

## Equality Impact Assessment

The Council is required to have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Act
- advance equality of opportunity between people who share a relevant protected characteristic and those who do not
- foster good relations between people who share a protected characteristic and those who do not.

The Act explains that having due regard for advancing equality involves:

- removing or minimising disadvantages experienced by people due to their protected characteristics
- taking steps to meet the needs of people from protected groups where these are different from the needs of other people
- encouraging people with protected characteristics to participate in public life or in other activities where their participation is disproportionately low.

The protected characteristics are:

- Age
- Disability
- Gender reassignment
- Pregnancy and maternity
- Race
- Religion of belief
- Sex
- Sexual orientation

The duty also covers marriage and civil partnership but only with regard to eliminating discrimination. And in Wales we also have to treat Welsh and English on an equal basis as well as promoting and facilitating the use of the Welsh language.

Further advice on completing impact assessments can be found on StaffNet

[http://staffnet.valeofglamorgan.gov.uk/corp\\_cust\\_services/equalities/equalities\\_policies\\_guidance/equality\\_impact\\_assessments.aspx](http://staffnet.valeofglamorgan.gov.uk/corp_cust_services/equalities/equalities_policies_guidance/equality_impact_assessments.aspx)

Title and description of the policy, procedure, practice or decision (referred to as "policy" throughout form).	Local Housing Strategy 2014-19 (referred to as 'the strategy' throughout the form)
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Who is responsible for developing and implementing the policy?

Name	Jenny Lewington
Job Title	Housing Strategy Officer
Directorate	Visible Services and Housing
Division	Housing

### 1. Who will be affected by this policy?

**Examples may include Vale of Glamorgan residents, internal department(s), a specific group of customers or employees, customers or residents in a specific location.**

**Please specify:**

- Vale of Glamorgan residents.
- Specific groups of customers; people applying for or accessing the following services – social housing/Homes4U, low cost home ownership/Aspire2Own, housing advice, homelessness, tenants, private home owners, people in need of adaptations, housing improvements, people in need of specialist/supported housing, housing support.

**2. Does the policy relate to an area where there are known inequalities (for example, disabled peoples' access to public transport; the gender pay gap; racist or homophobic bullying in schools; the educational attainment of Gypsies and Travellers)?**

Yes ✓ No

**Please detail:**

The Council has a statutory role to play in the functioning of the housing market, as set out in three pieces of legislation:

- S8 Housing Act 1985 - requiring local authorities to consider housing conditions/needs in their locality;
- S3 Housing Act 2004 - requiring local authorities to keep housing conditions in private sector housing in their area under review;
- S87 Local Government Act 2003 - requiring local authorities to produce local housing strategies.

S87 of the Local Government Act requires Local Authorities to produce a Local Housing Strategy which identifies the approach to housing across all tenures, including housing need and gaps in services. The strategy sets out how these housing needs will be met and how the delivery of housing and related services will be integrated with existing services and meet local need.

As such, the strategy does relate to areas where there are known to be inequalities, including;

- Access to housing and related support by people who have a disability, mobility issue, vulnerability, younger, people, older people, complex and multiple needs,

One of the strategy aims is to ensure that 'all residents in the Vale of Glamorgan should have equal access to housing and housing services'. In promoting this aim it is acknowledged that some groups of people within the population require particular attention. For example:

- Some lesbian, gay and bisexual people experience problems and, in some cases harassment, that sometimes leads to them leaving their home. Lack of privacy and being accepted by flatmates and landlords are factors.
- Transgender people may also experience housing problems which are directly related to their gender identity.
- People in black and ethnic minority groups are more likely to be living in crowded conditions and more likely to consider their home unsuitable. Approximately one in six people from black and ethnic minority groups say they have experienced some form of harassment.
- The accommodation needs of gypsy-traveller families, while not huge in terms of numbers, are important not least because of their

difficulties in being able to use public services, such as health and education. There are also difficulties in identifying and providing suitable sites.

