Transforming Places; Changing Lives: 
taking forward the regeneration framework 
Equality Impact Assessment
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1  Name of programme, project, or policy

Transforming places; changing lives: taking forward the regeneration framework.

2  Full Assessment undertaken by:

   Director or Deputy Director  Roger Wilshaw
   Policy Developer/Lead       Andrew Paterson
   Other people involved in the assessment
                               Sam Williams
                               Robert Keeling

3  Scope of the assessment

This document provides an overview of how Transforming Places; Changing Lives: taking forward the regeneration framework, will impact on key equalities groups. It builds on the issues identified during screening, and through consultation, to develop our approach in the framework. The assessment finds that while there are general trends in the demography of most deprived areas, it is more important to note the significant variations between deprived areas that require a flexible approach to regeneration.

Aims, purpose and outcomes

Transforming Places; Changing Lives: taking forward the regeneration framework aims to provide a clearer link between neighbourhood renewal and wider regeneration and economic interventions. This will help ensure regeneration interventions are coordinated with regional strategies so they are focused on areas with potential for sustainable economic growth and for private sector investment over the longer term.

The framework aims to set out a clear vision for regeneration, to develop a shared focus for activity between actors at a central, regional and local level. In particular, it aims to address:

- the lack of clarity as to what regeneration should deliver. There is currently a range of bodies and funding streams aimed at what could be broadly defined as regeneration. However, while some agencies have a clear focus on neighbourhood renewal outcomes, others are targeted at housing growth, economic development or land remediation. A clear framework for regeneration activity will help to clarify objectives, and enable greater coordination between agencies to coordinate interventions
• disparate targeting of regeneration activity. Because of the lack of clear and consistent objectives, various types of regeneration activity are targeted according to very different criteria, used at different spatial levels. Improving the targeting of social, physical and economic regeneration is a key aim of the framework; and

• the lack of clarity in the roles of different actors at different spatial levels. The formation of the Homes and Communities Agency, new powers and responsibilities for the regional development agencies and the new local performance framework have all influenced the institutional landscape for regeneration. The framework seeks to provide clarity of roles and responsibilities for different actors at different spatial levels

Activities and beneficiaries

Regeneration is a place-based policy, working with mainstream resources, and targeting specific geographies to reverse social, physical, and economic decline. The framework aims to set high level principles that will ensure that regeneration activities at different spatial levels promote economic inclusion, particularly for the most vulnerable areas.

Transforming Places; Changing Lives builds on evaluation evidence to improve the effectiveness of regeneration policy in England. In common with the approach of many OECD\textsuperscript{1} countries, the framework focuses on addressing the needs of underperforming areas. The approach taken by the regeneration framework intends to meet the needs of different areas that experience poor outcomes across a range of measures.

Evidence shows that in order to be effective, regeneration activities need to focus on addressing the underlying economic drivers of decline that prevent residents from underperforming areas from reaching their potential. We know that earnings are lower and worklessness is higher in such areas, and that this drives low aspirations across successive generations. Moreover, poor economic outcomes can lead to poor outcomes across a range of other domains – including self-reported measures of happiness\textsuperscript{2}, health\textsuperscript{3}, and likelihood to get involved in crime\textsuperscript{4}. For this reason, the regeneration framework focuses on achieving economic inclusion in the most disadvantaged areas.

While primarily being geared to target specific areas rather than specific groups, in order to be successful, effective regeneration needs to be based on a robust understanding of the drivers of decline in target areas, as well as the needs of residents. Clearly the demography of different areas needs to be a key consideration in this analysis, which is explored further in section 4.1.

\textsuperscript{1} Organisation for Economic Cooperation and Development
\textsuperscript{2} Life Satisfaction: the state of knowledge and implications for government, Strategy Unit, December 2002
\textsuperscript{3} Is work good for your health and well-being?, Gordon Waddell and A Kim Burton, 2006
\textsuperscript{4} Crime and Economic Incentives, IFS, 2000 (Meghir and Machin)
The framework reinforces the need for regeneration to be:

- flexible and responsive to the needs of different areas and communities. That is why we have proposed outcome-based indicators – with a focus on meeting the needs of different areas – rather than output indicators that may constrain the process through which regeneration is achieved.

