

Title of policy / procedure / function / project / decision: Strategic Housing Plan
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Evidence based equality analysis – can include documents, quotes, and web links for photos and videos

Main aims, purpose and outcomes and how does it fit in with the wider aims of the organisation: The Strategic Housing Plan and Action Plan for the borough is a high level strategy that aims to support the achievement of the Council's ambitions for sustainable growth and housing delivery set out in the Growth Strategy and the Local Plan. It also supports the achievement of other strategic housing aims such as reducing homelessness, improving the quality and condition of the borough's existing homes and improving access to housing. It does not set out numbers or sites for new housing delivery, which is the remit of the Local Plan and it does not deal with the allocation of social housing, as this is the remit of the Common Allocation Policy.

The Plan has three overarching priorities:

1. Increasing supply: more homes stable growth
2. Improving access to housing
3. Quality, sustainability and design

The aim of the Strategic Housing Plan is to address known housing issues and improve the housing position of the residents of the borough so, in essence, all groups should effectively benefit from many of the actions proposed. Many of the outcomes/ actions identified support several of the Altogether Better Project themes, including Starting Well, Ageing Well and Working Well.

The Plan has been developed in consultation with the Council's Strategic Housing Partnership and with relevant Council colleagues and is founded on a substantial evidence base that includes analysis of population data and expected population growth, housing and labour market intelligence, customer profiling, Census data and economic data. The evidence base will be published as a standalone document alongside the Strategic Housing Plan and will be updated on a regular basis. It is envisioned that the Action Plan will lead to a series of individual projects flowing from the three key priorities above. Individual policies and projects flowing from the Action Plan in future will be subject to an Equality Assessment as and when required and progress against targets will be measured and reported on a regular basis.

Lead officer: Helen Weaver, Strategy & Enabling Officer.

Stakeholders: Registered Providers, the Council's Strategic Housing Partnership and colleagues from the Council's Private Sector Housing, Strategic Commissioning, Adult and Children's Social Care, Planning, Localities and Climate Change teams.

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
	Please note that figures in bracket refer to the relevant reference in the Strategic Housing Action Plan		
Target group / area			
Race and ethnicity (including Gypsies and Travellers; migrant workers, asylum seekers etc.)		<ul style="list-style-type: none"> Individuals from the travelling community are known to experience very poor living conditions on unauthorised sites and on the roadside; the SHAP supports delivery of appropriate housing/ accommodation solutions for Gypsies, Travellers and Travelling Showpeople which will mitigate this (2.3) National research shows that people from some ethnic groups tend to have larger families than others and may prefer to live with extended family members; this could result in 	Medium impact – mitigations in place: <ul style="list-style-type: none"> Language barrier may be a problem in terms of access/ knowledge of services available Knowledge of different communities living in the borough needs

