to all landlords to complete the application form.</i></p>

3.4	Age – identify the impact/potential impact of the policy on different age groups	<p>As in 3.1 above</p> <p>Current issues associated with HMOs include isolation/ feelings of vulnerability among the elderly, the proposal should lead to more balanced communities as more students move into purpose built accommodation.</p> <p>Family housing in areas of high density of HMOs are likely to become cheaper, meaning it could become easier for new entrants to the housing market.</p> <p>More choice of high quality HMOs will make it easier to attract young professionals/lower paid employees to Bath.</p>	<p>Licensing may push up rental prices if landlords see the opportunity to pass on costs to tenants, (will affect those with lower salaries and students that tend to be younger people).</p> <p>Action <i>Balance this with the provision of purpose built accommodation.</i></p>
3.5	Race – identify the impact/potential impact on different black and minority ethnic groups	<p>As in 3.1 above and</p> <p>Increasing availability of HMOs and choice of HMOs for people to live in.</p> <p>The imposition of a framework for good management, the provision of a good basic level of standard amenities and the subsequent remedying of actionable hazards in licensed HMOs has a positive impact for all ethnic groups. This would particularly be the case where a property is used for asylum seekers. Any cultural issues will be</p>	<p>Wards with highest proportion of BME populations Bathwick with 16% and Abbey with 15%, also have high proportions of HMOs, so these groups may be adversely affected by the potential inflated rental prices that arise from the potential increase in costs that arise from the licensing requirements.</p> <p>May result in a loss of trade in some areas that could affect BME business owners, if places are left unoccupied as students move into purpose built accommodation.</p> <p>Action</p>

		considered before enforcing standards.	<i>Accommodation only built in line with projected increase in demand to minimise the number of HMOs left empty.</i>
		Examples of what the service has done to promote equality	Examples of potential negative or adverse impact and what steps have been or could be taken to address this
3.6	Sexual orientation - identify the impact/potential impact of the policy on lesbians, gay, bisexual & heterosexual people	The licensing requirements and new purpose built accommodation are very unlikely to create an impact on individuals because of their sexual orientation. However, should someone consider that this is in fact the case we will consider the points made.	
3.7	Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	As in 3.1 above	None identified
3.8	Socio-economically disadvantaged – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances	As in 3.1 above Family housing in areas of high density of HMOs are likely to become cheaper, meaning it could become easier for new entrants to the housing market	May push up rental prices as landlords pass the licensing costs onto the tenants which would affect students and those with lower incomes.. Action <i>Balance this with the provision of purpose built accommodation.</i>
3.9	Rural communities – identify the impact / potential impact on people living in rural communities	Potentially increasing the choice of affordable areas within the city to live, e.g. young people living at home in rural areas, may be able to move out.	

4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
The completion of a complicated licence application form can be difficult for those with certain impairments. There can also be communication difficulties if legal action is taken for noncompliance with the HMO licence provisions.	Assistance to be offered to all landlords to complete the application form.	Assistance available from when the licensing requirements are implemented.	Housing department	When licensing requirements are implemented
Licensing may push up rental prices if landlords see the opportunity to pass on costs to tenants, (will affect those with lower salaries and students).	Ensure licensing is balanced with the roll out of provision of purpose built student accommodation	Ensure purpose built accommodation policy is implemented at the same time as the licensing requirements	Planning policy teams in discussion with Universities.	Concurrently with the implementation of the purpose built accommodation policy.
Potential loss of trade in some	Balance this by ensuring that	Purpose built accommodation	Planning	Concurrently

areas that could affect BME business owners, if places are left unoccupied as students move into purpose built accommodation.	purpose built accommodation is only built in line with demand. University to produce demand forecasts for future demand for accommodation	policy implemented at the same time as licensing requirements. Ongoing demand forecasting, with annual update.	policy teams University	with the implementation of the licensing requirements. .
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5. Sign off and publishing

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Signed off by:
Date:

(Divisional Director or nominated senior officer)

