

## Equality Analysis Report

<b>Title of activity / Budget Proposal title and number</b> Adoption of the Housing Strategy 2021-2026	<b>Committee meeting (decision maker) and date</b> Executive 5th January 2021
<b>Service area</b> Environment, Planning and Housing	<b>Lead officer</b> Gill Cowie, Service Manager Planning & Housing Strategy
<b>Approved by</b> Jon Shortland, Chief Officer for Planning and Infrastructure Development	<b>Date of approval</b> 13 <sup>th</sup> October 2020
<b>Description of activity:</b>  As a housing authority, the Council has a responsibility to assess the housing issues in its area and to formulate strategies to address any that are identified.  The Council transferred its housing stock to Bedfordshire Pilgrims Housing Association (now bpha) in 1990. However it still retains a role as a strategic and enabling authority along with a number of responsibilities in relation to housing, housing conditions, housing need and the development of a housing strategy.  Once adopted, the Housing Strategy 2021-2026 (the Strategy) will replace the existing Housing Strategy Review which expires at the end of December 2020. It takes into account developments in legislation and Government best practice and the successes the Council has achieved since the Housing Strategy Review was published.  The Strategy provides an overarching framework against which the authority will consider and formulate other policies on more specific housing issues.  The four themes of the Strategy are:	

- Understanding Housing Needs
- Delivering the Homes Required
- Making Best Use of Existing Housing and
- Meeting the Housing Needs of Vulnerable People

The adoption of the Strategy – following public consultation in summer 2020 - will facilitate the delivery of the key objectives in relation to each of these themes.

## Relevance Test

1. The outcomes of the activity directly and significantly impact on people, e.g. service users, employees, voluntary and community sector groups.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
2. The activity could / does affect one or more protected equality groups.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
3. The activity could / does affect protected equality groups differently.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4. One or more protected equality groups could be disadvantaged, adversely affected or are at risk of discrimination as a result of the activity.	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
5. The activity relates to an area where there are known inequalities.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
6. The activity sets out proposals for significant changes to services, policies etc. and / or significantly affects how services are delivered.	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
7. The activity relates to one or more of the three aims of the Council's equality duty.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
8. The activity relates to the Council's Corporate Plan objectives, is a significant activity and / or presents a high risk to the Council's public reputation.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
9. An equality analysis of this activity is required.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
This activity has no relevance to Bedford Borough Council's duty to eliminate unlawful discrimination, harassment and victimisation; to advance equality of opportunity; and to foster good relations. An equality analysis is not needed.				<input type="checkbox"/>
<b>Explanation why equality analysis is not needed</b>				
N/A				

## Scope of equality analysis

<b>Who is / will be impacted by the activity's aims and outcomes?</b>	All residents require somewhere to live and therefore the adoption and the subsequent implementation of the Strategy has the potential to impact on everyone in the Borough. This includes those with protected characteristics as defined by the Equality Act 2010. Protected Groups include age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex (gender), gender reassignment, sexual orientation, marriage and civil partnership groups as well as those with multiple protected characteristics.

<p><b>Which particular protected equality groups are likely / will be affected?</b></p>	<p>The implementation of the adopted Strategy will impact differently on individual protected groups but will not impact on all of them disproportionately. This is considered further in 'Impact on equality groups' below.</p> <p>The implementation of the Strategy will result in new housing development. This has the potential to impact positively on some protected groups such as older persons, people who have mental health needs, learning disabilities, or those who require adapted and accessible properties. Theme 4 - Meeting the Needs of Vulnerable People - specifically addresses this.</p> <p>The Strategy also contains objectives to address the needs of those who are homeless or at risk of homelessness - although this is covered in further detail in the Homelessness Strategy 2016. Although not specifically a protected group, vulnerabilities may mean those facing homelessness are more likely to have other protected characteristics including disabilities relating to mental health.</p>
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**Evidence, data, information and consultation**