- built on effective engagement with the communities affected. Building on the Communities in control: real people, real power white paper, the framework reinforces the need for communities to be engaged in regeneration. Through the ‘Duty to Involve’, key regeneration agencies will already be required to engage with local communities in planning their activities; and

- built from the bottom-up. Improving the targeting of regeneration activity will need to be built from the bottom up, reflecting local needs and opportunities through active consultation, rather than central prescription.

It is the intention that the framework benefits residents of underperforming areas – which suffer from high levels of deprivation and limited economic opportunity.

4 Evidence Sources

The following sources were used to find evidence on the demographic make up of deprived areas in terms of the key equalities strands. When possible, lower layer super output area (LSOA) data was used in order to identify the significant differences between individual areas, as follows:

- annual population survey (Apr 2007 – Mar 2008)
- DWP information directorate (May 2008 estimates)
- lower layer super output area population estimates for England and Wales, (mid-2007 experimental statistics)

Existing research and evidence was also used to best understand the problems faced by equality groups in regeneration, as follows:

- Modelling change in deprived areas (the ‘AMION model’): Emerging Findings, 3 December 2008
- Poverty rates amongst ethnic groups in Great Britain, Joseph Rowntree Foundation, April 2007
- Monitoring poverty and social exclusion, Joseph Rowntree Foundation, December 2007
4.1 Data

This section outlines the state of our knowledge on the impact of deprivation on different key equalities groups.

There are significant differences in the demography of deprived areas – and the ways in which different groups experience deprivation. However, the differences between deprived areas are even more marked – necessitating a flexible response that is able to meet the very different circumstances of different areas.

Gender

The gender makeup in deprived areas is not markedly different from the national average. In the most deprived areas, females make up 50.9 per cent of the population; very close to the national average.

However, within deprived neighbourhoods, different genders are affected in different ways. As shown below, males in deprived areas are more likely to claim incapacity benefit – 14.82 per cent of males compared to 9.54 per cent of females. The same is true for jobseekers’ allowance (JSA). 8.66 per cent of males in the most deprived areas claim JSA, compared to just 2.95 per cent of females. Conversely females in the 10 per cent most deprived areas are more likely to claim income support – 15.94 per cent of females are claimants compared to 9.43 per cent of males. This is likely to be the case as females more often work in the unpaid sector (e.g. child care), hence being more likely to claim income support than JSA.

**IB/SDA claimant rate by gender and deprivation decile**

![IB/SDA claimant rate by gender and deprivation decile](image)

IB/SDA Female claimant rate  
IB/SDA Male claimant rate

IMD decile

<<<<most deprived – least deprived>>>>

Sources: ONS mid-year population estimates 2007, IMD 2007
JSA claimant rate by gender and deprivation decile

Sources: ONS mid-year population estimates 2007, IMD 2007

Income Support claims rates by gender and deprivation decile

Sources: ONS mid-year population estimates 2007, IMD 2007

Ethnicity
For all ages, family types and family work statuses, people from minority ethnic groups are, on average, much more likely to be in income poverty than white British people\(^5\). We know from the 2001 Census that over 50 per cent of ethnic minorities live in the most deprived areas of the country. Ethnic minority groups are also over-represented in deprived areas relative to the national average as shown in the charts below\(^6\).

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\(^5\) Poverty rates amongst ethnic groups in Great Britain, Joseph Rowntree Foundation, April 2007

It is also important to note the economic inactivity rates of different ethnicities in the 10 per cent most deprived and 90 per cent most deprived lower layer super output areas. People of ‘white British’ origin appear to be at a greater relative disadvantage, compared with other groups, when they live in a deprived area than if they were resident elsewhere.

Economic inactivity rates by ethnicity in the most and least deprived areas

Sources: Evaluation of National Strategy for Neighbourhood Renewal, 6 May 2008
Religion
As shown in the table below, there are a significantly higher proportion of religious minority groups in the most deprived areas, and a significantly lower proportion of Christians than in other deciles.

Religion by Deprivation

![Religion by Deprivation chart]


Disability
There are significantly higher levels of disability in deprived areas relative to the national average, as shown in the chart below.

Disability by Deprivation

![Disability by Deprivation chart]

There are also higher levels of mental health claims in the 10 per cent most deprived areas, with 5.63 per cent of the population making claims. This is significantly higher than even the next 10 per cent most deprived areas (3.89 per cent).