Equality Impact Assessment / Equality Analysis

Title of service or policy	B&NES Article 4 Direction Feasibility Study. Implementation Option 3: Article 4 Direction and a Supplementary Planning Document on HMOs (including a threshold approach); Planning Policy promoting purpose built student accommodation & Additional Licensing.
Name of directorate and service	Directorate: Service Delivery Service: Planning and Accommodation Services
Name and role of officers completing the EIA	Planning consultants (Arup) on behalf of Cleo Newcombe-Jones, Planning Policy Officer
Date of assessment	18 th November 2011

Equality Impact Assessment (or 'Equality Analysis') is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The primary concern is to identify any discriminatory or negative consequences for a particular group or sector of the community. Equality impact Assessments (EIAs) can be carried out in relation to service delivery as well as employment policies and strategies.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis on a policy, service or function. It is intended that this is used as a working document throughout the process, with a final version including the action plan section being published on the Council's and NHS Bath and North East Somerset's websites.

1.	Identify the aims of the policy or service and how it is implemented.	
	Key questions	Answers / Notes
1.1	<p>Briefly describe purpose of the service/policy including</p> <ul style="list-style-type: none"> • How the service/policy is delivered and by whom • If responsibility for its implementation is shared with other departments or organisations • Intended outcomes 	<p>Implementation of the following:</p> <ul style="list-style-type: none"> • A non-immediate Article 4 Direction covering the whole of Bath urban area; • An additional policy setting out the approach for determining planning applications made. This would include an additional threshold policy related the existing HG12 policy within the Core Strategy; • Pro Purpose-Built Student Accommodation Policy (Linking to growth in academic space); and • Additional HMO Licensing (All HMOs in Oldfield Park, Westmoreland and Widcombe as initial phase. Consider extending to the whole city thereafter). <p>The responsibility for regulating would be shared between the Planning Policy, Development Management, Housing and Environmental Health departments.</p> <p>The intended outcomes include:</p> <ul style="list-style-type: none"> • Response to local residents' concerns regarding over-concentration of HMOs in some areas of the city, both in terms of existing and potential future problems. • All HMOs would comply with higher quality standards, meaning better surroundings for tenants.

