

Equality Impact Assessment

Equality Impact Assessments will be carried out whenever you plan, change or remove a service, strategy, policy, project or function. Equality impact assessments can help to achieve the following:

- increased participation with customers
- more transparency in policy and service development
- a more proactive approach to the promotion of equality
- prioritise expenditure in an efficient and fair way
- make decisions that are justified, evidenced and relevant

Impact assessments should be carried out as soon as a relevant new strategy, policy, function, project, plan or procedure is considered. It should be an integral part of policy development.

The purpose of an EQIA is to assess and record the potential impact of a service, strategy, policy, project or function on residents and staff. It can help us to deliver excellent services by making sure that these reflect the needs of the community. The process involves anticipating the potential positive and negative consequences (impacts) and putting plans in place to make sure that any negative impacts are eliminated or minimised, and that any opportunities for promoting equality are maximised.

What do we mean by 'impact'?

The assessment looks at two possible impacts:

- a) **negative, adverse or unhelpful impact, effect or limitation** – this is where the impact could disadvantage one or more of the protected groups. The impact may be differential, i.e. the negative impact on one particular group is greater than on another. Negative impacts may be unintentional; they may also be unlawful.
- b) **positive or helpful impact or effect** – this is where the impact has a positive effect on one or more of the protected groups, and/or where the impact improves relations between groups or improves equal opportunities. The positive impact may also be differential, i.e. the effect on one particular group is greater than on another. Please bear in mind that we are always allowed to treat disabled people more favourably than other groups.

The '**protected characteristics**' are:

Age – a person belonging to a particular age (eg. 18 year olds) or a range of ages (e.g. 18 – 30 year olds).

Disability – a person has a disability if (s)he has a physical or mental impairment which has a substantial and long term adverse affect on that person's ability to carry out normal day-to-day activities.

Gender reassignment – the process of transitioning from one gender to another.

Marriage and civil partnership – marriage is defined as a legally recognised union between two individuals. Same sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must be treated the same as married couples on a wide range of legal matters.

Pregnancy and maternity – pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Race – refers to a group of people defined by their race, colour and nationality (including citizenship) ethnic or national origins.

Religion or belief – religion has the meaning usually given to it but belief includes religious and philosophical beliefs including a lack of belief (e.g. atheism). Generally, a belief should affect your life choices or the way you live to be included in the definition.

Sex – a man or a woman.

Sexual orientation – whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

Other characteristics important to Test Valley:

Socio-economic – overall the borough is not deprived, but there are areas where there are high levels of deprivation, economic inactivity and low education achievement.

Rural isolation – Test Valley is a rural area and this can affect access to services and some people's ability to take advantage of opportunities available.

Key points to remember:

- Don't do it on your own!
- EQIAs are supposed to be challenging but not over-complicated
- Use common sense and be proportionate
- Look at the strategy, policy, function, project, plan or procedure from the perspective of the person/people affected by it.
- Lack of data is not a reason to halt or not complete the process - find out if research or data already exists, or consult directly with representatives of relevant groups or specialist organisations.
- The process isn't a 'last minute check' - develop plans that include time to make changes to a project, strategy or policy as identified by the EQIA.
- Know your customers, their needs and the barriers they face
- Avoid focusing on one issue or protected groups; look at the demographics of your area and your service users
- Remember to look for the positive as well as the negative
- EQIA should be part of the development process – don't leave it until the Committee report deadline

Equality Impact Assessment

Service:	Housing & Environmental Health
Officer(s) completing the assessment:	Phil Turner
Date:	4 th February 2020
Name of service, strategy, policy, project or function being assessed:	Housing Strategy 2020 to 2025 & Preventing Homelessness & Rough Sleeping Strategy 2020 to 2023

1.	<p>What are the aims, objectives, outcomes, purpose of the service, strategy, policy, project or function that you are assessing?</p>	<p>The Housing Strategy is a key strategic document that sets out how the Council plans to meet all types of housing need over a 5 year period.</p> <p>Whilst it is interested in the delivery of all tenures of housing accommodation, it is primarily focused on meeting the needs of people who may otherwise struggle to access market housing and those who may be vulnerable. It includes commitments to ensuring that housing standards requirements are met, and to supporting people who may have specific mobility needs.</p> <p>The overarching aims of the Housing Strategy have been developed through data analysis, research and consultation, in order to ensure that they meet identifiable needs in the local area.</p> <p>The key strategic priorities identified are to:</p> <ol style="list-style-type: none"> 1. Enable the delivery of new homes that people can afford and meet different types of need in our communities 2. Improve access to and quality of existing housing 3. Meet the challenge of an ageing population 4. Prevent & relieve homelessness and rough sleeping <p>The fourth priority is subject to a specific strategy on</p>
----	---	--