**IB/SDA mental health claim rates by IMD decile**


**Age**

The most deprived areas have higher proportions of children and working age adults than the national average, as shown in the charts below.

**Difference between % of population aged 0-15 and national average by deprivation decile**

Sources: Lower Layer Super Output Area population estimates for England and Wales, mid-2007 (e statistics)
Variations

It is important to note that across all these domains, the differences between individual areas are more significant than the similarities. This supports the need for a flexible approach to regeneration. For example, within the 10 per cent most deprived neighbourhoods, the proportion of residents aged 0-15 ranges from 4 per cent to 43 per cent, the proportion of working age adults
ranges from 44 per cent to 91 per cent, and the number of adults over retirement age ranges from 3 per cent to 52 per cent.

Similarly, the proportion of the population claiming disability living allowance in the most deprived neighbourhoods ranges from 3 per cent to 23 per cent. The range of mental health claimants as a proportion of the population is 1 per cent to 19 per cent.

The gender make up in the most deprived areas as a whole is not markedly distinct from the national average. However, there are striking variations in the proportion of males and females between the most deprived neighbourhoods, ranging from 38 per cent to 70 per cent male populations.

The proportion of population belonging to an ethnic minority varies considerably across the country, ranging from 50 per cent in inner London to less than 5 per cent across rural England and urban north east England. For people from minority ethnic groups, income poverty rates are much higher in London, the north and the midlands than elsewhere. 70 per cent of those in income poverty in inner London are from minority ethnic groups, as are 50 per cent in outer London.

Change over time
Evidence suggests that areas with larger black African and Indian cohorts have performed better over time, and are more likely to improve. These areas are also less likely to decline relative to other areas. There is additional, weaker evidence to suggest that areas with larger Bangladeshi cohorts are less likely to decline.

Summary
The most deprived areas can be characterised by having higher proportions of residents from minority groups – particularly in terms of faith, ethnicity and disability. There are also considerably more young people and considerably fewer people over retirement age. But it is vitally important to note the significant variance between deprived areas. There is no ‘standard’ demographic make of a deprived area.

4.2 Research
Data and existing research was brought together from a number of sources (listed in section 4) and through consultation (listed in section 4.3).

4.3 Consultation
We published the consultation document – Transforming Places; Changing Lives: a framework for regeneration in July 2008. In their responses, most groups agreed broadly with the analysis – including the emphasis on economics as a key driver of deprivation.

7 Poverty rates amongst ethnic groups in Great Britain, Joseph Rowntree Foundation, April 2007
8 Modelling change in deprived areas (the ‘AMION model’): Emerging Findings, 3 December 2008
In terms of equalities, most respondents said that the specific impacts would be dependent on local analysis and specific projects/programmes. In light of these differences, respondents argued that in terms of tackling worklessness, evidence shows that flexible and comprehensive approaches that can tackle many problems simultaneously have the best chance of engaging diverse communities and achieving lasting impacts.

And the findings of the Commission for Racial Equality's report, *Regeneration and the Race Equality Duty*, were a particular cause of concern for some respondents which suggested that the needs of different groups were not always taken into account in key investment decisions. In response to this, we are announcing a programme to support mainstreaming equalities in regeneration schemes through regional improvement and efficiency partnerships (RIEPs).

**Internal (staff, unions etc)**
We conducted consultation with a wide range of internal partners.

**Stakeholder groups**
We met the following groups during the consultation process:

- Oxfam
- Equality and Human Rights Commission
- Faith Based Regeneration Network
- Audit Commission

**4.4** Does the evidence gathering comply with the principles set out in Civil Service guidance on evidence-based policy making and Impact Assessment?

Yes

**5. Summary of key insights by equality group**

By devolving power, so that decisions about where to invest are made as locally as possible, this framework proposes an approach to prioritisation that starts with communities and their councils, and provides an approach, to align investment behind local and regional regeneration priorities. Programmes will be tailored to fit places rather than having places fit programmes.

A stronger focus on the most deprived areas\(^9\) will benefit both ethnic minority groups – which comprise 28 per cent of the total population compared to a national baseline of 12 per cent – and those registering a form of disability, who comprise 32.2 per cent compared to a national average of 24.4 per cent provided their needs are taken into account by local and regional decision-makers.