		<ul style="list-style-type: none"> • Wider range of options to live in purpose built student accommodation. • Dispersal of HMOs rather than concentration in certain areas of the City leading to more choice in areas to rent privately across Bath • All HMOs would comply with higher quality standards, meaning better living environments for tenants and stricter regulation of landlords upkeep of properties. • If students move out of HMOs into purpose built accommodation then there is more choice in the private rental sector for other tenants groups (and possible reduction in price if supply outstrips demand). • Increases in purpose-built accommodation likely to be attractive to many new students, and may become increasingly important in an increasingly competitive market. • Higher levels of confidence in recommending properties in the private rented sector if they reach standards for licensing. • Should lead to more balanced communities, meaning a wider mix of residents in many areas. • If the size of the market for HMOs decreases with an increase in purpose-built student accommodation, then there may be some return to family housing. This may also lead to a reduction in house prices; making it more affordable for first-time buyers. • A combination of higher quality HMOs and more capacity (as students are increasingly catered for in purpose-built accommodation). • A dispersal of HMOs across the city may lead to more affordable private rented sector accommodation in some areas. This combination may make it easier to attract new employees to the area.
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1.2	<p>Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> • Is it a new service/policy or review of an existing one? • Is it a national requirement?). • How much room for review is there? 	<p>Houses of Multiple Occupation (HMOs) can be defined as houses with 3 or more people not from the same family living together. High densities of HMOs are often associated with issues such as noise disturbances, litter and parking difficulties.</p> <p>This option is one of four options being considered following a feasibility study by Arup looking at the correlation between these negative issues and high densities of HMOs in Bath.</p> <p>This study was prompted by a change in the law in 1st October 2010, which stated that all change of use from a C3 dwelling (a family home) to a C4 HMO is classed as permitted development and will not require planning permission. The introduction of an Article 4 Direction would mean that express planning permission would be required for a material change of use.</p> <p>This will form an appropriate evidence base to consider, in particular, whether an Article 4 Direction and additional policy would be suitable tools to assist in the control of conversion of dwelling houses (i.e. family homes) to HMOs in the City of Bath. Other measures that could be implemented to help create sustainable, balanced communities including the use of licensing are also reviewed.</p> <p>The imposition of an HMO Article 4 Direction is at the discretion of Local Authorities. Central Government has made the necessary changes to legislation to facilitate the process. If progressed the Article 4 Direction would be placed on a 12 month notice period before a final decision is made by the Council to proceed with the A4D. Legislation allows for period review of the A4D once in place so the Council has the ability to monitor the impacts of the A4D and review its status.</p> <p>The Article 4 Direction would not have an impact on the quality of existing HMOs. The study assesses whether the provision of additional licensing along with a pro-purpose built student accommodation policy will address the environmental concerns associated with existing HMOs. It is recommended that an additional licensing scheme is put in place for the wards of Oldfield Park, Westmoreland and Widcombe. Additional licensing is used to tackle specific problems in specific areas, rather than covering all HMOs across a local authority area.</p>
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1.3	Do the aims of this policy link to or conflict with any other policies of the Council?	<p>Option 3 proposals fit with the saved Local Plan Policy HG12 which regulates larger HMO conversions. It also fits with the overarching objective for balanced communities as detailed in the emerging Core Strategy and the Housing and Well Being Strategy.</p> <p>The benefits of this option are highlighted in Section 1.1. Several challenges have been identified with this option including:</p> <ul style="list-style-type: none"> • May push rental prices up in some areas (particularly Oldfield Park, Westmoreland and Widcombe areas), potentially leading to inequality in where HMO residents can afford to live. • May mean students in new areas feel isolated if there is a lack of public transport. • Students living over a wider area may mean that some areas, at least initially, are not well served by public transport. This may lead to an increase in those wanting to use private modes to access University campuses. • There may be an increase in students seeking welfare advice if students have problems with money / social divide. • May lead to de-studentification, and not return to family housing as local residents might hope. This may lead to local owner-occupier residents may seeing a drop in value of their homes in areas where high concentrations of HMOs already exist. Where existing densities are really high, it may also become difficult to sell homes if they want to move. • If the Article 4 Direction leads to a perception that HMOs are not welcome in Bath, then this may lead to a shortage in affordable private rented property. This may make it harder for employers to attract lower paid employees, particularly those at the start of their careers, including new graduates. • May result in loss of trade in some areas, where HMOs are left unoccupied, or current tenants are replaced by people with a lower disposable income (e.g. migrants living in HMOs or young families).
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2. Consideration of available data, research and information		
<p>Monitoring data and other information should be used to help you analyse whether you are delivering a fair and equal service. Please consider the availability of the following as potential sources:</p> <ul style="list-style-type: none"> • Demographic data and other statistics, including census findings • Recent research findings (local and national) • Results from consultation or engagement you have undertaken • Service user monitoring data (including ethnicity, gender, disability, religion/belief, sexual orientation and age) • Information from relevant groups or agencies, for example trade unions and voluntary/community organisations • Analysis of records of enquiries about your service, or complaints or compliments about them • Recommendations of external inspections or audit reports 		
	Key questions	Data, research and information that you can refer to
2.1	What is the equalities profile of the team delivering the service/policy?	Wide range of service deliverers including public, private and voluntary sectors and the Universities.
2.2	What equalities training have staff received?	Planning policy team have received corporate equalities training and EQIA training. A number of the service deliverers within the Council will have received corporate equalities training.
2.3	What is the equalities profile of service users?	<p>Through equalities mapping and population profile analysis (B\$+&NES Equality Profile 2009) we now know more about the wider groups of user who will benefit from any improvements.</p> <p>Data is available from the Higher Education Statistics Agency, on the gender, age and socio-economic profile of students at the Higher Education Institutions in Bath</p>

