

# Equality Impact Assessment

Please click on headings to find [general guidance](#) or section guidance with an example. You will find supporting information in appendices at the end of the guidance.

When you start to assess your proposal, arrange to meet Tim Greaves, Equality Co-ordinator, for specific guidance. Send the completed form to him for a final check and so that he can publish it on our Vale of Glamorgan equality web pages.

Please also contact Tim Greaves if you need this equality impact assessment form in a different format.

## 1. [What are you assessing?](#)

Draft Empty Homes Strategy 2019-2024
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## 2. [Who is responsible?](#)

<b>Name</b>	David Williams	<b>Job Title</b>	Principal Regeneration Officer
<b>Team</b>	Regeneration and Planning	<b>Directorate</b>	Managing Director and Resources

## 3. [When is the assessment being carried out?](#)

<b>Date of start of assessment</b>	19 <sup>th</sup> June 2019
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## 4. [Describe the proposal?](#)

### What is the purpose of the proposal?

The purpose of the proposal is to update the Empty Homes Strategy. The purpose of the strategy is to address issues relating to empty private sector homes as defined in Appendix 1 of the Draft Empty Homes Strategy 2019-2024 (attached). The aims of the strategy are to:

- Assemble, maintain and improve the accuracy of empty homes data;
- Provide advice, assistance and financial incentives to reduce the number of long-term empty properties;
- Promote the whole Council approach to tackling empty homes;

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- Prioritise empty homes for enforcement action; and
- Raise awareness of the empty homes issue.

## Why do you need to put it in place?

There is widespread agreement that empty private sector homes are a wasted resource and have a detrimental impact on communities. A strategic approach is required to tackle the issue of empty private sector homes and unlock the potential contribution those properties can make to increasing available housing stock and furthering wider community regeneration.

The previous strategy covered the period 2012-2017. The proposed version (Draft Empty Homes Strategy 2019-2024) provides an update on action undertaken to date and sets out the role that the Council and its partners will play in returning empty private sector homes back into use, together with the resources, powers and processes the Council can use to achieve this.

## Do we need to commit significant resources to it (such as money or staff time)?

The resources required to deliver the Draft Empty Homes Strategy 2019-2024 (Draft EH Strategy) are outlined in the Section 3.2 (Resources) of the draft strategy.

## What are the intended outcomes of the proposal?

A revised Empty Homes Strategy will be in place to reflect current practices and updated aims. Please refer to Appendix 8 (Strategic Partnership Action Plan) of the Draft EH Strategy where the Aims and Objectives are outlined along with the success criteria and outcomes.

## Who does the proposal affect?

The proposal affects the owners of empty private sector homes in the Vale of Glamorgan; and, Vale of Glamorgan residents where the condition of the property is detrimental to the amenities of a neighbourhood.

Due to its nature, this work is detailed and requires thought about the needs of people with protected characteristics on a case by case basis.

**Note:** If the proposal affects lesbian, gay, homosexual, or transgender people, ensure you explicitly include same-sex couples and use gender neutral language

## Will the proposal affect how other organisations work?

Yes, it will affect the work undertaken by Registered Social Landlords (please refer to Section 3.2 of the Draft EH Strategy). It will also impact on the use of the Housing Loans funding provided by the Welsh Government (please refer Sections 2.4 and 3.4 of the Draft EH Strategy). It will also contribute to Welsh Government set targets for the numbers of homes brought back into use.

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## Will the proposal affect how you deliver services?

Yes, it will affect how the Council provide services for landlords and property owners (please refer to Section 3.4 of the Draft EH Strategy) and the services for residents with a housing need as it is hoped that an increased number of properties will be available for occupation.

## Will the proposal impact on other policies or practices?

Yes, the empty homes issue requires a joined-up whole Council approach to make the best possible use of our existing housing stock. The Draft EH Strategy therefore links with several key Council documents, strategies and plans, as outlined below (as referred to in Section 3.1 of the Draft EH Strategy):

- Vale of Glamorgan Council Corporate Plan 2016-2020
- Vale of Glamorgan Local Development Plan 2011-2026
- Vale of Glamorgan Local Housing Strategy 2015-20
- Vale of Glamorgan Housing Regeneration Policy 2018
- Vale of Glamorgan Local Housing Market Assessment 2017
- Vale of Glamorgan Council Tax Policy 2019

## Can you change the proposal so that it further promotes equality of opportunity and fosters good relations?

Yes, Cabinet (15<sup>th</sup> July 2019, minute C42 refers) resolved to approve the Draft EH Strategy as a consultative document. Furthermore, it was also resolved that a further report is presented to Cabinet following public consultation to present the findings of the public consultation exercise and consider any changes to the Draft EH Strategy prior to finalising for adoption. The Draft EH Strategy was also referred to Scrutiny Committee (Homes and Safe Communities) on 16<sup>th</sup> July 2019 (minute 162 refers). Cabinet considered the recommendations of Scrutiny Committee (Homes and Safe Communities) on 29<sup>th</sup> July 2019 (minute C57 refers).

