Equality Impact Assessment

|  |  |
| --- | --- |
| **Name and role of officers completing the EIA** | Mike Chedzoy  Susan Hayter |
| **Date of assessment** | 10/5/18 |

The Equality Act 2010 public sector equality duty requires public authorities to demonstrate that they have paid 'due regard' to the need to:

* eliminate unlawful discrimination, harassment and victimisation
* advance equality of opportunity
* foster good relations between people

**Introduction**

The Foxhill Estate and Mulberry Park Local Lettings Plan has been produced in line with Bath and North East Somerset Council’s Homesearch Policy. The Homesearch Policy covers a variety of equalities issues, including many of the issues identified in this Equalities Impact Assessment as well as other issues that are not specifically mentioned. The Homesearch Policy can be viewed at:

[*http://www.bathnes.gov.uk/sites/default/files/siteimages/Housing/Strategyandperformance/homesearch\_allocation\_scheme\_2016\_v2\_for\_publication.pdf*](http://www.bathnes.gov.uk/sites/default/files/siteimages/Housing/Strategyandperformance/homesearch_allocation_scheme_2016_v2_for_publication.pdf)

The Homesearch Policy Equalities Impact Assessment can be viewed at:

[*http://www.bathnes.gov.uk/services/your-council-and-democracy/equality-and-diversity/equality-impact-assessmentsequality-1*](http://www.bathnes.gov.uk/services/your-council-and-democracy/equality-and-diversity/equality-impact-assessmentsequality-1)

**Context of the Foxhill Estate and Mulberry Park Local Lettings Plan**

The Foxhill Estate and Mulberry Park Local Lettings Plan has been put in place to respond to the following considerations:

* First lettings on a new development, where issues such as child density, vulnerability of applicants, and ensuring a mix of working families with economically inactive families may be important.
* Lettings, when a small geographic area has become unbalanced and steps are being taken to rectify this.

These local lettings plans need a strong evidence base, and regular review, but can support for example regeneration activity by prioritising working families into an area which has an over-representation of economically inactive families, alongside support to enable local families to move into work.

Regular review of lettings will also identify any restrictive lettings practices being applied by landlords (eg, age restrictions or no families with children) and enable the local authority to challenge these where appropriate.

Calculation of percentage of lets to people in employment will not include those tenants who are unable to work due to age, disability, pregnancy or maternity.

| **Equalities Profile** | **How the LLP meets any particular needs or helps to promote equality in some way.** | **How the LLP could have a negative or adverse impact** | **Comments** |
| --- | --- | --- | --- |
| **Age** | Priority is because of housing need regardless of age. See Appendix 1 Table A1.2. | None. | Monitor future lettings to ensure that there is no under or over representation of particular age groups, e.g older or younger people. |
| **Disability** - physical, sensory and mental impairments/mental health | People who need adapted properties will be prioritised above existing tenants who do not have adapted property need. | Residents with specific needs will take priority over other people when adapted or specialist properties are allocated.  People with high support needs may be excluded only if it is reasonable. | Impact unknown due to insufficient data.  Information can be made available in suitable accessible formats for people with visual or other reading impairments.  The Homesearch website provides a variety of accessible options. |
| **Economic Inclusion** | The LLP is promoting a closer balance of people employed/unable to work, that reflects the wider BANES community. | Some applicants may be overlooked for properties. | BANES and Curo will be monitoring this on a 6 monthly basis to review progress against the LLP.  50% of allocations will have no restrictions at all – so unemployed people will still be offered housing without any restrictions. |
| **Gender** | Allocations will be made based on housing need and all genders will be treated equally.  See Appendix 1 Table A1.3. | A higher number of properties may be allocated to Female tenants, based on current trends across BANES, where 66% of tenants are female against 34% male. (Appendix 1 TableA1. 3) | Priority for housing is often awarded to households with children; these are disproportionately headed by females. |
| **Gender Reassignment** | We do not have data on the gender identity of those covered by the LLP and therefore cannot measure the impact, but we do not envisage an impact on this protected characteristic. | A person who is transgender could become unable to work due to transition as a result of psychological considerations or medical complications.  Trans people may not be working because they have experienced discriminatory attitudes when trying to find a job. | Within Homesearch, any discrimination, bullying or harassment based upon gender identity should be combatted. |
| **Marriage and civil partnership** | Couples in civil partnerships will be treated the same as married couples and cohabitees in relationships. | None | Impact unknown due to insufficient data. |
| **Pregnancy and maternity** | The LLP will consider predicted housing need. | Issues around affordability will be discussed pre tenancy. | Impact unknown due to insufficient data. |
| **Race and ethnicity**- BAME Groups | Priority is given depending on housing need, regardless of race/ethnicity.  See Appendix 1 Table A1.1. | None | Homesearch monitors lettings to ensure that there is no under or over representation of different ethnic groups.  Provide information in suitable accessible formats. The Homesearch website provides a variety of accessible options.  Within Homesearch, any discrimination, bullying or harassment based upon race or ethnicity should be combatted. |
| **Religion/belief** | Priority is given based on housing need, regardless of religion/belief. | None | Homesearch monitors stated religion/belief. Priority is given depending on housing need, regardless of religion or belief.  Within Homesearch, any discrimination, bullying or harassment based upon religion or belief should be combatted. |
| **Sexual orientation -** lesbian, gay, bisexual, heterosexual people | Priority is given depending on housing need, regardless of sexual orientation. | None | Homesearch monitors this information to identify and address positive or negative trends.  Within Homesearch, any discrimination, bullying or harassment based upon sexual orientation should be combatted. |
| **All** | Creating a community where:   * people feel safe, take responsibility and make a contribution ­ * the disadvantaged are supported ­ * the vulnerable are protected * people feel proud to live | Some individuals may be overlooked for accommodation, where the tenancy would have a detrimental effect on the community. | This policy seeks to balance between the needs of individuals and the needs of the wider community. |