		http://www.hesa.ac.uk/index.php?option=com_content&task=view&id=2060&Itemid=141 The B&NES Residential Review 2007 provides data across the B&NES wards on items such as population age profile, tenure profile, affordable housing profile and location of accredited properties.
2.4	What other data do you have in terms of service users or staff? (e.g results of customer satisfaction surveys, consultation findings). Are there any gaps?	All data is referred to above. The total number of HMO's in the City based on existing data is considered to be an underestimate of the real level of provision. Data on the profile of landlords/HMO developers is lacking. Data on the profile of other HMO residents than students is lacking.
2.5	What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	As part of the feasibility study a workshop was held on Monday 24th October 2011 in the Guildhall, Bath to scope stakeholder's views on the issues. The aims of the workshop were: <ul style="list-style-type: none"> • to bring stakeholders together to share and understand different perspectives related to HMOs in Bath; • to share the data related to both need for HMOs and impacts of HMOs; and • to test potential interventions that might help to create balance and sustainable communities A wide range of stakeholders were represented at the workshop, including: <ul style="list-style-type: none"> • Ward Councillors from across Bath • Planning Officers, B&NES Council • Housing, Transport, Research, Community and Economic Development Officers, B&NES Council • University of Bath • Bath Spa University

		<ul style="list-style-type: none"> • Royal United Hospital • Bath Spa University Students Union • University of Bath Students Union • HMO Landlords • HMO Developers • Estate Agents • Local Residents • Avon and Somerset Police <p>The results included analysis of the benefits and challenges of implementing an Article 4 Direction. It was agreed that should an Article 4 Direction be implemented it should adopt a city wide approach and include a threshold approach.</p> <p>The results also included broad support for the introduction of additional or selective licensing. There was a feeling that in many parts of Bath there are smaller HMOs than will currently be included in the licensing scheme, so a change would deal with some of the existing issues in a way that an Article 4 Direction alone would not.</p> <p>There was support for planning policies in support of purpose-built student accommodation. It was noted that this type of accommodation may have negative impacts for neighbours, but that it would be easier for the universities to control the behaviour of their students.</p>
2.6	If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?	If the option is taken forward a full consultation process would be undertaken with respect to the Article 4 Direction and additional policy and separately for the licensing. The consultation would target all groups of user who would be affected by the proposals.

3. Assessment of impact: 'Equality analysis'			
	<p>Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:</p> <ul style="list-style-type: none"> • Meets any particular needs of equalities groups or helps promote equality in some way. • Could have a negative or adverse impact for any of the equalities groups 		
		Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
3.1	<p>Gender – identify the impact/potential impact of the policy on women and men. (Are there any issues regarding pregnancy and maternity?)</p>	<p>The process of requiring a planning application and licensing will mean that action will have to be taken to resolve hazards and ensure higher standards (particularly for energy efficiency and security). NB these positive impacts will apply to all the groups considered below.</p> <p>The SPD will set out standards for properties that will have positive impacts for all the groups considered.</p> <p>Providing greater choice in terms of areas to live</p> <p>NB these positive impacts will apply to all the groups considered below.</p>	<p>The A4D will potentially lead to a more dispersed pattern of HMO's in the City with students in particular living in a wider range of neighbourhoods than currently experienced. The intention of the A4D and the threshold policy is to encourage and maintain balanced and mixed communities that support the needs of all groups in society.</p> <p>Potential negative impacts of a more dispersed set of students or young professionals over a larger area could lead to feelings of isolation for some groups e.g. women who are forced to live further out and may feel unsafe travelling at night.</p> <p>Note this will apply to all the groups considered below</p> <p>Action <i>Ensure the provision of good public transport and amenity in all areas where there is likely to</i></p>

			<i>be a high proportion of HMOs.</i>
3.2	Transgender – – identify the impact/potential impact of the policy on transgender people	As in 3.1 above	None identified
3.3	Disability - identify the impact/potential impact of the policy on disabled people (ensure consideration of a range of impairments including both physical and mental impairments)	<p>As in 3.1 above; and</p> <p>The higher standards applied with the additional licensing will mean that provision with respect to disabled persons is improved.</p> <p>New purpose built accommodation will ensure that new buildings provide good facilities for disabled persons.</p>	<p>The completion of licence application forms and planning applications can be difficult for those with certain impairments. There can also be communication difficulties if legal action is taken for noncompliance with the HMO licence provisions.</p> <p>Action <i>Guidance to be offered to landlords to complete the licensing application and the planning application process.</i></p>
3.4	Age – identify the impact/potential impact of the policy on different age groups	<p>As in 3.1 above and</p> <p>Current issues associated with HMOs include isolation/ feelings of vulnerability among the elderly, the proposal should lead to more balanced communities as more students move into purpose built accommodation.</p> <p>Family housing in areas of high density of HMOs are likely to become cheaper, meaning it could become easier for new entrants to the housing market.</p> <p>More choice of high quality HMOs will make it easier to attract young</p>	<p>May push up rental prices in some areas (particularly Oldfield Park, Westmoreland and Widcombe area) that will affect those with lower incomes and students.</p> <p>Action <i>Balance this with the increased provision and marketing of purpose built accommodation</i></p> <p><i>May lead to students and young people living in peripheral areas of the City possibly leading to feelings of isolation for young people that are forced to live further out.</i></p> <p>Action <i>Ensure the provision of good public transport</i></p>

