

## Initial assessment or screening

**Name of policy, service or decision: Housing Strategy**

**Lead directorate: DACHS**

| <p>1. Description – what is being assessed?</p> <p>Dudley is updating its Housing Strategy. As the previous one was produced in 2007 this is a whole scale re-write rather than an update.</p>   |  |
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| <p>2. Lead officer on assessment: Jo Forbes – Strategy Manager DACHS</p>   |  |
| <p>3. Head of service: Andrew Leigh</p>  |  |
| <p>4. Members of assessment team:</p> <p>DACHS Assistant Director – Housing Strategy – Ron Sims<br/> DACHS Head of Strategy – Andrew Leigh<br/> Dudley Housing Partnership – Chair – Ian Stuart (Black Country Housing Group)<br/> DACHS Strategy Manager – Saroj Norman</p>   |  |
| <p>5. What are the main issues relating to each protected characteristic? Consider all three parts of the public sector equality duty:</p> <ul style="list-style-type: none"> <li>• eliminating discrimination, harassment and victimisation,</li> <li>• advancing equality of opportunity, and</li> <li>• fostering good relations</li> </ul> |  |
| Protected characteristic   | Issues   |
| <p>All protected characteristics</p>   | <p>The aim of the strategy is to ensure that all of the residents of Dudley live in a good quality home in an attractive neighbourhood. The strategy covers all housing tenures, not just the stock that is actually owned by the council. Through the strategy we aim to encourage a mix of different sizes and types of housing throughout the Borough. In order to eliminate discrimination and to foster good relations, access to good quality affordable housing is essential.</p> <p>In preparation for the development of the strategy a Housing Market Intelligence Report (Housing Needs Study) was undertaken. It highlighted that there was an ageing population, a shortage of affordable housing in the borough, low earnings and many households who were unable to buy or rent privately. It</p> |

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|            | <p>also highlighted that the Borough had a lot of 3 bedroomed properties but fewer smaller units (1 or 2 bedrooms) and a shortage of 4 bedroom or larger properties to rent. All of these housing issues can impact on people with the protected characteristics. Some people may be indirectly disadvantaged from accessing suitable accommodation because of one or more of the protected characteristics. For example, people with long term medical conditions or other disabilities may find it difficult to sustain the long term employment required to obtain and pay for a mortgage so their housing options are more limited than others.</p>  |
| Age        | <p>Dudley's population is projected to grow by 7.4% (22,600 people) between 2008 and 2033. The most significant growth will be in the 65+ age group. A key challenge for the Housing Strategy will be to provide a balance of attractive specialist housing for older people such as Extra Care Housing (housing with on-site care, support and other facilities), providing smaller homes that older people would like to move into when they are thinking of down-sizing from a family sized home, building homes that are easily adaptable for when people become less mobile (homes built to Lifetime Homes standards) and providing resources and support that will help people to adapt their current homes so that they will be able to remain in their existing home for longer and reduce the need for people to move into residential care. By providing a range of options older people can make choices about their housing and there is likely to be less demand for costly residential care as people can live independently for longer.</p> |
| Disability | <p>Our latest Housing Needs data indicates that almost 26% (32,850) of households in the Borough contain somebody with a disability. This is higher than other areas where it is normally around 20%.</p> <p>An analysis of disability by housing tenure indicates that a large number of owner occupiers without a mortgage have a disability. This is likely to be older people who have encountered ill health or become less mobile as they have got older. Far fewer are home owners with a mortgage as these are more likely to be of working age. A high percentage of council tenants have a disability, and again, this is likely to be linked to the fact that Dudley's council tenant population tends to contain a large number of older people. The high percentage in housing association stock may be explained by the fact that many housing associations have supported housing schemes that are specifically for older people.</p>   |

Information that we have about the facilities and amenities in the privately rented stock in Dudley suggest that it is the least likely to be adapted or in a suitable condition to be occupied by people with disabilities and the percentage of those with disabilities living within this tenure type seems to support this assumption.

| Tenure                          | Tenure in sample% | Tenure of those with disability % | Implied no. (Disability) |
|---------------------------------|-------------------|-----------------------------------|--------------------------|
| Owner Occupied without mortgage | 31.8              | 39.5                              | 12,978                   |
| Owner Occupied with mortgage    | 40.3              | 20.2                              | 6,630                    |
| Council rented                  | 17.7              | 29.7                              | 9,744                    |
| Hsg Assoc rented                | 3.0               | 4.3                               | 1,428                    |
| Private rented                  | 6.2               | 4.8                               | 1,578                    |
| Other                           | 1.0               | 1.5                               | 492                      |
| Total                           | 100               | 100                               | 32,850                   |

We know from our Housing Needs Study data that the largest group of people who told us that they had a disability said that they had a walking difficulty (56.6%) followed by diabetes (19.9%) and asthma/respiratory problem (19.8%).

