

Thanet District Council (TDC) Equality Impact Assessment

Step one: test for relevance

1 Person responsible for this assessment

Name:	Ashley Jackson		
Job title:	Head of Housing & Planning		
Phone:	01843 577280		
Service area:	Housing and Planning	Date of assessment:	9.7.24

2 Others involved in carrying out the analysis

Name:	Mark James (Strategic Housing Manager)
Name:	Connie Stickings (Housing Options Manager)
Name:	

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

Title:	The Temporary Accommodation policy is presented at a time of higher temporary accommodation usage, and is designed to ensure that following the scrutiny of councillors the Council has a robust policy in place that clearly sets out how it sensitively places vulnerable households inside and outside of the district boundary.
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Is it new?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
A review of existing?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

3.1 Aims and objectives

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

The cost of TA is exacerbated by the fact that applicants are having to stay in TA for longer periods of time due to a declining supply of social housing lets and a reduction in the supply of private rented housing being available at an affordable rent level.

The Council has therefore set out a policy that not only takes into account the implications of its

natural decision-making process, but also the considerations for TA provided by third-party providers.

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

Homeless households will benefit from this policy.

The proposed policy document sets out Thanet District Council's approach to the placement of homeless households in TA inside and, where unavoidable, outside of the Thanet district. It covers both the Council's interim and full housing duties to provide accommodation - as outlined below:

- Interim Housing Duty: this is where the Council is required to have TA available for applicants who they believe are homeless, eligible for assistance and in priority need, while the Council completes its investigations.
- Full Housing Duty: This applies to longer-term TA placements for households accepted as homeless where the Council has a duty to secure accommodation for applicants who are homeless, eligible for assistance, have a priority need and are not intentionally homeless.

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.

This decision affects households who are homeless and in need of temporary accommodation.

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

A common theme is that low income households are more likely to find themselves homeless. Homelessness is, therefore, likely to be greater for those people who share protected characteristics who live in poverty.

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 proposal to adopt a Temporary Accommodation Policy is not unlawfully discriminatory.

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

The proposal to implement a temporary accommodation policy aims to promote balanced, inclusive, and sustainable communities that benefit all.

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 proposal to implement a temporary accommodation policy aims to foster good relations with those within the protected characteristics classifications, for instance in relation to meeting housing need for all groups.

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'?		*
Comments:		
2. Does your information suggest that some groups of people are less satisfied than others with this 'service'?		*
Comments:		
3. Will this service have a significant impact on any of our residents?	*	
Comments: This policy will have a positive positive impact on homeless households.		
4. Do you have any evidence that discrimination, harassment and/or victimisation could occur as part of this service?		*
Comments: No discrimination, harassment or victimisation will occur because of this policy.		
5. Do you think the service will hinder communication and negatively impact relations between the organisation and its employees, residents, contractors or anyone else?		*
Comments: No, this policy will not hinder communication or negatively impact relations.		
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?		*
Comments:		
7. Does consultation need to be carried out?		*
Comments:		

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.

If, following the completion of the test for relevance, a full assessment is not required, go straight to the declaration. If a full assessment is required, go to Step two: full equality impact assessment.

Step two: full equality impact assessment

1 Could the strategy, policy, service, project, activity or decision have a **negative, positive or neutral** effect on groups or individuals?

Consider:

What you are doing?

Why you are doing it?

How you are doing it?

Who can access the service easily and who may not be able to access the service and **why**?

The full analysis explores ways to reduce or eliminate barriers and/or negative impacts.

Protected characteristics	N e g a t i v e	P o s i t i v e	N e u t r a l	<p align="center">Evidence/Reasoning</p> <p align="center">(Consider any barriers which will have negative impact and/or good practices giving positive impact)</p>
<p>Age</p> <p>Consider:</p> <ul style="list-style-type: none"> • The way younger and older people access services may be different • Use of technology • Child care/care of other dependant • Timings/flexibility, such as work patterns • Transport arrangements • Venue location 				<p>Recommendations:</p> <p>Certain groups of children are at higher risk of living in poverty, including deaf and disabled children and those from single parent families. Proposals which increase the number of affordable homes being acquired could benefit these households and help to reduce this inequality.</p> <ul style="list-style-type: none"> • Design and sustainability standards are likely to benefit children by reducing the physical and mental health issues related to poor quality housing, such as cold and damp and poor air quality. <p>In addition, increasing the provision of play space within housing developments will be of direct benefit to children and younger people.</p> <p>Younger people</p> <p>Younger people are more likely to be unemployed than adults aged between 25 and 64 and are more likely to face higher housing costs, relative to income. Proposals which increase the number of affordable homes being acquired and the affordability of those homes could benefit these households and help to reduce this inequality.</p>
<p>Disability (Includes: physical, learning, sensory (deaf/blind), mental health)</p> <p>Consider:</p>				<p>Recommendations:</p> <p>Households containing people with disabilities are more likely to experience poverty. Proposals which increase the number of affordable homes being</p>