		<p>overcrowding, especially where the high cost of housing prevents access to larger family homes. The SHAP seeks to ensure delivery of appropriate housing solutions for people from different backgrounds through working together with partners and representatives of relevant groups to establish a baseline of the different groups living in the borough, determine their housing needs and develop an inclusive strategic delivery plan; this will include the needs of people from different ethnic groups and religions, as well as vulnerable and special needs groups (2.1 and 2.3)</p> <ul style="list-style-type: none"> • The Strategic Housing Plan encourages new housing design that is flexible and inclusive, to ensure that the needs of all residents are accommodated, regardless of age, race, religion, sex, sexual orientation or disability (3.3) • The Strategic Housing Plan encourages inclusive design for new housing for older people (including Extra Care and sheltered schemes) in order to meet the diverse needs of older people from the borough's different ethnic communities (3.3) • National research shows that people from ethnic minorities tend to be on lower incomes than the rest of the population; the SHAP seeks to support those on lower incomes to achieve economic wellbeing and thus improve their opportunity of accessing a sustainable housing solution (2.4 and 2.5) • Similarly, the SHAP seeks to increase the supply of housing, especially affordable housing, to address barriers to accessing housing and increase the choice and availability of sustainable housing solutions for all (1.1) • National research shows that people from ethnic minorities are more likely to live in poor housing conditions than the rest of the 	<p>updating</p> <ul style="list-style-type: none"> • Danger of failing to keep up with newly emerging communities • Danger that small numbers of households from the different groups could lead to generalisation about issues experienced and insufficient or unsuitable mitigations.
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		<p>population; the SHAP seeks to prioritise actions to address poor housing conditions and their impact on health and wellbeing (2.3 and 3.1)</p>	
<p>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)</p>		<ul style="list-style-type: none"> • National research shows that disabled people are more likely to be on low incomes and have difficulty in accessing paid employment than the rest of the community; the Strategic Housing Plan seeks to support those on lower incomes to achieve economic wellbeing, helping to improve access to a sustainable housing solution (2.4) • In collaboration with partners and the Homes and Communities Agency, the SHAP seeks to promote and increase the delivery of new housing overall, including housing for vulnerable groups and those with disabilities and other special needs (1.1) • Through collaboration with other public sector agencies (PCT, schools etc), the SHAP seeks to identify surplus public sector land suitable for specialist housing delivery to increase the availability of accommodation for those with disabilities and special needs (1.1) • The Strategic Housing Plan seeks to ensure the needs of those with disabilities and special needs are understood and that an inclusive strategic delivery plan is developed; this will include the needs of people from different ethnic groups and religions, as well as vulnerable and disabled people and special needs groups (2.1) • The Strategic Housing Plan seeks to ensure that we work in collaboration with partners to ensure new development/ remodelling of existing supported housing stock supports anticipated future housing needs (2.3) • An update of the existing supply and sustainability assessment of older persons and supported housing will be undertaken and any issues arising addressed, in partnership with Registered Providers and other partners (2.3) 	<p>Medium impact – mitigations in place:</p> <ul style="list-style-type: none"> • Disability may impact on access to/ knowledge of services available • Limited knowledge of local disabled population, including the different types of disabilities present may lead to generalisation and unsuitable mitigations • How can we raise awareness of services available/ engage households who have not contacted the Council for help before e.g. where young disabled adults are currently being looked after by parents at home? Danger that parents will no longer be able to cope when they become elderly.

		<ul style="list-style-type: none"> • Through collaboration with Children’s Services, the Strategic Housing Plan seeks to ensure successful pathways to suitable housing/ accommodation solutions for young people, especially vulnerable young people and to utilise relevant needs data to inform future planning for suitable accommodation for adults with disabilities and special needs (2.3) • The Strategic Housing Plan seeks to encourage collaboration with relevant colleagues and partners to improve access to grants, loans, advice and support for disabled people to carry out improvements/ adaptations to their home (3.1) • The Strategic Housing Plan encourages new housing design that is flexible and inclusive, to ensure that the needs of all residents are accommodated, regardless of age, race, religion, sex, sexual orientation or disability (3.3) 	
<p>Gender</p>		<ul style="list-style-type: none"> • Research shows that the majority of rough sleepers and homeless people are young, single males; the SHAP seeks to support these individuals to access a settled housing solution through supporting the delivery of the borough’s Homelessness Strategy (2.3) • Research shows that working age females living in the borough are more likely to be in part time work and on lower incomes than their male counterparts; the SHAP seeks to support those on lower incomes to achieve economic wellbeing, helping to improve access to a sustainable housing solution (2.4) • Similarly, the SHAP seeks to increase the supply of housing, especially affordable housing, to address barriers to housing and increase the choice and availability of sustainable housing solutions for all (1.1 and 2.5) • Census data shows that the ratio of females to males in the local population increases over the 	