9.9% (12,387 implied) of properties had been adapted to meet the needs of somebody within the household who had a disability (or the property may already have received the adaptations prior to purchase/letting). This is lower than other areas which indicate levels of around 11%.

An analysis of adaptation by tenure indicates that the highest level of adaptation was in the owner occupied (no mortgage) sector. Breakdown by tenure:

31.5% Owner occupied (no mortgage) (implied 3,898 residents)

28.3% Dudley Council rented (implied 3,501 residents)

21.6% Owner occupied (with mortgage) (implied 2,681 residents)

|                        |   |
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|                        | <p>12.8% Housing association rented (implied 1,582 residents)<br/> 4.7% Private rented (implied 584 residents)<br/> 1.1% Living rent free (implied 142 residents)</p> <p>There are a number of key factors that impact greatly on disabled people and their housing conditions:</p> <ul style="list-style-type: none"> <li>• Space standards – disabled people may require larger spaces within their homes to accommodate wheelchairs, walking frames, hoists etc. Also the levels of light, layout of rooms and the materials used is crucial for people who have visual impairments or some forms of learning disabilities.</li> <li>• Additional rooms – some people may need an additional room for a carer or for storing vital equipment</li> <li>• Location – location can be crucial for those who receive family or informal care and support. It is also important for people with a learning disability to be familiar with and comfortable with the location of their home. It is helpful and promotes independence if the person’s home is close to good transport links as this can increase their likelihood of being able to travel independently.</li> <li>• General design – in the case of people with learning disabilities the design of housing plays a key role. Some people like to share facilities or communal areas so that they can socialise with others. Other people with more severe learning disabilities may become agitated if too many people are near by so housing with shared or communal areas does not work so well for them.</li> </ul> <p>The move to building homes to Lifetime Homes standard with level access and good heating/ventilation will help to meet the housing needs of some of the people with disabilities in the Borough but the annual supply of new housing in the Borough is small compared to the impact that making changes to the existing housing stock would make so we need to make sure that there are resources to carry out adaptations to the existing housing stock (all tenures).</p> |
| Gender reassignment    | We do not currently collect or analyse data on gender re-assignment   |
| Pregnancy or maternity | As a local authority we take into account pregnancy or maternity whilst assessing the housing needs of people who register to bid   |

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|      | <p>for social housing. We also monitor rates of teenage pregnancy. We believe that access to the right size of housing and affordability would probably rank as highly important to this group of people.</p>   |
| Race | <p>The Housing Needs Study questionnaire included a question on race. From the responses we know that:</p> <p>93.3% of respondents were White (British/Irish/Other white) (implied 117,824 residents)</p> <p>0.8% of respondents were Mixed (White and Black Caribbean, White and Black African, White and Asian, Other Dual Heritage) (implied 1,067 residents)</p> <p>3.9% of respondents were Asian or Asian British (Indian, Pakistani, Bangladeshi, Other Asian Background) (implied 4,916 residents)</p> <p>1.3% of respondents were Black or Black British (Caribbean, African or Other Black Background) (implied 1,674 residents)</p> <p>0.3% of respondents were Chinese (implied 374 residents)</p> <p>0.3% of respondents were 'Any Other' (implied 414 residents).</p> <p>National research and local homelessness data indicates that Black and Minority Ethnic (BME) households are more likely to experience homelessness when compared to the White British population. Research indicates that this is due to a complex interaction of a number of socio-economic factors. This is explained in detail in the Department for Communities and Local Government publication 'Housing &amp; Black and Minority Ethnic Communities: Review of evidence base' published in May 2006. In summary, the evidence suggests that the housing experiences of BME communities and their preferences for different tenures differ widely. For example, Households of Indian origin are most likely to be owner occupiers. On a percentage basis they are more likely than White British households to be in the owner occupied tenure. This contrasts markedly with members from the Pakistani/Bangladeshi communities, for whom many experience poorer housing conditions and more overcrowding and tend to have the lowest incomes of the BME communities. Households of Black origin tend to have lower incomes and be less likely to be in the owner occupied sector.</p> <p>It should be noted that according to Dudley's Joint Strategic Needs Assessment 2012 (based on 2009 Office of National Statistics data) Dudley's two largest BME populations are</p> |