In accordance with Welsh Language Standards the Draft EH Strategy was translated into Welsh prior to being published for public consultation in October 2019. The public consultation period ended on 22<sup>nd</sup> November 2019.

The findings of the public consultation exercise and any changes to the Draft EH Strategy will be reported to Cabinet on 23<sup>rd</sup> March 2020. The Equality Impact Assessment will also be included in the Cabinet report.

## How will you achieve the proposed changes?

Cabinet will receive a further report as described above.

## Who will deliver the proposal?

The Council has a dedicated Empty Homes and Loans Officer who operates behind the strategy.

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## How will you know whether you have achieved the proposal's purpose?

The Empty Homes Working Group chaired by the Head of Regeneration and Planning will monitor the implementation of this strategy. To ensure corporate ownership of this strategy an annual review of the Strategic Partnership Action Plan (refer to Appendix 8 of the Draft EH Strategy) will be reported to the relevant Scrutiny Committee.

## 5. What evidence are you using?

### Engagement (with internal and external stakeholders)

Examples of engagement include:

- Engagement with empty home owners through proactive work being undertaken, such as the Empty Homes surveys.
- Representation at Strategic Housing Forums which are led by colleagues in the Housing Department and partner Registered Social Landlords.
- Attendance at Landlord Forums to offer advice and assistance to bring properties back into use.
- Attendance at the Welsh Government's Property Loans Group to contribute to the development of empty homes work and to support performance reporting (Housing Loans funding etc).
- Regular social media posts on the Council's accounts reminding of the consultation taking place and of the advice/assistance available.

### Consultation (with internal and external stakeholders)

Public consultation on the Draft EH Strategy included an Equalities Questionnaire for respondents to complete. Key organisations whose work is pertinent to the issue e.g. Registered Social Landlords, Shelter Cymru etc. were given advanced notice of the public consultation exercise. Networks of key stakeholders e.g. landlords were also used to disseminate information during the consultation period. The Council also used its social media platforms to disseminate information during the consultation period.

From 14 respondents to the public consultation exercise, it has been identified that the Draft EH Strategy has no impacts on any group with protected characteristics.

### National data and research

As at 1<sup>st</sup> April 2018 there were around 27,000 private sector homes in Wales that have been empty for more than six months (Source: InfoBase Cymru). During 2019 the National Assembly for Wales (Equality, Local Government and Communities Committee) undertook an inquiry into the issue of empty homes. The aim of the inquiry was to better understand the scale and impact of the empty homes issue and to assess the effectiveness of the measures to deal with the situation. Links to the Final Report (published in October 2019) and the Welsh Government response can be found below:

<https://www.assembly.wales/laid%20documents/cr-ld12797/cr-ld12797%20-e.pdf>

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<https://www.assembly.wales/laid%20documents/gen-ld12892/gen-ld12892%20-e.pdf>

Council officers regularly attend national and regional groups to share best practice and to help tackle the empty homes issue.

## Local data and research

Affordable housing provision is an issue at a local level in the Vale of Glamorgan. The headline annual need for affordable housing in the Vale of Glamorgan Local Housing Market Assessment from 2017 to 2022 is 576 units per annum. Based on Council Tax data there are at present over 800 empty private sector homes across the Vale of Glamorgan (empty over 6 months). Actions to address empty homes within the Draft EH Strategy have a positive impact on the supply of available housing.

The Council follows the Performance Accountability Measures (PAMs) guidance which has been developed by a Welsh Local Government Association led Task and Finish Group in consultation with local authorities. The PAM dataset enables local authorities to give account of their performance to the public, including comparing their performance with that of other authorities.

The guidance included in the published document Public Accountability Measures 2019-20: Guidance for Local Authorities includes detailed definitions for each measure. The Draft EH Strategy (refer to Appendix 1) will help to work deliver results in respect of:

PAM/013 Percentage of empty properties brought back into use.

In financial year 2018/19 the Council was ranked 1<sup>st</sup> overall for the PAM/013 dataset.

The owners of empty homes are provided with a range of assistance options which include interest free Housing Loans and referrals to the Housing Department so that their properties can be linked to potential tenants and buyers.