The strategy sets out how the Council will actively seek to plan and meet the need for housing and housing related services for:

- Gypsy and traveller
- Refugees and Asylum Seekers
- Migrant Workers
- People who use the Welsh Language

**3. Decisions must be based on robust evidence. Please detail the evidence that you have used to inform your assessment. What evidence do you have about how your service is used? What was the strength of the evidence and did you identify any gaps? Did the evidence identify any barriers to services, or different needs and priorities for protected characteristic groups? If the evidence was weak or gaps were identified, what action have you taken to address this?**

The evidence used to identify the priorities identified in the strategy includes:

- The Local Housing Market Assessment provides information on the type of housing required to meet local need.
- The Housing Renewal Policy provides data on the quality of private sector housing and the need for adapted/accessible housing.
- The Homes4U and Accessible Homes Register identifies the number of people registered as requiring social housing, housing designated for older people and accessible/adapted housing.
- Census data has been used to explore the demographics of the Vale of Glamorgan population.
- Access to housing advice and homelessness services is monitored and some of this information has been used to identify gaps in services.
- The Supporting People Programme monitors the need for housing related support services, the priorities are published in the Local Commissioning Plan. Supporting People also monitors the commissioned services and as such engages with services and service users to gather their feedback on services and inform service provision.
- A consultation event was held to inform the development of the Local Housing Strategy, which was attended by 130 people, representing a wide range of organisations and partners.

The barriers to services and priorities identified include:

- Promoting the provision of services in the rural Vale. Many services are located within urban areas, which may mean some people in rural areas have difficulties accessing services.
- Housing advice for older people requires some improvements to ensure older people are able to access advice and support to proactively plan to meet their housing requirements.
- The housing needs of people (or households with children) with a disability, mobility or health issue which mean they may need accessible or adapted housing are well monitored and catered for through the Accessible homes Register. However services for homeowners, particularly when there is a need for a purpose built property are less well planned for. Greater tenure options are required for this client group.
- The lack of one and two bedroom properties available to rent in the Vale does cause some difficulty moving people on from supported housing and temporary accommodation, including the refuge. The homelessness legislation and in particular the priority need criteria, means that most people households residing in temporary accommodation are female.
- People may require supported or specialist housing for a variety of reasons and vulnerabilities. Therefore by the very nature of planning and commissioning the services which are needed to meet local need, the Council actively engages with:
  - People experiencing domestic abuse
  - People with a learning disability, physical/sensory disability, development disorders or chronic illness
  - People with mental health or substance misuse issues.
  - People who are homeless or potentially homeless
  - Ex-offenders and those at risk of offending
  - Care leavers and 16-24 years olds with support needs
  - Older people (over 55 years of age)
  - Families with support needs

One of the strategy aims is to ensure that ‘all residents in the Vale of Glamorgan should have equal access to housing and housing services’. In promoting this aim it is acknowledged that some groups of people within the population require particular attention. For example:

- Some lesbian, gay and bisexual people experience problems and, in some cases harassment, that sometimes leads to them leaving their home. Lack of privacy and being accepted by flatmates and landlords are factors.

- Transgender people may also experience housing problems which are directly related to their gender identity.
- People in black and ethnic minority groups are more likely to be living in crowded conditions and more likely to consider their home unsuitable. Approximately one in six people from black and ethnic minority groups say they have experienced some form of harassment.
- The accommodation needs of gypsy-traveller families, while not huge in terms of numbers, are important not least because of their difficulties in being able to use public services, such as health and education. There are also difficulties in identifying and providing suitable sites.