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|                    | <p>Pakistani at 2.5% and Indian at 2.3%. Within the Borough there are concentrations of BME households, notably Pakistani households in the Lye area. These concentrations of communities who may have low incomes and tend to live in poorer housing conditions need to be taken into account and considered for targeted interventions such as housing renewal schemes or may require more advice and assistance in improving their housing conditions.</p> <p>These generalisations mask the complex impact of a range of factors including educational attainment, low earnings, relationships (the difference between having one or two adult incomes often impacts on your ability to meet your own housing needs by buying your own home). The levels of relationship breakdown and the fluidity of household size/make up all impacted on housing, especially overcrowding. The evidence base also suggests that the interplay of these factors often mean that BME households occupy tenancies within the private rented sector that have less security of tenure which leads to higher levels of homelessness.</p> <p>At the local level homelessness acceptances for BME households has increased over recent years from 16.93% in 2006/7 to 30.1% in 2010/11. This indicates that Dudley's BME households are over-represented within the homelessness services as our overall BME population is less than 10%. The Homelessness Prevention and Response Team are doing additional analysis of our homelessness data to evaluate if there is anything that we can put in place locally to ensure that appropriate services are in place to try to maximise our opportunities to prevent homelessness amongst BME communities and other potentially disadvantaged and excluded groups. This may include considering what we can do to assist BME householders to understand how the services work and the importance of contacting us for advice at an early stage if they are in housing difficulties. It would appear that the levels relate to socio-economic factors rather than racial harassment as only one case involved homelessness being caused due to the household experiencing racial harassment.</p> |
| Religion or belief | <p>The Housing Needs Study questionnaire included a question on religion. This question was answered by 95.3% of the 2,689 respondents. This data is statistically valid to a confidence level of 95% at Borough and Ward level. From the responses we know that:</p>  |

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|     | <p>67.9% of respondents were Christian (implied 83,779 residents)<br/> 23.3% of respondents were No Religion (implied 28,783 residents)<br/> 2.7% of respondents preferred not to say (implied 3,288 residents)<br/> 2.5% of respondents were Muslim (implied 3,095 residents)<br/> 1.4% of respondents were Other religion (implied 1,761 residents)<br/> 1.0% of respondents were Sikh (implied 1,256 residents)<br/> 0.9% of respondents were Hindu (implied 1,056 residents)<br/> 0.3% of respondents were Buddhist (implied 390 residents)<br/> 0.0% of respondents were Jewish (implied 0 residents)</p> <p>We anticipate that the issues of access to good quality affordable housing would be universal across the different religions but we are also mindful that the approach of some religions to debt and borrowing money may prove to be additional barriers to accessing certain housing tenure types.</p>  |
| Sex | <p>We have not specifically analysed our Housing Needs Study data by gender, although further analysis may be possible at a later date. There are potential barriers to accessing suitable housing based on gender related issues, for example, women are more likely to be in part time employment and have lower earnings than men.</p> <p>Child care responsibilities and child care costs can impact on the ability to enter the employment market and the affordability of housing. The need for appropriate property sizes that will accommodate children will also impact on housing options. Whilst these issues could, and do, impact equally on some male parents, these are key issues for single parents who tend to be, in the main, females.</p> <p>Our ageing population also needs to be taken into account as there are still differences in age related mortality for males and females. Within the growing elderly population there are more females as they tend to live longer. The average life expectancy for a Dudley male is 78.10 years (78.60 England average) compared to a Dudley female of 82.50 years (82.60 England average)<sup>1</sup></p> |

<sup>1</sup> Dudley Joint Strategic Needs Assessment Core Data Set

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| <p>Sexual Orientation</p>  | <p>The Housing Needs Study questionnaire included a question on sexuality. This question was answered by 92.6% of the 2,689 respondents. This data is statistically valid to a confidence level of 95% at Borough and Ward level. From the responses we know that:</p> <p>95.1% of respondents were heterosexual/straight (implied 114,012 residents)</p> <p>0.6% of respondents were gay man/woman/lesbian (implied 811 residents)</p> <p>0.1% of respondents were bisexual (implied 114 residents)</p> <p>0.2% of respondents were 'other' (implied 189 residents)</p> <p>4% of respondents preferred not to say (implied 4,792 residents)</p> |
| <p>6. Outline any information, such as from monitoring, consultation feedback or complaints, which indicate a differential impact on particular protected groups.</p> <p>We triangulate data from a range of local and national sources which help to inform our Housing Strategy. The strategy will also be influenced by a range of Government Policy drivers that will/are impacting on the provision of housing and affordability. An example of this is the Government reforms to welfare benefits that directly impact on the size and affordability of housing that people who claim help with their housing costs will be able to occupy/afford. The impacts of these policies have been assessed and reported on by the Government.</p> <p>We have attempted to highlight what we think are the key impacts on the protected groups in relation to the development of this strategy in section 5.</p> |  |
| <p><b>Conclusions</b></p>  |  |
| <p>7. On the basis of sections 5 and 6, is an equality impact assessment required? Provide a justification for your answer.</p> <p>Yes – we feel that an impact assessment is required as the strategy will cover our key objectives in relation to housing for the coming years and there are policy implications about where housing development investment is directed. In addition to this there are policy decisions that impact on households that contain some of the protected characteristics, for example the policy decision to continue to build more Extra Care Housing Schemes will directly impact on older people and their housing choices.</p>   |  |
| <p>8. (a) If no, list any actions identified:<br/> (b) If yes, what priority do you assign to the EIA (high, medium, low) and why?</p>   |  |