## 6. How robust is the evidence?

### Does it show what the impact will be (positive and negative)?

The consultation questionnaire included an equality monitoring section and a section for other comments. From 14 respondents to the public consultation exercise, it has been identified that the Draft EH Strategy has no impacts on any group with protected characteristics (refer to attached summary document).

Most of the respondents either agreed or strongly agreed with the proposed Strategic Aims (refer to Section 3.7 of the Draft EH Strategy).

### What are the gaps?

No equalities impact was identified where action is required and no gaps were found.

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## What will you do about this?

As a guiding principle (based on a process of monitoring) an equality monitoring section will be included in the Empty Homes Survey documents that are issued periodically every 6 months to 1 year. The results will be analysed and if an impact is identified on a protected characteristic, then measures will be determined to reduce any negative impacts and to promote positive impacts.

## What monitoring data will you collect?

Future Empty Homes Surveys will include a section to enquire whether empty home owners feel that their protected characteristic are impacted (positive, negative or neutral) by empty homes work covered in the Draft EH Strategy (wording to be confirmed) and to be able to elaborate, as required.

The team will consider issuing an equality questionnaire to representatives or samples of groups that could be affected by the Draft EH Strategy e.g. Shelter Cymru, landlords etc.

## How often will you analyse and report on this?

Empty Homes Surveys are conducted periodically every 6 months to 1 year. An annual review of the Strategic Partnership Action Plan (refer to Appendix 8 of the Draft EH Strategy) will be reported to the relevant Scrutiny Committee.

## Where will you publish monitoring data and reports?

The annual review will be published on the Vale of Glamorgan Council website *Council Committee Meetings* pages.

## 7. [Impact](#)

### Is there an impact?

Given the scope of the Draft EH Strategy, there is no indication that there is a protected characteristic issue. It is considered that the Draft EH Strategy will have a positive impact in terms of unlocking the potential contribution empty private sector homes can make to increasing available housing stock and furthering wider community regeneration.

### If there is no impact, what is the justification for thinking this? Provide evidence.

No equalities impact was identified during the consultation on the Draft EH Strategy and through on-going empty homes work. No gaps were found.

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## If there is likely to be an impact, what is it?

There is no indication that the adoption of the Draft EH Strategy will have a negative impact on people that will identify themselves as having any of the protected characteristics.

**Age:** Neutral impact.

**Disability:** Neutral impact.

**Gender reassignment, including gender identity** (ensure policies explicitly include same-sex couples and use gender neutral language): Neutral impact.

**Marriage and civil partnership (discrimination only):** Neutral impact.

**Pregnancy and Maternity:** Neutral impact.

**Race:** Neutral impact.

**Religion and belief:** Neutral impact.

**Sex:** Neutral impact.

**Sexual orientation** (ensure policies explicitly include same-sex couples and use gender neutral language): Neutral impact.

**Welsh language:** Neutral impact.

**Human rights:** Neutral impact.

## How do you know?

**Explain this for each of the relevant protected characteristics as identified above.**

Given the scope of the Draft EH Strategy, there is no indication that there is a protected characteristic issue. No equalities impact was identified during the consultation on the Draft EH Strategy or through on-going empty homes work.

## What can be done to promote a positive impact?

**Explain this for each of the relevant protected characteristics as identified above.**

### Age

It is recognised that not all property owners have access to computers and are comfortable to communicate electronically. This can be the case across all age groups but there is the potential for a proportion of persons in an older age group to be more greatly affected. The Empty Homes Surveys and the outline of assistance on offer is distributed periodically by sending hard copies through the post with freepost return envelopes. The option to communicate via online survey

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and via email is also available. The continuation of the offer of different communication methods will continue as this helps ensure that the information and dialogue is encouraged with all property owners, regardless of their communication preference.

The Empty Homes surveys and other such documents to be distributed going forward will include an equality monitoring section to see whether the property owner/responsible person identifies themselves as being one or more of the protected characteristics (to note which one/s); whether they feel that Empty Homes work/ Strategy has had a positive, negative or neutral affect; and, a comments box to provide detail. The responses will be periodically monitored by the Empty Homes and Loans Officer to determine if any additional measures are required to support those with protected characteristics and to promote a positive impact.

## **Disability**

If it is recognised that a property is empty due to the owner's disability or due to caring for a disabled relative, this will be noted and the Empty Homes and Loans Officer who will provide the relevant assistance, communicate via a text service (if relevant) or meet the home owner in person and assist with the completion of forms including the housing loans form and access to other services. If a disabled person is to occupy an empty home which required adaptations, the adaptations can be funded by interest free housing loans. A Disabled Facilities Grant would only be accessible to current owner-occupiers and therefore not relevant to the Draft EH Strategy.