**4. There is a legal duty to consult and involve people and organisations representing the protected characteristics where it is identified that they are potentially affected by the policy (for example men; women; parents; carers; the black and minority ethnic community (including asylum seekers, refugees, economic migrants); disabled people; the Welsh speaking community; the lesbian, gay and bisexual community; transgender people; different faith groups; etc.)**

**Please detail engagement activities that have taken place – internally and externally:**

An Evidence Gathering Day was organised in partnership with partners to inform the development of the Local Housing Strategy. Presentations, workshops and consultation exercises covered a wide range of housing topics, including:

- Local Housing Market Assessments
- Market housing development
- Homelessness and housing advice
- Housing and the ageing population
- The Supporting People Programme
- Support Services
- Housing one-stop-shops
- Gypsy and traveller site provision
- Affordable housing development
- Housing in the rural Vale

- The private rented sector
- Priorities for investing in housing

The day was attended by 130 people, representing a wide range of organisations:

### **Council Service Areas and Representatives**

- |  |  |
|--|--|
| <ul style="list-style-type: none"> <li>• Community Safety,</li> <li>• Corporate Consultation</li> <li>• Corporate Policy and Communications</li> <li>• Councillors (10)</li> <li>• Development Services</li> <li>• Equalities</li> <li>• Flying Start</li> <li>• Homes4U</li> <li>• Housing Advice and Homelessness</li> <li>• Housing and Building Services</li> <li>• Housing Improvements and Assets</li> <li>• Housing Management</li> </ul> | <ul style="list-style-type: none"> <li>• Housing Strategy</li> <li>• Learning Disability</li> <li>• Mental Health</li> <li>• Older Persons</li> <li>• Planning and Transportation</li> <li>• Safer Vale</li> <li>• Children and Young Peoples Partnership</li> <li>• Strategy and Sustainability</li> <li>• Supporting People</li> <li>• Tenant Engagement</li> <li>• Ty Iolo Hostel</li> <li>• Vale of Glamorgan 50+ Forum</li> </ul> |
|--|--|

### **External Organisations and Partner Agencies**

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>• Atal Y Fro</li> <li>• Bridgend County Borough Council</li> <li>• CanDo Lettings</li> <li>• Cardiff and Vale Adult Mental Health</li> <li>• Cardiff and Vale Citizens Advice Bureau</li> <li>• Cardiff and Vale Credit Union</li> <li>• Cardiff and Vale Probation Service</li> </ul> | <ul style="list-style-type: none"> <li>• Life Surfing</li> <li>• Llamau</li> <li>• Neath &amp; Port Talbot County Borough Council</li> <li>• Newydd Housing Association</li> <li>• Private housing developers and land owners</li> <li>• Residential Landlords Association</li> <li>• Rhondda Cynon Taff CBC</li> </ul> |
|---|---|

- Cardiff and Vale Public Health
- Cardiff and Vale University Health Board
- Cardiff Gypsy and Traveller Project
- Chartered Institute of Housing
- Cymorth Cymru
- Families First – FACT Project
- Gofal
- Gwalia Care and Support
- Hafod Care
- Hafod Housing Association
- Hendre Ltd
- Home Access
- Rural Housing Enabler – Monmouthshire
- Shelter Cymru
- South Wales Fire and Rescue Service
- South Wales Police
- Taff Housing Association
- Taylor Wimpey for the National Home Builders Federation
- United Welsh Housing Association
- Vale Centre for Voluntary Services
- Wales and West Housing Association
- Welsh Government
- Welsh Local Government Association

A public consultation strategy has been developed to direct further consultations, this will include:

- Advertising the consultation opportunity in the local press, online and using social media.
- Hard copies of the draft Local Housing Strategy 2014-19 in Vale libraries and Council buildings.
- A 'drop in' event, where a Council Officer will be available to speak to the public.
- The strategy will be sent directly to all relevant partners and Council departments.
- Consultation with the Citizens Panel.
- The consultation has been planned to ensure the opportunity is fully accessible; members of the public will be able to provide their feedback in person, in writing, online or on the phone.
- The public consultation exercise will be four weeks in duration.
- The public consultation strategy detailed above has been developed in partnership with and approved by the Corporate Consultation Officer.

**5. Will this policy have a significant effect on how services are delivered?**

Yes ✓

No

**Please detail:**

Yes; a focus on providing services as part of a Housing Solutions Service does have the potential to significantly change how services are delivered.

