

Appendix B: Equality Impact Assessment for Housing, Homelessness and Rough Sleeping Strategy

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Background

Context

This section provides a summary of the decision to be made and the context for the decision within wider Council priorities.

The existing West Kent Housing and Homelessness Strategy 2016 – 2021 expires in July 2021. It is a joint strategy which was undertaken in partnership with Sevenoaks District Council, and Tonbridge and Malling District Council.

It was decided that going forward, TWBC would have its own Housing, Homelessness and Rough Sleeping Strategy 2021 – 2026. The Strategy is currently in draft form and is listed in the Forward Plan for Cabinet to consider on 28 October 2021, where permission to consult will be requested. A six week consultation period will then take place, feedback will be considered, and the Strategy will be amended and updated, as necessary. The Strategy will then be reported to Cabinet on 17 March 2022 for adoption.

Scope of equality impact assessment (EqIA)

This section sets out what aspects are being considered, what changes are being made to existing policies or procedures and if there are any aspects that are not being covered and why (for example if they have already been covered in another EqIA).

The scope of the EqIA is to consider how our services/policies meet the needs of those who are:

- homeless or threatened with homelessness
- rough sleepers
- in need of an affordable home
- living in the private rented sector
- living in fuel poverty
- require support from integrated housing, health and care providers

Data and information

Please see Annex 1 for data relating to our population, Residents' Survey and performance indicators. Specific findings in relation to protected characteristics may be described in more detail within the consideration of impacts.

Relevance to the Public Sector Equality Duty

This section explains which of the following aspects of the Public Sector Equality Duty are relevant and how:

- a. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.*
- b. Advance equality of opportunity between people who share a protected characteristic and those who do not.*
- c. Foster good relations between people who share a protected characteristic and those who do not.*

The Housing, Homelessness and Rough Sleeping Strategy is relevant to any person who resides in the Tunbridge Wells borough. It sets out key ambitions and aims for 2021 – 2026 and all of the protected characteristics in the next section have been considered.

The four over-arching ambitions are:

- Preventing homelessness and ending rough sleeping;
- Increasing the supply and choice of affordable homes;
- Improving housing and meeting need;
- Promoting homes that sustain health and wellbeing.

Consideration of impacts

Protected characteristics

Disability (including carers)

Summary of available data, statistics or consultation findings held by the service

Kent County Council district profiles [facts-and-figures-about-Kent/area-profiles](#) and [facts-and-figures-about-Kent/equality-and-diversity-data](#)

Disability in Kent - Strategic Commissioning Analytics Statistical Bulletin September 2020
[Disability-in-Kent](#)

Kent Public Health Observatory Health and social care maps kpho.org.uk/area-profile

TWBC annual housing register statistics.

TWBC disabled facilities grant completions.

How will the proposal impact on people?

Safe accessible housing can maintain or improve health and wellbeing and greatly improve quality of life, especially as people grow older. As the number of people over 50 increases, so does the proportion of the population with disability, accessibility, and mobility requirements. Kent Public Health Observatory produces health and social care maps at ward level, and with regards to Tunbridge Wells Borough Council, key issues are:

- in 2017 of those aged 65+, 44% have two or more long term conditions
- in 2018/19, there were 602 admissions to hospital for falls

Housing, health and social care needs to be connected in ways that improve older people's quality of life in terms of delivering a diverse range of housing options and providing services to help to maintain both health and independence. We participate in the regular Kent and Medway Clinical Commissioning Group Multi-disciplinary team meetings which identifies adults who require support from a range of health and social care professionals, providing an integrated, holistic and patient centred approach to their needs.

