

## EQUALITY IMPACT ASSESSMENT FORM INCLUDING SOCIO-ECONOMIC DUTY

(Revised March 2021)

Please refer to the current Equality Impact Assessment guidance when completing this document. If you would like further guidance please contact the Diversity and Inclusion Team on 01443 444529.

An equality impact assessment **must** be undertaken at the outset of any proposal to ensure robust evidence is considered in decision making. This documentation will support the Council in making informed, effective and fair decisions whilst ensuring compliance with a range of relevant legislation, including:

- Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011
- Socio-economic Duty – Sections 1 to 3 of the Equality Act 2010.

This document will also contribute towards our duties to create a More Equal Wales within the

- Well-being of Future Generation (Wales) Act 2015.

The [‘A More Equal Wales – Mapping Duties’](#) guide highlights the alignment of our duties in respect of the above-mentioned legislation.

## SECTION 1 – PROPOSAL DETAILS

Lead Officer: Claire Hutcheon

Service Director: Derek James

Service Area: Prosperity and Development

Date:

1.a) What are you assessing for impact?

| Strategy/Plan            | Service Re-Model/Discontinuation of Service | Policy/Procedure         | Practice                 | Information/Position Statement      |
|--------------------------|---|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/>                    | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

1.b) What is the name of the proposal?

Rhondda Cynon Taf Local Housing Market Assessment: Rhondda Cynon Taf Report of Findings July 2022

1.c) Please provide an overview of the proposal providing any supporting links to reports or documents.

In Wales local authorities have a requirement to consider the housing accommodation needs if their localities under Section 8 of the Housing Act 1985. In order to fulfill this requirement, Welsh Local Authorities must produce a LHMA (Local Housing Market Assessment). This assessment will consider the current state of the housing market, including the need for affordable homes of different tenures.

The LHMA provides understanding of the nature of the makeup of the current and future needs across RCT, providing robust evidence to support future plan making for the period of 15 years, 2022 – 2037.

The information produced by the assessment will be used by a range of internal and external stake holders such as RCT's Housing Strategy Team and Housing Developers. It will also play a huge part in the allocation of Social Housing Grant as it identifies the areas of RCT that are in the most need of affordable housing.

1.d) Please outline where delivery of this proposal is affected by legislation or other drivers such as code of practice.

As mentioned above the requirement for each local authority in Wales is set out in the Housing Act 1985 and are crucial for forming part of an evidence base that will feed in to the Local Development Plans and Local Housing Strategies. RCT CBC have an important role to play in community leadership and strategic housing. Under the Housing Act 1985 RCT CBC are also responsible for completing a review of housing need periodically. RCT CBC are required to rewrite the LHMA every 5 years and refresh the data that is held in the LHMA every 2 – 3 years, utilizing section 87 of the Local Government Act 2003.

Other relevant legislation:

- Housing (Wales) Act 2014
- Equality Act 2010
- Future Generations (Wales) Act 2015

1.e) Please outline who this proposal affects:

- Service users
- Employees
- Wider community

## SECTION 2 – SCREENING TEST – IS A FULL EQUALITY IMPACT ASSESSMENT REQUIRED?

Screening is used to determine whether the initiative has positive, negative or neutral impacts upon protected groups. Where negative impacts are identified for protected groups then a full Equality Impact Assessment is required.

Please provide as much detail as possible of how the proposal will impact on the following groups, this may not necessarily be negative, but may impact on a group with a particular characteristic in a specific way.

### Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011

The Public Sector Equality Duty requires the Council to have “due regard” to the need to eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity between different groups; and foster good relations between different groups. Please take an intersectional approach in recognising an individual may have more than one protected characteristic.

| <u>Protected Characteristics</u>  | Does the proposal have any positive, negative or neutral impacts | Provide detail of the impact   | What evidence has been used to support this view?  |
|---|--|--|--|
| <b>Age</b> ( <i>Specific age groups i.e. young people or older people</i> ) | Positive   | <p>Cwm Taf Morgannwg, Regional Partnership Board, 10-Year Strategic Capital Plan 31 July 2023 was used to assess the needs for older people in RCT. It was identified that there would be Age designated rent including suitable Sheltered Housing needed by 2025: 414 by 2035: 780</p> <p>Retirement for sale needed by 2025: 46 and by 2035: 87.</p> <p>Extra Care Rent: by needed 2025 and by 2035: 214</p> <p>Extra Care for sale by needed 2025: 7 and by 2035: 24</p> <p>Step Up/Step Down by needed 2025: 2</p> | Cwm Taf Morgannwg, Regional Partnership Board, 10-Year Strategic Capital Plan 31 July 2023 |