**A Housing Solutions Service**

An independent review of the Councils Housing Advice and Homelessness service improved significantly during the life of the last Local Housing Strategy; by increasing the capacity of the service by appointing dedicated advice officers and through building partnerships with agencies to enable customers to access a range of housing, advice and support. However the review also identifies that there remains room to improve the service by strengthening the housing options function, offering tailored housing advice and a more coordinated response between organisations.

Key to achieving improved advice services will be the development of *housing solutions service* which focuses on the individual housing needs of each customer, providing tailored advice and housing options, and helping them plan to meet their housing needs.

The development of the housing solutions service could include the development of a *Housing One-Stop-Shop*; with access to a number of housing options and advice services located together. Funding has been secured from the Welsh Government to pursue this objective by considering the feasibility of such a service, the costs, relevant partners, objectives of the service and to provide support to implement a range of changes.

**Demand for a Housing Solutions Service**

Initial consultation exercises have been conducted with Council Officers, partners and stakeholders around the development of a Housing Solutions Service and three key reasons for the development have emerged:

- The need to reconfigure the Council's Housing Advice service to respond to the new legislation in the Housing Bill. The Bill will place a new duty on the Local Authority to take all reasonable steps to prevent homelessness for anyone at risk of losing their home within 56 days.
- To take the opportunity to change the focus of the Councils Housing Advice service to be able to offer help and advice for any resident in the

Vale with a housing problem or who needs housing advice relating to the home that they live in regardless of tenure or help to look for a home.

- To be able to respond to residents effected by welfare reform and the introduction of Universal Credit so that they do not get into debt problems that may impact on their ability to keep their home.

### **Outcomes and Outputs for a Housing Solutions Service**

Identifying and agreeing the intended outcomes and outputs of a Housing Solutions Service is important in order to continue to shape the service in line with the Council and partners shared objectives.

Essentially a Housing Solutions Service would be a tailored service relevant for every customer who makes a housing enquiry. The advice provided would be focussed on:

- Sustaining and maintaining the customer's current housing status and preventing housing crisis.
- Identifying all housing options across all forms of tenure.
- Empowering customers to make informed choices.
- Meeting housing and other relevant needs through strong partnerships.
- Assisting customers to realise their housing aspirations.

The development of a Housing Solutions Service should better meet the needs of Vale residents and promote equality of access to housing services as it will provide tailored services. This service model will improve the services provided to people where there are known inequalities, including older people, people who do not speak English, people wishing to communicate in Welsh, people with disability, mobility or health issues, people who are vulnerable or those with complex or multiple needs by:

- Providing outreach services and 'housing advice on the road' to the rural areas.
- Providing housing advice tailored to the needs of older people.
- Providing accessible services, available in person, online or over the phone.
- Improving the supply of homes available to meet the needs of specific populations.

**6. Will this policy have a significant effect on how other organisations operate?**

Yes No ✓

**Please detail:**

The strategy provides strategic direction for partner organisations, including; advice and service providers and registered social landlords. For example;

- Providing services which are strategically relevant and meet local need.
- Planning and delivering housing which meets local need.
- Monitoring and promoting equality of access.
- Unstande and recognise the needs of local residents.
- Services should be informed, or at best led, by those who use them.
- Services should reflect the needs of users; being aware of, and proactive about, the diversity of customers will ensure that housing organisations are able to provide the right services and meet the right needs.
- Providers of housing and housing related services should actively promote the involvement of service users and potential service users, in particular with groups of people who may not engage with consultation or may be considered to be hard to reach.
- Housing organisations play a key role in eliminating discrimination, harassment and victimisation. Working within communities housing providers are able to promote a positive approach to diversity, promote understanding and good relations between people who have different backgrounds and experiences, in turn this contributes to enhancing and improving the quality of life in local areas.

These are not significant changes to how partner organisations currently operate. Many of the relevant partner agencies are public or third sector organisations who already work in ways which are mindful and promote equality issues.