		professionals/lower paid employees to Bath.	<i>and amenity in all areas where there is likely to be a high proportion of HMOs.</i>
3.5	Race – identify the impact/potential impact on different black and minority ethnic groups	<p>As in 3.1 above and</p> <p>The imposition of improved standards in licensed HMOs has a positive impact for all ethnic groups. This would particularly be the case where a property is used for asylum seekers. Any cultural issues will be considered before enforcing standards.</p>	<p>Wards with highest proportion of BME populations Bathwick with 16% and Abbey with 15%, also have high proportions of HMOs, so these groups may be adversely affected by the potential inflated rental prices that arise out of the proposals.</p> <p>Action <i>Ensure other areas where people may end up living, have good levels of public transport and amenity.</i></p>
		Examples of what the service has done to promote equality	Examples of potential negative or adverse impact and what steps have been or could be taken to address this
3.6	Sexual orientation - identify the impact/potential impact of the policy on lesbians, gay, bisexual & heterosexual people	The proposals are very unlikely to create an impact on individuals because of their sexual orientation. However, should someone consider that this is in fact the case we will consider the points made.	
3.7	Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	As in 3.1 above and	None identified
3.8	Socio-economically disadvantaged – identify the	As in 3.1 above	May push up rental prices in some areas (particularly Oldfield Park, Westmorel and

	impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances	Family housing in areas of high density of HMOs are likely to become more affordable, meaning it could become easier for new entrants to the housing market	Widcombe area) that will affect those with lower salaries. Action <i>Ensure other areas where people may end up living, have good levels of public transport and amenity</i>
3.9	Rural communities – identify the impact / potential impact on people living in rural communities	Potentially increasing the choice in areas to live within the city, e.g. young people living at home in rural areas, may be able to move out	

4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
Ensure the consultation on the draft Article 4 Direction and additional policy accompanied by appropriate guidance and that additional support is available for equalities groups.	Ensure equalities is included in the plan for the formal consultation on the Article 4 direction and SPD	Preparation of appropriate guidance in time for the consultation.	Planning Policy Team	In time for consultation
Completion of the licensing application form may be difficult for certain groups	Ensure appropriate guidance is provided	Guidance available	Housing department	In place when extended licensing requirements are activated
HMO occupants forced to live in other areas, due to rising prices in central locations.	Ensure good levels of amenity and public transport in the alternative areas where people may end up living	Review in conjunction with local transport policy and proposals. Review accessibility of wards within Bath where HMO housing are likely to grow as a proportion of housing stock. Planning policy team to monitor	Planning Policy Team	Ongoing
Licensing may push up rental prices if landlords see the opportunity to pass on costs to tenants, (will affect those with lower salaries and students).	Ensure this is balanced with the provision of purpose built accommodation	Ensure purpose built accommodation policy is implemented at the same time as the licensing requirements	Planning policy teams	At the same time that the purpose built accommodation policy is implemented
Potential feelings of isolation for students and other HMO	Information provision, e.g. on transport access, local	Included within student information and housing packs	Student Community	To coincide with students

residents who live in less accessible areas	amenities, safety measures, and support helplines		Liaison Officer	arriving at University and during housing week
Potential loss of trade in some areas that could affect BME business owners, if places are left unoccupied as students move into purpose built accommodation.	Balance this by ensuring that purpose built accommodation is only built in line with demand. University to produce demand forecasts for future demand for accommodation	Purpose built accommodation policy implemented at the same time as licensing requirements. Ongoing demand forecasting, with annual update.	Planning policy teams University	Purpose built accommodation policy implemented at the same time as licensing requirements.

