

**Tameside & Glossop Strategic Commission  
Equality Impact Assessment (EIA) Form**

<b>Subject / Title</b>	Housing Strategy 2021-2026
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<b>Team</b>	<b>Department</b>	<b>Directorate</b>
Development and Investment	Investment, Development and Housing	Growth

<b>Start Date</b>	<b>Completion Date</b>
7 June 2021	12 August 2021

<b>Project Lead Officer</b>	Patrick Nolan
<b>Contract / Commissioning Manager</b>	Patrick Nolan
<b>Assistant Director/ Director</b>	Gregg Scott

<b>EIA Group</b> (lead contact first)	<b>Job title</b>	<b>Service</b>
Mick Coogan	Housing Growth Project Manager	Development and Investment
Patrick Nolan	Head of Housing	Development and Investment
John Hughes	Housing Growth Lead	Development and Investment

**PART 1 – INITIAL SCREENING**

*An Equality Impact Assessment (EIA) is required for all formal decisions that involve changes to service delivery and/or provision. Note: all other changes – whether a formal decision or not – require consideration for an EIA.*

*The Initial screening is a quick and easy process which aims to identify:*

- *those projects, proposals and service or contract changes which require a full EIA by looking at the potential impact on, or relevance to, any of the equality groups*
- *prioritise if and when a full EIA should be completed*
- *explain and record the reasons why it is deemed a full EIA is not required*

*A full EIA should always be undertaken if the project, proposal and service / contract change is likely to have an impact upon, or relevance to, people with a protected characteristic. This should*

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*be undertaken irrespective of whether the impact or relevancy is major or minor, or on a large or small group of people. If the initial screening concludes a full EIA is not required, please fully explain the reasons for this at 1e and ensure this form is signed off by the relevant Contract / Commissioning Manager and the Assistant Director / Director.*

<b>1a.</b>	<b>What is the project, proposal or service / contract change?</b>	A new holistic Housing Strategy is proposed to be adopted.
<b>1b.</b>	<b>What are the main aims of the project, proposal or service / contract change?</b>	The strategy manifests challenges, objectives, priorities and key actions which will shape the housing offer over the next 5 years and beyond. The strategy supports the delivery of the Corporate Plan and the aims of GM Housing Strategy. Key actions emanating from the strategy have been or will be subject to their own governance requirements and could need their own EIAs dependant on their nature.

<p><b>1c. Will the project, proposal or service / contract change have either a direct or indirect impact on, or relevance to, any groups of people with protected equality characteristics?</b></p> <p><b>Where there is a direct or indirect impact on, or relevance to, a group of people with protected equality characteristics as a result of the project, proposal or service / contract change please explain why and how that group of people will be affected.</b></p>				
<b>Protected Characteristic</b>	<b>Direct Impact/Relevance</b>	<b>Indirect Impact/Relevance</b>	<b>Little / No Impact/Relevance</b>	<b>Explanation</b>
Age	✓	✓		There are direct positive impacts for people in both younger (16-25) and older age (55+) age groups. There are actions contained specifically to support older people such as Extra Care schemes and well as younger

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				<p>people coming through the Children’s Social Care route. The Council has legal duties under legislation such as the Care Act 2014, Children Act 1989, and Housing Act 1996 (as amended) amongst others more than justify the relevant actions.</p> <p>The Council has duties and powers under the Housing Act 2004 and Environmental Protection Act 1990 to improve PRS stock, and how powers and incentives to provide affordable housing.</p> <p>Whilst homes ownership was recorded at 64.1% at the last Census, and rented from private landlords and letting agents was 11.9% for Tameside households, for</p>
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				<p>the 16-34 year old housing reference person cohort, only 39.8% own a house and 30.5% were in the private rented sector (PRS). Therefore affordable housing initiatives and improvements to the Private Rented Sector will disproportionately benefit households under 35.</p>
Disability	✓			<p>The council has a legal duty to adapt properties to make them safe and accessible under the Housing and Regeneration Act 1996, and the strategy expands on this act using flexibilities allowed under the Regulatory Reform (Housing Assistance) Order 2002. Adaptability and Accessibility of</p>

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				new homes are promoted through the M4(2) optional Building Regulation reflection the spatial framework and GM Strategy. There is direct provision of housing for people with Learning Disabilities, Autism and Mental Health problems.
Ethnicity		✓		There are differences in home ownership between different ethnic groups in Tameside, Asian /Asian British households or more likely to own their own home than average, however black/black british and mixed heritage households are significantly less likely to be home owners than average and therefore more likely to have insecure tenures, threatened with

