

Appendix B HDC Due Regard (Equality Analysis) Template

Due Regard (Equality Analysis) is an on-going proactive process which requires us to consider the effect our decisions are likely to have on local communities, service users and employees, particularly those most vulnerable and at risk of disadvantage.

This template has been designed to assist in the collation of information and evidence required to support the 'Due Regard' process when introducing new policies/procedures/functions and services or reviewing existing ones.

For help with this template please view the guidance document, which contains advice to assist you when you are considering the impact (both positive and negative) of the proposed actions on each of the protected equality characteristics.

Name of policy/procedure/function/service being analysed: A Strategy for Housing and the Prevention of Homelessness and Rough Sleeping

Department and section: Community Partnerships

Name of lead officer: Tom Day

Other people involved (assisting or reviewing - including any service users or stakeholder groups etc.):

Date assessment completed: 4.3.19

Step 1: Defining the policy/procedure/function/service

Is this a new, amended or reviewed policy? What are the aims, objectives and purpose and how will they be achieved? What are the main activities and which communities are likely to be affected by these activities? What are the expected outcomes?

The Strategy for Housing and the Prevention of Homelessness and Rough Sleeping ('the Housing Strategy') sets out the priorities of the Council to meet the housing needs in the district (as identified in the local plan). This includes homeless households, older people, young people, people with disabilities and other groups of people unable to access market housing. The strategy focuses on delivering new affordable housing, improving the quality and accessibility of homes and providing services that meet peoples' housing needs.

The Housing Strategy sets out a delivery framework and gives direction to a group of more specific strategies, policies and partnership working arrangements (identified in the strategy document) to ensure the council is joined up and resources targeted to the right areas to meet our priorities.

The Housing Strategy affects all residents and households. The main stakeholders include health and social care professionals, voluntary agencies, district, parish and county councils, registered social landlords, tenants, Homes & Communities Agency, housing developers, private landlords, any person with a housing or support need.

Step 2: Data collection & evidence

What relevant evidence, research, data and other information do you have and is there any further research, data or evidence you need to fill any gaps in your understanding of the potential or known affects of the policy on different communities? Include quantitative data as well as qualitative intelligence such as community input and advice.

Age

- We know that the Harborough District has a much higher proportion of older people (65+) than the UK average. Correspondingly, we have fewer residents of working age (18-64) and slightly fewer young people aged under 18.

Age ranges, numbers and % of Harborough population from the 2011 Census.

0-4 years 4665 5.46%

5-9 years 5015 5.87%

10-17 years 8969 10.50%

18-24 years 5415 6.34%

25-29 years 3700 4.33%

30-44 years 16827 19.71%

45-59 years 19139 22.42%

60-64 years 6061 7.10%

65+ years 15591 18.26%

- We know that there has been a 50% reduction in under 35s owning their own home. This is due to a number of issues

including housing availability and that house price inflation has been significantly outstripping wage growth for many years. Tighter lending criteria since the last financial crash also means a higher deposit is needed to get a mortgage.

- Recent welfare reforms affecting single under 35s, such as limiting local housing allowance and housing benefit to the shared room rate, pose additional challenges to this group when seeking an affordable home.
- Young people are also more likely to make a homeless application. Those between 18 and 25 make up 27% of homeless households owed a main duty by Harborough District Council between 2014 and 2017 despite only making up 6.3% of the population.
- We also know that the 25-44 age group are more likely to be homeless. This group made up 63% of homeless households owed a fully duty by the Council between 2014 and 2017 despite only making up 24% of the population in the district.
- Despite having a much larger older population than other areas there have been no homeless applications since 2014 from people aged 65 and over.
- There were also no homeless applications from young people aged 16/17 between 2014 and 2017
- However there are other housing and support needs to consider for older people, especially as there will be a 95% increase in 65 and over population by 2036 (including 200% increase in over 84 population)
- Loneliness and isolation is one of these concerns with 7300 people over 75 predicted to live alone by 2030 - a 100% increase