|   |                  |  |  |
|---|------------------|--|--|
|   |                  | <p>and by 2035: 6<br/>Nursing Care Beds needed by 2025: 226 and by 2035: 406</p> <p>Using these figures, the council is able to direct funding from Social Housing Grant and Housing Care Fund to the development of the needed units above.</p> <p>Young people over the age of 16 with no additional disabilities fall in to the general needs category of housing. It is identified that 7,285 market and affordable housing will be need to be constructed over the period 2022-37 to meet the need. Again with a healthy SHG development programme and an up to date Local Development plan we are able to suitable properties are build to meet this need.</p> | <p>Welsh Government LHMA toolkit (Source: <a href="https://www.gov.wales/local-housing-market-assessment-lhma-guidance-local-authorities">https://www.gov.wales/local-housing-market-assessment-lhma-guidance-local-authorities</a>)</p>   |
| <p><b>Disability</b><br/><i>(people with visible and non-visible disabilities or long-term health conditions)</i></p> | <p>Positive:</p> | <p>Paragraph 4.2.11 of the Planning Policy Wales (PPW) (edition 10, Dec 2018) identifies that authorities should plan for households with specific needs.</p> <p>It is with this in mind that it is appropriate for new homes to meet the Lifetime Home Standards that are incorporated in to the Welsh Government Design Quality</p>  | <p>Paragraph 4.2.11 PPW 10:<br/><i>“Planning authorities should also identify where interventions may be required to deliver the housing supply, including for specific sites. There must be sufficient sites suitable for the full range of housing types to address the identified needs of communities, including the needs of older people and people with</i></p> |

|  |  |   |  |
|--|--|---|--|
|  |  | <p>Requirements which is now a mandatory standard for any homes classed as affordable or aided in development by Welsh Government grant.</p> <p>It has also been identified in this assessment that Disabled Facilities Grants (DFG) are the main resource by where existing stock can be adapted to meet the needs of its current/future occupants. RCT CBC provides these grants to carry out a range of work ranging from major building work to minor adaptations.</p> <p>This assessment has projected census data supported by information from the department of work and pensions to ascertain that there are currently 42,888 households in RCT that have long-term illness or a disability. It is therefore evermore important that RCT</p> | <p><i>disabilities. In this respect, planning authorities should promote sustainable residential mixed tenure communities with 'barrier free' housing, for example built to Lifetime Homes standards to enable people to live independently and safely in their own homes for longer."</i></p> <p>The Lifetime Homes concept is based on five overarching principles:</p> <ul style="list-style-type: none"> <li>Inclusivity.</li> <li>Accessibility.</li> <li>Adaptability.</li> <li>Sustainability.</li> <li>Good value.</li> </ul> <p>Wales Audit Office, 2018 Crisis Paper.</p> <p>LHMA 2022/27 Households with disabilities (Source, Census 2021, DWP.)</p> |
|--|--|---|--|

|  |          |  |  |
|--|----------|--|--|
|  |          | CBC keep developing homes through Welsh Government's SHG to the DQR standards to meet this need.   |  |
| <p><b>Gender Reassignment</b><br/> <i>(anybody who's gender identity or gender expression is different to the sex they were assigned at birth including non-binary identities)</i></p> | Neutral: | <p>The purpose of the LHMA is to identify housing need across RCT to allow the council to deliver housing where it is needed, regardless of gender or identity.</p> <p>However the council does recognise that members of the LGBTQ+ community will benefit from having accessible affordable housing in areas that prior to this LHMA would not have been identified.</p> |  |

| <b><u>Protected Characteristics</u></b>   | <b>Does the proposal have any positive, negative or neutral impacts</b> | <b>Provide detail of the impact</b>  | <b>What evidence has been used to support this view?</b> |
|---|---|--|--|
| <b>Marriage or Civil Partnership</b><br><i>(people who are married or in a civil partnership)</i> | Neutral   | <p>The purpose of the LHMA is to identify housing need across RCT to allow the council to deliver housing where it is needed, regardless of marital or partnership status.</p> <p>However the council does collect this data when completing an application to the common housing register on behalf of services users. This data is then used to calculate bedroom need based on numbers only. This data set has been used to identify current and projected need across the plan period but the partnership status has no impact on the output of this data.</p> | Common housing register (Homefinder RCT)                 |
| <b>Pregnancy and Maternity</b><br><i>(women who are pregnant/on maternity leave)</i>              | Neutral   | <p>The purpose of the LHMA is to identify housing need across RCT to allow the council to deliver housing where it is needed, regardless of pregnancy or maternity.</p> <p>However the council does collect pregnancy data when completing an application to the common housing register on behalf of services users. This data is then used to calculate bedroom need based on numbers only. This data set has been used to identify current and projected need across the plan period but the partnership status has no impact on</p>                            | Common housing register (Homefinder RCT)                 |