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				homelessness and in need of affordable housing,
Sex			✓	Whilst services are not gender specific, it is clear demand for certain services can be highly skewed towards gender. For example single homeless people and those at risk of rough sleeping are far more likely to be male, and the families at risk of homelessness and domestic abuse are far more likely to have a female as the lead applicants. The gender differences are due to societal reasons and typical across the country. However on balance there will be positive impacts irrespective of gender.
Religion or Belief		✓		Larger homes and increased supply of larger affordable

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				housing will have a positive impact on faiths which have been identified as having larger households and increased instances of overcrowding from census information.
Sexual Orientation			✓	No evidence has been found to suggest a positive or negative impact compared to the population as a whole.
Gender Reassignment			✓	No evidence has been found to suggest a positive or negative impact compared to the population as a whole.
Pregnancy & Maternity		✓		Indirectly due to increasing supply of affordable housing to assist households with additional bedroom needs.
Marriage & Civil Partnership			✓	There is no evidence to suggest that the strategy will have any impact on positive or

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				negative based on marital status.
<b>Other protected groups determined locally by Tameside and Glossop Strategic Commission?</b>				
<b>Group (please state)</b>	<b>Direct Impact/Relevance</b>	<b>Indirect Impact/Relevance</b>	<b>Little / No Impact/Relevance</b>	<b>Explanation</b>
Mental Health	✓	✓		There will be direct provision for this group were there is a duty under the care act to provide more suitable accommodation where required.
Carers		✓		This group has community contribution priority through the allocations policy, and also a priority banding if foster carers, and it expected that the strategy will be conducive to an increased supply of social housing to be allocated.
Military Veterans		✓		This group has additional priority through the allocations policy, and it expected that the strategy will be conducive to an increased supply



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				of social housing to be allocated.
Breast Feeding			✓	No likelihood on any impact on breastfeeding.
<p><b>Are there any other groups who you feel may be impacted by the project, proposal or service/contract change or which it may have relevance to?</b></p> <p><i>(e.g. vulnerable residents, isolated residents, those who are homeless)</i></p>				
<b>Group (please state)</b>	<b>Direct Impact/Relevance</b>	<b>Indirect Impact/Relevance</b>	<b>Little / No Impact/Relevance</b>	<b>Explanation</b>
Low or no income groups	✓	✓		Households on low incomes are the most likely to benefit from priority 2, which seeks to maximise the delivery of a wide range of affordable housing. Most housing services assist households based on need, and lower income households are far more likely to be in need of the whole range of housing services.
Disadvantaged Families	✓	✓		Disadvantaged families are more likely to be in need of a range of housing services, including

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				affordable housing and assistance from the Housing Advice teams and with Private Sector Landlord issues, and the majority of the strategy will have positive direct or indirect impacts on this group.
Gypsies and Travellers	✓			Need identified by the GM GTTSAA is being directly addressed.

*“Low or no income groups” should be included as a key consideration when assessing the impact of your project, proposal, policy or service/contract change.*

*Wherever a direct or indirect impact or relevance has been identified you should consider undertaking a full EIA or be able to adequately explain your reasoning for not doing so. Where little / no impact or relevance is anticipated, this can be explored in more detail when undertaking a full EIA.*

1d.	Does the project, proposal or service / contract change require a full EIA?	Yes	No
		✓	

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<b>1e.</b>	<b>What are your reasons for the decision made at 1d?</b>	<p>The Strategy as a whole promotes positive impacts in terms of and improved housing offer which will help the most vulnerable and disadvantaged cohorts more than the population in Tameside in general. It is anticipated that the development and implementation will not have direct or indirect negative impacts in a significant sense. Positive direct impacts have been identified for several areas.</p> <p>As this high level strategy will be implemented via various policies, strategies and action plans, it is considered that equalities implications of actions arising should be assessed by completing EIAs on a case-by-case basis.</p>
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*If a full EIA is required please progress to Part 2.*

**PART 2 – FULL EQUALITY IMPACT ASSESSMENT**

<b>2a. Summary</b>
<p>An EIA was undertaken as the Housing Strategy is a major document, housing affects everyone’s lives, and the strategy aims to have a significant positive impact on the borough.</p> <p>This is the first overarching Housing Strategy since 2010 and the following priorities were devised as part of the strategy formulation process:</p>

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- Delivering sustainable housing growth to support economic development and the increasing population
- Maximising the delivery of a wide range of affordable housing to meet the needs of all household
- Meeting the housing and related support needs of an ageing population.
- Ensuring the specialist and supported housing offer meets current and future needs
- Improving the quality standards and management of the private rented sector
- The prevention of homelessness and rough sleeping