\(^9\) As defined by the most deprived 10 per cent of lower super output areas according to the index of multiple deprivation, 2007
The framework builds on existing equalities provisions. All public bodies involved in regeneration are required to conduct their activity in accordance with the Equalities Act 2006, to promote equality of opportunity. The Single Equality Bill will also require key delivery partners to consider how their strategic decisions can better tackle socio-economic disadvantage.

The flexible nature of the framework puts communities at the heart of regeneration, equipping residents of the most deprived areas to shape the future of their communities and the nature of the regeneration investment made in their areas.

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<th>Equality Groups</th>
<th>Key Insights</th>
<th>Assessment of scale of potential impact – positive or adverse</th>
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<tbody>
<tr>
<td><strong>RACE</strong></td>
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</table>
|                 | The most deprived areas have higher proportions of ethnic groups. Bangladeshi and Pakistani people make up four times as high a proportion of the population of the most deprived local areas compared to the national average, while the proportion is approximately two and a half times as high for black African and black Caribbean groups. Ethnic minority groups can often feel physical regeneration is forced upon them, resulting in disengagement and dissatisfaction. | The framework will:  
• improve inclusivity through increased recognition of the differences between communities  
• increase transparency through explicit prioritisation of funding  
• spread best practice to bodies involved in regeneration, in involving communities in regeneration and recognising diversity  
• strengthen the focus on the needs of residents of deprived areas – in which minority ethnicities are disproportionately concentrated  
• lead to greater community involvement in regeneration which will lead to greater engagement and satisfaction with the regeneration process |
| **DISABILITY**  |              |                                                              |
|                 | The most deprived neighbourhoods have significantly higher rates of disability and levels of mental health claimants than less deprived areas, so people with disabilities will be more significantly affected by regeneration activities. | The framework will:  
• improve access to economic opportunity for those suffering from multiple disadvantages  
• increase focus on areas where health conditions (amongst other disadvantages) are concentrated  
• strengthen focus on the needs of residents of deprived areas – in which disabled individuals are disproportionately concentrated |

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11 In the most deprived 10 per cent of neighbourhoods, residents from ethnic minority groups represent 28 per cent of the total population compared to a national baseline of 12 per cent
12 In the most deprived 10 per cent of neighbourhoods, those registering a form of disability comprise 32.2 per cent compared to a national average of 24.4 per cent
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<tr>
<td><strong>GENDER AND GENDER IDENTITY</strong></td>
<td>While the gender ratio of deprived areas is very similar to the national average, the needs of different genders in deprived areas are very different. Males have a significantly higher propensity to claim jobseekers’ allowance and incapacity benefit, while females are more likely to claim income support when compared to less deprived areas – due to the greater likelihood of females working in the unpaid sector. Planning policy tends to ignore the fact that men and women use public space differently, resulting in environments that often disadvantage women and do not meet their needs.</td>
<td>• the framework will provide a flexible, outcome-based approach to regeneration that takes into account the needs of local residents rather than top-down output measures.</td>
</tr>
<tr>
<td><strong>SEXUAL ORIENTATION</strong></td>
<td>• None known</td>
<td></td>
</tr>
<tr>
<td><strong>AGE</strong></td>
<td>The most deprived areas have higher proportions of children and working age adults than the national average, and smaller proportions of males over 65 and females over 60.</td>
<td>The framework will: • promote a devolved approach to regeneration that is informed by local demography • improve role models for young people through tackling inter-generational cultures of worklessness</td>
</tr>
</tbody>
</table>

13 Planning, Regeneration and the Gender Equality Duty, Cambridge Centre for Housing and Planning Research, 2008
6. Proportionality

*Transforming Places; Changing Lives: taking forward the regeneration framework* is necessary as it aims to improve the value-for-money of regeneration investment by co-ordinating and prioritising regeneration investment in the right places, with public; private; and third sector organisations working together in the same places towards a shared vision.

The framework builds on existing processes for mainstreaming equalities, including the Equalities Act 2006 (which requires all public agencies undertaking regeneration to promote equality of opportunity), and on evidence highlighting the differences between deprived communities across a range of variables (including demography) to propose a devolved approach to the targeting and delivery of regeneration.

