

City of York Council
Equalities Impact Assessment

Who is submitting the proposal?

Directorate:	Environment and Climate Emergency		
Service Area:	Highway Asset Management		
Name of the proposal :	Local Flood Risk Management Strategy		
Lead officer:	Mark Henderson		
Date assessment completed:	26/08/2025		
Names of those who contributed to the assessment:			
Name	Job title	Organisation	Area of expertise
Mark Henderson	Flood Risk Manager	City of York Council	Flood Risk

Step 1 – Aims and intended outcomes

1.1	What is the purpose of the proposal? Please explain your proposal in Plain English avoiding acronyms and jargon.
	<p>There is a current process in place for supporting the community in the event of a flood event and this EiA is to review process of how we notify people of the scheme.</p> <p>Please see section 2 and 8 of the LFRMS which provides further detail on how the Local Flood Risk Management Strategy (LFRMS) is to notify people. In summary:</p> <p>Section 2 'Action Plan' of the LFRMS intends to:</p> <p>'Work with the North Yorkshire Local Resilience Forum (NYLRF) and CYC Emergency Planning Unit to support community resilience work such as creation of Community Emergency Plans and public education programmes as set out in the Community Resilience Action Plan, increase flood warning uptake and input into the CYC River Flood Emergency Plan. Encourage local knowledge of community resilience work and volunteering through CYC and ward level communications, including CIO's and ward councillors.'</p> <p>Section 8 'Community Action and Resilience' details the support provided to communities and signposts to further help. This includes:</p> <p>the work undertaken by the North Yorkshire Local Resilience Forum (NYLRF), information on Community and Household Flood Plans, information on how to prepare for a flood, Information on signing up to the Environment Agency Flood Warning System, Information on better protecting household and business properties, Insurance for those who struggle to secure insurance and the availability of flood wardens and volunteer services to support vulnerable people.</p>

1.2	Are there any external considerations? (Legislation/government directive/codes of practice etc.)
	<p>The Flood Risk Regulations 2009 and the Flood and Water Management Act 2010 enacted by Government in response to the recommendations of the Pitt Review (2007). The Act gives local authorities a role, namely Lead Local Flooding Authority (LLFA) responsibilities for leading and co-ordinating the management of local flood risk - surface water run-off, groundwater and smaller watercourses and ditches known as ordinary watercourses.</p> <p>In addition, the delivery of a LFRMS is statutory requirement by the Act to:</p> <ul style="list-style-type: none"> • assess the local flood risk • set out objectives for managing local flooding • list the costs and benefits of measures proposed to meet these objectives, and how the measures will be paid for
1.3	Who are the stakeholders and what are their interests?
	<p>The following groups have an interest in flood risk management as they are affected by or can affect the delivery of flood risk work within York. We will consult with the following:</p> <ul style="list-style-type: none"> • Risk Management Authorities as defined by the Flood and Water Management Act 2010. • Residents and businesses • Parish/Ward Councils. • Community Groups including those with protected characteristics
1.4	What results/outcomes do we want to achieve and for whom? This section should explain what outcomes you want to achieve for service users, staff and/or the wider community. Demonstrate how the proposal links to the Council Plan (2019- 2023) and other corporate strategies and plans.

- CYC has a duty to develop, maintain, apply and monitor a strategy for local flood risk management in York under the Flood and Water Management Act 2010. This strategy will set out how local flooding will be managed in the City.
- CYC has a large population and a dynamic economy. Due to the historic development of the city around rivers and watercourses, and its geography including a very large catchment (Swale, Ure, Nidd and Ouse) as well as a very large and combined surface and sewage network there is a significant risk of flooding from river and surface water. These sources of risk are significant in York and threaten the safety and wellbeing of York's residents, and the sustainability of its economy.
- Through the Local Flood Risk Management Strategy for York, we aim to improve the safety and wellbeing of York's residents and the economy of York through appropriate flood risk management. To do this we will work effectively with communities and partners, adapt to climate change, and utilise natural processes to provide multiple benefits, where possible. Any projects that are as a direct result of this Local Strategy will be subjected to a separate EIA.
- This Local Flood Risk Management Strategy will build upon the lessons CYC have learned from previous local strategies for York to reduce flood risk in the areas identified as at risk, will enable CYC to continue to develop an understanding of flood risk, and improve how we work together with partners and communities.
- The objectives for this Local Flood Risk Management Strategy reflect the need to build on the improvements achieved to date and to address the challenges that we face now, and in the future. The objectives include: understanding flood risk, reduce the risk of flooding, resilient planning, and resilient communities.
- All actions stated within this Local Strategy have been analysed to determine any potential positive or negative impacts on the protected characteristics. We have found that the actions stated to achieve have potential impacts on protected characteristics, including age and disability; this is discussed further in Section 4 and Section 7 of this EIA.
- York's Local Flood Risk Management Strategy will be available on the CYC website and can be produced in other formats, if requested. We have considered whether the detail provided within the Local Flood Risk Management Strategy would have a negative or positive impact for the nine protected characteristics; we did not find any evidence to suggest this and have ensured the document is comprehensive for the