The Empty Homes surveys and other such documents to be distributed going forward will include an equality monitoring section to see whether the property owner/responsible person identifies themselves as being one or more of the protected characteristics (to note which one/s); whether they feel that Empty Homes work/ Strategy has had a positive, negative or neutral affect; and, a comments box to provide detail. The responses will be periodically monitored by the Empty Homes and Loans Officer to determine if any additional measures are required to support those with protected characteristics and to promote a positive impact.

## **Gender reassignment, including gender identity** (ensure policies explicitly include same-sex couples and use gender neutral language)

The Empty Homes surveys and other such documents to be distributed going forward will include an equality monitoring section to see whether the property owner/responsible person identifies themselves as being one or more of the protected characteristics (to note which one/s); whether they feel that Empty Homes work/ Strategy has had a positive, negative or neutral affect; and, a comments box to provide detail. The responses will be periodically monitored by the Empty Homes and Loans Officer to determine if any additional measures are required to support those with protected characteristics and to promote a positive impact.

## **Marriage and civil partnership (discrimination only)**

The Empty Homes surveys and other such documents to be distributed going forward will include an equality monitoring section to see whether the property owner/responsible person identifies themselves as being one or more of the protected characteristics (to note which one/s); whether they feel that Empty Homes work/ Strategy has had a positive, negative or neutral affect; and, a comments box to provide detail. The responses will be periodically monitored by the Empty Homes and Loans Officer to determine if any additional measures are required to support those with protected characteristics and to promote a positive impact.

## **Pregnancy and Maternity**



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The Empty Homes surveys and other such documents to be distributed going forward will include an equality monitoring section to see whether the property owner/responsible person identifies themselves as being one or more of the protected characteristics (to note which one/s); whether they feel that Empty Homes work/ Strategy has had a positive, negative or neutral affect; and, a comments box to provide detail. The responses will be periodically monitored by the Empty Homes and Loans Officer to determine if any additional measures are required to support those with protected characteristics and to promote a positive impact.

## **Race**

The Empty Homes surveys and other such documents to be distributed going forward will include an equality monitoring section to see whether the property owner/responsible person identifies themselves as being one or more of the protected characteristics (to note which one/s); whether they feel that Empty Homes work/ Strategy has had a positive, negative or neutral affect; and, a comments box to provide detail. The responses will be periodically monitored by the Empty Homes and Loans Officer to determine if any additional measures are required to support those with protected characteristics and to promote a positive impact.

## **Religion and belief**

The Empty Homes surveys and other such documents to be distributed going forward will include an equality monitoring section to see whether the property owner/responsible person identifies themselves as being one or more of the protected characteristics (to note which one/s); whether they feel that Empty Homes work/ Strategy has had a positive, negative or neutral affect; and, a comments box to provide detail. The responses will be periodically monitored by the Empty Homes and Loans Officer to determine if any additional measures are required to support those with protected characteristics and to promote a positive impact.

## **Sex**

The Empty Homes surveys and other such documents to be distributed going forward will include an equality monitoring section to see whether the property owner/responsible person identifies themselves as being one or more of the protected characteristics (to note which one/s); whether they feel that Empty Homes work/ Strategy has had a positive, negative or neutral affect; and, a comments box to provide detail. The responses will be periodically monitored by the Empty Homes and Loans Officer to determine if any additional measures are required to support those with protected characteristics and to promote a positive impact.

## **Sexual orientation** (ensure policies explicitly include same-sex couples and use gender neutral language)

The Empty Homes surveys and other such documents to be distributed going forward will include an equality monitoring section to see whether the property owner/responsible person identifies themselves as being one or more of the protected characteristics (to note which one/s); whether they feel that Empty Homes work/ Strategy has had a positive, negative or neutral affect; and, a comments box to provide detail. The responses will be periodically monitored by the Empty Homes and Loans Officer to determine if any additional measures are required to support those with protected characteristics and to promote a positive impact.

## **Welsh language**

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Bilingual correspondence is issued in accordance with Welsh Language Standards. The Draft EH Strategy is available and all relevant information is available both in Welsh and English. Communication in Welsh and English are welcome.

The Empty Homes surveys are issued (bilingual) and the online form allows for the language preference for future correspondence. Moving forward the hard copy form will be amended so that the language option for future correspondence can be selected rather than rely on the language used for completed surveys.