Disability

- We know, from Census 2011 figures, that around 6% of Harborough District residents' day to day activities are limited a lot because of a health problem or disability. 15% are limited a little.
- There are 8 applicants on our housing register that have indicated that they have a learning disability. 37 have indicated they have a physical disability and 17 have indicated they have a mental illness. There are currently around 1200 households on the Housing Register.
- Data from the government office for disability issues show there are more than 11 million people with a disability in the UK.
- The Leonard Cheshire Disability Charity claims that as many as five million people in the UK now need a disabled-friendly home. More than half of survey respondents said their buildings do not have doors and hallways wide enough for a wheelchair.

- The number of people with a disability is rising, partly because our population is ageing. It is predicted that 11400 people over 65 will have a limiting illness in Harborough district by 2030 - an 85% increase.
- Between 2014 and 2017 a total of 5.8% of homeless households owed a main duty by Harborough District Council had a physical disability and 7.2% of homeless households owed a main duty had a mental illness. It is important that we recognise particular difficulties a client group may have regarding housing and accessing support.

Gender reassignment

- There is limited information on this characteristic in Harborough District. None of the customer satisfaction surveys have been completed by a person who has stated that they have had a gender reassignment. Leicester LGBT centre estimate that 0.25% of the population are transgender which, looking at Census 2011 statistics, would be approximately 214 people within the District.

Marriage or civil partnership (protected characteristic in relation to employment only)

- Around 26% of residents are single, 56% are married, 11% are separated, 7% widowed and 0.2% in a registered civil partnership.
- There is limited information on this characteristic. However wider than this we know that relationship breakdown is the 2nd most common reason for homelessness. With increase in separation and divorce there is an increased need for smaller affordable homes.

Pregnancy & Maternity

- There is limited information on this characteristic.

Race

- People from BME communities make up 4.5% of the population in the district (Census 2011)
- National statistics indicate that 36% of the people owed a main homelessness duty are from BME background. In total 9% of homeless applications in Harborough district between 2014 and 2017 were from BME residents indicating this group are at a higher risk of homelessness.
- The HumanCityInstitute states that BME households are more likely to experience housing stress, such as overcrowding,

poorer quality housing and fuel poverty. Another barrier can be peoples attitudes - racism.

Religion or belief

- Around 66% of residents are Christian, 25% have no religion and 7% do not state a religion.

Sex

- There are slightly more females in the district (50.4%) than males (49.6%).
- Nationally nearly 63% of adults in households claiming housing benefit are women reflecting women's lower incomes. In the 2011 census women 'household reference persons' (the adult who pay all or most of the housing costs), were overrepresented amongst those in small homes (with one or two bedrooms), and amongst those in flats and terraced houses.

Sexual orientation

- There is limited information on this characteristic. We know from government statistics that an estimated 6% of the population are L,G or B. Using Census 2011 statistics this would be approximately 5123 residents.
- Research suggests that young and old LGB people may face domestic abuse from family members and be isolated or forced to leave home. Sexual orientation is therefore an important consideration when meeting housing needs.
- Socio-Economic - statistics show that the number of people utilising our housing register and also declaring themselves homeless has risen dramatically since 2015. This rise in people struggling financially can also be seen in the number of residents utilising local foodbanks. In a 'normal' month the foodbank in Market Harborough alone gives out food for approximately 500 to 600 meals but in November 2017 this rose to food for 1500 meals in one month. The characteristics of those needing food parcels is not recorded.

Step 3: Consultation and involvement

Have you consulted and if so outline what you did and who you consulted with and why.