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| Signed assessment lead officer: Jo Forbes                          | Date:                                  |
| <b>Signed head of service: Andrew Leigh</b><br><i>Andrew Leigh</i> | <b>Date: 18<sup>th</sup> Oct, 2012</b> |

## Equality impact assessment



**Name of policy, service or decision: Housing Strategy**

**Lead directorate: DACHS**

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| <p>1. Description – what is being assessed?<br/>Dudley is updating its Housing Strategy. As the previous one was produced in 2007 this is a whole scale re-write rather than an update.</p>   |  |
| <p>2. Lead officer on assessment: Jo Forbes</p>   |  |
| <p>3. Head of service: Andrew Leigh</p>   |  |
| <p>4. Members of assessment team:<br/>DACHS Assistant Director – Housing Strategy – Ron Sims<br/>DACHS Head of Strategy – Andrew Leigh<br/>Dudley Housing Partnership – Chair – Ian Stuart (Black Country Housing Group)<br/>DACHS Strategy Manager – Saroj Norman</p>  |  |
| <p>5. Date assessment began: October 2011</p>   |  |
| <p><b>Background</b></p>  |  |
| <p>6. What are the aims and objectives or purposes of the policy or function/service?<br/><br/>The last version covered the period 2007-2010. During 2010 a Local Investment Plan was produced in partnership with the Homes and Communities Agency (Government Funding source for new affordable housing delivery) which acted as an interim document to drive strategic investment linked to regeneration activities.<br/><br/>The new strategy aims to provide a strategic vision for investment in housing in Dudley covering existing housing and new housing provision. The strategy covers all housing tenure types. Attached to the strategy will be an action plan that can be reviewed on an annual basis to evidence the activities that are being undertaken and the progress that is being made.</p> |  |
| <p>7. Who is it intended to affect or benefit (the target population)?</p>  |  |
| <p>8. What are the main issues relating to each protected characteristic?<br/>Consider all three parts of the public sector equality duty:</p> <ul style="list-style-type: none"> <li>• eliminating discrimination, harassment and victimisation,</li> <li>• advancing equality of opportunity, and</li> <li>• fostering good relations</li> </ul>  |  |
| <p>All protected characteristics</p>  | <p>The aim of the strategy is to ensure that all of the residents of Dudley live in a good quality home in an attractive</p> |

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|            | <p>neighbourhood. This means providing a mix of different sizes and types of housing throughout the Borough. In order to eliminate discrimination and to foster good relations, access to good quality affordable housing is essential. The strategy covers all housing tenure types.</p> <p>In preparation for the development of the strategy a Housing Market Intelligence Report (Housing Needs Study) was undertaken. It highlighted that there was an ageing population, a shortage of affordable housing in the borough, low earnings and many households who were unable to buy or rent privately. It also highlighted that the Borough had a lot of 3 bedroomed properties but fewer smaller units (1 or 2 bedrooms) and a shortage of 4 bedroom or larger properties to rent. All of these housing issues can impact on people with the protected characteristics. Some people may be indirectly disadvantaged from accessing suitable accommodation because of one or more of the protected characteristics. For example, people with long term medical conditions or other disabilities may find it difficult to sustain the long term employment required to obtain and pay for a mortgage so their housing options are more limited than others.</p> |
| Age        | <p>Dudley's population is projected to grow by 7.4% (22,600 people) between 2008 and 2033. The most significant growth will be in the 65+ age group. A key challenge for the Housing Strategy will be to provide a balance of attractive specialist housing for older people such as Extra Care Housing (housing with on-site care, support and other facilities), providing smaller homes that older people would like to move into when they are thinking of down-sizing from a family sized home, building homes that are easily adaptable for when people become less mobile (homes built to Lifetime Homes standards) and providing resources and support that will help people to adapt their current homes so that they will be able to remain in their existing home for longer and reduce the need for people to move into residential care. By providing a range of options older people can make choices about their housing and there is likely to be less demand for costly residential care as people can live independently for longer.</p>   |
| Disability | <p>Our latest Housing Needs data indicates that almost 26% (32,850) of households in the Borough contain somebody with a disability. This is higher than other areas where it is normally around 20%.</p>  |

An analysis of disability by housing tenure indicates that a large number of owner occupiers without a mortgage have a disability. This is likely to be older people who have encountered ill health or become less mobile as they have got older. Far fewer are home owners with a mortgage as these are more likely to be of working age. A high percentage of council tenants have a disability, and again, this is likely to be linked to the fact that Dudley's council tenant population tends to contain a large number of older people. The high percentage in housing association stock may be explained by the fact that many housing associations have supported housing schemes that are specifically for older people.