<p><b>What evidence have you used to analyse the effects on equality?</b></p>	<ul style="list-style-type: none"> <li>• Population Census 2001 and 2011, ONS</li> <li>• Census and Statistics Information, BBC</li> <li>• Joint Commissioning Strategy for People with Physical Disabilities 2010-2013, BBC / NHS</li> <li>• Bedfordshire Black and Minority Ethnic Accommodation Needs Study 2003, DMU</li> <li>• Indices of Deprivation, BBC</li> <li>• Gypsy and Traveller Accommodation Assessment 2016</li> <li>• Equality monitoring information of consultation across the wider Council in 2011</li> <li>• Bedford Borough Growth Plan 2013 and update 2018</li> <li>• Strategic Housing Market Assessment, ORS 2016 and Addendum 2018</li> <li>• Work on Care and Support Accommodation Strategy</li> <li>• Empty Homes Strategy 2019-2024</li> <li>• Tenancy Strategy 2019-2024</li> <li>• Building Research Establishment Private Sector Housing Report 2018</li> <li>• Housing Tenure and Dwelling Type Data</li> <li>• Local Plan 2030</li> </ul>
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	<ul style="list-style-type: none"> <li>• BBC Housing Monitoring Reports</li> <li>• PANSI (Projecting Adult Needs and Service Information)</li> <li>• POPPI (Projecting Older People Population Information System)</li> </ul>
<p><b>What consultation did you carry out with protected equality groups to identify your activity's effect on equality?</b></p>	<p>The following Council officers – some of whom have specific responsibilities for working on behalf of and representing the interests of protected groups - were consulted prior to the public consultation on the draft Strategy:</p> <ul style="list-style-type: none"> <li>• Chief Officer for Planning and Infrastructure &amp; Development</li> <li>• Director for Adult Services</li> <li>• Chief Officer for Adults (Operational Services)</li> <li>• Chief Officer for Customer Experience &amp; Digital Service</li> <li>• Manager for Customer Service</li> <li>• Chief Officer for Environment</li> <li>• Energy &amp; Water Technical Officer</li> <li>• Chief Officer for Corporate Finance &amp; Pensions</li> <li>• Public Health Manager</li> <li>• Housing Partnerships Officer</li> </ul> <p>The following groups were consulted specifically during the public consultation exercise:</p> <ul style="list-style-type: none"> <li>• Bedfordshire and Luton Mental Health and Wellbeing Services</li> <li>• Bedfordshire Wellbeing Service (ELFT)</li> <li>• Bedfordshire and Luton Mental Health and Wellbeing Services</li> <li>• Bedford Borough Equality &amp; Diversity Network</li> <li>• Kings Arms Project</li> <li>• Salvation Army</li> <li>• YMCA</li> </ul> <p>The Strategy was subject to full public consultation, open to all including those with a protected characteristic. This was carried out for six weeks in the summer of 2020. Key stakeholders and other interested groups were emailed directly about the consultation.</p>

The consultation was also advertised through social media and on the council's website.

For those unable to access the internet, hard copies of the strategy were sent to Local Councils for them to make copies available to people within their area. Responses were also accepted via email or letter.

33 responses were received. All comments were considered and changes made to the Strategy where appropriate. 14 of these were from organisations and 19 were from individuals.

The following table analyses the number of responses that either agreed or disagreed with the key themes of the strategy. This information was only received from those completing the online survey.

Table 1: Consultation responses to the strategy themes

	<b>Strongly Agree</b>	<b>Agree</b>	<b>Neither Agree nor disagree</b>	<b>Disagree</b>	<b>Strongly Disagree</b>	<b>Don't know/No opinion</b>
Theme 1 – Understanding Housing Needs	12.5%	37.5%	17%	17%	12.5%	3.5%
Theme 2 – Delivering the Homes Required	12.5%	33%	12.5%	17%	8%	17%
Theme 3 – Making Best Use of Existing Housing	25%	33%	29%	0%	4%	9%
Theme 4 – Meeting the Housing Needs of Vulnerable People	21%	46%	12.5%	4%	8.5%	8%

The majority of respondents either strongly agreed or agreed with each of the Themes.