5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team (equality@bathnes.gov.uk), who will publish it on the Council's and/or NHS B&NES' website. Keep a copy for your own records.

Signed off by:

(Divisional Director or nominated senior officer)

Date:

Equality Impact Assessment / Equality Analysis

Title of service or policy	B&NES Article 4 Direction Feasibility Study. Implementation of Option 4 : Do nothing but continuation of existing initiatives including the Student Community Partnership, the Accreditation scheme, Growth in University Accommodation and use of existing policies.
Name of directorate and service	Directorate: Service Delivery Service: Planning Service
Name and role of officers completing the EIA	Planning Consultants (Arup) on behalf of Cleo Newcombe-Jones, Planning Policy Officer
Date of assessment	21 st November 2011

Equality Impact Assessment (or 'Equality Analysis') is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The primary concern is to identify any discriminatory or negative consequences for a particular group or sector of the community. Equality impact Assessments (EIAs) can be carried out in relation to service delivery as well as employment policies and strategies.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis on a policy, service or function. It is intended that this is used as a working document throughout the process, with a final version including the action plan section being published on the Council's and NHS Bath and North East Somerset's websites.

1.	Identify the aims of the policy or service and how it is implemented.	
	Key questions	Answers / Notes
1.1	<p>Briefly describe purpose of the service/policy including</p> <ul style="list-style-type: none"> • How the service/policy is delivered and by whom • If responsibility for its implementation is shared with other departments or organisations • Intended outcomes 	<p>This Option means that there is no action taken over and above the status quo. Existing initiatives and plans will continue. Conversion of family housing to HMO's will progress unfettered under permitted development rights. The Student Community Partnership is likely to grow its activity and support local community-student initiatives. Both Universities are likely to grow their supply of purpose-built student accommodation if there is sufficient demand and a compelling business case.</p> <p>Bath and North East Somerset Council's current accreditation scheme will need reviewing regardless of other options taken forward, as it is currently under-resourced.</p> <p>Intended outcomes:</p> <ul style="list-style-type: none"> • Strengthened Student Community Partnership; • Strengthened landlord accreditation scheme; • Students and other HMO residents continue to have freedom to live where they like <p>The strengthened landlord accreditation scheme would be run by the housing department, and the Student Community Partnership initiatives would be strengthened in partnership with the Universities.</p>
1.2	<p>Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> • Is it a new service/policy or review of an existing one? 	<p>Houses of Multiple Occupation (HMOs) can be defined as houses with 3 or more people not from the same family living together. High densities of HMOs are often associated with issues such as noise disturbances, litter and parking difficulties.</p> <p>This option is one of four options being considered following a feasibility study by Arup looking at the correlation between these negative issues and high densities of HMOs in Bath.</p>

	<ul style="list-style-type: none"> • Is it a national requirement?). • How much room for review is there? 	<p>This study was prompted by a change in the law in 1st October 2010, which stated that all change of use from a C3 dwelling (a family home) to a C4 HMO is classed as permitted development and will not require planning permission.</p> <p>The study assesses the outcomes and challenges associated with this approach.</p> <p>The imposition of an HMO Article 4 Direction is at the discretion of Local Authorities. Central Government has made the necessary changes to legislation to facilitate the process. If progressed the Article 4 Direction would be placed on a 12 month notice period before a final decision is made by the Council to proceed with the A4D. Legislation allows for period review of the A4D once in place so the Council has the ability to monitor the impacts of the A4D and review its status.</p>
1.3	Do the aims of this policy link to or conflict with any other policies of the Council?	<p>The benefits are highlighted in 1.1, and the challenges that may conflict with other policies of the Council include that:</p> <ul style="list-style-type: none"> • This Option will be seen as not responding to issues raised by the local community; • Doing nothing creates potential for worsening of quality of HMO accommodation; • Doing nothing may see the balance of communities tip in certain parts of the City • May impact on house prices, if left unchecked, making homeownership unaffordable for a growing number of people; • Residents may be increasingly exposed to low level anti-social behaviour associated with high density of HMOs; • House prices may continue to rise if left unchecked, making home ownership unaffordable for a growing number of local people; • There is potential for HMO expansion which might benefit local employers who may struggle to attract new graduates and young professionals if housing in the area is expensive; and • Seasonal business trade model may lead to under employment of some people.
2. Consideration of available data, research and information		