		<p>homelessness and which is also being considered as part of this EIA.</p> <p>The approach ensures the Council meets the standalone legal requirement to publish a homelessness strategy (as set out in the Homelessness Act 2002). Perhaps more importantly, however, it also ensures that tackling homelessness and rough sleeping receive a commensurate level of priority in keeping with the Council's corporate aims, and sets out a clear roadmap through which to lead local partnerships to prevent and relieve homelessness with a shared sense of responsibility across agencies and sectors.</p>
<p>2.</p>	<p>Who implements or delivers the service, strategy, policy, project or function?</p> <p>State if this is delivered by more than one service or team, including any external partners.</p>	<p>Whilst the Housing Strategy 2020 to 2025 is a document that is produced by the Council, it is something that can only be successfully delivered in partnership. The same is true for the Preventing Homelessness & Rough Sleeping Strategy 2020 to 2023.</p> <p>There are various stakeholders who are instrumental in influencing the success of both strategies. These include developers, Registered Providers, supported housing providers, Hampshire County Council, along with a range of other statutory and voluntary sector partners.</p> <p>Within the Council, the Housing Strategy and Preventing Homelessness & Rough Sleeping Strategy will primarily be delivered by the Housing & Environmental Health Service, the Planning & Building Service, Planning Policy and Economic Development, Legal & Democratic Services, Finance, and Communities and Leisure. In that sense they are corporate strategies for the borough council as much as they are strategies to inform local partnerships.</p> <p>Whilst the Housing Strategy is not of itself a legal requirement following the introduction of the Deregulation Act 2015, it is a best practice approach to setting out plans for the local area, and it has</p>

		<p>been drafted with regard to a range of relevant statutory requirements, guidance and national policy initiatives. The Preventing Homelessness & Rough Sleeping Strategy is required by law, as set out in the Homelessness Act 2002.</p>
3.	<p>Who will be affected by the service, strategy, policy, project or function?</p>	<p>The strategies will support all Test Valley communities. Their impacts will be far reaching, and with specific aims to ensure those on low incomes and/or who may be vulnerable in a range of ways are adequately supported including to remain in their existing homes or to access suitable alternative settled homes.</p> <p>The identified priorities and detailed delivery plans seek to ensure appropriate local service provision for all groups, regardless of background or type, and include some specific actions to ensure anyone who may otherwise be disadvantaged are being actively considered and supported locally.</p>
4.	<p>What are the likely <u>positive impacts</u> for the protected groups (see above)?</p> <p>Are any particular groups more affected and why?</p>	<p>Ensuring access to a home, or to be enabled to remain in a home, are fundamental aims within the Housing Strategy and Preventing Homelessness & Rough Sleeping Strategy. Identifiable positive impacts for protected groups include:</p> <ul style="list-style-type: none"> • Actions to support all age groups, and with particular actions to support both younger and older people who may have particular needs or who may be vulnerable as a result of their age. • Actions to ensure affordable housing provision is maximised to assist those of working age and who are identifiably likely to struggle most to sustain themselves in the local housing market without support. • Actions to encourage the development of properties to a higher standard that will meet the needs of people with a range of disabilities, and as people grow and age.

- Actions to ensure that people with mobility needs can access support including adaptations to enable them to remain in their homes.
- Actions to assist people who may be affected by a breakdown in their relationship with their partner, family or friends, and including support for couples to secure homes.
- Actions to ensure suitable provision for couples (married or otherwise), households with dependent children and those who may be pregnant.
- Specific actions to address identifiable priorities and/or gaps in provision, for example, to support single females to prevent or relieve female rough sleeping in the borough and/or to ensure the right provision is in place to assist those who may be fleeing the effects of domestic abuse.
- Actions to ensure there is adequate temporary accommodation provision and capacity to provide support for people, including where they may be affected by other forms of violence, abuse or harassment.
- The evidence base that underpins the strategy has reviewed demographic data and compared this with the operational delivery of services, and ensured that the forward plan contained in the strategy will continue to achieve the right balance of support and assistance including for those from BME backgrounds.
- Generic actions to improve service delivery across a range of deliverables, that seek to raise the bar for all those who require help and support with housing or a related support need. This will have a positive impact on all groups.