|  |         |  |  |
|--|---------|--|--|
|  |         | the output of this data.   |  |
| <b>Race</b><br><i>(ethnic and racial groups i.e. minority ethnic groups, Gypsy, Roma and Travellers)</i>                         | Neutral | <p>The purpose of the LHMA is to identify housing need across RCT to allow the council to deliver housing where it is needed, regardless of race.</p> <p>However the council does complete a separate accommodation needs assessment for the Gypsy Traveller community.</p>  |  |
| <b>Religion or Belief</b><br><i>(people with different religions and philosophical beliefs including people with no beliefs)</i> | Neutral | <p>The purpose of the LHMA is to identify housing need across RCT to allow the council to deliver housing where it is needed, regardless of religion or belief.</p>  |  |
| <b>Sex</b><br><i>(women and men, girls and boys)</i>   | Neutral | <p>The purpose of the LHMA is to identify housing need across RCT to allow the council to deliver housing where it is needed, regardless of sex.</p> <p>However the council does collect this data when completing an application to the common housing register on behalf of services users. This data is then used to calculate bedroom need based on numbers only. This data set has been used to identify current and projected need across the plan period but the partnership status has no impact on the output of this data.</p> | Common housing register (Homefinder RCT) |

|  |                |  |  |
|--|----------------|--|--|
| <p><b>Sexual Orientation</b><br/><i>(bisexual, gay, lesbian, straight)</i></p> | <p>Neutral</p> | <p>The purpose of the LHMA is to identify housing need across RCT to allow the council to deliver housing where it is needed, regardless of sexual orientation.</p> <p>However the council does recognise that members of the LGBTQ+ community will benefit from having accessible affordable housing in areas that prior to this LHMA would not have been identified.</p> |  |
|--|----------------|--|--|

In addition, due to Council commitments made to the following groups of people we would like you to consider impacts upon them:

|  | Does the proposal have any positive, negative or neutral impacts | Provide detail of the impact   | What evidence has been used to support this view? |
|--|--|--|---|
| <b>Armed Forces Community</b><br><i>(anyone who is serving, has served, family members and the bereaved)</i> | Neutral  | As the LHMA pulls data from the common housing register the local authority has a duty to assess all housing applications that present, including the Armed Forces Community. Therefore this cohorts data set is included in the LHMA. | Common Housing Register (Homefinder RCT)          |
| <b>Carers</b><br><i>(anyone of any age who provides unpaid care)</i>   | Neutral  | As the LHMA pulls data from the common housing register the local authority has a duty to assess all housing applications that present, including carers. Therefore this cohorts data set is included in the LHMA.                     | Common Housing Register (Homefinder RCT)          |

If the initial screening test has identified negative impacts then a full equality impact assessment (section 4) **must** be undertaken. However, if after undertaking the above screening test you determine a full equality impact assessment is not relevant please provide an adequate explanation below:

Are you happy you have sufficient evidence to justify your decision?

Yes

No

Name: Liam Richards

Position: Housing Strategy Officer

Date: 31/01/2024

Please forward a copy of this completed screening form to the Diversity and Inclusion Team.

PLEASE NOTE – there is a separate impact assessment for Welsh Language. This must also be completed for proposals.

Section 3 Socio-economic Duty needs only to be completed if proposals are of a strategic nature or when reviewing previous strategic decisions. Definition of a 'strategic nature' is available on page 6 of the [Preparing for the Commencement of the Socio-economic Duty](#) Welsh Government Guidance.

### **SECTION 3 – SOCIO-ECONOMIC DUTY (STRATEGIC DECISIONS ONLY)**

The Socio-economic Duty gives us an opportunity to do things differently and put tackling inequality genuinely at the heart of key decision making. Socio-economic disadvantage means living on a low income compared to others in Wales, with little or no accumulated wealth, leading to greater material deprivation, restricting the ability to access basic goods and services.