	<p>67% either agreed or strongly agreed with Theme 4 – Meeting the Housing Needs of Vulnerable People. Comments made in relation to this theme referenced the need to ensure that adequate help is available to vulnerable people - who are more likely to be a member of a protected group.</p> <p>The consultation survey asked the following question:</p> <p><i>As a public body we have a duty to ensure that what we do does not discriminate against people with protected characteristics. These are: gender; age; ethnicity; disability; faith / religion; sexual preference; gender reassignment; and pregnancy. Please tell us if you believe that any of the issues raised would have an adverse impact on any of these groups, or if you feel we could do anything more to ensure discrimination does not take place.</i></p> <p>Five comments were received relating to this question. One comment requested clarity over the definition of ‘vulnerable’. The strategy has been altered to provide a more comprehensive definition.</p> <p>There were no comments relating specifically to any protected group.</p>
<p><b>What does this evidence tell you about the different protected groups?</b></p>	<p><b>General</b></p> <p>In 2011 The Borough was home to an estimated 157,800 residents from approximately 65,800 households. Population numbers had increased by approximately 6.5 % from 148,100 in 2001. The population of Bedford Borough is forecast to rise from 176,776 in 2020 to 205,257 in 2040, a rise of 16.1%.</p> <p><b>Age</b></p> <p>The population of the urban area is much younger on average than the rural area, with only 45% of the population aged 40+ compared to 56% in rural areas. Whilst borough wide the population is forecast to increase by 7% between 2014 and 2021, the number of people 65+ is forecast to increase by 16% and the number of people 85+ is forecast to increase by 32% over the same period. Between 2014 and 2037 the Borough’s population is forecast to rise by 21% with increases of 67% and 156% for the 65+ and 85+ age groups respectively. This will represent a significant ageing of the population.</p>

**Disability**

In Feb 2016 6,420 people claimed Disability Living Allowance and 3,595 people claimed Attendance Allowance. In 2011 16% of the Borough's population reported that they had a long term illness. Additionally in 2015 it was estimated that there were 2,414 adults with a learning disability and that this number will rise to 2,615 by 2030.

The prevalence of physical disability increases with age. The highest percentages are found in older age groups so as population growth is expected to be concentrated in older age groups there is likely to be an increase in the proportion of disabled people. There is no evidence that disabled people are concentrated in any particular part of the urban or rural area and it is assumed that they are randomly distributed within those locations.

**Pregnancy and maternity**

Between 2001 and 2007 the number of births in the Borough increased gradually, but rose significantly in 2008-2010. This can be largely attributed to mothers born outside the UK who accounted for 78% of the total increase between 2001 and 2010. Although the number of births to mothers born in the New European Union countries (countries which joined the EU in 2004) has increased greatly since 2004, the number of births to mothers born in Asia remains the largest group. This group, together with mothers born in Africa and the rest of the world, makes up 60% of total births. Therefore the distribution of the pregnancy and maternity group is assumed to largely mirror that of Black and Minority Ethnic (BME) groups (see below).

**Race**

The 2011 Census indicates that 28.5% of the Borough's population is from around 100 different Black and Minority Ethnic (BME) groups (defined as all ethnic groups other than White British). This compares to 20.2% in England (though only 13.9% when the London Boroughs are excluded) and 14.7% in the East of England. The Borough's BME population increased significantly between 2001 and 2011, while the White British population declined by almost 6,900. There were substantial increases in all BME groups, including Asian and Asian British (48.6%) and Black and Black British (61.3%). In 2001 the BME population was concentrated in the urban area and particularly in the wards of Queens Park (57.8%) and Cauldwell (43.6%).

Gypsies and Travellers experience multiple disadvantages as is demonstrated by indicators relating to health, education and other issues. The existing Gypsy and Traveller community is located on the Council's own sites at Kempston Hardwick (22 pitches), at Willow Drift Meadow Lane (14 pitches) and a number of privately owned sites in the urban and rural area. The 2016 based Gypsy and Traveller Accommodation Assessment evidences need for two additional pitches for Gypsy and Travellers to cover the period of the plan. It also evidences the need for the provision of an additional 5 Travelling Showpeople plots.