<b>2b. Issues to Consider</b>
<p><b>Age</b></p> <p>2 priorities of the strategy are age related, for young people coming through the care system and older people in particular the provision of general needs and specialist accommodation to meet the needs of these client groups which were identified by the Children’s and Adults social care services as well as the Housing Needs Assessments. Whilst the strategy should have a positive impact on people of all ages, home ownership in adults under 35 is around a half of those over 35 so the provision of increased numbers of affordable housing will indirectly benefit younger people more.</p> <p>Over the period 2014 to 2035, there is expected to be a 157% increase in the requirement for older persons’ specialist provision. However, when the current (2014) supply of accommodation is compared with change in demand to 2035, data would suggest a need to increase the current level of provision for older people, particularly the provision of sheltered housing and Extra Care 24/7 support. By 2035 there will be a shortage of 1,711 units of sheltered housing in Tameside and 866 units of accommodation with support by 2035. The current social housing stock for older people may become unfit for purpose over the next two decades. Decommissioned provision will need to be replaced. The updated Housing Needs Assessment confirms that there is no supply in Tameside of enhanced sheltered housing but a demand for 584. The need for specialist accommodation to be provided for adults has been addressed by the strategy, including 5 extra care schemes in the pipeline with over 400 units in the medium term.</p> <p>Given the above, it is considered that there are both direct and indirect positive impacts expected from the strategy in relation to age.</p> <p><b>Disability</b></p> <p>Across Tameside, the 2017 Household Survey identified a total of 33,281 households (31.7%) which contained at least one person with an illness/disability. The most frequently mentioned</p>

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illnesses/disabilities across the borough were physical / mobility impairment (experienced by at least one person in 9.0% of households), long standing illness or health condition (7.1%) and ' other' illness / disability (5.3%). 7.2% of households said they required care or support to enable them to stay in their current home. The local housing authority has a statutory duty to make people's homes safe and accessible if there is a disable person within the household, however his is means tested with adults. Using flexibilities under RRO 2002 will improve the outcomes for disabled people, along with the adoption of optional M building control standards as indicated. There are also people covered by the Care Act 2014 who will be provided with more suitable homes to meets their needs. These direct positive impacts stated are intentional.

### **Ethnicity**

Identified in the Census 2011, of all Ethnic Groups 6.1% were over-occupied by at least 1 bedroom, however this figure was 15.8% for Asian/Asian British households and 18.7% Black/African/Caribbean/Black British households. The overcrowding issue is clearly linked to household sizes and availability of suitable affordable homes. The Strategy seeks to increase the supply of larger homes across the board, along with increased numbers of affordable homes, and will help to mitigate overcrowding. Therefore positive impacts caused by the strategy in relation to ethnicity are expected.

### **Religion or Belief**

Similar to the above, 21.4% of Muslim households were overcrowded in Tameside as of 2011 compared to 6.1% of all households, and issue to strategy hopes to mitigate there the delivery of larger affordable homes, as well as enabling other innovative routes to home ownership. Therefore positive impacts caused by the strategy in relation to religion or belief are expected.

### **Pregnancy or Maternity**

There would be some indirect impact expected for women who are pregnant or on maternity from a housing perspective, as some will be looking for an extra bedroom which would be awarded through the social housing allocations policy dependant on household composition. Whilst the strategy will not change the policy, it is seeking to increase the number of properties that would be allocated in the borough, and whilst this benefits everyone on the Housing Register, households with a member pregnant or who have a new born child are more likely to find themselves in acute need for an extra bedroom. Therefore there is a suggestion of an indirect positive impact for this cohort.

### **Mental Health**

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Research from St. Mungo's suggests that over half the people who rough sleep and are UK nationals need help for a mental health problem, and evidence from Tameside's homelessness database shows that 455 out of 2,909 (15.6%) households that contacted the Tameside Housing Advice service from August 2020 to July 2021 are in need of support due to their mental health, and 205 out of 717(28.6%) of households who were or became homeless in the same time period needed support due to mental health. Therefore improvements to homelessness, allocations, and the housing offer through the strategy, whilst potentially benefiting all households, will disproportionately have a positive impact on those with mental health issues as they are more likely to be in housing need. As well as the indirect positive impacts there are also expected to be positive direct impacts Priority 4 - Ensuring the specialist and supported housing offer meets current and future needs.

### **Carers**

Under the Localism Act 2011 Local Authorities have been given powers to set their own qualifying criteria on who can join their schemes. In Tameside it has been decided to use our own qualifying criteria and to restrict the scheme to the following households who have a proven housing need, and people who need to move home to allow them to undertake foster parent duties requested by the council are included.

Applicants where a member of the household needs to move to another locality and in doing so relieve hardship for either themselves, or for someone they will be providing care for will be placed in band 2. On top of this foster carers will also receive community contribution priority within band 2 to give them more chance of being housed quicker

Reasonable Preference Criteria needed to qualify for an allocation in Tameside, and people who need to move to a particular locality to give or receive care are explicitly stated in the policy as being in a reasonable preference category.