		<p>age of 65; this means that the majority of older people in the borough are female and proportionately more likely to be living alone than the rest of the population. Older women living alone are more likely to be living in poverty and may be socially isolated; the SHAP seeks to ensure that there is a suitable choice of affordable housing/ accommodation solutions for older people living in the borough, including housing-related support to enable older people to stay in their own homes (2.3 and 2.4)</p>	
Gender reassignment	<p>There is no evidence at present that gender reassignment impacts upon availability of or access to housing or that housing policy can impact on transgender individuals. The Strategic Housing Plan is therefore not expected to have any impact on those individuals who have undergone or are in the process of undergoing gender reassignment; however, we are committed to an ongoing programme of research and needs analysis and, should it be concluded in the future that there are specific housing related issues arising for this group, this will form the basis of future policy development.</p>	<p>If individuals are deemed to be vulnerable as a result of gender reassignment, e.g. as a result of harassment or hate crime, then they will be supported to access sustainable accommodation, as per other special needs groups (1.1 and 2.3)</p>	<p>Low impact – mitigation in place: Individuals from the LGBT community may be nervous of disclosing their status.</p>
Religion and belief		<ul style="list-style-type: none"> National research shows that people from some religious groups tend to have larger families than others and may prefer to live with extended family members; this could result in overcrowding, especially where the high cost of 	<p>Medium impact – mitigations in place:</p> <ul style="list-style-type: none"> Knowledge of different communities living in

		<p>housing prevents access to larger family homes. The SHAP seeks to ensure delivery of appropriate housing solutions for people from different religions through working together with partners and representatives of relevant groups to establish a baseline of the different groups living in the borough, determine their housing needs and develop an inclusive strategic delivery plan; this will include the needs of people from different religious and ethnic groups, as well as vulnerable and special needs groups (2.3)</p> <ul style="list-style-type: none"> • The SHAP encourages new housing design that is flexible and inclusive, to ensure that the needs of all residents are accommodated, regardless of age, race, religion, sex, sexual orientation or disability (3.3) • The design of new housing for older people (including Extra Care and sheltered schemes) should be inclusive in order to meet the diverse needs of older people of different faiths (3.3) 	<p>the borough needs updating</p> <ul style="list-style-type: none"> • Danger of failing to keep up with the religious beliefs of newly emerging communities • Danger that small numbers of households from the different faiths could lead to generalisation about issues experienced and insufficient or unsuitable mitigations.
<p>Sexual orientation (including heterosexual, lesbian, gay, bisexual)</p>	<p>There is no evidence at present that sexual orientation, including marriage/ civil partnership impacts upon availability of or access to housing or that housing policy can impact differentially on people due to sexuality. The SHAP is therefore not expected to have any impact on individuals on the basis of sexual orientation; however, we are committed to an ongoing programme of research and needs analysis and, should it be concluded in the future that there are specific housing related issues arising for</p>	<p>If individuals are vulnerable as a result of their sexual orientation, then they will be supported to access sustainable accommodation, as per other special needs groups (1.1 and 2.3)</p>	<p>Low impact – mitigation in place: Individuals from the LGBT community may be nervous of disclosing their status.</p>

	those from a particular group, this will inform the basis of future policy development.		
<p>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)</p>		<ul style="list-style-type: none"> • Older people are more likely to be vulnerable, feel isolated and to suffer from poor health and disabilities and therefore the impacts noted under ‘Disabilities’ and ‘Health and Wellbeing’ will also apply to older people • Children living in poor housing conditions can be particularly adversely affected; by seeking to increase the supply of affordable housing and encourage a greater range and choice of housing across the borough, the SHAP will enable more families to access housing that is suitable for their needs, reducing the potential for negative impact on children’s health and wellbeing (1.1 and 1.2) • Through collaboration with Children’s Services, the Strategic Housing Plan seeks to ensure successful pathways to suitable housing/ accommodation solutions for young people, especially vulnerable young people and to utilise relevant needs data to inform future planning for suitable accommodation for adults with disabilities and special needs (2.3) • Young people are more likely to be on low incomes and the Strategic Housing Plan seeks to support those on lower incomes to achieve economic wellbeing and thus improve the chance of accessing a sustainable housing solution (2.4) • This includes shared housing solutions and we will work with the Housing Solutions team to establish the profile of people who could benefit from shared accommodation and scope out relevant initiatives which could address the identified need (2.5) • In general terms, the SHAP seeks to increase the supply of housing, especially affordable housing, to address barriers to housing and 	