	<p>general population of York with links to further information. For evidence, the census data (2021) was reviewed to ensure the general population of York was considered.</p> <ul style="list-style-type: none"> • Overall, the Local Flood Risk Management Strategy will continue to provide information in an accessible way for all protected groups, whilst fulfilling our obligations as laid out in the Flood and Water Management Act.
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Step 2 – Gathering the information and feedback

2.1	<p>What sources of data, evidence and consultation feedback do we have to help us understand the impact of the proposal on equality rights and human rights? Please consider a range of sources, including: consultation exercises, surveys, feedback from staff, stakeholders, participants, research reports, the views of equality groups, as well your own experience of working in this area etc.</p>	
	Source of data/supporting evidence	Reason for using
	Public Consultation - Consultation questionnaire	This will enable those living and working in York to provide input into the proposals.
	Meetings with Key Stakeholders	Enable in-depth discussions around the accuracy, brevity and potential opportunities of the Local Flood Risk Management Strategy.

Step 3 – Gaps in data and knowledge

3.1	What are the main gaps in information and understanding of the impact of your proposal? Please indicate how any gaps will be dealt with.	
Gaps in data or knowledge		Action to deal with this
Understanding if any residents or businesses are affected by flooding and if they are in need of support		Communicate and promote the flood risk service offered through various sources e.g. libraries, social media, local newspapers, schools, volunteer groups associated with emergency response

Step 4 – Analysing the impacts or effects.

4.1	Please consider what the evidence tells you about the likely impact (positive or negative) on people sharing a protected characteristic, i.e. how significant could the impacts be if we did not make any adjustments? Remember the duty is also positive – so please identify where the proposal offers opportunities to promote equality and/or foster good relations.		
Equality Groups and Human Rights.	Key Findings/Impacts	Positive (+) Negative (-) Neutral (0)	High (H) Medium (M) Low (L)
Age	Approximately 25% of Yorks population is over the age of 65. This group may have difficulty in accessing and/or reading material published to advise about flood risk and mitigation measures, or reporting flood events due to poor eyesight, reduced access to the internet, and/or a lesser technical ability.	0	L

	<p>It needs to be ensured that any publications or reporting mechanisms are accessible. For example, using Alt Text to describe any images within the document, a point of contact to verbally discuss the Local Strategy, printed publications to be available on request, Large Print copies available and for the website that the document is published on to have the option to be read by an automated voice.</p> <p>This group is identified as more vulnerable during flood events and may require additional support/assistance. The Norfolk Local Resilience Forum made up of category 1 responders is a multi agency response group responding to large scale emergency events. The Major Incident Response Team (MIRT) is part of North Yorkshire Council and the City of York Council's 24-hour emergency response service (linked to the North Yorkshire Local Resilience Forum), normally 'called out' by the emergency services or council emergency planning units. They provide services to those who are vulnerable to flooding. The LFRMS promotes this service and signposts those who may need additional support.</p>		
Disability	<p>Disabled people make up 17% of York's population. This group may have difficulty reading material published to advise about flood risk and mitigation measures, or reporting flood events due to poor eyesight, reduced access to the internet, and/or a lesser technical ability.</p> <p>For example, using Alt Text to describe any images within the document, a point of contact to verbally discuss the Local Strategy, printed publications to be available on request,</p>	0	L

	<p>Large Print copies available and for the website that the document is published on to have the option to be read by an automated voice.</p> <p>This group is identified as more vulnerable during flood events and may require additional support/assistance. The Norfolk Local Resilience Forum made up of category 1 responders is a multi agency response group responding to large scale emergency events. The Major Incident Response Team (MIRT) is part of North Yorkshire Council and the City of York Council's 24-hour emergency response service (linked to the North Yorkshire Local Resilience Forum), normally 'called out' by the emergency services or council emergency planning units. They provide services to those who are vulnerable to flooding. The LFRMS promotes this service and signposts those who may need additional support. The LFRMS has series of actions identified in Section 2 'Action Plan' to promote the services offered by the North Yorkshire Local Resilience Forum and this will involve ensuring that vulnerable groups are targeted to ensure that their needs are captured.</p>		
Gender	<p>The Council are providing support to residents regardless of their protected characteristics. The provision of flood risk measures is based on risk to flooding rather than any protected characteristics.</p> <p>In respect to this particular protected characteristic, challenges and barriers to protecting this community will be identified through the consultation process and any issues or concerns identified will be reviewed and addressed where</p>	0	L

	possible. When considering other protected characteristics through intersectionality, where disability, age or race is relevant, existing processes have already been identified.		
Gender Reassignment	<p>The Council are providing support to residents regardless of their protected characteristics. The provision of flood risk measures is based on risk to flooding rather than any protected characteristics.</p> <p>In respect to this particular protected characteristic, challenges and barriers to protecting this community will be identified through the consultation process and any issues or concerns identified will be reviewed and addressed where possible. When considering other protected characteristics through intersectionality, where disability, age or race is relevant, existing processes have already been identified.</p>	0	L
Marriage and civil partnership	<p>The Council are providing support to residents regardless of their protected characteristics. The provision of flood risk measures is based on risk to flooding rather than any protected characteristics.</p> <p>In respect to this particular protected characteristic, challenges and barriers to protecting this community will be identified through the consultation process and any issues or concerns identified will be reviewed and addressed where possible. When considering other protected characteristics through intersectionality, where disability, age or race is relevant, existing processes have already been identified.</p>	0	L

Pregnancy and maternity	<p>The Council are providing support to residents regardless of their protected characteristics. The provision of flood risk measures is based on risk to flooding rather than any protected characteristics.</p> <p>In respect to this particular protected characteristic, challenges and barriers to protecting this community will be identified through the consultation process and any issues or concerns identified will be reviewed and addressed where possible. When considering other protected characteristics through intersectionality, where disability, age or race is relevant, existing processes have already been identified.</p>	0	L
Race	<p>It is acknowledged that 13% of the York population is from an ethnic minority background and therefore they will need the strategy to be available in different languages, which will be provided on request. This will be clear on the website.</p> <p>In respect to this particular protected characteristic, challenges and barriers to protecting this community will be identified through the consultation process and any issues or concerns identified will be reviewed and addressed where possible. When considering other protected characteristics through intersectionality, where disability, age or race is relevant, existing processes have already been identified.</p>	0	L
Religion and belief	<p>The Council are providing support to residents regardless of their protected characteristics. The provision of flood risk measures is based on risk to flooding rather than any protected characteristics.</p>	0	L

	In respect to this particular protected characteristic, challenges and barriers to protecting this community will be identified through the consultation process and any issues or concerns identified will be reviewed and addressed where possible. When considering other protected characteristics through intersectionality, where disability, age or race is relevant, existing processes have already been identified.		
Sexual orientation	<p>The Council are providing support to residents regardless of their protected characteristics. The provision of flood risk measures is based on risk to flooding rather than any protected characteristics.</p> <p>In respect to this particular protected characteristic, challenges and barriers to protecting this community will be identified through the consultation process and any issues or concerns identified will be reviewed and addressed where possible. When considering other protected characteristics through intersectionality, where disability, age or race is relevant, existing processes have already been identified.</p>	0	L
Other Socio-economic groups including :	Could other socio-economic groups be affected e.g. carers, ex-offenders, low incomes?		
Carer	No	0	L
Low income groups	No	0	L

Veterans, Armed Forces Community	No	0	L
Other		0	L
Impact on human rights:			
List any human rights impacted.	The Council intends to implement flood resilience and mitigation measures and the impacts will be positive for people, property and infrastructure.	0	L

Use the following guidance to inform your responses:

Indicate:

- Where you think that the proposal could have a **POSITIVE** impact on any of the equality groups like promoting equality and equal opportunities or improving relations within equality groups
- Where you think that the proposal could have a **NEGATIVE** impact on any of the equality groups, i.e. it could disadvantage them
- Where you think that this proposal has a **NEUTRAL** effect on any of the equality groups listed below i.e. it has no effect currently on equality groups.

It is important to remember that a proposal may be highly relevant to one aspect of equality and not relevant to another.

<p>High impact (The proposal or process is very equality relevant)</p>	<p>There is significant potential for or evidence of adverse impact The proposal is institution wide or public facing The proposal has consequences for or affects significant numbers of people The proposal has the potential to make a significant contribution to promoting equality and the exercise of human rights.</p>
<p>Medium impact (The proposal or process is somewhat equality relevant)</p>	<p>There is some evidence to suggest potential for or evidence of adverse impact The proposal is institution wide or across services, but mainly internal The proposal has consequences for or affects some people The proposal has the potential to make a contribution to promoting equality and the exercise of human rights</p>
<p>Low impact (The proposal or process might be equality relevant)</p>	<p>There is little evidence to suggest that the proposal could result in adverse impact The proposal operates in a limited way The proposal has consequences for or affects few people The proposal may have the potential to contribute to promoting equality and the exercise of human rights</p>

Step 5 - Mitigating adverse impacts and maximising positive impacts

5.1	Based on your findings, explain ways you plan to mitigate any unlawful prohibited conduct or unwanted adverse impact. Where positive impacts have been identified, what is been done to optimise opportunities to advance equality or foster good relations?
The overall strategy at this time is considered to be neutral, however this may change following the consultation and what we learn about the impacts on the different protected characteristics and whether these can be mitigated.	

Step 6 – Recommendations and conclusions of the assessment

6.1	Having considered the potential or actual impacts you should be in a position to make an informed judgement on what should be done. In all cases, document your reasoning that justifies your decision. There are four main options you can take:
- No major change to the proposal – the EIA demonstrates the proposal is robust. There is no potential for unlawful discrimination or adverse impact and you have taken all opportunities to advance equality and foster good relations, subject to continuing monitor and review.	

- **Adjust the proposal** – the EIA identifies potential problems or missed opportunities. This involves taking steps to remove any barriers, to better advance quality or to foster good relations.
- **Continue with the proposal** (despite the potential for adverse impact) – you should clearly set out the justifications for doing this and how you believe the decision is compatible with our obligations under the duty
- **Stop and remove the proposal** – if there are adverse effects that are not justified and cannot be mitigated, you should consider stopping the proposal altogether. If a proposal leads to unlawful discrimination it should be removed or changed.

Important: If there are any adverse impacts you cannot mitigate, please provide a compelling reason in the justification column.

Option selected	Conclusions/justification
No major change to the proposal	<p>The proposal is being put forward to protect all of those working, living, visiting or studying in York from the current and future risks of flooding which in part are increasing in risk due to Climate Change and does not discriminate nor disadvantage anyone with protected characteristics and overall will provide a positive benefit.</p>

Step 7 – Summary of agreed actions resulting from the assessment

7.1 What action, by whom, will be undertaken as a result of the impact assessment.			
Impact/issue	Action to be taken	Person responsible	Timescale
Lack of understanding of the local flood risk management strategy including the flood risk management roles and responsibilities of the organisations serving the public	Promote the Local Flood Risk Management Strategy and ask for feedback on the actions and measures put forward to protect people, property and infrastructure. This is an opportunity to raise awareness of flood management schemes so that those who are affected by flooding are aware of the protection that may be available.	Mark Henderson	Autumn 2025
Ability to access or read the LFRMS	It needs to be ensured that any publications or reporting mechanisms are accessible. For example, using Alt Text to describe any images within the document, a point of contact to verbally discuss the Local Strategy, printed publications to be available on request, Large Print copies available and for the website that the document is published	Mark Henderson	Autumn 2025

	on to have the option to be read by an automated voice.		
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Step 8 - Monitor, review and improve

8. 1	How will the impact of your proposal be monitored and improved upon going forward? Consider how will you identify the impact of activities on protected characteristics and other marginalised groups going forward? How will any learning and enhancements be capitalised on and embedded?
	Any feedback from the public consultation will be fed back into the draft Local Flood Risk Management Strategy and outcomes will be recorded.