**Appendix 1**

Table A1.1 – Ethnicity of main applicant housed in Bath and North East Somerset

|  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Ethnicity** | **2013/4** | | **2014/15** | | **2015/16** | | **2016/17** | | **2017/18** | |
|  | **No** | **%** | **No** | **%** | **No** | **%** | **No** | **%** | **No** | **%** |
|  |  |  |  |  |  |  |  |  |  |  |
| White - British | 518 | 83.3% | 685 | 84.5% | 651 | 84.8% | 562 | 82.0% | 560 | 81.3% |
| White - Irish | 2 | 0.3% | 4 | 0.5% | 5 | 0.7% | 4 | 0.6% | 3 | 0.4% |
| White - Other | 33 | 5.1% | 50 | 6.2% | 56 | 7.3% | 38 | 6.0% | 45 | 6.6% |
| Black - African | 4 | 0.6% | 3 | 0.4% | 4 | 0.5% | 2 | 0.3% | 1 | 0.1% |
| Black - Caribbean | 2 | 0.3% | 6 | 0.7% | 4 | 0.5% | 8 | 1.2% | 2 | 0.3% |
| Black - Other | 3 | 0.5% | 2 | 0.2% | 4 | 0.5% | 5 | 0.7% | 3 | 0.4% |
| Asian - Bangladeshi | 1 | 0.2% | 2 | 0.2% | 2 | 0.3% | 1 | 0.1% | 1 | 0.1% |
| Asian -Indian | 2 | 0.3% | 2 | 0.2% | 2 | 0.3% | 1 | 0.1% | 1 | 0.1% |
| Asian - Other | 1 | 0.2% | 1 | 0.1% | 2 | 0.3% | 2 | 0.2% | 3 | 0.4% |
| Chinese | 0 | 0.0% | 1 | 0.1% | 0 | 0.0% | 1 | 0.1% | 1 | 0.1% |
| Indian/Bangladeshi/Pakistani | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Dual heritage | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Dual heritage - Asian | 1 | 0.2% | 3 | 0.4% | 3 | 0.4% | 2 | 0.2% | 5 | 0.7% |
| Dual heritage - Black African | 4 | 0.6% | 2 | 0.2% | 1 | 0.1% | 1 | 0.1% | 2 | 0.3% |
| Dual heritage - Black Caribbean | 12 | 1.9% | 9 | 1.1% | 11 | 1.4% | 8 | 1.2% | 9 | 1.3% |
| Dual heritage - Other | 4 | 0.6% | 4 | 0.5% | 3 | 0.4% | 5 | 0.7% | 1 | 0.1% |
| Dual heritage - White | 10 | 1.6% | 5 | 0.6% | 3 | 0.4% | 8 | 1.2% | 6 | 0.9% |
| Eastern European | 3 | 0.5% | 5 | 0.6% | 4 | 0.5% | 2 | 0.2% | 4 | 0.6% |
| Gypsy/Irish Traveller | 2 | 0.2% | 2 | 0.2% | 1 | 0.1% | 1 | 0.1% | 1 | 0.1% |
| South East Asian | 1 | 0.2% | 3 | 0.4% | 1 | 0.1% | 1 | 0.1% | 2 | 0.3% |
| Other/Not stated | 21 | 3.3% | 22 | 2.8% | 31 | 3.9% | 33 | 4.8% | 40 | 5.9% |
| Total | 622 |  | 811 |  | 788 |  | 685 |  | 690 |  |

