

Annex 2

Thanet District Council (TDC) Equality Impact Assessment

Step one: test for relevance

1 Person responsible for this assessment

Name:	Amena Matin		
Job title:	Housing Strategy and Projects Manager		
Phone:	01843 577010		
Service area:	Housing	Date of assessment:	14 November 2019

2 Others involved in carrying out the analysis

Name:	Carol Cook - Policy Officer
Name:	Victoria May - Housing Options Manager
Name:	Richard Hopkins - Private Sector Housing Manager

3. Description of strategy, policy, service, project, activity or decision

Title:	Draft Housing and Homelessness Strategy 2020-2025
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Is it new?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
A review of existing?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

3.1 Aims and objectives

Consider: what you are doing? why you are doing it? who will benefit?

What you are doing?

The draft Housing and Homelessness Strategy 2020-2025, sets the vision for the Council's role in addressing housing supply, homelessness, standards and health and wellbeing.

The draft strategy is built around four key themes:

1. Increasing access to and supply of housing
2. Improving standards and safety in homes across all tenures
3. Enhancing the health and wellbeing of our residents and communities
4. Preventing homelessness and tackling rough sleeping

why you are doing it?

A local housing strategy is the Council's vision for housing in its area. It sets out policies, objectives and targets on how the authority intends to manage and deliver its strategic housing role. It provides an overarching framework against which the authority considers and formulates other policies on more specific housing issues. The current Housing Strategy was adopted in 2014 and expires in December 2019.

who will benefit?

The trends which informed the Housing Strategy (2014), continue to drive the need for review and action in this revised strategy. Population is increasing and housing demand, especially affordable homes for those on low incomes, remains high. Housing costs have risen sharply when compared to median incomes and local housing allowance rates, creating an increasing affordability gap. This presents a real challenge for households seeking to buy or rent a home, and contributed to the increasing incidence and cost of homelessness. The high cost of home ownership has also resulted in a tenure shift and a significant increase in the number of people in privately rented accommodation. The draft Housing Strategy includes an action plan which seeks to address the inequalities faced by residents who struggle to access affordable housing, those who are at risk of homelessness, poor lifestyles as a result of housing needs and standards and an ageing population.

3.2 What outcomes are expected? Who is expected to benefit?

The outcomes include increasing supply that local people can afford, improving standards across all sectors, promoting independent and sustainable accommodation for those that are vulnerable and preventing and responding to homelessness and rough sleeping.

The draft Strategy has a key role in helping to deliver the ambition that everyone should have access to an affordable, safe and well-maintained home. It builds on the wider contribution that the Council and other housing providers and partners can make towards building mixed and sustainable communities and improving the health and wellbeing of residents. It sets out the Plan to set up a housing development company, to work towards building the necessary high quality and energy-efficient housing to meet the needs of existing and future communities.

4 Who is affected?

4.1 Which groups or individuals does the strategy, policy, service, project, activity or decision affect? For example, the Council, employees (including temporary workers), other public authorities, contractors, partner organisations, wider community, others.

The priorities have been designed to provide for all Thanet residents whilst seeking not to specifically affect on any protected characteristics of: age, race, disability within the context of the strategic priorities and proposals. This is based on a broad analysis of the local population, age structure and health issues in the area. Although not a 'protected characteristic' socio-economic issues would also form part of the analysis as being a significant issue for the district. The Local Context section of the strategy summarises the key social indicators and who the strategy is seeking to support. It includes detail of the district profile, economic growth, population indicators, social indicators, housing need and demand, affordability challenges, homelessness, and private sector housing.

4.2 Does the strategy, policy, service, project, activity or decision relate to a service area with known inequalities? (Give a brief description).

Thanet has been identified for some years as an area experiencing issues of multiple deprivation in some areas, which affect people's quality of life and opportunities. The draft Strategy seeks to address inequality and barriers faced by those with a protected characteristic by increasing access to housing options and improving housing and standard and links with health and wellbeing services. The Strategy identifies known inequalities faced by rough sleepers and seeks to increase prevention activity and accommodation for those who are hard to reach and entrenched as a result of systemic changes such as welfare reform.