The Housing Strategy and the Preventing Homelessness & Rough Sleeping Strategy have been deliberately designed to meet all

		<p>types of need and support all communities in Test Valley. It is anticipated it will have a positive impact for all protected groups both directly and indirectly.</p>
<p>5.</p>	<p>What are the likely negative impacts for the protected groups (see above)? Are any particular groups affected more and why?</p>	<p>The strategies aim to improve the situation for people who are on low incomes or who are vulnerable, whilst not detracting from those who are better able to thrive under their own steam.</p> <p>The way in which the Council prioritises people for housing has been considered in the interests of both ensuring that all target groups are represented and supported, whilst also actively seeking to contribute to mixed and sustainable communities. Whilst the demand for housing and support outstrips the available supply and local capacity, there may be disadvantages for some groups but on the basis of an overall quantum rather than by setting a particular protected group at a disadvantage.</p> <p>In the main, the EIA has found that there are no indications that either strategy will have negative impacts for any protected groups. Failure to deliver the strategies may, however, have negative consequences for some protected groups and in that sense the strategies have been designed to meet identified needs.</p> <p>Data has shown that there are some particular issues associated with certain elements of our local population, and the strategies includes actions specifically geared to ensure services are available to meet the needs of everyone, including marginalised groups.</p> <p>Both strategies are designed to support social inclusion and to help all residents to thrive.</p> <p>There is potential for vulnerable people and families (both with and without protected characteristics) to be adversely affected by public spending reductions – however, the actions contained in the strategy are intended to minimise any negative effects.</p>

		<p>It is not anticipated that the recommendations in the reports for both the Housing Strategy and the Preventing Homelessness & Rough Sleeping Strategy will in themselves, create any negative impacts for protected groups.</p> <p>The recommendations are designed to support social inclusion, however, accessibility may be a concern in a largely rural area – the Housing Service operates place based services and will continue to do so.</p>
6.	What consultation and engagement has taken place (or is planned) with the affected groups and other interested parties?	Wide consultation has been undertaken with stakeholders, including partner agencies, service users, elected members and staff.
7.	What plans do you have in place, or are developing, to mitigate the likely negative impacts, i.e. how will you reduce the impact on the protected groups?	<p>The strategies are designed to mitigate identifiable negative impacts.</p> <p>Outreach services will continue to be delivered from community venues and enhanced through the delivery of the strategy action plans.</p> <p>Ongoing service user engagement will seek views and regular forums for stakeholders will ensure any negative impacts are actively monitored and mitigated.</p>
8.	Please summarise or provide links to the information, data, research used in this assessment	Huge amounts of data were used to inform the strategies. This has been summarised in the Housing Strategy Evidence Base and Review of Homelessness that is available to download from the Council's website www.testvalley.gov.uk .

What course of action does this EQIA suggest that you take? (tick one of the following options)	
--	--

<p>Outcome 1: No major change required The EQIA has not identified any potential for discrimination or adverse impact and all opportunities to promote equality have been taken.</p>	X
<p>Outcome 2: Adjust the policy to remove barriers identified by the EQIA or better promote equality. Are you satisfied that the policy adjustments will remove the barriers identified?</p>	
<p>Outcome 3: Continue the policy despite potential for adverse impact or missed opportunities to promote equality identified. You should ensure that the EQIA clearly sets out the justifications for continuing with the policy. You should consider whether there are sufficient plans to reduce negative impact and/or plans to monitor the actual impact</p>	
<p>Outcome 4: Stop and rethink the policy when the EQIA shows actual or potential unlawful discrimination</p>	

<p>Summary of your proposals – copy and paste into any report for Cabinet, Council or General Purposes Committee</p> <p>What are the key impacts – positive and negative? What course of action are you advising as a result of this EQIA? Are there any particular groups affected more than others?</p>	
<p>The EQIA has identified that The strategies will impact positively on significant numbers of individuals in housing need by increasing the supply of affordable homes in the borough, preventing and relieving homelessness and rough sleeping, and creating sustainable and diverse communities.</p> <p>The EQIA has not identified any potential for discrimination or adverse impact and all opportunities to promote equality have been taken.</p>	

<p>Head of Service sign off (name):</p>	Phil Turner
<p>Date:</p>	27 th February 2019

Comments or any action required:	
No further action beyond actively monitoring the delivery of both strategies in partnership and adjusting the local approach accordingly and in particular, where any negative impacts may emerge or be sensibly anticipated during the life of both strategies.	
Critical Friends Group - date:	Preventing Homelessness Forum quarterly reviews Annual update to OSCOM (usually in April/May) Annual update to Cabinet (usually in May).
Equality Group - date:	N/A
Published on TV Screen and website – date:	