Information that we have about the facilities and amenities in the privately rented stock in Dudley suggest that it is the least likely to be adapted or in a suitable condition to be occupied by people with disabilities and the percentage of those with disabilities living within this tenure type seems to support this assumption.

| Tenure                          | Tenure in sample% | Tenure of those with disability % | Implied no. (Disability) |
|---------------------------------|-------------------|-----------------------------------|--------------------------|
| Owner Occupied without mortgage | 31.8              | 39.5                              | 12,978                   |
| Owner Occupied with mortgage    | 40.3              | 20.2                              | 6,630                    |
| Council rented                  | 17.7              | 29.7                              | 9,744                    |
| Hsg Assoc rented                | 3.0               | 4.3                               | 1,428                    |
| Private rented                  | 6.2               | 4.8                               | 1,578                    |
| Other                           | 1.0               | 1.5                               | 492                      |
| Total                           | 100               | 100                               | 32,850                   |

We know from our Housing Needs Study data that the largest group of people who told us that they had a disability said that they had a walking difficulty (56.6%) followed by diabetes (19.9%) and asthma/respiratory problem (19.8%).

9.9% (12,387 implied) of properties had been adapted to meet the needs of somebody within the household who had a disability (or the property may already have received the adaptations prior to purchase/letting). This is lower than other areas which indicate levels of around 11%.

An analysis of adaptation by tenure indicates that the highest level of adaptation was in the owner occupied (no mortgage) sector. Breakdown by tenure:

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28.3% Dudley Council rented (implied 3,501 residents)

21.6% Owner occupied (with mortgage) (implied 2,681 residents)

12.8% Housing association rented (implied 1,582 residents)

4.7% Private rented (implied 584 residents)

1.1% Living rent free (implied 142 residents)

There are a number of key factors that impact greatly on disabled people and their housing conditions:

- Space standards – disabled people may require larger spaces within their homes to accommodate wheelchairs, walking frames, hoists etc. Also the levels of light, layout of rooms and the materials used is crucial for people who have visual impairments or some forms of learning disabilities.
- Additional rooms – some people may need an additional room for a carer or for storing vital equipment
- Location – location can be crucial for those who receive family or informal care and support. It is also important for people with a learning disability to be familiar with and comfortable with the location of their home. It is helpful and promotes independence if the person's home is close to good transport links as this can increase their likelihood of being able to travel independently.
- General design – in the case of people with learning disabilities the design of housing plays a key role. Some people like to share facilities or communal areas so that they can socialise with others. Other people with more severe learning disabilities may become agitated if too many people are nearby so housing with shared or communal areas do not work so well for them.

The move to building homes to Lifetime Homes standard with

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|                        | <p>level access and good heating/ventilation will help to meet the housing needs of some of the people with disabilities in the Borough but the annual supply of new housing in the Borough is small compared to the impact that making changes to the existing housing stock would make so we need to make sure that there are resources to carry out adaptations to the existing housing stock (all tenures).</p> <p>There are both national and local policies that are encouraging local authorities and other housing providers to provide homes for people to live independently rather than being housed in institutional care. If these are not recognised in local housing strategies there may be a lack of suitable housing provision for disabled people, in particular people with learning disabilities.</p>  |
| Gender reassignment    | We do not currently collect or analyse data on gender re-assignment   |
| Pregnancy or maternity | As a local authority we take into account pregnancy or maternity whilst assessing the housing needs of people who register to bid for social housing. We also monitor rates of teenage pregnancy. We believe that access to the right size of housing and affordability would probably rank as highly important to this group of people.  |
| Race                   | <p>The Housing Needs Study questionnaire included a question on race. From the responses we know that:</p> <p>93.3% of respondents were White (British/Irish/Other white) (implied 117,824 residents)</p> <p>0.8% of respondents were Mixed (White and Black Caribbean, White and Black African, White and Asian, Other Dual Heritage) (implied 1,067 residents)</p> <p>3.9% of respondents were Asian or Asian British (Indian, Pakistani, Bangladeshi, Other Asian Background) (implied 4,916 residents)</p> <p>1.3% of respondents were Black or Black British (Caribbean, African or Other Black Background) (implied 1,674 residents)</p> <p>0.3% of respondents were Chinese (implied 374 residents)</p> <p>0.3% of respondents were 'Any Other' (implied 414 residents).</p> <p>National research and local homelessness data indicates that Black and Minority Ethnic (BME) households are more likely to experience homelessness when compared to the White British population. Research indicates that this is due to a complex</p> |