Whilst the strategy does not change the policy itself, and will be reviewed in the lifetime of the strategy and become more conducive to its priorities. The additional social housing generated as a result of actions in the strategy will help all households looking for social housing in Tameside, however carers will have a greater positive impact given their priority.

It is therefore considered that there will be an indirect positive impact on Carers.

### **Military Veterans**

To qualify for allocation in Tameside the household has to live in the borough for 2 years, however there are exceptions, and people who are serving/have served in the UK armed forces, is one of them, as otherwise there is a possibility they would not meet the local connection criteria of any local authority. This exemption applies to all current serving UK Armed Forces members and their immediate families, as well as those who have left the armed forces providing they apply within 5 years of their leaving date. Armed forces members/former

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members in housing need are also given additional priority within the policy allowing them to be placed in band. The additional social housing generated as a result of actions in the strategy will help all households looking for social housing in Tameside, however carers will have a greater positive impact given their priority.

It is therefore considered that there will be an indirect positive impact on Military Veterans.

### **Low or no income groups**

Households on low incomes are most likely to benefit from Affordable Housing, with 64% of household in social housing not economically active, compared to 38% in all tenures. Delivering increased numbers of affordable homes to meet a diverse range of need is a key objective of the strategy, and therefore there are direct positive impacts expected. Also the majority of households who need assistance from the council, housing advice, social housing or help with homelessness are also not economically active, and improving the housing offer will therefore help people with lower incomes disproportionately higher than the population as a whole.

### **Disadvantaged Families**

Every improvement to the housing offer will have a positive impact wither directly or indirectly on disadvantaged households, as meeting unmet need is core to strategic housing due to the overlaps between disadvantage and priority need in homelessness legislation and reasonable preference in allocation law., and will benefit directly from improvements in the housing offers across the strategy including enhanced services, increased affordable housing and the prevention of homelessness.

### **Gypsies and Travellers**

The Housing Act 2004 gave us a duty to assess the housing needs of Gypsies, Travellers and Travelling Showpeople when the needs of the wider population are assessed in Strategic Housing Market Assessments, Housing Needs assessment or similar. Due to the housing needs of these groups being so specific and specialist, there needs would be lost in a general assessment and specialist studies have been carried out over the past 15 years on regional and sub-regional levels. The Greater Manchester Gypsy and Traveller and Travelling Showperson Accommodation Assessment Update 2018 identified the need for one additional Gypsy Traveller pitch in Tameside to cover the period from 2017-2036. This need is accounted for by the strategy, so there is considered to be a positive impact by the strategy on this cohort.

## **2c. Impact/Relevance**

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After reflecting on the issues to consider the impacts of the Housing Strategy, it is expected that they will be:

Directly and Indirectly positive for Age, Mental Health, Low Income Groups and Disadvantaged Families.

Directly positive for Disability and Gypsies & Travellers

Indirectly positive for Ethnicity, Religion or Belief, Pregnancy & Maternity, Carers and Military Veterans.

Have no significant impact on Sex, Sexual Orientation, Gender Reassignment and Marriage and Civil Partnership.

The strategy is a high level document, further consultation will be taken to ensure that other strategies and policies arising from this strategy do not have any unintended consequences affected any cohort in particular at the time when they are formulated

#### **2d. Mitigations** *(Where you have identified an impact/relevance, what can be done to reduce or mitigate it?)*

There are no undesirable impacts expected so there is no reason to mitigate them.

It is expected that the strategy would affect certain cohorts in a more positive way than others, as is the cohorts who are more likely to have housing need, and housing strategies focus on meeting housing need.

#### **2e. Evidence Sources**


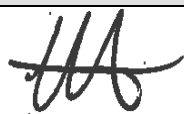
- Census 2011
- Housing Needs Assessment 2020
- Greater Manchester Gypsy and Traveller and Travelling Showperson Accommodation Assessment Update 2018
- Tameside Homelessness Data
- Tameside Housing Register Data
- 4 Week consultation via Survey Monkey July 2021
- PEN Consultation Event July 2021



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<b>2f. Monitoring progress</b>		
<b>Issue / Action</b>	<b>Lead officer</b>	<b>Timescale</b>
Consultation process review and learning.	Mick Coogan	July 2021
Review EIA annually.	Mick Coogan	August 2022
Review service user data from Tameside Housing Advice on an annual basis, along with other new data available, such as new studies or possible GMCA releases.	Mick Coogan	August 2022
Investigate 2021 Census data for changes to housing related equality data.	Mick Coogan	April 2023

<b>Signature of Contract / Commissioning Manager</b>	<b>Date</b>
 Patrick Nolan, Head of Housing, TMBC	25/8/2021
<b>Signature of Assistant Director / Director</b>	<b>Date</b>
 Gregg Stott, Assistant Director Investment, Development and Growth, TMBC	25/8/2021