The Better Care Fund provides financial support for councils and NHS organisations to jointly plan and deliver integrated services to cover health, social care, and housing, to prevent ill-health and avoid unnecessary hospital admissions. We use this funding to provide disabled

facilities grants to enable disabled people to live independently in their own homes, and to provide a package of grants and financial assistance to repair, improve or provide energy efficient measures to private sector housing. The range of grants and financial assistance is set out in our Housing Assistance Policy 2021 – 2026

The following aims are included in the Strategy as part of our plans for 2021 - 2026

Aim	How we will deliver	By when
Monitor Housing Register applications and allocations to assess number of vacancies and housing need	Review banding system to address needs of households living with complex disabilities and other long term health conditions	Year 1
Ensure housing provision aligns with forecast change in needs of residents	Explore solutions for high needs households, including those with children with complex needs and disabilities	Years 1 - 5
Promote design standards for new homes that support independent living	New homes to meet Accessible Homes Standard	Years 1- 5
Maximise use of Better Care Fund to deliver disabled facilities grants and other grants and assistance	Prioritise Better Care funding and specifically disabled facilities grants to support independent living for elderly and disabled households	Years 1 - 5
Develop joint and strategies that align approaches to housing and health, promoting good health and preventing ill-health	Work with Housing, Health and Social Care sub-group to research local and national models, share good practice and develop guidance and advice to include: <ul style="list-style-type: none"> • hospital discharge • preventing delayed transfers of care • use of DFGs • extra care assistive moving on schemes, downsizing and mutual exchanges	Years 1- 5

What action will be taken to reduce or mitigate any potential negative impacts?

No potential negative impacts identified.

Race

Summary of available data, statistics or consultation findings held by the service

Kent County Council district profiles [facts-and-figures-about-Kent/area-profiles](#) and [facts-and-figures-about-Kent/equality-and-diversity-data](#)

TWBC annual housing register statistics.

How will the proposal impact on people?

Most of those on the housing register (75%) describe themselves as White British, with a further 10% describing themselves as White other, and 5% as Asian or Asian British. We will continue to monitor the race of applicants.

The current Housing Register Allocation Policy will be updated during 2021, and the information that we collect will be reviewed.

We will continue to assist families under the Home Office Syrian Vulnerable Persons' Relocation Scheme, working with Kent County Council, the support organisations Rethink and Clarion, and the local charity Tunbridge Wells Welcomes Refugees to provide privately rented furnished homes for vulnerable families. Support is provided to families to settle and feel at home in the Borough, including support to obtain work and claim benefits, to settle children into school, and obtaining help with medical issues

What action will be taken to reduce or mitigate any potential negative impacts?

No potential negative impacts identified.

Sex

Summary of available data, statistics or consultation findings held by the service

Kent County Council district profiles [facts-and-figures-about-Kent/area-profiles](#) and [facts-and-figures-about-Kent/equality-and-diversity-data](#)

The ONS mid-year estimate for 2019 reports a total population of 118,700, of which 58,600 are men and 60,100 are women.

How will the proposal impact on people?

We will continue to work with partners and participate in the Sanctuary scheme for victims of domestic violence.

Aims for 2021 – 2026

The following aims are included in the Strategy as part of our plans for 2021 - 2026

Aim	How we will deliver	By when
Strengthen the support for victims experiencing or at risk of domestic abuse	<p>Implement the Domestic Abuse Act specifically the duty to provide support to victims and their children within refuges and other safe accommodation and provide housing related advice and support.</p> <p>Participate in the multi-agency Domestic Abuse Local Partnership Board</p>	Years 1 - 5

What action will be taken to reduce or mitigate any potential negative impacts?

No potential negative impacts identified.

Age (including dementia)

Summary of available data, statistics or consultation findings held by the service

Kent County Council district profiles [facts-and-figures-about-Kent/area-profiles](#) and [facts-and-figures-about-Kent/equality-and-diversity-data](#)

TWBC annual housing register statistics.

How will the proposal impact on people?

Specific groups within the community face particular challenges in meeting their housing needs. The Strategy considers the needs of young people and older people and those suffering from dementia, in particular.

Young people

Young people who may be particularly affected by welfare reform and meeting affordability criteria to access housing.

Young people, if single and under the age of 35, face restrictions on claiming housing benefit or Universal Credit if renting from a private landlord, as the maximum amount payable is the shared room rate which is often not suitable especially for vulnerable young people. Care leavers, of which there are a disproportionately large number in Kent, must be placed in suitable accommodation with appropriate levels of support.