interaction of a number of socio-economic factors. This is explained in detail in the Department for Communities and Local Government publication 'Housing & Black and Minority Ethnic Communities: Review of evidence base' published in May 2006. In summary, the evidence suggests that the housing experiences of BME communities and their preferences for different tenures differ widely. For example, Households of Indian origin are most likely to be owner occupiers. On a percentage basis they are more likely than White British households to be in the owner occupied tenure. This contrasts markedly with members from the Pakistani/Bangladeshi communities, for whom many experience poorer housing conditions and more overcrowding and tend to have the lowest incomes of the BME communities. Households of Black origin tend to have lower incomes and be less likely to be in the owner occupied sector.

It should be noted that according to Dudley's Joint Strategic Needs Assessment 2012 (based on 2009 Office of National Statistics data) Dudley's two largest BME populations are Pakistani at 2.5% and Indian at 2.3%. Within the Borough there are concentrations of BME households, most notably Pakistani households in the Lye area. These concentrations of communities who may have low incomes and tend to live in poorer housing conditions need to be taken into account and considered for targeted interventions such as housing renewal schemes or may require more advice and assistance in improving their housing conditions.

These generalisations mask the complex impact of a range of factors including educational attainment, low earnings, relationships (the difference between having one or two adult incomes often impacts on your ability to meet your own housing needs by buying your own home). The levels of relationship breakdown and the fluidity of household size/make up all impacted on housing, especially overcrowding. The evidence base also suggests that the interplay of these factors often mean that BME households occupy tenancies within the private rented sector that have less security of tenure which leads to higher levels of homelessness.

At the local level homelessness acceptances for BME households has increased over recent years from 16.93% in

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|                           | <p>2006/7 to 30.1% in 2010/11. This indicates that Dudley’s BME households are over- represented within the homelessness services as our overall BME population is less than 10%. The Homelessness Prevention and Response Team are doing additional analysis of our homelessness data to evaluate if there is anything that we can put in place locally to ensure that appropriate services are in place to try to maximise our opportunities to prevent homelessness amongst BME communities and other potentially disadvantaged and excluded groups. This may include considering what we can do to assist BME householders to understand how the services work and the importance of contacting us for advice at an early stage if they are in housing difficulties. It would appear that the levels relate to socio-economic factors rather than racial harassment as only one case involved homelessness being caused due to the household experiencing racial harassment.</p>   |
| <p>Religion or belief</p> | <p>The Housing Needs Study questionnaire included a question on religion. This question was answered by 95.3% of the 2,689 respondents. This data is statistically valid to a confidence level of 95% at Borough and Ward level. From the responses we know that:</p> <ul style="list-style-type: none"> <li>67.9% of respondents were Christian (implied 83,779 residents)</li> <li>23.3% of respondents were No Religion (implied 28,783 residents)</li> <li>2.7% of respondents preferred not to say (implied 3,288 residents)</li> <li>2.5% of respondents were Muslim (implied 3,095 residents)</li> <li>1.4% of respondents were Other religion (implied 1,761 residents)</li> <li>1.0% of respondents were Sikh (implied 1,256 residents)</li> <li>0.9% of respondents were Hindu (implied 1,056 residents)</li> <li>0.3% of respondents were Buddhist (implied 390 residents)</li> <li>0.0% of respondents were Jewish (implied 0 residents)</li> </ul> <p>We anticipate that the issues of access to good quality affordable housing would be universal across the different religions but we are also mindful that the approach of some religions to debt and borrowing money may prove to be additional barriers to accessing certain housing tenure types.</p> |
| <p>Sex</p>                | <p>We have not specifically analysed our Housing Needs Study data by gender, although further analysis may be possible at a later date. There are potential barriers to accessing suitable housing based on gender related issues, for example, women are more likely to be in part time employment and have lower earnings</p>  |