Additionally, Equality Impact Assessments were undertaken for policies underpinning the strategy:

Allocations Policy (September 2019)

Local Plan (October 2018)

5 Equality Act 2010

How does the strategy, policy, service, project, activity or decision actively meet the public sector equality duties to:

Eliminate unlawful discrimination (including harassment, victimisation and other prohibited conduct)

The Strategy sets out objectives and actions which aim to address the inequalities faced by all residents, whether they are social housing tenants living in privately rented accommodation or in owner occupation. It seeks to eliminate unlawful discrimination by including everyone in the Council's vision for housing.

Thematic Priority 1 - Improving access to and supply of housing

Housing is at the core of our ambitions for growth, for jobs and prosperity, for the health and wellbeing of our residents and to ensure that Thanet is a place where people of all characteristics and none, can thrive. There is a recognised mismatch between growth in second homes and the corresponding slower growth in local residents accessing homes. This is a result of low rates of house-building and infrastructure delivery. A lack of well connected homes has adverse impacts on both people and businesses. The actions within this theme, seek to increase the pace of delivery of new homes to stimulate the housing market, especially in the case of any market failure which would worsen inequalities already faced by Thanet residents. We also need to make sure that we are providing the right types of homes in the right locations, ensuring these are affordable for those that need to live and work in the area, whilst minimising adverse impacts of growth.

Thematic Priority 2 - Improving standards and safety across all tenures

Everyone has the right to live in a safe home, whichever sector they live in. Whilst we have an ambitious programme for building new homes in future years that are well designed and energy and water efficient, we must not forget that the majority of residents live in existing homes, and as many of the homes are older, they are more likely to be in poorer condition, less well insulated, and more expensive to heat. The Council supports this right for all tenants and works hard to ensure that landlords in all sectors provide good quality well-managed accommodation across the district. The Council has embraced these new enforcement tools and uses them robustly whenever appropriate to help safeguard tenants, particularly those with a protected characteristic.

Thematic Priority 3 - Enhancing the health and wellbeing of our residents and communities

The strategy aims to help people live safely and independently at home, and encourage residents to be active participants in community life to combat loneliness and isolation. The **Better Care Fund** (BCF) is a programme spanning both the NHS and local government which seeks to join-up health and care services, so that people can manage their own health and wellbeing, and live independently in their communities for as long as possible. The Government awards allocations for Disability Facilities Grant based on need and Thanet has year on year had the highest allocation at around £3m. This enables the Council to enhance the ways residents live in their homes, maintain their homes and have access to wellbeing services.

In collaboration with key stakeholders like the Department for Work and Pensions and Your Leisure we are delivering schemes that focus on our general resident population as well as specific community groups. This includes projects for people on benefits who have anxiety and depression, dementia swimming opportunities, upskilling voluntary organisations through our stakeholder networks to improve the availability of sports like tennis and bowls and supporting existing external partners with their delivery plans.

Thematic Priority 4 - Preventing Homelessness and tackling rough sleeping

The Housing Options does not harass, victimise or contradict any other conduct prohibited by the act. It aims to make long term improvements to the policy to enable social housing to be allocated to those most in need.

It also aims to ensure that Thanet District Council makes best use of its housing stock enabling households to fully understand their housing options. The Housing Act outlines 'Reasonable Preference' categories that should be prioritised appropriately and this has been addressed within the policy ensuring consistency and fair treatment of this category of households.

Advance equality of opportunity (between people who share a protected characteristic and people who do not share it)

The strategy seeks to have a consistent approach to households faced with and without a housing need to advance equality of opportunity. This ensures that a joined up approach with key stakeholders is undertaken, for those requiring specialist accommodation or have a specific housing need.

Promoting specialist and other types of housing We will continue to develop partnership working with appropriate organisations to ensure that sufficient support is available for those at greatest risk in our communities, including young people, families with young children, young people leaving care, ex-offenders, those suffering from domestic abuse and asylum seekers. Where purpose built accommodation is required, we will work with both commissioners and developers to secure appropriate accommodation on new developments.