- To build on the data we have and ensure we engage on all aspects of the Housing and Homelessness Prevention Strategy we intend to run a 6 week public consultation between April and May 2018. This will include:
 - Online survey
 - Social media marketing of survey
 - Member briefing
 - Adverts on screens in customer services
 - Emails to known stakeholders - Health and social care professionals, voluntary agencies, district, parish and county councillors, registered social landlords, tenants, Homes & Communities Agency, housing developers, private landlords, any person with a housing or support need

Step 4: Potential impact

Considering the evidence from the data collection and feedback from consultation, which communities will be affected and what barriers may these individuals or groups face in relation to Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex, Sexual Orientation, Other groups e.g. rural isolation, deprivation, health inequality, carers, asylum seeker and refugee communities, looked after children, deprived or disadvantaged communities and also the potential impact on Community Cohesion. Remember people have multiple characteristics so the impact of a policy on a particular community may impact people within the community differently. Where possible include numbers likely to be affected.

From statistical and local information the communities which will be impacted most by this strategy will be all ages but particularly those aged under 35 and Female residents as well as people with disabilities and medical/health conditions which impact on their ability to undertake day to day activities. These groups are the highest users of our current housing services and statistics show that this demand is unlikely to change. Therefore this strategy will need to monitor these characteristics for impact.

Step 5: Mitigating and assessing the impact

If you consider there to be actual or potential adverse impact or discrimination, please outline this below. State whether it is justifiable or legitimate and give reasons. If you have identified adverse impact or discrimination that is illegal, you are required

to take action to remedy this immediately. If you have identified adverse impact or discrimination that is justifiable or legitimate, you will need to consider what actions can be taken to mitigate its effect on those groups of people. Consider what barriers you can remove, whether reasonable adjustments may be necessary and how any unmet needs have identified can be addressed.

Customer satisfaction data for housing options service

- 94% said our advice was easy to understand
- 90% satisfied with advice given
- Improvements mainly around the supply of affordable housing
- There was no feedback on how we could better engage with clients with protected characteristics.

Customer satisfaction data for homelessness prevention service.

- 100% said our staff explained things clearly and were given clear contact details for their case officer
- 90% understood what documents and evidence they needed to supply
- 77% said we understood their views and considered individual circumstances
- 89% were kept well informed on their case
- 89% were satisfied with the support offered by the council (55% very satisfied)
- Clients are given the opportunity to suggest improvements. The majority are about increasing the supply of affordable homes.
- There was no feedback on how we could better engage with clients with protected characteristics.
- 60% were satisfied with temporary accommodation

Prioritising housing to those most in need

- The Council uses a banding scheme to prioritise applications for Social Housing in accordance with housing need.
- All housing applications received for rented accommodation will be assessed and placed in one of 4 bands. The table below sets out the banding scheme and gives examples of those applicants who would be eligible to be placed in each band.

PRIORITY HOUSING NEED - Time in band 8 weeks

Applicants who are homeless and the council has a statutory duty to secure accommodation

Applicants with an emergency welfare need to move

Applicants with an emergency medical need to move

Applicants with complex housing needs

Applicants with a management need to move

Displaced agricultural workers

HIGH HOUSING NEED - Time in band 16 weeks

Applicants who have 2 or more qualifying Medium Housing Need categories

Applicants who are threatened with homelessness within 56 days, are working with the council and are in priority need.

Applicants who are overcrowded by two or more bedrooms

Applicant who are in supported accommodation and is ready for move-on or independent living

Applicant who are under-occupying social housing which is in high demand

Applicant who are under-occupying social housing and in financial difficulty due to welfare reform

MEDIUM HOUSING NEED - Not time limited

Homeless households who do not qualify for a full housing duty or are threatened with homelessness within 56 days and are working with the council.

Applicants suffering from poor housing conditions - households living in unsanitary or otherwise unsatisfactory housing conditions.

Applicants with a medical need to move

Applicants with a welfare need to move

Applicants with the Right To Move

Applicants who are suffering financial hardship through reasons outside of their control

Applicants living in Insecure accommodation

LOW HOUSING NEED - Normally not time limited

Applicants who are guilty of behaviour within the last twelve months which affects their suitability to be a tenant.

A joint tenant of a social landlord property where the other party does not wish to move.

An applicant who only wishes to be considered for low cost home ownership schemes.