**Religion or belief**

The 2011 Census indicated that religious belief for the borough was as follows: Christian 59.3%, Muslim 5.5%, Hindu 1.5%, Sikh 2.1%, Jewish 0.1%, Buddhist 0.3%, Ravidassia 0.6%, other 0.4%, no religion 23.6%, not stated 6.6%. There is a strong correlation between certain religions and race: for example, many Pakistanis and Bangladeshis are Muslims, while many Indians are Hindu or Sikh. 2011 information shows that the composition of religion by ward varies greatly, with differences largely tied to ethnicity. For example, 41% of Queens Park ward residents are Muslim (3,500), and there are also large Muslim populations in Cauldwell (970), Castle (870) and Kingsbrook (840) wards. Almost 5% of Kempston Town residents are Sikh, and there is a large Hindu community in Cauldwell (460). There is a notable difference in the proportion of the population who are Christian between the urban (56%) and rural (65%) areas of the Borough. Again, this largely reflects their different ethnic compositions, but is also influenced by the older age profile of the rural area. The highest proportion of Christians is in Oakley (69%) ward, followed by Bromham & Biddenham and Putnoe (both 68%). The lowest is in Queens Park (37%).

**Sex (gender)**

The 2011 Census indicates that out of 158,000 residents, 80,200 are women. There is no evidence that members of this group are concentrated in any particular area and it is assumed that they are randomly distributed.

**Other identified groups**

The highest ranked areas for deprivation in the Borough are all in the urban area. They are located within the following wards – Castle, Harpur, Cauldwell, Kingsbrook, Goldington and Kempston

	North. The wards with the highest levels of unemployment are all in the urban area. They are as follows – Castle, Cauldwell, Queens Park, Kingsbrook, Goldington, Harpur, Kempston North, Kempston West.
<b>What further research or data do you need to fill any gaps in your understanding of the potential or known effects of the activity?</b>	None at the present time. The Strategy identifies that data from the 2021 Census should be obtained and analysed as it is released to establish what it might reveal about the equalities impact of the strategy and what might be done to address any issues identified.

### General Equality Duty

<b>Which parts of the general equality duty is the activity relevant to?</b>			
	Eliminate discrimination, harassment and victimisation	Advance equality of opportunity	Foster good relations
Age		<p>The implementation of the Strategy, in particular the key objectives of Theme 4 – Meeting the Needs of Vulnerable People, will help to advance the equality of opportunity to access suitable housing for older persons.</p> <p>The provision of affordable housing for families and single people – in particular the implementation of the key objective of Theme 2 – Delivering the Homes Required - will help advance equality of opportunity</p>	<p>Many specialist older persons' housing schemes work to involve the local community in their activities, inviting local residents, schools etc to become part of the wider supported housing scheme community at the scheme. These links help to foster good relations between older residents and the local community.</p>

		to access suitable housing for younger people and families.	
Disability	<p>Many specialist housing schemes for those with learning disabilities have associated support workers who help service users to be part of the local community. This might include finding employment (if appropriate) and / or helping service users to undertake daily activities which ensure they can become part of the local community to the extent that they are able. This can help to raise awareness on the needs of those with learning disabilities and to foster good relations between them and the wider community.</p> <p>The presence of support workers in specialist mental health schemes can help to address misconceptions about mental illness. Support workers can provide a link with the existing community that could help residents to establish relationships with those who live around them more easily than they might otherwise have done.</p>	The implementation of the Strategy, in particular the key objectives of Theme 4 – Meeting the Needs of Vulnerable People, will help to advance the equality of opportunity to access suitable housing for those with physical and mental health disabilities.	
Gender reassignment			

Pregnancy and maternity			
Race		The implementation of the Strategy , in particular the key objectives of Theme 4 – Meeting the Needs of Vulnerable People, will help to advance the equality of opportunity to access suitable housing for Gypsy and Travellers by delivering additional pitches and plots to meet their identified needs.	
Religion or belief			
Sex			
Sexual orientation			
Marriage & civil partnership			