		<p>increase the choice and availability of sustainable housing solutions for all (1.1)</p> <ul style="list-style-type: none"> • The wellbeing of families living in the private rented sector may be affected by the relatively short-term tenancies available resulting in lack of a long-term housing solution; this may be of particular relevance to families with young children in local schools and we will work with private sector landlords to encourage them to offer longer, 'family friendly' tenancies to combat this issue (2.5) • Older owner occupiers are more likely to have difficulty in maintaining their homes and through the Strategic Housing Plan, we will seek to identify relevant solutions to help people affected in this way (2.2 and 3.1) • An update of the existing supply and sustainability assessment of older persons and supported housing will be undertaken and any issues arising addressed in collaboration with Registered Providers and other partners (2.3) • Research into relevant best practice exhibited by specialist organisations such as Age UK and United for All Ages will enable any useful projects and good practice to be rolled out across the borough (2.3) • The Strategic Housing Plan encourages the delivery of new housing that is inclusive and flexible in its design and that supports the occupants during all stages of life; the design of new housing for older people (including Extra Care and sheltered schemes) should be inclusive in order to meet the diverse needs of older people from the borough's different communities (3.3) 	
<p>Rural communities</p>		<ul style="list-style-type: none"> • The Strategic Housing Plan seeks to align with place team working/ neighbourhood plans to deliver housing that supports sustainable communities, including sustainable rural communities (1.1) • Many rural communities have very limited 	<p>Low impact – mitigations in place:</p> <ul style="list-style-type: none"> • Access to and awareness of services available may be a problem

		<p>diversity in terms of the type, size and value of housing available; the SHAP promotes the delivery of new housing that supports a more balanced housing mix and improves the tenure mix in areas of limited variety, thus promoting rural sustainability (2.2)</p> <ul style="list-style-type: none"> • We know that there is a high proportion of older/ elderly people living in the borough's rural areas and the impacts/ actions noted for this age group under other sections will also apply to older people living in rural communities. • National research shows that disabled people are more likely to be on low incomes and have difficulty in accessing paid employment than the rest of the community; disabled people living in rural areas may have even more difficulty in finding employment due to transport/ accessibility problems. The SHAP seeks to support those on lower incomes, including disabled people, to achieve economic wellbeing through increasing opportunities to access work, helping to improve access to a sustainable housing solution (2.4) • The Strategic Housing Plan support the aims of the Affordable Warmth Strategy, which seeks to reduce fuel poverty in the borough, including rural areas and to support individual and community projects, many in rural areas, including Keep Warm Keep Well, Snow Angels and rural oil-buying clubs (3.2) 	<ul style="list-style-type: none"> • Danger of generalisation about issues experienced in different types of rural communities could lead to insufficient or unsuitable mitigations.
<p>Areas of deprivation</p>		<ul style="list-style-type: none"> • The Strategic Housing Plan seeks to align with place team working/ neighbourhood plans to deliver housing that supports sustainable communities, including those in deprived localities (1.1) • The Strategic Housing Plan seeks to align with Growth Strategy priorities to deliver housing and employment opportunities that support sustainable growth and reduce deprivation (1.1) • Areas of deprivation may suffer from low 	<p>Low impact – mitigations in place:</p> <ul style="list-style-type: none"> • Danger of generalisation about issues experienced in different areas could lead to insufficient or unsuitable mitigations.