The Empty Homes surveys and other such documents to be distributed going forward will include an equality monitoring section to see whether the property owner/responsible person identifies themselves as being one or more of the protected characteristics (to note which one/s); whether they feel that Empty Homes work/ Strategy has had a positive, negative or neutral affect; and, a comments box to provide detail. The responses will be periodically monitored by the Empty Homes and Loans Officer to determine if any additional measures are required to support those with protected characteristics and to promote a positive impact.

## Human rights

The Draft EH Strategy drives a corporate commitment to finding solutions to the empty private sector homes problem. Article 1 of the First Protocol of the Human Rights Act 1998, which protects the right of the individual to enjoy their property peacefully, has been a fundamental guiding principle throughout the formation of the Strategy.

The Empty Homes surveys and other such documents to be distributed going forward will include an equality monitoring section to see whether the property owner/responsible person identifies themselves as being one or more of the protected characteristics (to note which one/s); whether they feel that Empty Homes work/ Strategy has had a positive, negative or neutral affect; and, a comments box to provide detail. The responses will be periodically monitored by the Empty Homes and Loans Officer to determine if any additional measures are required to support those with protected characteristics and to promote a positive impact.

## What can be done to lessen the risk of a negative impact?

**Explain this for each of the relevant protected characteristics as identified above.**

Given the scope of the Draft EH Strategy, there is no indication that there is a protected characteristic issue. No equalities impact was identified during the consultation on the Draft EH Strategy or through on-going empty homes work.

However, refer to Section 6 (What monitoring data will you collect?) of this document, if the owner of an empty property is in a group with a protected characteristic and a negative impact has been identified, then practical changes/actions will be taken to remove or mitigate the impact.

## Is there a need for more favourable treatment to achieve equal outcomes? (Disability only)

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None identified. However, if the owner of an empty property is in a group with a protected characteristic and a negative impact has been identified, then practical changes/actions will be taken to remove or mitigate the impact.

## Will the impact be positive, negative or neutral?

Explain this for each of the relevant protected characteristics as identified above.

### If there is likely to be an impact, what is it?

**Age:** Neutral impact.

**Disability:** Neutral impact.

**Gender reassignment, including gender identity** (ensure policies explicitly include same-sex couples and use gender neutral language): Neutral impact.

**Marriage and civil partnership (discrimination only):** Neutral impact.

**Pregnancy and Maternity:** Neutral impact.

**Race:** Neutral impact.

**Religion and belief:** Neutral impact.

**Sex:** Neutral impact.

**Sexual orientation** (ensure policies explicitly include same-sex couples and use gender neutral language): Neutral impact.

**Welsh language:** Neutral impact.

**Human rights:** Neutral impact.

## 8. Monitoring ongoing impact

### Date you will monitor progress

July - August 2020 to tie-in with the Empty Homes surveys.

### Measures that you will monitor

Refer to Section 6 (What monitoring data will you collect?) of this document.

If the owner of an empty property is in a group with a protected characteristic and a negative impact has been identified, then practical changes/actions will be taken to remove or mitigate the impact.

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## Date you will review implemented proposal and its impact

An annual review of the Strategic Partnership Action Plan (refer to Appendix 8 of the Draft EH Strategy) will be reported to the relevant Scrutiny Committee.

## 9. Further action as a result of this equality impact assessment

Possible Outcomes	Say which applies
No major change	No impacts on protected characteristics groups have been identified.
Adjust the policy	
Continue the policy	.
Stop and remove the policy	

## 10. Outcomes and Actions

### Recommend actions to senior management team

None. It has been identified that the Draft EH Strategy has no impacts on any group with protected characteristics.

### Outcome following formal consideration of proposal by senior management team

Agreed, that no major change is necessary.

## 11. Important Note

**Where you have identified impacts, you must detail this in your Cabinet report when seeking approval for your proposal.**

It has been identified that the Draft EH Strategy has no impacts on any group with protected characteristics.

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## 12. [Publication](#)

**Where will you publish your approved proposal and equality impact assessment?**

The approved proposal will be published on the Vale of Glamorgan Council website *Empty Homes* pages.

**In addition to anywhere you intend to publish your approved proposal and equality impact assessment, you must send a copy to Tim Greaves, Equality Co-ordinator, to publish on the equality pages of the Vale of Glamorgan website.**

## 13. [Authorisation](#)

<b>Approved by (name)</b>	Marcus Goldsworthy
<b>Job Title (senior manager)</b>	Head of Regeneration and Planning
<b>Date of approval</b>	3 <sup>rd</sup> March 2020
<b>Date of review</b>	March 2021