**Impact on equality groups**

<b>Based on the evidence presented what positive and negative impact will your activity have on equality?</b>				
	Positive impact	Negative impact	No impact	Explanation
Age	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Implementation of the adopted Strategy will facilitate the provision of additional accommodation to meet the identified needs of Older Persons. Theme 4 – Meeting the Needs of Vulnerable People particularly addresses this. The objectives of Theme 2 - Delivering the Homes Required address the needs of

				younger people and families.
Disability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Implementation of the adopted Strategy will facilitate the provision of additional accommodation to meet the identified needs of those with physical, learning and mental health disabilities. Theme 4 –Meeting the Needs of Vulnerable People particularly addresses this.
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence that demonstrates that the Strategy will disproportionately impact on this protected equality group.
Pregnancy and maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence that demonstrates that the Strategy is likely to disproportionately affect this protected equality group.
Race	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Implementation of the adopted Housing Strategy will facilitate the provision of additional pitches and plots to meet the identified needs of Gypsies and Travellers.
Religion or belief	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence that demonstrates that the Strategy is likely to disproportionately affect this protected equality group.
Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence that demonstrates that the Strategy is likely to disproportionately affect this protected equality group.
Sexual orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence that demonstrates that the Strategy is likely to disproportionately affect this protected equality group.
Marriage & civil partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no evidence that demonstrates that the Strategy is likely to disproportionately affect this protected equality group.
Other relevant groups	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No other relevant groups identified.

### Commissioned services

<b>What equality measures will be included in Contracts to help meet the three aims of the general equality duty?</b>	N/A – no services are to be commissioned in relation to the adoption of the Strategy.
<b>What steps will be taken throughout the commissioning cycle to meet the different needs of protected equality groups?</b>	N/A

### Actions

	What will be done?	By who?	By when?	What will be the outcome?
<b>Actions to lessen negative impact</b>	N/A – no negative impacts have been identified			
<b>Actions to increase positive impact</b>	N/A			
<b>Actions to develop equality evidence, information and data</b>	The Strategy identifies that some data on which demographic contextual information is based will require updating as much of it is sourced from the 2011 Census. This is acknowledged in the Strategy at 1.6, 4.2, 5.3.2, 5.4.2. The Action Plan for the strategy (Actions 1.2 and 1.3)	Housing Strategy Team	2021 and following – as 2021 Census data is released	Improved and up to date demographic information including that relevant to understanding protected groups.

	identifies the gathering and interpretation of data from the 2021 Census is required.			
<b>Actions to improve equality in procurement / commissioning</b>	N/A - no services are to be commissioned in relation to the adoption of the Strategy.			
<b>Other relevant actions</b>	N/A			

### Recommendation

<b>No major change required</b>	<input checked="" type="checkbox"/>	The evidence shows no negative effect or potential for discrimination and an appropriate and proportionate approach has been taken to advance equality and foster good relations between different protected equality groups.
<b>Adjustments required</b>	<input type="checkbox"/>	
<b>Justification to continue the activity</b>	<input type="checkbox"/>	
<b>Stop the activity</b>	<input type="checkbox"/>	

### Summary of analysis

By facilitating the provision of housing that is needed by everyone the adoption and implementation of the Strategy will impact positively on all residents of the Borough. The implementation of Theme 4 – Meeting the Needs of Vulnerable People will impact positively on some protected groups i.e. Age, Disability and Race. Updated data from the 2021 Census will need to be analysed as it is released to establish what changes there have been to the demographics of Bedford Borough since the 2011 Census, to identify how those changes might impact on the provisions of the Strategy for protected groups and what should be done to address any issues identified.

In preparing this report, due consideration has been given to the Borough Council's statutory Equality Duty to eliminate unlawful discrimination, advance equality of opportunity and foster good relations, as set out in Section 149(1) of the Equality Act 2010.

### **Monitoring and review**

<b>Monitoring and review</b>	<b>Review date</b>
<p>The delivery of the Action Plan for the adopted Strategy – which includes that of Key Theme 4 – Meeting the Needs of Vulnerable People which is particularly relevant to some protected groups – will be reviewed annually.</p>	<b>Annually</b>
<p>This Equality Analysis will be reviewed following the publication of data from Census 2021. It is as yet unclear when and in what order this data will be published and so the Review date may be subject to change.</p>	<b>2023</b>