Monitoring data and other information should be used to help you analyse whether you are delivering a fair and equal service. Please consider the availability of the following as potential sources:

- **Demographic** data and other statistics, including census findings
- Recent **research** findings (local and national)
- Results from **consultation or engagement** you have undertaken
- Service user **monitoring data** (including ethnicity, gender, disability, religion/belief, sexual orientation and age)
- Information from **relevant groups** or agencies, for example trade unions and voluntary/community organisations
- Analysis of records of enquiries about your service, or **complaints** or **compliments** about them
- Recommendations of **external inspections** or audit reports

	Key questions	Data, research and information that you can refer to
2.1	What is the equalities profile of the team delivering the service/policy?	Wide range of service deliverers including public, private and voluntary sectors and the Universities which mirrors the equality profile of Bath and North East Somerset.
2.2	What equalities training have staff received?	Housing and Planning Departments have received corporate equalities training.
2.3	What is the equalities profile of service users?	<p>Through equalities mapping and population profile analysis (B&NES Equality Profile 2009) we now know more about the wider groups of user who will benefit from any improvements to services</p> <p>Students make up the largest proportion of occupants of HMO's in Bath. Data is available from the Higher Education Statistics Agency, on the age, gender and socio-economic profile of students at the Higher Education Institutions in Bath http://www.hesa.ac.uk/index.php?option=com_content&task=view&id=2060&Itemid=141</p> <p>The B&NES Residential Review 2007 provides data across the B&NES wards on items such as population age profile, tenure profile, affordable housing profile and location of accredited properties.</p>
2.4	What other data do you have in	All data is referred to above.

	terms of service users or staff? (e.g results of customer satisfaction surveys, consultation findings). Are there any gaps?	The total number of HMO's in the City based on existing data is considered to be an underestimate of the real level of provision Data on the profile of landlords/HMO developers is lacking. Data on the profile of other HMO residents than students is lacking.
2.5	What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	<p>As part of the feasibility study a workshop was held on Monday 24th October 2011 in the Guildhall, Bath to scope stakeholder's views on the issues. The aims of the workshop were:</p> <ul style="list-style-type: none"> • to bring stakeholders together to share and understand different perspectives related to HMOs in Bath; • to share the data related to both need for HMOs and impacts of HMOs; and • to test potential interventions that might help to create balance and sustainable communities <p>A wide range of stakeholders were represented at the workshop, including:</p> <ul style="list-style-type: none"> • Ward Councillors from across Bath • Planning Officers, B&NES Council • Housing, Transport, Research, Community and Economic Development Officers, B&NES Council • University of Bath • Bath Spa University • Royal United Hospital • Bath Spa University Students Union • University of Bath Students Union • HMO Landlords • HMO Developers • Estate Agents • Local Residents • Avon and Somerset Police <p>The results included support for a strengthened Student Community Partnership, including support for a campaign improving the positive image of students and benefits they bring to communities; increased student volunteering locally to where students live;</p>

		and increased publicity of the Student Action Line. There was a suggestion by one group that better/wider public transport would give more choice to students on where they live. There was also a suggestion that an Affordable Bath campaign should be considered to help attract a wider range of people, including young professionals and recent graduates to the City.	
2.6	If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?	No additional consultation would be planned under this option. Existing practices would need to be kept under review.	
3. Assessment of impact: 'Equality analysis'			
	Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy: <ul style="list-style-type: none">• Meets any particular needs of equalities groups or helps promote equality in some way.• Could have a negative or adverse impact for any of the equalities groups		
		Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
3.1	Gender – identify the impact/potential impact of the policy on women and men. (Are there any issues regarding pregnancy and maternity?)		Potential worsening of quality of HMO accommodation. Action <i>Campaigns to encourage landlords to sign up to the accreditation scheme, encouraging students to use landlords on the accreditation scheme</i> Students may feel less welcome as