Older people

The need to provide housing for older people (generally defined as being over 65) is a significant priority, as the proportion of older people in the population is increasing. The number, size, location, and quality of dwellings needs to be considered, to enable older people to live independently and safely in their own homes for as long as possible or move to

suitable accommodation if they wish. Many older people, 63.5% in the borough would consider staying in their own homes, with 26.3% considering buying a property on the open market and 8.5% considering renting from a social landlord.

For older people who wish to remain in their homes, a proportion will need some assistance and/or adaptations. The disabled facilities grant is a useful intervention for maintaining independence and helping people to remain in their homes.

New housing, in particular affordable housing, needs to be accessible and adaptable to meet the needs of older people and those with disabilities and long-term health conditions. Supporting independent living can help to reduce costs to health and social services and providing more options for older people to move could also free up family size homes and release smaller homes for first time buyers.

Extra care and dementia appropriate housing options are provided in partnership with KCC Adult Social Care team.

Aims for 2021 - 2026

The following aims are included in the Strategy as part of our plans for 2021 - 2026

Aim	How we will deliver	By when
Monitor Housing Register applications and allocations to assess number of vacancies and housing need	Review banding system to address needs of households living with complex disabilities and other long term health conditions	Year 1
Maximise use of Better Care Fund to deliver disabled facilities grants and other grants and assistance	Prioritise Better Care funding and specifically disabled facilities grants to support independent living for elderly and disabled households	Years 1 - 5
Explore the use of the Better Care Fund to support people with dementia	Work with partners to deliver dementia friendly equipment	Year 1
Develop joint and strategies that align approaches to housing and health, promoting good health and preventing ill-health	Work with Housing, Health and Social Care sub-group to research local and national models, share good practice and develop guidance and advice to include: <ul style="list-style-type: none"> • hospital discharge • preventing delayed transfers of care • use of DFGs • extra care assistive moving on schemes, downsizing and mutual exchanges	Years 1 - 5

What action will be taken to reduce or mitigate any potential negative impacts?

No potential negative impacts identified.

Religion or Belief

Summary of available data, statistics or consultation findings held by the service

Kent County Council district profiles [facts-and-figures-about-Kent/area-profiles](#) and [facts-and-figures-about-Kent/equality-and-diversity-data](#)

How will the proposal impact on people?

The Strategy provides assistance for residents, regardless of their religion/belief.

What action will be taken to reduce or mitigate any potential negative impacts?

No potential negative impacts identified.

Sexual orientation

Summary of available data, statistics or consultation findings held by the service

Kent County Council equality and diversity data [facts-and-figures-about-Kent/equality-and-diversity-data](#)

How will the proposal impact on people?

The Strategy provides assistance for residents, regardless of their sexual orientation.

What action will be taken to reduce or mitigate any potential negative impacts?

No potential negative impacts identified.

Pregnancy and maternity

Summary of available data, statistics or consultation findings held by the service

No data available.

How will the proposal impact on people?

The Strategy provides assistance for residents, regardless of their pregnancy/maternity status.

What action will be taken to reduce or mitigate any potential negative impacts?

No potential negative impacts identified.

Gender reassignment

Summary of available data, statistics or consultation findings held by the service

No data available.

How will the proposal impact on people?

The Strategy provides assistance for residents, regardless of gender reassignment

What action will be taken to reduce or mitigate any potential negative impacts?

No potential negative impacts identified.

Marital or civil partnership status

Summary of available data, statistics or consultation findings held by the service

Kent County Council equality and diversity data [facts-and-figures-about-Kent/equality-and-diversity-data](#)

How will the proposal impact on people?

The Strategy provides assistance for residents, regardless of their marital/civil partnership status

What action will be taken to reduce or mitigate any potential negative impacts?

No potential negative impacts identified.

Armed Forces Community

Summary of available data, statistics or consultation findings held by the service

No data available.

How will the proposal impact on people?

Additional priority on the housing register is provided for members of the Armed Forces Community, as local connection criteria are waived for ex and serving military personnel applying to join the register.

What action will be taken to reduce or mitigate any potential negative impacts?

There are no potential negative impacts, but it is worth noting that the Housing Register Allocations Policy will be reviewed during 2021 and priority for ex and serving military personnel will be considered.

Conclusions

This section summarises the details of any positive or negative impacts that have been identified and any actions that may be required to mitigate negative impacts.