The framework is deliberately tailored to fit different circumstances. Decisions about where to invest should be made as locally as possible, so it proposes an approach to prioritisation that starts with communities and their councils, and provides an approach, coordinated by regional development agencies, to align investment behind local and regional regeneration priorities.

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14 The Economies of Deprived Areas, DCLG, 2006; Political devolution, regional governance and tackling deprivation; JRF, 2007
There are risks to this approach, however. First, a devolved approach may result in differential outcomes between areas and in the degree to which minority groups are represented in key decision-making processes. For this reason, the proposals in the framework seek to mitigate this risk by advocating active consultation with local communities through neighbourhood management processes and participatory budgeting. In addition, there is a converse risk that an alternative approach that centralises decision-making may not reflect the diversity of target communities.

Second, there is a risk that increasing the focus on improving economic inclusion through the proposals in the regeneration framework will disadvantage those unable to work. However, it is clear from evaluation evidence that reinvigorating the economic performance of deprived areas will result in benefits across a range of variables that are not exclusive to working groups. For example, encouraging inward investment can result in significant improvements in the physical environment, and raise the level of provision of services\textsuperscript{15}.

7. Summary of the assessment

The most deprived areas are characterised by having higher proportions of the population from minority groups, most noticeably in terms of race, religion and disability. Deprived areas also have noticeably different age demographics. A recent report\textsuperscript{16} from the Equality and Human Rights Commission (EHRC) suggests that people from ethnic minorities have not always benefited from regeneration investment or been fully engaged in the regeneration process.

One of the underlying aims of the regeneration framework is to focus regeneration investment on tackling the underlying economic challenges that hold back these deprived areas, in particular supporting people to get a job and get on in the labour market. By targeting deprived areas, with characteristics as described above, \textit{the regeneration framework will play a key role promoting equality of opportunity}. It must be noted that these characteristics vary significantly across deprived areas, so the flexible nature of the Framework will also be of great importance in increasing equality.

The framework sets out a vision for regeneration that is driven by communities, a crucial step forward in promoting good community relations. A common problem in regeneration schemes is dissatisfaction as minority groups feel they are not involved in the process. Moving away from Whitehall to community focused regeneration will help address this balance.

In response to this equalities impact assessment, the IDeA and the RIEP network have developed the outline of a three part programme for District

\textsuperscript{15} Under-served Markets, Preliminary research findings, BITC, 2005
\textsuperscript{16} Regeneration and the Race Equality Duty, CRE, September 2007
Counsellons, running over 6 months, to support the promotion of equality of opportunity and community relations in regeneration schemes. The proposal is in three parts:

1. **Liaison and agreement with EHRC on proportionate compliance for district councils**
   This would pick up on areas of weakness identified by the Commission for Racial Equality report, with a view to developing a bespoke good practice template which is suitable for districts, as much existing good practice guidance is orientated to larger public bodies.

2. **Diagnosing the problem**
   This would look at a number of variables including political understanding, relevance of issues to rural areas, capacity, community engagement, responses to proposals for a generic duty and single equality schemes.

3. **A legacy regional peer mentoring programme for districts**
   This would support the capacity of RIEPs to provide local peer mentoring schemes drawing on the experience of the successful peer support initiative which was developed to enable councils to help each other with meeting the requirement to carry out equality impact assessments.

As part of the framework, the Homes and Communities Agency will meet its responsibilities to equality of opportunity and elimination of discrimination by working with local and national agencies to ensure that regeneration priorities identify and respond to the needs of diverse communities and consider the impact of regeneration on equality and community cohesion. It will also encourage local agencies and partners to identify and work with diverse communities in the design, planning and ongoing delivery of regeneration locally, as well as ensuring that decisions relating to regeneration programmes are fair, transparent and communicated to local people.
8. Monitoring and review

How will the impact of the policy be monitored and how may stakeholders and the target equality groups continue to be involved/engaged in this area of policy?

