

Fees and charges for park homes sites following the introduction of the Mobile Homes Act 2013

Evidence based equality analysis

The Council is authorised and has a duty to license caravan sites under the Caravan Sites and Control of Development Act 1960. The government has recently introduced the Mobile Homes Act 2013 in response to unfair trading practices on some sites to enable local authorities to charge for inspection of protected sites. This equality analysis relates to the Council's charging scheme for protected sites details contained in the attached Officer Decision Notice.

Lead officer: Lyn Collins

Stakeholders: Site owners, site occupants of protected sites, fire service

Equality analysis is a valuable tool to help embed equality into everything we do

While process is important, equality analysis is essentially about outcomes

Lack of evidence of discrimination is not evidence of a lack of discrimination

It is not acceptable to say that a policy is applied uniformly to all groups and is therefore fair and equal. Applying a policy or procedure consistently may result in differential outcomes for different groups.

For each of the areas below, an assessment needs to be made on whether the policy has a positive, negative or neutral impact, and brief details of why this decision was made and notes of any mitigation should be included. Where the impact is negative, this needs to be given a high, medium or low assessment. It is important to rate the impact of the policy based on the current situation (i.e. disregarding any actions planned to be carried out in future).

High impact – a significant potential impact, risk of exposure, history of complaints, no mitigating measures in place etc.

Medium impact – some potential impact exists, some mitigating measures are in place, poor evidence

Low impact – almost no relevancy to the process, e.g. an area that is very much legislation led and where the Council has very little

discretion			
	Neutral	Positive	Negative
Target group / area			
Race and ethnicity (including Gypsies and Travellers; migrant workers, asylum seekers etc.)		Some park homes sites are both owned or occupied by the Gypsy /Traveller community. The proposed charging regime will benefit occupants and owners in ensuring standards are maintained and sites are therefore more desirable to occupants. A discount has been applied to sites having fewer than five units to limit the cost per occupant to a maximum of £66.67 per year. Costs to individual park home owners have been minimised within the cost recovery policy of the council.	A review of sites highlighted that some Gypsy and Traveller sites which are occupied by fewer than five homes (up to 15 sites) could be disproportionately affected by the change. For this reason one Traveller site has been excluded from the scheme. Additionally a discount has been applied to sites having fewer than five units to limit the cost per occupant to a maximum of £66.67 per year. Costs to individual park home owners have been minimised within the cost recovery policy of the Council. The total cost of this discount amounts to £1800. Low impact mitigation applied.
Disability (as defined by the Equality Act - a person has a disability if they have a physical or mental impairment that has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities)		Inspection of sites will mean that the state or roadways will be checked on an annual basis supporting access for disabled people. Many elderly / vulnerable people live in park homes. An inspection regime and charging for non compliance interventions should drive up standards on sites. Costs to individual park home owners have been minimised within the cost recovery policy of the Council.	
Gender	Fees and charges do not impact on gender.		

Gender reassignment	Fees and charges do not impact on this.		
Religion and belief	Fees and charges do not impact on this		
Sexual orientation (including heterosexual, lesbian, gay, bisexual)	Fees and charges do not impact on this		
Age (children and young people aged 0 – 24, adults aged 25 – 50, younger older people aged 51 – 75/80; older older people 81+. The age categories are for illustration only as overriding consideration should be given to needs)		Many elderly / vulnerable people live in park homes. An inspection regime and charging for non compliance interventions should drive up standards on sites. Costs to individual park home owners have been minimised within the cost recovery policy of the	
Rural communities		Park homes are often in rural locations. Issues raised with the team include adequate road drainage, lighting, electrical safety and adequacy. An annual inspection regime should improve standards for residents.	
Areas of deprivation			Many site occupants have low incomes. Care has been taken in setting the fees to keep the impact on individual households low. The one site of one unit has been made exempt, and a discount has been applied to sites with fewer than five units. This makes the maximum cost for a resident on this site £66.67 (less than £1.30 per week). Low impact mitigation applied.

Human rights		Human rights have been at the heart of the proposed changes in legislation to improve standards for park home occupants.	
Health and wellbeing (consider both the wider determinants of health such as education, housing, employment, environment, crime and transport, as well as the possible impacts on lifestyles and the effect there may be on health and care services)		The change is intended to improve health and well being of park home occupants by increasing accountability on site owners to provide well managed and safe sites.	
Procurement/partnership (if project due to be carried out by contractors/partners etc, identify steps taken to ensure equality compliance)		Price setting will need to be done by the Council in future taking into account equality considerations.	

Evidence:

Officer Decision Notice - draft currently awaiting confirmation of proposed change to fees and charges

Service requests held in database relating to park home issues.

List of sites identifying Gypsy and Traveller sites

Action plan:

Actions required	Key activity	Priority	Outcomes required	Officer responsible	Review date
Resident information	Advise all residents in fees information letters and via website of the route for raising any concerns about overpayment of fees to site owners.	High	Residents aware of complaint agencies who can assist them.	Mike Cronley	1 September 2014
Benefits impacts	Establish whether park	High	Residents informed by	Mike Cronley	1 September

	home owners on benefits will be negatively impacted by the introduction of additional pitch fees.		letter and Council aware of the impacts and any negative impact mitigated if possible.		2014
--	---	--	--	--	------

Sign off	
Lead officer:	Lyn Collins supported by Mike Cronley
Approved by Head of Service:	Vanessa Griffiths
Moderation and/or Scrutiny - Localities Directorate Equality Group	
Date: 9 June 2014	
Date analysis to be reviewed based on rating (high impact – review in one year, medium impact - review in two years, low impact in three years)	Three year review

Please forward the completed Equality Analysis to the Equality and Diversity Managers for publishing on the Council's website