Aims of the Strategy

Some of the aims of the Strategy for 2021 – 2026 apply to all groups with protected characteristics as follows:

Aim	How we will deliver	By when
Develop affordable housing for residents on the housing register	Monitor delivery and review if the housing needs of all residents are being met, including those with disabilities or long-term health conditions	Years 1 - 5
Review the Housing Register Allocations Policy and adopt new Policy	Ensure alignment with Homelessness Reduction Act and work with registered providers to align allocation policies	Years 1 -2
Ensure housing provision aligns with forecast change in needs of residents	Monitor changing needs	Years 1 - 5

Outcome

The Public Sector Equality Duty (section 149 of the Equality Act 2010) requires the Council to have due regard to:

- (i) eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
- (ii) (ii) advance equality of opportunity between people from different groups, and
- (iii) (iii) foster good relations between people from different groups.

The impact has been analysed and does not vary between groups of people. The actions identified in the Strategy will assist all residents at risk of homelessness.

Select one/delete those that are not relevant from the list below:

Continue the policy

When will this equality impact assessment be reviewed

It will be reviewed every six months when the Strategy is reviewed, by the Housing Advisory Panel.

Annex 1 – Borough Data

Population data

Disability

The 2011 Census recorded that 12,763 households (27.1 per cent) in the borough include people with a long-term health problem or disability. Of these 2,260 households (4.8 per cent) include two or more persons with a long-term health problem or disability.

16,371 people (14.3 per cent) in the borough have their day to day activities limited a little or a lot by a long-term illness or disability. This is lower than the Kent average of 17.6 per cent and lower than the national average of 17.9 per cent.

9.2% (10,539) of population provide unpaid care.

Age

Mid-year population estimates (2019) recorded the average age of the borough's population as 41.5. This compares with a Kent average of 41.2 years and a national average of 40.2 years. Currently, 19.4 per cent of the borough's population is aged over 65. Population forecasts indicate that 25.2 per cent of the borough's population will be aged over 65 by 2038. This is in line with population forecasts for the Kent area.

Sex

The ONS mid-year estimates (2019) puts the percentage of females in the Borough as 50.6 percent, and males as 49.4 percent. The number of females over 85 years is significantly higher than the number of males.

Race

The 2011 Census recorded that 5,810 people (5.1 per cent) in the borough are from a Black or Minority Ethnic background. This is lower than the Kent average of 6.9 per cent and the national average of 14.6 per cent.

Religion or belief

The 2011 Census recorded that 62.9 per cent of the population is Christian. This is higher than the Kent average of 61.8 per cent and the national average of 59.4 per cent. 26.6 per cent of the population have no religion. Small proportions of the remainder of the population are Muslim, Buddhist, Hindu, Sikh and Jewish.

Sexual orientation

Sexual orientation data is not captured by the Census. There are plans to include this as a question topic for the Census in 2021.

Pregnancy or maternity

The ONS Birth Summary Tables (2019) show that the total fertility rate for Tunbridge Wells Borough was 1.75, which is similar to the Kent average of 1.76 and higher than the national average of 1.65.

In 2019, there were 56.8 births per 1,000 of the borough's population. This is lower than the Kent average of 59.4 and the national average of 57.5.

Marital or civil partnership status

The 2011 Census recorded that 50.1 per cent of the borough's population are married. This is higher than the Kent average of 48.9 per cent and the national average of 46.6 per cent.

Gender reassignment

At present, there is no official estimate of the trans population. Gender reassignment data is not captured by the Census. The Census (2021) will update the national information recorded on sex and gender and allow for respondents to enter their own identity in a free text box, if they do not feel it is the same as their sex as assigned at birth.

Residents' Survey (2015)

Summary of where significant differences were found by demographic group.

Disability

Contact with the Council

Those with a disability were more likely to have contacted the Council (main method of contact by telephone and in person).

Age

Contact with the Council

Those aged 35-54 were most likely to have contacted the Council overall.

A higher proportion of those aged 55+ have contacted the Council by telephone.

Those aged 16-34 were more likely to use the website as the primary means of obtaining information.

Those aged 35-54 were more likely to use the website as the most common means of obtaining information but the local newspaper and Local are also common.