Where the Council commissions a service provider to provide a service on behalf of the Council (e.g. the young person's housing advice service and housing related support services) the public sector equality duty applies and is part of the service specification and / or contract. Registered Social Landlords are also subject to the public sector equality duty.

**7. Will the policy impact upon other policies or practices?**

Yes ✓

No

**Please detail:**

The Local Housing Strategy 2014-19 will have an impact on existing and future practices, including;

- The delivery of homelessness services; the strategy details the changes required in order to meet the new requirements set out in the Housing Bill.
- Changes to the way that housing advice will plan to be delivered, to move towards a housing solutions approach.
- Planning for the provision of a gypsy and traveller site, in order to meet the new requirements set out in the Housing Bill.

The Local Housing Strategy is the key strategic document which provides the overall vision for housing in the Vale and as such it will provide direction for a number of policies and plans, including;

- The Housing Renewal Policy.
- Homelessness Strategy; this is under development and will be informed by the strategic direction provided in the Local Housing Strategy.
- Supporting People; ensuring services continue to be compliant with the Grant Conditions may require some services to change their practise, e.g. to monitor and collect service user outcome data.
- A review of Homes4U and Aspiree2Own may lead to changes to the eligibility criteria and allocation policy.

**8. Have you identified any evidence that the policy could directly or indirectly discriminate against or have an adverse impact on people in any of the protected groups? If 'Yes', what do you intend to do to mitigate against this?**

Yes

No ✓

**If you do not intend to mitigate against any identified adverse impact please provide justification.**

**Please detail:**

No – no evidence has been identified that suggests the strategy could directly or indirectly discriminate against or have an adverse impact on people in any of the protected groups.

The strategy promotes equality monitoring and actively encourages services to identify where access to services is unequal or where people in any of the protected groups are directly or indirectly discriminated against or where a change to a policy or service has an adverse impact on a group of people.

The strategy seeks to improve access to services and promotes equal access to services. People in the protected groups, vulnerable people, those with complex or multiple needs and minority populations are identified within the strategy and many of the priorities specifically address ensuring that the needs of these groups are identified, planned for and met.

The strategy actively promotes equality of access to housing services.

**9. What can be done further to promote equality of opportunity by altering the policy?  
Please detail, including opportunities to promote good relations and community cohesion:**

The strategy promotes:

- Community cohesion through engagement, greater understanding and education.
- Developing housing and housing related support options which meet the identified needs of the community, including specialist and supported housing.
- Greater engagement with communities; enabling local communities to contribute to the planning and development of services.
- A housing solutions approach which provides tailored housing advice to all households.
- Eliminate discrimination, harassment and victimisation.
- Advancing equality of opportunity and fostering good relations within and between communities.
- Understand and recognise the needs of people falling within the eight strands of equality and who use the Welsh language.
- Eliminating discrimination, harassment and victimisation.
- Responding to the diverse housing needs of people in the Vale of Glamorgan.

**10. Has the assessment identified the need for future monitoring? If so, what monitoring do you intend to conduct? (for example the number of disabled people using your service as a proportion of the general population)**

**Please detail:**

Yes – Aim number 4 is focused on equality issues. The aim includes a key objective around equality monitoring:

**Understand and Recognise the Needs of Residents**

Housing plays a fundamental role in everyone’s life. Equality and diversity is key for housing because:

- The Equality Act 2010 brings together anti-discrimination and equality legislation to protect nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation
- The Public Sector Equality Duty requires housing providers to give “due regard” to the need to eliminate discrimination, advance equality of opportunity and foster good relations where they exercise a public function

In order to respond to the diverse housing needs of people in the Vale of Glamorgan it is necessary to understand the needs of residents, in particular the people falling within the eight strands of equality and who use the Welsh language. As far as possible, housing and housing related services should monitor the characteristics of people accessing their services in order to ensure access is equal and that certain groups of people are not disadvantaged or prevented from accessing services. *Equality monitoring* promoted and monitored in a number of ways:

- As a public sector body, the Council is required to provide an annual Equality Monitoring Report to the Welsh Government. The Housing department contributes to this report by analysing the characteristics of people who access housing services to ensure that access is equal.
- The Council also ensures that organisations who are commissioned to provide services, for example support providers, advice agencies and contractors, also promote equal access to their services. Requirements are often detailed in contracts which they are monitored against.
- Registered Social Landlords also have duties in relation to promoting equalities; these are monitored as part of the Welsh Governments Regulatory Framework for RSLs.