### ACTION PLAN

<table>
<thead>
<tr>
<th>Actions taken or proposed</th>
<th>Rationale for the action</th>
<th>Beneficiaries of the action</th>
<th>Timing</th>
<th>Responsibility</th>
</tr>
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<tbody>
<tr>
<td>Discussed the importance of taking equalities into account in the comprehensive area assessment (CAA) with the Audit Commission</td>
<td>To ensure that the CAA, the framework for the independent assessment of local public services in England investigates the experience of different demographic groups in each locality</td>
<td>All</td>
<td>The CAA came into effect April 2009. First results under CAA will be published by partner inspectorates in Autumn 2009</td>
<td>CLG</td>
</tr>
<tr>
<td>Talked to the Homes and Communities Agency (HCA) to ensure that equalities issues are integrated into the single conversation and corporate plans</td>
<td>It is important that the HCA, the new national housing and regeneration delivery agency, will be responsive to the varying needs of different equality groups</td>
<td>All</td>
<td></td>
<td>CLG</td>
</tr>
</tbody>
</table>

** Mitigation:** For areas where a policy may have a differential impact on certain groups, what arrangements are in place or proposed to mitigate these effects?

- A programme to support mainstreaming equalities in regeneration schemes. This will be initially through the three RIEPs for the regions with the most districts performing poorly on the race duty
- £70,000 per region will support:
  1. liaison and agreement with EHRC on proportionate compliance with district councils
  2. diagnosis for individual districts to develop a better understanding of the barriers to equality and reactions to generic equality schemes
  3. establishing a peer review and all mentoring schemes in the regions

CRE/EHRC report *Regeneration and the Race Equality Duty* highlighted the need to strengthen local authorities’ capacity in improving equality
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<td>The framework will deliver a flexible approach to regeneration. Local authorities can work with delivery partners to identify local regeneration priorities based on local knowledge and consultation. This local knowledge will best place them to mitigate against the differential impacts on certain equalities groups.</td>
<td>To ensure that regeneration funding meets the varying needs of different communities.</td>
<td>All</td>
<td>Local authorities</td>
<td></td>
</tr>
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</table>

**Justification:** For areas where a policy may impact negatively (but not illegally) on certain groups but mitigation is not possible (e.g. an overriding driver) there needs to be a strategy for handling issues of unfairness.

**Opportunities:** Please state actions designed to maximise positive effects, i.e. opportunities identified for: promoting equality, good relations or knowledge about groups; increasing civic and democratic participation; or addressing inequalities.

By setting out a vision for regeneration that is driven by communities rather than Whitehall, the framework will inspire greater transparency and confidence in regeneration schemes.

Community driven regeneration will take into account local equalities needs.

All

**Monitor:** How will you monitor the impact and effectiveness of the new policy?

Use the comprehensive area assessment (CAA) to ensure equalities are being taken into account. The CAA looks at how well local services are working together to improve the quality of life for local people.

If the CAA finds that outcomes delivered by local public services are less equitable for some groups and individuals in areas, and local public bodies are not seeking to address this, then it will be identified in their assessment, and the need for further action to investigate and address the causes will be highlighted.

The framework is a high-level document. There needs to be a system of monitoring as CLG is not directly involved in all regeneration projects.

The CAA will monitor the extent to which public services are meeting the needs of the diverse groups within communities.

All

The CAA came into effect April 2009. First results under CAA will be published by partner inspectorates in autumn 2009.

Audit Commission

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17 *Equalities Impact Assessment of the second trial stage of the Comprehensive Area Assessment*, February 2009
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<td>regional development agencies (RDAs) are required to monitor the impact of their investment on race, gender, disability and age equality through equality impact assessments, to ensure that equality issues are built into their work</td>
<td>RDAs are uniquely placed to address inequalities and the diverse needs of their regions, by promoting economic inclusion for under-represented groups as a central part of their strategy and delivery</td>
<td>All</td>
<td>Ongoing</td>
<td>RDAs</td>
</tr>
</tbody>
</table>
| The Homes and Communities Agency's (HCA) single equality scheme includes commitment to diversity, through:  
• consultation and engagement  
• monitoring and evaluation  
• assessing the impact of decisions on diverse communities  
• communication and reporting; and  
• promoting good relations between diverse communities. | The single equality scheme will ensure that the HCA, the Government's national housing and regeneration agency, is maintaining its commitment to diversity and equality | All | Ongoing | HCA |

18 RDAs and Economic Inclusion: Tackling barriers to sustainable economic growth, February 2008