		<p>demand and a higher proportion of empty homes; reducing the number of empty properties in the borough increases the number of available dwellings, including affordable homes and improves the sustainability of such areas (1.2)</p> <ul style="list-style-type: none"> • Areas of deprivation are likely to have limited diversity in terms of the type and size of housing available; the SHAP seeks to promote the delivery of new housing that supports a more balanced housing mix and improves the tenure mix in areas of limited variety (2.2) • Areas of deprivation are likely to have housing that is in relatively poor condition and a higher proportion of privately rented homes; the SHAP seeks to improve standards in the Council's own housing stock and work collaboratively with partners to improve the quality of homes in the private sector, especially the private rented sector (3.1) • The Strategic Housing Plan seeks to make the most of the opportunities delivered by new technologies to reduce the incidence of fuel poverty in the borough, reducing the effects of income deprivation (3.2 and 3.3) 	
Human rights	No impact.		
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)		<ul style="list-style-type: none"> • Gypsies and Travellers are known to have a greater incidence of poor health than the settled population and a much lower life expectancy; supporting the delivery of sustainable accommodation solutions for this ethnic group will help to deliver improved health outcomes. It will also benefit Traveller children in terms of increasing stability and support to access education (2.3) • There is a known correlation between poor housing and poor health in the settled community; improving housing conditions in the borough, in all sectors, will also help to deliver improved health outcomes (3.1) 	

		<ul style="list-style-type: none">• Removing barriers to accessing housing, through increasing supply and choice, especially of affordable housing and promoting an adequate supply of accommodation for vulnerable people and those with special needs, will improve health outcomes by ensuring that everyone in the borough is able to access a sustainable housing solution (2.3 and 2.5)• Children living in poor housing conditions can be particularly adversely affected; by seeking to increase the supply of affordable housing and encourage a greater range and choice of housing across the borough, the SHAP will enable more families to access housing that is suitable for their needs, reducing the potential for negative impact on children's health and wellbeing (1.1 and 1.2)• Through collaboration with Children's Services, the SHAP seeks to ensure successful pathways to suitable housing/ accommodation solutions for young people, especially vulnerable young people and to utilise relevant needs data to inform future planning for suitable accommodation for adults with disabilities and special needs (2.3)• Through collaboration with Public Health, the SHAP seeks to ensure there is enough support for people moving into/ out of hospital or long term care and raise awareness of the importance of suitable housing to aid recovery (2.3)• The SHAP seeks to raise awareness of alternative housing options for vulnerable people and those with special needs including supported housing, Extra Care and shared ownership (2.3)• Empty homes can attract anti-social behaviour, leading to stress and nuisance for neighbouring householders, especially where homes are empty for long periods of time; the SHAP seeks	
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		<p>to bring empty homes back into use, helping to reduce any potential health impact caused (1.2)</p> <ul style="list-style-type: none">• Unemployment and debt can have a detrimental impact on people's mental and physical health and wellbeing; we are working with partners through the SHAP to monitor and understand the impact of the Government's welfare reforms, especially on our most vulnerable residents and to develop plans to mitigate any potential impacts; we are also working with partners to help residents to access training and employment opportunities, helping them to achieve economic wellbeing (2.4)• Young people's wellbeing may be adversely affected by affordability problems, preventing them from accessing the housing market and this can be exacerbated where they are forced to stay in overcrowded or abusive situations in the family home or face homelessness; in general terms, the SHAP seeks to increase the supply of housing, especially affordable housing, to address barriers to housing and increase the choice and availability of sustainable housing solutions for all, including shared housing solutions and we will work with the Housing Solutions team to establish the profile of people who could benefit from shared accommodation and scope out relevant initiatives which could address the identified need (2.5)• The wellbeing of families living in the private rented sector may be affected by the relatively short-term tenancies available resulting in lack of a long-term housing solution; we will work with private sector landlords to encourage them to offer longer, 'family friendly' tenancies to combat this issue (2.5)• We will support the aims of the Affordable Warmth Strategy, which seeks to reduce the incidence of fuel poverty in the borough, reduce	
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		<p>the costs of energy usage, improve the energy efficiency of the borough's homes and reduce the impact of excess cold to improve health outcomes (3.2)</p> <ul style="list-style-type: none"> • The SHAP encourages the delivery of new housing that is inclusive and flexible in its design and that supports the occupants during all stages of life, helping to ensure better health outcomes (3.3) 	
<p>Procurement/partnership (if project due to be carried out by contractors/partners etc, identify steps taken to ensure equality compliance)</p>		<ul style="list-style-type: none"> • Any procurement (e.g. of services such as research studies) will be carried out in accordance with the Council's standard procurement process. • Commissioning of any specific services or developments will be undertaken in collaboration with colleagues in the Strategic Commissioning team and will be subject to the Council's standard procurement process. • Any services or developments commissioned from partners or third parties will require evidence of adequate equality and diversity policies, or alternatively, adherence to the Council's equality and diversity policies, including the prevention of unlawful discrimination and regular equality monitoring. 	