**Table A1.2 – Age of main applicant housed**

|  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Age** | **2013/4** | | **2014/15** | | **2015/16** | | **2016/17** | | **2017/18** | |
|  | **No** | **%** | **No** | **%** | **No** | **%** | **No** | **%** | **No** | **%** |
| 16-24 | 49 | 7.9% | 91 | 11.2% | 116 | 14.7% | 100 | 14.6% | 101 | 14.6% |
| 25-44 | 274 | 44.1% | 372 | 45.9% | 364 | 46.2% | 328 | 47.9% | 330 | 47.8% |
| 45-59 | 144 | 23.2% | 177 | 21.8% | 174 | 22.1% | 147 | 21.5% | 157 | 22.8% |
| 60-64 | 41 | 6.6% | 54 | 6.7% | 33 | 4.2% | 33 | 4.8% | 38 | 5.5% |
| 65-74 | 58 | 9.3% | 69 | 8.5% | 54 | 6.9% | 53 | 7.7% | 39 | 5.7% |
| 75+ | 56 | 9.0% | 48 | 5.9% | 47 | 6.0% | 24 | 3.5% | 25 | 3.6% |
| Total | 622 |  | 811 |  | 788 |  | 685 |  | 690 |  |

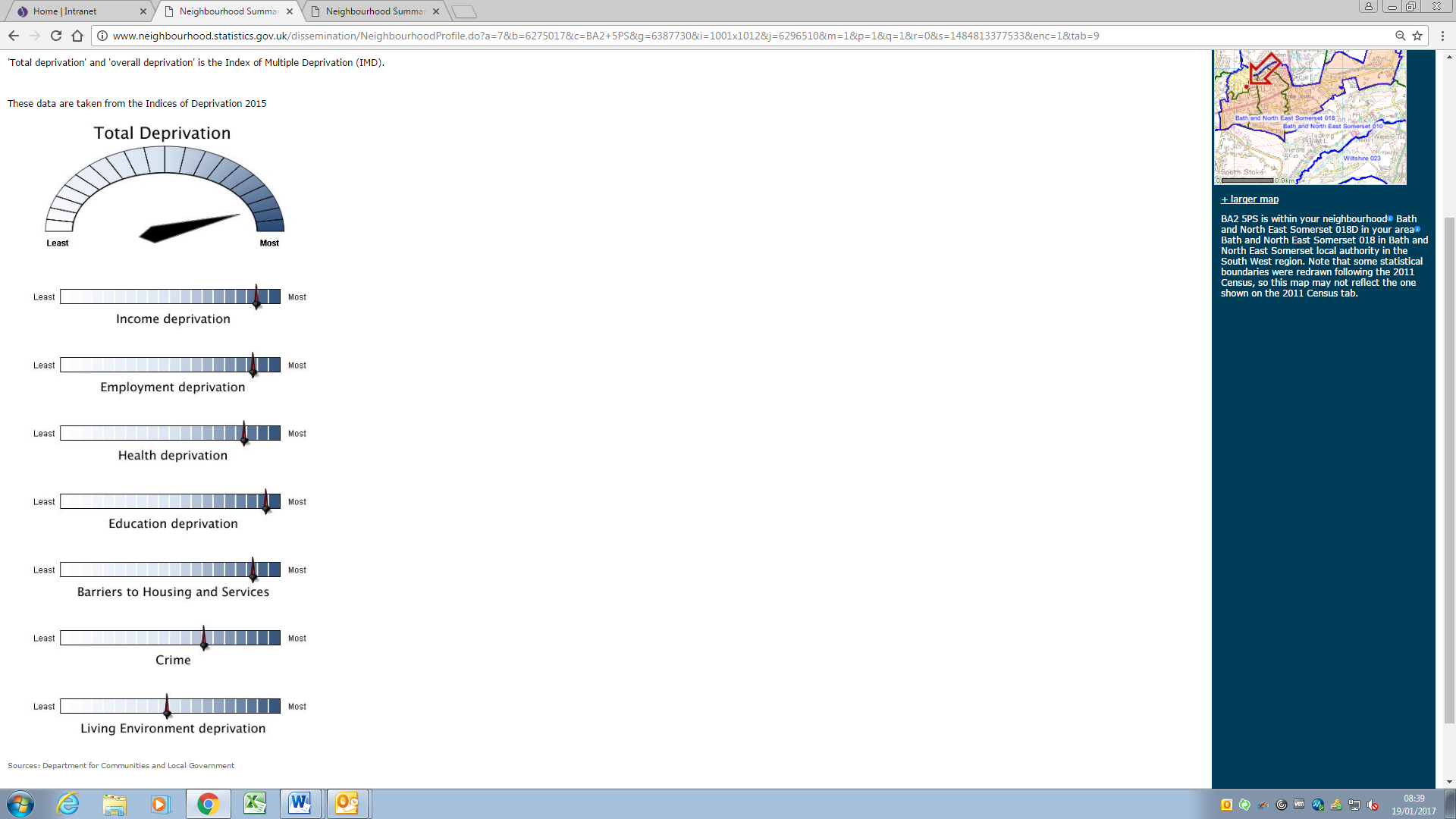
**Table A1.3 – Gender of main applicant housed**