Equality monitoring should be a key tool used by providers of housing and housing related services to improve the service they provide. Gaps in knowledge and understanding of the needs of people from minority groups need to be addressed.

Services are at their best when they are informed, or at best led, by those who use them. Services should reflect the needs of users; being aware of, and proactive about, the diversity of customers will ensure that housing organisations are able to provide the right services and meet the right needs. Providers of housing and housing related services should actively promote the involvement of service users and potential service users, in particular with groups of people who may not engage with consultation or may be considered to be hard to reach.

**11. How often will you analyse and report upon this data, and where will it be reported?**

**Please detail:**

The Councils Housing Department will complete the corporate equality monitoring form annually.

Commissioned services are required to monitor equality information and this is monitored through the Councils contract and performance management role. E.g. housing related support services are monitored by the Councils Supporting People Team; the young persons housing advice service is monitored by the Councils Housing Advice and Homelessness Team. The Welsh Government provides the regulatory service for Registered Social Landlords.

**12. How will you publish and publicise the policy to ensure equality of access to this information (including raising awareness with minority groups, producing information in accessible formats, etc.)?**

**Please detail:**

The draft Local Housing Strategy will now be subject to wider consultation, including public consultation. This will include:

- Advertising the consultation opportunity in the local press, online and using social media.
- Hard copies of the draft Local Housing Strategy 2014-19 in Vale libraries and Council buildings.
- A 'drop in' event, where a Council Officer will be available to speak to the public.
- The strategy will be sent directly to all relevant partners and Council departments.
- Consultation with the Citizens Panel.
- The consultation has been planned to ensure the opportunity is fully accessible; members of the public will be able to provide their feedback in person, in writing, online or on the phone.

- The public consultation exercise will be four weeks in duration.
- The public consultation strategy detailed above has been developed in partnership with and approved by the Corporate Consultation Officer.

**13. Any recommendations for action that you plan to take as a result of this impact assessment (listed in the sections above) should be included in your Team Plan or Departmental Service Plan. Please detail those actions and where they will be placed:**

Ensure the services provided by the Councils Housing Department:

- Collect equality information for the people applying for and accessing services.
- Analyse equality information annually.
- Identify areas of inequality or discrimination.
- Promote equality of access and ensure that support all residents are able to/supported to access services.

14. An equality impact assessment may have four possible outcomes, though more than one may apply to a single policy. Please indicate the relevant outcome(s) of the impact assessment below.

Please tick as appropriate:

**No major change** – the impact assessment demonstrated that the policy was robust; there was no potential for discrimination or adverse impact. All opportunities to promote equality have been taken.



**Adjust the policy** – the impact assessment identified potential problems or missed opportunities. The policy was adjusted to remove barriers or better promote equality.



**Continue the policy** – the impact assessment identified the potential for adverse impact or missed opportunities to promote equality. The justification(s) for continuing with it have been clearly set out. (The justification must be included in the impact assessment and must be in line with the duty to have due regard. Compelling reasons will be needed for the most important relevant policies.)



**Stop and remove the policy** – the impact assessment identified actual or potential unlawful discrimination. The policy was stopped and removed, or changed.



### 15. Authorisation

This equality impact assessment must be authorised by the relevant Head of Service or Operational Manager.

Approved by (name)	
Job Title	
Date	

Signature \_\_\_\_\_

On completion of this form send a signed copy and an electronic copy to the Equalities Section: [tsgreaves@valeofglamorgan.gov.uk](mailto:tsgreaves@valeofglamorgan.gov.uk). For support, ring: 01446 709446

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