Those aged 55+ were more likely to use the local newspaper as the most common means of obtaining information and Local is also common.

Higher proportions of those aged 16-54 have access to the internet, consider themselves confident/expert and consider the internet to be essential.

Those aged 35-44 were more likely to disagree that they can influence decisions in their local area and more likely to be interested in being involved in decisions that affect their local area.

Town Centre

Those aged 16-54 were more likely to visit the town centre at least once a week than those aged 55+.

Those aged 16-34 were more likely to be satisfied with the town centre than those aged 55+.

Feelings of safety

Those aged 16-54 were more likely to feel safe walking alone in their local area during the day and after dark than those aged 55+.

Importance of services

Those aged 16-34 ranked providing support to local businesses and the creation of jobs, activities for promoting health and wellbeing and housing services as important.

Those aged 35-54 ranked protecting the quality of the local environment, providing support to local businesses/creation of jobs and activities for promoting health and wellbeing as important.

Those aged 55+ ranked events, theatres and arts as important.

Those aged 16-54 ranked using technology to redesign how services are provided as important.

Those aged 55+ ranked asking users to pay more towards the cost of discretionary services as important.

Sex

Feelings of safety

Males were more likely to feel safe walking alone in their local area during the day and after dark.

Race

Satisfaction with the Council and value for money

Respondents of a Black and Minority Ethnic background were more likely to strongly agree that TWBC provides value for money than residents of White origin.

Respondents of a Black and Minority Ethnic background were more likely to be very satisfied with how the Council runs things than residents of White British origin.

Contact with the Council

Respondents of White origin were more likely to have visited the Council's website than respondents of a Black and Minority Ethnic background.

Religion or belief

This information was not collected by the Residents' Survey.

Sexual orientation

This information was not collected by the Residents' Survey.

Pregnancy or maternity

This information was not collected by the Residents' Survey.

Marital or civil partnership status

This information was not collected by the Residents' Survey.

Gender reassignment

This information was not collected by the Residents' Survey.

Performance indicators by service

Data collected in 2019-20.

Assembly Hall

Number of Access Focussed Performances per annum – 6.

Cemetery and Crematorium

Percentage of Muslim burials at the Crematorium – 5%.

Housing

Percentage of applicants from a Black and Minority Ethnic Background on the housing register – 13.5%

Percentage of applicants from a Black and Minority Ethnic Background housed through the housing register – 10.9%.

Percentage of full-time and occasional wheelchair users on the housing register – 1.6%.

Percentage of full-time and occasional wheelchair users housed through the housing register – 3%.

Percentage of those aged 16-24 on the housing register – 13.8%.

Percentage of those aged 16-24 housed – 18.4%.

Percentage of those aged 55+ on the housing register – 20.5%.

Percentage of those aged 55+ housed – 28.9%.

Number (estimated) of rough sleepers aged 16-24 (snapshot 31/03/2020) – 1.

Number of households in temporary accommodation aged 16-24 (snapshot 31/03/2020) - 4.

Number of homeless acceptances aged 16-24 (snapshot 31/03/2020) - 11.

Number of Disabled Facilities Grants completed per year - 89.

Human resources

Average age of the Council's workforce (mean) – 43.98.

Percentage of women in top 10 per cent highest paid Council employees – 43.36%.

Percentage of local authority employees with a disability- 3.4%.

Percentage of local authority employees from a Black and Minority Ethnic Background – 4.23%.

Percentage of applicants for Council vacancies with a disability – 2.31%.

Percentage of those recruited with a disability – 3.51%.

Percentage of applicants for Council vacancies from a Black and Minority Ethnic Background – 12.08%.

Percentage of those recruited who are from a Black and Minority Ethnic Background – 7.01%.

Gender pay gap reporting figures are available at:

<https://tunbridgewells.gov.uk/council/freedom-of-information-and-transparency/gender-pay-gap>

Licensing

Number of licensed wheelchair accessible taxis and private hire vehicles - 27.

Revenues and Benefits

Number of 16-24 year olds affected by the benefit cap (annual) - 0

Number of people in receipt of single room rate aged under 35 (annual) - 12