			<p>neighbourhoods are less tolerant and place the blame for problems on students.</p> <p>Action <i>Campaigns run by the Student Community Partnership to address these issues</i></p> <p>Increasingly low levels of anti-social behaviour associated with high densities of HMOs.</p> <p>Action <i>Campaigns run by the Student Community Partnership to address these issues</i></p> <p>House prices may continue to rise if left unchecked, making home ownership unaffordable for a growing number of local people. It also may mean that people are forced to live in further out areas, leading to feelings of isolation etc.</p> <p>Action <i>Growth in University Accommodation to address this</i></p> <p>Ensure all areas where there are high levels of HMOs have good access to public transport and amenity.</p> <p>These adverse impacts will apply to all groups below.</p>
3.2	Transgender – – identify the impact/potential impact of the policy on transgender people		See 3.1 above.

3.3	Disability - identify the impact/potential impact of the policy on disabled people (ensure consideration of a range of impairments including both physical and mental impairments)		<p>See 3.1 above, to emphasise</p> <p>Potential worsening of quality of HMO accommodation could particularly affect disabled persons.</p> <p>Action <i>Campaigns to encourage landlords to sign up to the accreditation scheme as well as encouraging students to use landlords on the accreditation scheme would mean higher standards that would benefit disabled people.</i></p> <p>Growth in University Accommodation to provide accommodation that suits the needs of disabled persons.</p>
3.4	Age – identify the impact/potential impact of the policy on different age groups		<p>See 3.1. above</p> <p>To emphasise, younger groups tend to be those on lower incomes who may be particularly affected by rising house prices associated with the demand for HMOs</p> <p>Actions <i>Address this through the growth of University accommodation to meet the demand.</i></p>
3.5	Race – identify the impact/potential impact on different black and minority ethnic groups		See 3.1. above
		Examples of what the service has done to promote equality	Examples of potential negative or adverse impact and what steps have been or could be taken to address this

3.6	Sexual orientation - identify the impact/potential impact of the policy on lesbians, gay, bisexual & heterosexual people	It is considered that the do nothing option is unlikely to create an impact on individuals because of their sexual orientation.	
3.7	Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.		See 3.1. above
3.8	Socio-economically disadvantaged – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances		<p>See 3.1 above, and to emphasise</p> <p>House prices may continue to rise if left unchecked, making home ownership unaffordable for a growing number of local people.</p> <p>Action <i>Growth in University Accommodation to address this</i></p> <p>Action Ensure other areas where people may end up living, have good levels of public transport and amenity.</p>
3.9	Rural communities – identify the impact / potential impact on people living in rural communities	Potentially more diverse rural communities as people from the city move out to the countryside to avoid the problems of high HMO density in the city.	<p>Potentially increasing house prices with increased demand in the countryside.</p> <p>Action <i>Balance with growth in University</i></p>

			Accommodation.
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4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Responsibility	By when
House prices may continue to rise if left unchecked, making home ownership unaffordable for a growing number of local people. It also may mean that people wishing to live centrally are forced to live in peripheral areas of the city, leading to feelings of isolation or disassociation from communities they have affiliation with etc.	Ensure good levels of amenity and public transport in the alternative areas where people may end up living Growth in purpose built student accommodation to address the demand for private sector HMO's	Review in conjunction with local transport policy and proposals. Review accessibility of wards within Bath where HMO residents are likely to live Demand forecasts developed for university accommodation	Planning Policy Team University.	Ongoing
Potential worsening of quality of HMO accommodation.	Develop action plan for widening the landlord accreditation scheme Campaigns to encourage landlords to sign up to landlord accreditations	Ongoing monitoring and improvement	Housing department	Ongoing

	<p>scheme</p> <p>Encourage students to go with houses that are accredited</p>			
Increasing levels of low level anti-social behaviour associated with high densities of HMOs.	Develop action plan for campaigns to address these issues	Ongoing monitoring and improvement	Student Community Liaison Officer	Ongoing campaigns throughout the year

5. Sign off and publishing

Once you have completed this form, it needs to be ‘approved’ by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team (equality@bathnes.gov.uk), who will publish it on the Council’s and/or NHS B&NES’ website. Keep a copy for your own records.

Signed off by:

(Divisional Director or nominated senior officer)

Date: