

Equality Analysis Equality Impact Assessment (EIA) Form 'Knowing your customers needs'

Background

An Equality Analysis is a way of making sure that equality considerations are embedded into our decision-making processes and that equality is considered when we are developing key policy & services etc. One tool to help you do this is an Equality Impact Assessment or EIA. It will assist you in ensuring that “**due regard**” has been given to identify any potential or actual impact (Positive or Negative) that our policies/services/functions*etc., have on differing groups of people.

EIAs also provide a systematic approach to identifying and recording gaps and actions in relation to ensuring equal access when providing functions.

The purpose of the Equality Analysis is to:

- make us focus on the needs, experiences and circumstances of everyone who will be affected by the decisions the Council makes
- direct us to seek alternative ways of achieving our aims and avoiding inequality
- enhance our creditability with our service users to have greater confidence in our performance
- improve our policy making procedures and services

*** Note: For simplicity we have sometimes referred to the following (listed below) as 'Functions'. This includes:** Services, Employment Practices, Projects, Strategy, Processes, Systems, Practices, Procedures, Protocols and Guidelines

Legislation - Equality duty

As a local authority that provides services to the public, Melton has a legal responsibility to ensure that we can demonstrate having paid due regard to the need to:

- Eliminate discrimination, harassment and victimisation
- Advance Equality of Opportunity
- Foster good relations

For the following protected characteristics:

1. Age
2. Disability
3. Gender reassignment
4. Marriage and civil partnership
5. Pregnancy and maternity
6. Race
7. Religion and belief
8. Sex
9. Sexual orientation

When completing the Equality Impact Assessment you are encouraged to consider other disadvantaged or socially excluded communities or groups e.g. carers, the homeless, rural communities, priority neighborhoods, ex-forces personnel etc., who are likely to be affected by the proposal. The evidence also needs recording to demonstrate that consideration has been given.

Title of the policy	Draft Housing Strategy 2021-2026
Is it new or existing?	Housing Strategy is considered to be new since the Council has not had a Housing Strategy in place for a number of years
Date	February 2021
Officer undertaking EIA	Nic Butcher
Who else is involved in undertaking this assessment?	

1. Overview of policy/function being assessed

<p>A. Outline: What is the purpose of this policy? (Specify the aims and objectives.) Please also state why the policy has been introduced or changed.</p> <p>The Housing Strategy is a key strategic document that sets out the Council’s strategic priorities for housing in the Melton Borough over a 5 year period. It helps to identify local housing issues and ensures that they are considered at a strategic level so housing related services and plans are delivered efficiently and effectively in a joined up way. Whilst a housing strategy is not a legal requirement, it is a best practice approach and it has been drafted with regard to a range of relevant statutory requirements, guidance and national policy initiatives.</p> <p>The Housing Strategy as a strategic document sets out the over-arching objectives for the next five years, rather than a set of specific detailed actions. It will be delivered by embedding its objectives within other key policies and plans including the Melton Local Plan, the Homelessness Strategy, the Tenancy Strategy and the Allocations Policy. These and other documents which will deliver the objectives of the housing strategy will themselves be subject to EIA.</p> <p>The Housing Strategy will ensure that housing and meeting local peoples housing needs is considered both within the Council and by external partner organisations who deliver housing related services as well as help deliver the objectives of the Corporate Strategy. The Corporate Strategy 2020-24 is considered to be a central foundation of the housing strategy, itself subject to a recent EIA and extensive community engagement.</p> <p>The housing strategy has developed four objectives;</p> <p>Delivering Growth: Delivering sustainable and inclusive housing growth that meets the needs of current and future residents in Melton</p> <p>Better Homes: Ensure that as many homes as possible, in all tenures, are of good quality and support health and wellbeing</p> <p>Supporting People: Support people to access and sustain housing appropriate for their needs</p> <p>Climate Emergency: Ensure climate change implications are considered at all stages of planning, delivery and occupations of homes</p>
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B. Who are the people/groups affected and what is the intended change or outcome for them?

Housing is a basic need for all people and therefore the Housing Strategy has potential to impact all current and future residents in the Melton Borough across all of the protected groups. The Housing Strategy is focussed on creating a positive impact on residents, housing availability, current housing stock conditions, quality of new build homes and housing related support and other services provided by the Council and others, helping to lever in funding to do so.

The Housing Strategy supports measures to;

- Ensure continued housing delivery (and supply of developable sites for new homes) to meet population and household growth
- Ensure that new housing delivery meets the needs of the local population, providing a mix of housing to meet local peoples housing needs and address shortfalls in the existing housing stock
- make the best use of and improve the condition of the existing housing stock across all tenures
- ensure good quality housing related advice and support is available, particularly for the most vulnerable and those facing homelessness
- improve understanding of local housing needs, including changing needs likely to arise as local population ages
- enable people to live successfully independently for as long as they wish
- have a positive impact on the environment and support the transition to net zero

The strategic aims of the Housing Strategy are intended to be inclusive, to ensure that the housing needs of various sections of the community are identified and services are designed to ensure that they are accessible for all. The strategy takes into account the diverse needs of current and potential Borough residents across all tenures and types of housing.

C. Equality implications/obligations: Will this proposal/policy/service etc., meet the Equality Act requirement to have ‘due regard’ to the need to meet any of the following duties? In this question, consider both the new/current service and the proposed changes.

	Is the equality duty listed in the left hand column relevant to your policy/service etc.?		Comments on how it meets the duty or why is not relevant
	Yes	No	

<p>(1) Eliminate unlawful discrimination, harassment and victimisation – please complete section 4 of the template</p>			
<p>(2) Advance equality of opportunity between different groups How does the proposal/policy/service etc ensure that the intended outcomes promote equality of opportunity for users who have protected characteristics?</p> <p>This includes: Removing or minimising disadvantages for protected groups of people Taking steps to meet the needs of people from protected groups where these are different from the needs of other people Encouraging people from protected groups to participate in public life or in other activities where there participation is disproportionately low e.g. are stakeholders engaged in the process and are there any barriers?</p>	<p>Yes</p>		<p>Housing Strategy aims to improve housing stock and housing options for all. It sets out ambitions to better understand housing needs for all types of housing, across all tenures and groups of people, including Gypsy and Traveller accommodation needs, a protected ethnic group whose accommodation needs differ to the general population and need to be specifically assessed (led by Melton Local plan team as part of the evidence base process). It sets out an aim to improve support, advice and assistance to all people across a range of housing services.</p> <p>The strategy also seeks to improve the accessibility of the housing stock to be able to meet needs of all, regardless of mobility difficulties or ill health.</p> <p>The housing strategy is a strategic document and there will be further opportunities for engagement on specific issue and policies/plans that will sit underneath it, which will also be subject to an EIA.</p>
<p>(3) Foster good relations between different groups (tackling prejudice and promoting understanding).</p> <p>Does the service contribute to good relations or to broader community cohesion objectives? How does it achieve this aim?</p> <p>This could include: <i>(The following are examples and so you do not need to answer all the bullet points below.)</i></p> <ul style="list-style-type: none"> • Building services around people 	<p>Yes</p>		<p>The housing strategy sets out steps to better understand housing needs across all groups and tenure and promotes actions to meet them across various supporting policies and plans, which is expected to help contribute to better community cohesion and widen community understanding of local housing needs</p> <p>The housing strategy, linking to corporate strategy objectives, clearly sets out the need to work in partnership</p>

<p>and communities and involving them</p> <ul style="list-style-type: none"> • Considering if there are strong and positive relationships between groups/communities affected by this policy. Does the policy/service bring together groups of people not used to interacting with each other? If so will it raise any issues that need to be addressed? • Tackling myths and misinformation. If the service is seen as unfair by certain groups, how do you tackle the myths and communicate this? 			<p>to achieve its aims and ensure wide ranging engagement with the local community and partner organisations, this will include the Council's tenants where Council owned housing may be impacted.</p> <p>Opportunities to foster good relations between groups will be achieved through specific policies and plans which will deliver the objectives of the housing strategy, which themselves will be subject to consultation and EIA. For example, a clear and well communicated allocations policy can help local people understand how social rented housing is allocated in rational and fair way, tackling misconceptions.</p>
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D. Which groups have been consulted as part of the creation or review of the policy? Did they identify any barriers?

No formal consultation has occurred yet, this draft EIA has been prepared to inform the draft housing strategy to be released for consultation with public and organisations.

The draft housing strategy has been written to be accessible to a wide audience, written in plain English without significant technical language or data, in order to effectively communicate with the public.

The Corporate Strategy (2020-24) has been used as a foundation for developing the Housing strategy and this has been subject to extensive community consultation and an EIA. The development of the housing strategy has also taken into consideration feedback on other housing related plans and policies including the consultation on the homelessness strategy in 2018, the Melton Local Plan and community consultation events on design of new development in 2020.

A housing strategy workshop was held with elected members in October 2020, this informed the development of the draft housing strategy, alongside with engagement with Council officers to ensure key housing issues across all services were understood and reflected in the draft strategy.

2. What we already know and where there are gaps

A. What existing information/data do you have/monitor about different diverse groups in relation to this policy? This could consist of previous EIA's, reports, consultation, surveys, demographic profiles etc.

The housing strategy has been developed based on extensive examination of housing data and information, using primary qualitative data analysis from a wide range of sources. It has also had regard to;

- The Corporate Strategy and evidence base which supported its development, including extensive public survey and its EIA
- Evidence base that supports planning policy and the Melton Local Plan, including;
 - Leicester and Leicestershire Housing and Economic Development Needs Assessment
 - Melton Housing Need Assessment
 - Gypsy and Traveller Accommodation Need Assessment
- Homelessness review and EIA for the development of the Council's Homelessness strategy
- Previous EIA for meeting the accommodation needs for Gypsies and Travellers
- Other databases and wide range of government statistics on housing for the Melton Borough; including the POPPI and PANSI databases and Land Registry Price Paid Data
- Other data, reports and information on housing at a regional or national level, to provide context and information where there are gaps in local data

B. What does this information/data tell you about diverse groups? If you do not hold or have access to any data/information on certain/all diverse groups, what do you need to begin collating/monitoring? (please list)

Certain groups are more likely to live in certain tenures or types of housing and therefore some housing policies have the potential to impact different groups in different ways. Many of the difference between groups in relation to housing relate to incomes, life skills and health (mental and physical). Examples include, that disable people are much more likely to live in social rented housing than other tenures and that single parent households who live in the private rented sector with the support of housing benefit are much more likely be female.

The local population is growing and aging, the population over the age of 80, the people who are most likely to require specialist housing or housing support services, is expected to more than double over the next 20 years. There are clear links between aging and ill health and reduce mobility and there are likely to be increasing numbers of people with complex health problems and disabilities, including dementia. It is appropriate to address this within the housing strategy which makes provision for a better understand of the need for support services and specialist accommodation as well as the provision of healthier and more accessible homes over the next 5 year period.

Younger people are finding it increasingly difficult to access housing and achieve home

ownership aspirations in particular (under 40's). They are at also the most at risk of homelessness (under 45's). There are structural inequalities in the housing market, so these issue are most acute for those with lower and moderate incomes and for those without any family wealth (so called 'bank of Mum and Dad'). It is noted that data on tenure and age is hard to collect at a local level, given fluidity between private rented and home ownership tenures, new census data (2021) when released will assist in monitoring this.

Low income and single income family households with children are identified as potentially struggling to secure rented accommodation without assistance, it is noted that single parent families may be impacted in particular and as they are predominately female led, and there may be indirect gender impacts. There is potential for a similar issues for households whose protected characteristic (e.g. disability, ill health, mental health) or other social excluded group characteristics (e.g. credit history/personal debt, low literacy, offenders, drug and alcohol dependency) impacts their ability to work and/or income and therefore their ability to secure and maintain housing without assistance.

National data and analysis shows that overall black and minority ethnic households and recent migrants are more likely to be living in the private rented sector and are more likely to be living in poor housing conditions. This reflects structural inequalities in the housing market but cannot be solely accounted for by where ethnic groups live, social status, their age, and family structure or when they arrived in Britain. Rates of housing deprivation are higher in ethnic minority groups, particularly for white Gypsy and Irish Traveller households (7.5 times more likely than white British to live in deprived housing conditions), but also notably for Black African households (75% more likely) and Bangladeshi households (63% more likely). However this national picture has not been demonstrated at a local level, due to low historic levels of diversity in the Melton population, its rural nature and because Melton's population has generally become more diverse due to in migration to the area by households with moderate to high incomes who are owner occupiers. The exception is Gypsies and Travellers, who have accommodation needs that sit outside standard housing assessments that require specialist consideration. Some limited local data also suggests that recent migration waves from eastern European EU accession countries, in particular Poland reflect the national level data for recent migrants. Given the small size and low diversity of the local population, continued monitoring of both local and national data will be required to ensure we understand and meet the needs of different racial groups, a separate accommodation assessment will be regularly require to understand the accommodation needs of Gypsies and Travellers.

Relatively little is known about the challenges LGBTQTI+ people face in relation to housing. Historical discrimination means many LGBTQTI+ people have been reluctant to articulate their needs or have been marginalised in consultation processes. A person's sexual orientation can impact their housing experiences; this can include perceptions of unfavourable treatment in housing services, hate crime and harassment in homes and communities, family rejection which can lead to homelessness as well a lack of understanding of peoples needs, this includes some recent research which has shown a lack of awareness around (older) LGBTQTI+ people who live in supported housing or receive housing support. Given small size of the local population, continued monitoring of both local and national data will be required to ensure we understand and meet the housing needs of the local LGBTQTI+ groups.

Religious belief can also impact housing availability and choice. Proximity to place of worship, local religious community ties, design of housing (e.g. space for quiet prayer) and financial arrangements (e.g. Islamic mortgage) can all impact housing choice and these specific issues need to be considered in the policies and plans that sit beneath and will deliver the objectives of the housing strategy. Housing finance however is not something that is controllable at the local authority level or within housing strategy, the Government will need to take it into

account and mitigate potential negative impacts at a national level, particularly for its homeownership schemes. Given small size of the local population, its high proportion of Christian and non religious beliefs, continued monitoring of both local and national data will be required to ensure we understand and meet the housing needs of people with other religious beliefs.

A customer-focused approach to diversity recognises that the needs and experiences of individuals will be different. A starting point for delivering better services to customers is to gain a better understanding of who they are and how they articulate their needs. The first step, in line with the corporate strategy objectives (2020-2024) is increasing knowledge about the Council's service users.

The housing strategy sets out a need to continue to update housing information and housing needs knowledge to ensure that we understand and meet the housing needs of different groups and it will remain important to ensure that all groups are considered in the scoping of any housing research, albeit that the small local population may mean that we will have to draw on larger scale analysis for some groups.

Differences between groups and cumulative impacts (where an individual is part of more than one protect group) need careful consideration in the development of all housing policies and plans that sit under the housing strategy to ensure that there is no unjustified direct or indirect discrimination.

3. Do we need to seek the views of others and if so, who?

A. In light of the answers you have given in question 1D & 2 do you need to consult with specific groups? If not please explain why.

The housing strategy is a high level strategic document and so consultation on the draft strategy is required with a broad range of groups. Specific groups will need to be involved in the development of specific policies that sit under the housing strategy, for example housing policies that may impact MBC's tenants or its housing stock should involve sufficient engagement with them and Gypsy and Traveller accommodation assessments need to be undertaken with input and support from the community and those with specialist knowledge of their needs, such as the Leicester and Leicestershire Multi Agency Traveller Unit.

4. Assessing the impacts

In light of any data/consultation/information and your own knowledge and awareness, please identify whether the policy has an actual or potential positive or negative impact on the groups specified and whether there is evidence of discrimination. Please read the guidance that accompanies this template.

If you have identified actual or potential negative impact or discrimination that is *illegal*, you are required to take action to remedy this immediately.

If you have identified negative impact or discrimination that is justifiable or legitimate please give your reasons. You will need to consider what can be done to mitigate its effect on those groups of people.

Provide an explanation for your decisions

<u>Diversity Groups</u>	<u>Positive impacts (Actual or Potential)</u>	<u>Negative impacts (Including any barriers) (Actual or Potential)</u>	<u>Is there evidence of direct/indirect discrimination? (Is it illegal or legitimate/justifiable?)</u>	<u>Mitigation</u> <u>Where there are potential barriers, negative impacts identified and/or the barriers or impacts are unknown, please outline how you propose to minimise or remove all negative impact or discrimination.</u>
Age	<p>Potential: Young People: The housing strategy aims to reduce homelessness and support people into home ownership, both actions are more likely to positively impact younger people (under 45).</p> <p>Potential: Older people: Action to better understand and provide sheltered and supported housing and housing support will disproportionately positively impact disabled, vulnerable and older people who are the primary end users of such accommodation</p>	None identified	No	The housing strategy is a high level strategic document, policies and plans that have a direct impact on protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect discrimination related to age
Disability (physical, visual, hearing, learning disability, mental health)	<p>Potential: Disabled people: 1) more likely to live in social rented housing and be impacted positively by housing strategy aims to expand and improve this sector; and 2) Provision of more housing that is accessible and adaptable will increase choice in all tenures and help mitigate</p>	None identified	No	The housing strategy is a high level strategic document, policies and plans that have a direct impact on protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect disability discrimination

	existing identified shortfall and barriers 3) Action to better understand and provide sheltered and supported housing and housing support will disproportionately positively impact disabled, vulnerable and older people who are the primary end users of such accommodation			
Gender / Sex	Potential: Female: due to gender differences across household types and tenures; specifically that most single parent households are female, and single income households are more likely to face challenges in accessing and affording housing particularly private rented homes if in need of housing benefit assistance and more likely to live in social rented housing and be impacted positively by housing strategy aims to expand and improve these sectors.	None identified		The housing strategy is a high level strategic document, policies and plans that have a direct impact on protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect gender discrimination
Religious Belief	None identified	None identified	No	The housing strategy is a high level strategic document, policies and plans that have a direct impact on protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect discrimination due to religious belief

Racial Group	Potential: Gypsies and travellers: have unique accommodation needs and the housing strategy ensures that all groups should be assessed to ensure their needs are identified and met	None identified	No	The housing strategy is a high level strategic document, policies and plans that have a direct impact on protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect racial discrimination.
Sexual Orientation	None identified	None identified	No	The housing strategy is a high level strategic document, policies and plans that have a direct impact on protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect discrimination due to sexual orientation
Gender reassignment / Transgender	None identified	None identified	No	The housing strategy is a high level strategic document, policies and plans that have a direct impact on protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect discrimination due to gender reassignment/transgender

<p>Other protected groups (pregnancy & maternity, marriage & civil partnership)</p>	<p>None identified</p>	<p>None identified</p>	<p>No</p>	<p>The housing strategy is a high level strategic document, policies and plans that have a direct impact on protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect discrimination</p>
<p>Other socially excluded groups (low literacy, offenders, priority neighbourhoods, ex forces personnel etc)</p>	<p>Objectives of housing strategy is to support those who may find it hard to find, secure or maintain accommodation without assistance which is likely to include a variety of socially excluded groups may include offenders, vulnerable drug and alcohol dependent, low literacy, in debt/poor credit rating or bankruptcy, people without life skills to manage housing without support</p> <p>objective to provide good quality temporary accommodation likely to positively impact some groups more than other, particularly people fleeing harassment/violence/abuse and prison, care or other secure accommodation leavers</p> <p>Recent eastern EU national Migration: Housing deprivation is more likely for those who have come to the UK recently, including those who have moved to Melton since EU accession for eastern European countries, particularly Polish migrants, and actions to improve stock condition in the private rented sector likely to disproportionately indirectly positively impact this group</p>	<p>None identified</p>	<p>No</p>	<p>The housing strategy is a high level strategic document, policies and plans that have a direct impact on protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect discrimination</p>

5. Action Plan

Please include any identified concerns/actions/issues in this action plan: The issues identified should inform your 'One Council Delivery Plan' and, if appropriate, your Consultation Plan			
Action Number	Action	Responsible Officer	Target Date
1	Member scrutiny of draft housing strategy (Scrutiny Committee)	Director for Growth and Regeneration	Feb 2021
2	Ensure wide spread and effective consultation on draft housing strategy	Planning Policy Officer	Jul 2021
3	Adopt housing strategy	Director for Growth and Regeneration	Oct 2021
4	Ensure plans and policies that sit beneath the adopted housing strategy undertake robust EIA assessments and consultation processes	Organisation wide	Ongoing
5	Ensure ongoing housing need assessments are robust, consider the needs of all relevant groups, including the protected groups and are regularly monitored and updated	Planning Policy manager Housing options manager	Ongoing
6	Ongoing equality monitoring of housing and planning related services	Organisation wide	Ongoing
7	Review and refresh Housing Strategy	Planning Policy manager	By Oct 2026

6. Who needs to know about the outcomes of this assessment and how will they be informed

	Who needs to know (Please tick)	How they will be informed (we have a legal duty to publish EIA's)
Internally (employees & Check & Challenge group)	✓	Check and Challenge Process
Externally (service users, stakeholders, private sector householders, landlords etc)	✓	Publish this EIA online alongside the draft housing strategy consultation Undertake active not just passive notification of consultation, making

		direct contact with key stakeholders to get encourage feedback on draft strategy and EIA
Others – Elected Members	✓	Members workshop October 2020 Scrutiny Committee Feb 2021 Cabinet adoption Sep 2021
To ensure ease of access, what other communication needs/concerns are there?	✓	Preparation of draft and final strategy that conforms to accessibility standards To be made available on request in paper format or in alternative formats/languages

7. Internal Scrutiny (to be completed and signed by a member of the check and challenge group).

Please delete as appropriate
I agree / disagree with this assessment / action plan
If disagree, state action/s required:
Signed (Check and challenge):
Date:

8. Conclusion (to be completed and signed by the Head of Service)

Please delete as appropriate
I agree / disagree with this assessment / action plan
If disagree, state action/s required, reasons and details of who is to carry them out with timescales:
Signed (Head of Service):
Date:

Once approved by Head of Service please pass to person responsible for Equalities to publish on the internet