<ul style="list-style-type: none"> • Communication methods • Accessibility – venue, location, transport • Range of support needed to participate • Hearing Loops/Interpreters • Disability awareness training for employees 			<p>acquired and the affordability of those homes – especially Social Rent homes – could benefit these households and help to reduce this inequality.</p> <p>Design and sustainability standards are likely to benefit deaf and disabled people by reducing the physical and mental health issues related to poor quality housing, such as cold and damp and poor air quality.</p>
<p>Race (Includes; gypsy, travelling, refugee and migrant communities)</p> <p>Consider:</p> <ul style="list-style-type: none"> • The size of the BME communities that your service/project affects. • Language(s) spoken/understood. • Culture, such as hygiene, clothing, physical activities, mixed gender activities. • What access support can you offer? 			<p>Recommendations:</p> <p>Black, Asian and minority ethnic (BAME) groups are more likely to experience poverty, are less likely to own their own home and are disproportionately affected by overcrowding. Proposals which increase the number of affordable homes being acquired and the affordability of those homes – especially Social Rent homes – could benefit these households and help to reduce this inequality.</p>
<p>Religion, faith or belief</p> <p>Consider:</p> <ul style="list-style-type: none"> • The diversity within the communities that your service/project affect • Prayer times, meal times, food (some religions do not eat meat), cultural habit or belief, religious holidays such as Ramadan • Awareness training for employees 			<p>Recommendations:</p> <p>The limited availability of data on the extent to which those who hold a particular religion or belief (including no religion or belief) are subject to particular housing problems, makes it difficult to reliably identify potential impacts.</p>
<p>Pregnancy and maternity</p> <p>Consider:</p> <ul style="list-style-type: none"> • Flexible hours of the service/project • Is there access to private area for breastfeeding mothers? 			<p>Recommendations:</p> <p>The limited availability of specific data on this group makes it hard to identify impacts, beyond those that affect households including children.</p>
<p>Gender</p> <p>Consider:</p> <ul style="list-style-type: none"> • The impact on men and women 			<p>Recommendations:</p> <p>Women are more likely to be economically inactive, low paid, and/or subject to the poverty that affects single parent families. Female-headed households</p>

<ul style="list-style-type: none"> • Child care/care of other dependant • Mixed/single gender groups/activities • Timing of services/projects 			<p>are also more vulnerable to statutory homelessness. Proposals which increase the number of affordable homes being acquired and the affordability of those homes – especially Social Rent homes – could benefit these households and help to reduce this inequality.</p>
<p>Sexual orientation (Includes: lesbian, gay, bisexual)</p> <p>Consider:</p> <ul style="list-style-type: none"> • LGB people should feel safe to disclose their sexual orientation without fear of prejudice • Make it clear you recognised civil marriage and partnerships • Awareness training for employees 			<p>Recommendations:</p> <p>There is an absence of data on the extent to which those who identify as LGBTQ+ experience difficulties covering housing costs or occupy particular types of housing. There is evidence that those who are LGBTQ+ may experience discrimination when seeking to rent or buy a home. Younger LGBTQ+ people are also more vulnerable to homelessness. There is also evidence of demand from older LGBTQ+ people for specialist provision care and retirement housing. The provision of more affordable housing, and specialist housing in particular, may therefore benefit this group.</p>
<p>Transgender</p> <p>Consider:</p> <ul style="list-style-type: none"> • Trans people should be able to disclose their gender identity without fear of prejudice • Making it clear you have a Trans policy and process • Awareness training for employees 			<p>Recommendations:</p> <p>The limited availability of specific data on this group makes it hard to identify impacts,</p>
<p>Marriage and civil marriage/partnership</p> <p>Consider:</p> <ul style="list-style-type: none"> • All couples or partners, regardless of gender, should be able to access services 			<p>Recommendations:</p> <p>The limited availability of data on the extent to which those who married or in a civil partnership are subject to particular housing problems, makes it difficult to reliably identify potential impacts.</p>

Outsourced services	
<p>If your policy/process is partly or wholly provided by external organisations/agencies (such as Civica or Capita), please list any arrangements you plan to ensure that they promote equality and diversity. Include this in your improvement plan</p>	<p>N/A</p>
Relations between different equality groups	

Does your assessment show that a strategy, policy or process may amount to potential adverse impact between different equality groups? If yes please explain how the improvement plan is going to tackle this issue	No
Consultation responses	
Summary of replies from individuals and stakeholders consulted including any previous complaints on equality and diversity issues about the strategy, policy or process	N/A

Summary of recommendations		
Actions	By Who	By When
Work with communications to ensure effective management of clear messages.	Housing Strategy & Projects Team	March 2025

Declaration

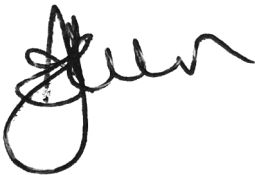
I am satisfied that a Test for Relevance has been carried out on the matter named in this Analysis and conclude that a full Equality Impact Assessment **is not required**.

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:	Date:
	9th July 2024

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