|  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Gender** | **2013/4** | | **2014/15** | | **2015/16** | | **2016/17** | | **2017/18** | |
|  | **No** | **%** | **No** | **%** | **No** | **%** | **No** | **%** | **No** | **%** |
| Female | 402 | 64.6% | 515 | 63.7% | 526 | 66.8% | 446 | 65.1% | 454 | 65.8% |
| Male | 220 | 35.4% | 295 | 36.3% | 262 | 33.2% | 239 | 34.9% | 236 | 34.2% |
| Grand total | 622 |  | 811 |  | 788 |  | 685 |  | 690 |  |

**Appendix 2**

**Indices of Deprivation**

The Indices of Deprivation 2015 provide a set of relative measures of deprivation for small areas (Lower-layer Super Output Areas) across England, based on seven different domains of deprivation:

• Income Deprivation

• Employment Deprivation

• Education, Skills and Training Deprivation

• Health Deprivation and Disability

• Crime

• Barriers to Housing and Services

• Living Environment Deprivation

The area covered by the Local Lettings Plan forms part of a Lower Super Output (i.e. neighbourhood), which is ranked **3,569** out of 32,844 LSOAs in England; where 1 is the most deprived LSOA. This is amongst the 20% most deprived neighbourhoods in the country.

**Table A2.1 – Economic Activity (Unemployment)**

The following data shows the level of unemployment, as recorded in the 2011 Census, across the area covered by this LLP. The data includes postcodes from across the area and is broken down into Output Areas.

|  |  |  |  |
| --- | --- | --- | --- |
|  | **2011 (Census Data)** | | |
| **Economic Activity: Unemployment** | **Output Area** | **Bath & NE Somerset** | **England** |
| All usual residents aged 16-17 years |  |  |  |
| E00072684 (BA2 5PJ) | 3.2% | 2.7% | 4.4% |
| E00072683 (BA2 5QJ & 5QW & 5PF) | 4.6% | 2.7% | 4.4% |
| E00072673 (BA2 5PY) | 4.8% | 2.7% | 4.4% |
| E00072671 (BA2 5PR & 5PS & 5PE) | 4.8% | 2.7% | 4.4% |
| E00072678 (BA2 5PA & 5PU) | 9.7% | 2.7% | 4.4% |
| E00072675 (BA2 5PB & 5NZ) | 10.3% | 2.7% | 4.4% |

**Employment Data**

Average percentage unemployment across the area = 6.2%

Average percentage unemployment in BANES = 2.7%

Average percentage unemployment in England = 4.4%

**Source:** ONS Crown Copyright Reserved [from Nomis May 2018]