Homes for Gypsies and Travellers Under the Housing & Planning Act 2016, local authorities have a duty to assess the housing needs of those residing in caravans. As part of the council's action to identify new sites, we will look to see how we can best accommodate those stopping temporarily in the District. A key priority is to identify transit sites to accommodate those that wish to live in a caravan. Under the planning definition, a recent assessment identified the need for Gypsy & Traveller sites for those residing in caravans who no longer travel (7 permanent pitches) and 5 transit pitches.

Foster good relations (between people who share a protected characteristic and people who do not share it). Could it have an adverse impact on relations between different diverse groups?

The Strategy contributes to this aim and raises the awareness of housing services to remove barriers to accessing a safe and secure home. This Strategy and the services outlined within, have been developed as a response to the emerging policy landscape and guides how we approach the housing needs of our residents, the future delivery of new homes and the management of existing accommodation. Partnership working is key to increasing access, supply, quality and management of all homes regardless of characteristics. The impact on health associated with poor housing is well versed, and the functionality of mixed and sustainable communities is crucial in terms of social interaction and residents’ health and wellbeing.

The service seeks to foster relationships by:

- i) Focusing on housing supply and delivering more homes of all tenures, increasing our affordable housing supply and accelerating economic growth to meet local needs.
- ii) Improving standards across all tenures to ensure everyone has the same rights to a safe and secure home, whether it is owned privately, by the Council, private landlords or Housing Associations
- iii) Supporting our residents to enhance and develop effective partnerships with stakeholders, residents and tenants to tackle health inequalities
- iv) Preventing homelessness is about assessing people’s housing needs earlier to reduce the risk of homelessness and ensure that those who lose their home can access appropriate and timely support to live independently.

6 Priority

The following questions will help you to identify whether this ‘service’ is a high priority. Please answer all questions with particular reference to the protected characteristics; race, gender, gender reassignment, disability, religion or belief, sexual orientation, age, marriage and civil marriage/partnership and pregnancy and maternity.

Please provide a comment for each answer, providing evidence for your answer, regardless whether you have answered yes or no.

Questions	Yes	No
1. Are there any particular groups who may have trouble accessing the ‘service’?		x
Comments: A number of stakeholders were engaged in the development of the strategy and it is considered that the Services are in line with statutory powers and seek to address inequalities.		
2. Does your information suggest that some groups of people are less satisfied than others with this ‘service’?		x
Comments: No. Where issues have been identified, these have been addressed through the strategy and will be monitored over the period of the action plan.		
3. Will this service have a significant impact on any of our residents?		x

Comments: Any impact is assessed to be positive.		
4. Do you have any evidence that discrimination, harassment and/or victimisation could occur as part of this service?		X
Comments: There are related policies and procedures in place aligned to statutory guidance which underpin this strategy.		
5. Do you think the service will hinder communication and negatively impact relations between the organisation and its employees, residents, contractors or anyone else?		X
Comments: This is a corporate wide priority focussed on helping residents to access housing and live in a safe, secure home regardless of tenure.		
6. Does this service need to improve the way in which it is communicated to people who have literacy, numeracy or any other access needs?		X
Comments: The services have protocols in place for the implementation of the service and therefore access needs are already addressed.		
7. Does consultation need to be carried out?	X	
Comments: Corporate Management Team 5 November 2019 Overview and Scrutiny Panel 19 November 2019 Cabinet 16 December 2019 6 week consultation period which will seek views from stakeholders Final Housing Strategy will be submitted to Full Council in February/March 2020		

In order to assess the priority of your 'service' please complete the table below by adding up how many questions you answered yes to and following the appropriate action.

Priority	Number of questions answered 'yes'	Rating	Action
High	3 or more		Continue to section 2
Medium	1 to 2		Please provide evidence to any questions you answered 'yes' to in section 1. Test for relevance complete (sometimes a full assessment may be required).
Low	0		Test for relevance complete.

Declaration


I am satisfied that a Test for Relevance has been carried out on the matter named in this Analysis and conclude that a full Equality Impact Assessment **is not required**.

Yes No

If you do not think that a full Equality Impact Assessment is required – please give your reasons:

I confirm that a full Equality Impact Assessment has been completed.

Yes No

Signature of Head of Service: Bob Porter	Date:
	22 November 2019

Recommendations agreed:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
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Signed: (Director): Tim Willis	EIA date:
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