Applicants who have deliberately worsened their circumstances to gain an unfair advantage over other Applicants on the housing register - normally remain in the Low housing need band for a period of 12 months.

Age

- A mix of ages have completed satisfaction surveys.

Disability

- 33% of clients who completed satisfaction surveys for homelessness support reported their day to day activities are limited a lot because of a health problem or disability. 11% reported their activities are limited a little.
- 24% of clients who completed satisfaction surveys for housing options reported their day to day activities were limited a lot. 18% reported their activities were limited a little.
- Information produced by the Council is written in plain English and is designed to be easy to understand.

Gender reassignment

- None of the customer satisfaction surveys have been completed by a person who has had gender reassignment.

Marriage & Civil Partnership

- 89% of clients who completed satisfaction surveys for homelessness support were legally single, 11% were from a same sex civil partnership.
- 41% of clients who completed satisfaction surveys for housing options were legally single, 29% were married, 18% separated and 11% divorced.

Pregnancy & Maternity

- There is no information on this characteristic from satisfaction surveys.

Race

- 10% satisfaction surveys for homelessness support offered by the Council are completed by BME communities.
- 6% of housing options satisfaction surveys were completed by people from the Gypsy and Traveller communities
- Information produced by the Council is written in plain English and is designed to be easy to understand. Translation and interpretation services are available if required

Religion or belief

- 55% of satisfaction surveys for homelessness support are completed by residents with no religion or belief followed by 33% who identify as Christian. The remaining 11% did not declare a religion or belief.
- 53% of satisfaction surveys for housing options were completed by clients identifying as Christian followed by 41% with no religion or belief. The remaining 6% did not declare

Sex

- We know that females are more likely to make a homeless application to the Council. Females made up 62.3% of homeless applications between 2014 and 2017 but make up 50% of the population (Census2011).
- 77% of homelessness service satisfaction surveys have been completed by females.

Sexual orientation

- 22% of satisfaction surveys for homelessness support offered by the Council are from clients who identify as a gay women/ lesbian. 10% prefer not to say.

Step 6: Making a decision

Summarise your findings and give an overview of whether the policy will meet Harborough District Council's responsibilities in relation to equality, diversity and human rights. Does it contribute to the achievement of the three aims of the Public Sector Equality Duty - eliminate unlawful discrimination, harassment, victimisation; advance equality of opportunity and foster good relations?

In summary the development of a new integrated Housing, Homelessness and Rough Sleeping Prevention Strategy will lead to a positive impact on promoting equality, diversity and human rights. The draft strategy and action plan identifies key actions to both increase our understanding of key issues, particularly needs for Specialist Housing and improving the supply and quality of the housing stock in the district.

Step 7: Monitoring, evaluation & review of your policy/procedure/service change

What monitoring systems will you put in place to promote equality of opportunity, monitor impact and effectiveness and make positive improvements? How frequently will monitoring take place and who will be responsible?

We will measure customer satisfaction and carryout equalities monitoring for our Housing Options and Homelessness Prevention Service. We will also take steps to properly understand the needs for Specialist Housing for residents with disabilities and use this to ensure the right houses are provided in the right place and at the right time to keep place with changing demographics and needs.

Equality Improvement Plan

Equality Objective :

Action: Collate quarterly statistics regarding characteristics of those on housing register and those who have assessed as being covered by our homelessness duty

Officer Responsible: RF

By when: Quarterly from April 2019

Equality Objective :

Action: Feed information into other councils departments to help them understand how they can work together to ensure all departments are working towards same aim.

Officer Responsible: RF

By when: from April 2019

Equality Objective :

Action:

Officer Responsible:

By when:

Equality Objective :

Action:

Officer Responsible:

By when:

Signed off by: T. Day

Date: 4.3.19

Once signed off, please forward a copy for publication to Julie Clarke, Equality and Diversity Officer
e-mail: j.clarke@harborough.gov.uk , telephone: 01858 821070.