|   |   |
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|   | <p>than men.</p> <p>Child care responsibilities and child care costs can impact on the ability to enter the employment market and the affordability of housing. The need for appropriate property sizes that will accommodate children will also impact on housing options. Whilst these issues could, and do, impact equally on some male parents, these are key issues for single parents who tend to be, in the main, females.</p> <p>Our ageing population also needs to be taken into account as there are still differences in age related mortality for males and females. Within the growing elderly population there are more females as they tend to live longer. The average life expectancy for a Dudley male is 78.10 years (78.60 England average) compared to a Dudley female of 82.50 years (82.60 England average)<sup>2</sup></p> |
| Sexual Orientation  | <p>The Housing Needs Study questionnaire included a question on sexuality. This question was answered by 92.6% of the 2,689 respondents. This data is statistically valid to a confidence level of 95% at Borough and Ward level. From the responses we know that:</p> <p>95.1% of respondents were heterosexual/straight (implied 114,012 residents)</p> <p>0.6% of respondents were gay man/woman/lesbian (implied 811 residents)</p> <p>0.1% of respondents were bisexual (implied 114 residents)</p> <p>0.2% of respondents were 'other' (implied 189 residents)</p> <p>4% of respondents preferred not to say (implied 4,792 residents)</p>  |
| <b>Stage 1 – evidence gathering</b>   |   |
| <p>Provide details of all information about the policy, service or decision which will help with the assessment. Use the headings below as reminders of what may be useful, although this not an exhaustive list.</p> <p><b>Equality monitoring data:</b><br/> What systems are in place to monitor current and future impact for each protected characteristic? What monitoring data is collected for each of the protected characteristics? Set out details of this data:</p> |   |

<sup>2</sup> Dudley Joint Strategic Needs Assessment Core Data Set

The development of the Housing Strategy is informed by data from a range of different sources. The primary data source is the Housing Market Intelligence Report (Housing needs Study) that has been produced by David Couttie Associates on behalf of Dudley MBC and the Dudley Housing Partnership. The research involved conducting postal questionnaires with residents. 9,300 postal questionnaires were sent out to randomly selected households and 2,139 were returned. In addition to this 550 face to face interviews were carried out with BME households or in areas where we have had low response rates to previous questionnaires. This achieved a response rate of over 2,500 ensuring that the results were statistically valid at Borough, Town area and ward level. Questions were asked on current housing, future housing intentions (people planning to move) and questions to identify concealed households or newly forming households (households who are currently living with another household because they cannot afford housing of their own). We also collected information on age, sex, employment status, income and savings levels, disabilities and support needs. In terms of the protected characteristics we covered the following:

**Age** : ages of each household member was collected

**Disability** : disability and support needs plus any adaptations to the home were collected

**Gender Re-assignment** : No information was collected

**Pregnancy or maternity** : Some information was collected from newly forming households

**Race** : The race of the head of the household was collected

**Religion or belief** : The religion or belief of the head of the household was collected

**Sex** : The gender of each household member was collected

**Sexual Orientation** : The sexual orientation of the head of the household was collected

**Other data sources** : Joint Strategic Needs Assessment, Dudley MBC Housing Registration data, lettings data, Homes and Communities data, Planning – housing completions, planning permissions granted, supported housing data, Economic Regeneration Strategic Assessment. This list is not exhaustive.

## **Engagement and customer feedback:**

Key partners were involved in the design of the Housing Needs Study questionnaire including Housing Strategy, Housing Management, Planning, Public Health and Occupational Therapists.

9,000 households were approached to participate in our research and 2,689 responded.

The results of the survey were presented to the Housing Conference in March 2012 where a diverse range of stakeholders debated the results and put forward suggestions as to the issues that should be tackled within the strategy. This conference and the workshops were attended by various Councillors, Dudley MBC employees, housing associations, Homes and Communities Agencies, Voluntary Organisations, Tenant Representatives, Public Health and other local authorities.

As a result of the discussions a number of themes for the strategy were agreed. These are:

- Responding to demographic changes
- Balancing our housing market
- Access to housing and affordability
- Meeting specific housing needs
- Investing in and improving existing housing stock
- Reducing the number of empty homes
- Partnership working

In addition to the themes we identified and agreed a number of cross cutting themes that must be considered:

- Economic regeneration
- Neighbourhood management
- Affordability/Welfare Reforms
- Health and Well-being
- Sustainability

As a result of this a small working group has been created to draft the strategy. This includes a range of council officers and the Homes and Communities Agency. Further consultation will be undertaken as the draft strategy develops.

Feedback on the research and themes for the strategy has been provided to the Dudley Housing Partnership (all of the housing associations that operate within the Borough).

Details of the consultation and key contacts are on the Dudley MBC Community Engagement Database

On the 25<sup>th</sup> June 2012 we will be meeting with housing developers to discuss the research findings, our outline strategy themes and gather feedback about how they will respond.

At a more local level, we have recently built 18 apartments for people with learning disabilities. We have engaged the specialist accommodation team for people with learning disabilities and other professionals to make sure that the design was suitable for people. We could not consult the actual people who moved in to the properties at the design stage because we had not identified them individually. As the build progressed, however, changes to the design and fittings were made as individuals were identified for each apartment. We are also about to ask the new residents about their experience of moving into the apartments and living in them so that we can take on board their feed back for future new schemes.

**Barriers to access:**

There are many barriers to accessing good quality affordable housing that are linked to wider economic conditions such as the availability of employment and mortgages, new building supply, how existing housing stock is occupied and used, rent caps, rules on public sector investments and a range of market forces impacting on property prices (incomes to mortgage ratios). It is possible that households containing members with the protected characteristics may experience multiple barriers to accessing appropriate housing.