Evidence (see guidance note for details of what to include here):

- Evidence base will be available to download from Council website
- Summary of feedback from workshops with stakeholders will be available to view on the Council website
- Feedback from wider consultation will be added as development continues
- Performance indicators/ dashboard will be added when the strategy and action plan have been formally adopted and performance criteria agreed

Action plan:

Actions required	Key activity	Priority	Outcomes required	Officer responsible	Review date
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General					
Wider consultation	Consultation with colleagues and partners is ongoing; wider consultation with other stakeholders, including members of the public, will be carried out as part of the strategy development process	Medium	Ensure feedback is taken into account; stakeholders and customers are able to inform strategy and action plan development	Helen Weaver	
Action Plan Monitoring	The impact of the SHAP will be monitored through a formal performance monitoring framework, which will be developed alongside the strategy and action plan	Medium	Ensure that agreed actions are completed and measure impact; report on progress achieved and revise actions where necessary	Helen Weaver	
Race and ethnicity and religion and belief					
<ul style="list-style-type: none"> • Mitigate potential barriers to/ awareness of services • Keep abreast of newly emerging communities • Combat generalisation 	<ul style="list-style-type: none"> • Update knowledge of different communities/ faith groups living in the borough through e.g. Strategic Housing Market Assessment, Census data and other surveys • Make links with representatives of the different groups and relevant third sector agencies to share knowledge/ experience • Ensure representatives and third sector agencies are included in consultation on action plan • Ensure literature is available in different languages on request 	Medium	<ul style="list-style-type: none"> • Ensure knowledge of local communities is robust and regularly updated • Ensure feedback is taken into account; stakeholders and customers are able to inform strategy and action plan development 	Will be taken forward through Action Plan	

Disability					
<ul style="list-style-type: none"> • Mitigate potential barriers to/ awareness of services • Combat generalisation • Raise awareness among households who have had no previous contact with the Council 	<ul style="list-style-type: none"> • Update knowledge of disabled population living in the borough through e.g. Strategic Housing Market Assessment, Census data and other surveys • Make links with representatives of relevant groups and third sector agencies to share knowledge/ experience • Ensure representatives and third sector agencies are included in consultation on action plan 	Medium	As above	Will be taken forward through Action Plan	
Gender reassignment and sexual orientation					
Individuals from the LGBT community may be nervous of disclosing their status.	Work with colleagues and representative groups to encourage openness/ transparency, promote tolerance and encourage trust.	Low	Grow Council reputation as an LGBT friendly organisation that understands the needs of individuals from this group.		
Rural communities and areas of deprivation					
<ul style="list-style-type: none"> • Mitigate potential barriers to/ awareness of services • Combat generalisation 	<ul style="list-style-type: none"> • Update knowledge of different communities living in the borough and spatial differences through e.g. Strategic Housing Market Assessment, Census data and other surveys • Work with Locality Teams to ensure a co-ordinated, place-based approach to delivery • Ensure relevant 	Low	<ul style="list-style-type: none"> • Ensure knowledge of local communities is robust and regularly updated • Ensure feedback is taken into account; stakeholders and customers are able to inform strategy and action plan development • Ensure the right approach is in place for each locality 	Will be taken forward through Action Plan	

	representatives and third sector agencies are included in consultation on action plan				
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Sign off	
Lead officer:	Helen Weaver
Approved by Head of Service:	
Moderation and/or Scrutiny	
Date:	
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)	

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