We will be monitoring the impacts of welfare reform measures on our local authority tenants. One potential barrier to accessing or continuing to live in suitable accommodation for people with a disability may be the move to Universal Credit and housing allowance being paid on the basis of the number of rooms that are needed rather than the actual number of rooms in the property. Some disabled benefit claimants may be financially worse off where they have additional rooms that they use for storing equipment or where they have informal care arrangements and extra rooms are needed. The need for the additional rooms may not be taken into account within the new Universal Credit calculation.

In terms of developing the strategy, we will endeavour to maximise opportunities that will deliver additional housing into the Borough and steer developers to address the imbalance of housing size types that we need in order to improve the flow of housing within the Borough.

**Information about the borough e.g. Census data:**

This is covered in other sections. We are able to use 2011 housing needs data rather than relying on the 2001 Census that is relatively out of date at the moment.

**Background or comparative information:**

Where possible within this impact assessment and whilst developing the strategy we have used background or comparative data. For example, Dudley's private rented market is small at 6% of the total stock in the Borough. This compares to national data which suggests that in most areas around 9% of the housing stock is privately rented. Growing the private rented sector is likely to be a key priority within the strategy as it provides a wider range of housing options for people who cannot afford to buy their own home.

Other comparative data has been used, for example, on the levels of self reported disability which in Dudley are higher than the national average.

**What evidence is missing? What will be done to collect it?**

We do not have data in relation to gender re-assignment and limited information on pregnancy/maternity. When we update our Housing Needs Study data we will consider including a question on gender re-assignment. Some pregnancy/maternity data is available to us via an analysis of our housing register but that only covers households seeking social housing.

**Stage 2 – data analysis**

Provide details of the analysis completed on the information presented at stage 1 above, identify patterns or trends and compare with other authorities, national research, census data, etc.

See information in section 8

**Stage 3 - assess the impact**

Does the policy or function/service have any potential adverse impacts on particular protected groups? If so explain what they are.

We do not anticipate that the Housing Strategy will have any adverse impacts on particular protected groups. We are mindful of the issues that we have identified in section 8 and will develop our strategy with the intention to address the issues.

**Stage 4 - reasons for adverse impacts**

Outline the reasons identified for adverse impacts

We have identified some of the key reasons in section 8 and will develop our strategy with the intention to address the issues. Other impacts and issues will be covered in more detail in the actual strategy itself.

**Stage 5 - consider alternatives/mitigating actions**

How will any adverse impacts identified be reduced or removed? Explain if it is decided that an adverse impact is unavoidable.

We have identified some of the key reasons in section 8 and will develop our strategy with the intention to address the issues. Other impacts and issues will be covered in more detail in the actual strategy itself.

**Stage 6 - test the changes**

Detail how the mitigating actions to reduce or remove the adverse impacts were tested, piloted or consulted on and the results of this.

An action plan will be developed and monitored as part of the Housing Strategy. This will be used to monitor impacts. A refresh of the Housing Needs Study is likely to be done before 2016 which will also give us up to date data on housing needs/identify adverse impacts.

**Stage 7 – decision making**

Did the test, pilot or further consultation illustrate that the mitigating actions will be effective? What decision is recommended about the policy or service and why? How will the decision maker be briefed on the EIA?

We are not always in a position to put mitigating actions in place to ensure that the housing market functions correctly as it is influenced by national and international economic factors, however, on a local level we will continue to closely monitor demand for social housing, homelessness and new housing delivery.

Each chapter within the strategy will clearly set out the strategic implications and the actions that we intend to take.

The decision makers will be briefed via council officers, briefings, formal reports and the strategy will be signed off through the normal local democratic process.

**Stage 8 - monitoring arrangements**

How will the equality impact of the policy or service be monitored in the future?

It is unlikely that we will get sufficiently detailed information on each of the protected characteristics until we do our next housing needs study in a few years time but in the interim we will measure demand for social housing, homelessness and new housing delivery, some of the data from these service areas will give us a picture about some of the protected characteristics but we recognise that it will not provide a comprehensive view on all of them.

**Stage 9 – action planning**

Provide details of actions or improvements identified during the EIA.

The EIA has highlighted a need to collect more data in relation to gender re-assignment. This needs to be included in our next housing needs study.

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|---|--|
| <b>Signed by assessment leader officer:</b><br>Jo Forbes:                           | <b>Date completed:</b>                 |
| <b>Signed by Assistant Director/ Head<br/>Of Service:</b><br><br><i>Andrew Lish</i> | <b>Date: 18<sup>th</sup> Oct, 2012</b> |