Please consider these additional vulnerable groups and the impact your proposal may or may not have on them:

- Single parents and vulnerable families
- Pensioners
- Looked after children
- Homeless people
- Students
- Single adult households

- People living in the most deprived areas in Wales
- People with low literacy and numeracy
- People who have experienced the asylum system
- People misusing substances
- People of all ages leaving a care setting
- People involved in the criminal justice system

| <b><u>Socio-economic disadvantage</u></b>   | <b>Does the proposal have any positive, negative or neutral impacts</b> | <b>Provide detail of the impact</b> | <b>What evidence has been used to support this view?</b> |
|---|---|-------------------------------------|--|
| <b><u>Low Income/Income Poverty</u></b><br><i>(cannot afford to maintain regular payments such as bills, food, clothing, transport etc.)</i>  | Select from the following:  |                                     |  |
| <b><u>Low and / or No Wealth</u></b><br><i>(enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provisions for the future)</i>        | Select from the following:  |                                     |  |
| <b><u>Material Deprivation</u></b><br><i>(unable to access basic goods and services i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, hobbies etc.)</i> | Select from the following:  |                                     |  |

| <b><u>Socio-economic disadvantage</u></b>  | <b>Does the proposal have any positive, negative or neutral impacts</b> | <b>Provide detail of the impact</b> | <b>What evidence has been used to support this view?</b> |
|--|---|-------------------------------------|--|
| <b><u>Area Deprivation</u></b><br><i>(where you live (rural areas), where you work (accessibility of public transport))</i>  | Select from the following:  |                                     |  |
| <b>Socio-economic background</b><br><i>(social class i.e. parents education, employment and income)</i>  | Select from the following:  |                                     |  |
| <b>Socio-economic disadvantage</b><br><i>(What cumulative impact will the proposal have on people or groups because of their protected characteristic(s) or vulnerability or because they are already disadvantaged)</i> | Select from the following:  |                                     |  |

## SECTION 4 – FULL EQUALITY IMPACT ASSESSMENT

You should use the information gathered at the screening stage to assist you in identifying possible negative/adverse impacts and clearly identify which groups are affected.

- 4.a) In terms of disproportionate/negative/adverse impacts that the proposal may have on a protected group, outline the steps that will be taken to reduce or mitigate the impact for each group identified. **Attach a separate action plan where impacts are substantial.**

N/A

- 4.b) If ways of reducing the impact have been identified but are not possible, please explain why they are not possible.

N/A

- 4.c) Give sufficient detail of data or research that has led to your reasoning, in particular, the sources used for establishing the demographics of service users/staff.

The data used in this report can be found in the final LHMA with reference to the data sources such as ONS and Stats Wales.

- 4.d) Give details of how you engaged with service users/staff on the proposals and the steps taken to avoid any disproportionate impact on a protected group. Explain how you have used feedback to influence your decision.

N/A

- 4.e) Are you satisfied that the engagement process complies with the requirements of the Statutory Equality and Socio-economic Duties?

Yes

No

## SECTION 5 – MONITORING AND REVIEW

5a) Please outline below how the implementation of the proposal will be monitored:

The LHMA will be reviewed and updated again by September 2024 as on the 21 March 2022 Welsh Government Published new guidance that all local authorities must adopt at the next iteration.

5b) When is the evaluation of the proposal due to be reviewed?

N/A

5c) Who is responsible for the monitoring and review of the proposal?

RCT CBC's Housing Strategy Team will carry out the next LHMA.

5d) How will the results of the monitoring be used to develop future proposals?

The next LHMA will set out where investment is needed in RCT to meet the housing needs of the county borough.

## SECTION 6 – REVIEW

As part of the Impact Assessment process all proposals that fall within the definition of ‘Key Decisions’ must be submitted to the Review Panel. This panel is made up of officers from across Council Services and acts as a critical friend before your proposal is finalised and published for SLT/Cabinet approval.

If this proposal is a Key Decision please forward your impact assessment to [Councilbusiness@rctcbc.gov.uk](mailto:Councilbusiness@rctcbc.gov.uk) for a Review Panel to be organised to discuss your proposal. The EqlA guidance document provides more information on what a Key Decision is.

It is important to keep a record of this process so that you can demonstrate how you have considered equality and socio-economic outcomes. Please ensure you update the relevant sections below

|                                      |                        |   |
|--------------------------------------|------------------------|---|
| <b>Officer Review Panel Comments</b> | <b>Date Considered</b> | <b>Brief description of any amendments made following Officer Review Panel considerations</b> |
|                                      |                        |   |
| <b>Consultation Comments</b>         | <b>Date Considered</b> | <b>Brief description of any amendments made following consultation</b>                        |
|                                      |                        |   |

## **SECTION 6 – SUMMARY OF IMPACTS FOR THE PROPOSAL**

Provide below a summary of the impact assessment. This summary should be included in the equality and socio-economic impact section of the Cabinet report template. The impact assessment should be published alongside the report.

In summary there are many positive impacts to groups that are covered in the equality impact assessment. As the LHMA is an assessment of all housing need across RCT it naturally takes in to account all cohorts and it will inform future projects/strategies/policies on key data points relating to current and future demand across the county borough.

## **SECTION 7 – AUTHORISATIONS**

Lead Officer: Liam Richards

Name: Liam Richards

Position: Housing Strategy Officer

Date: 28/07/2022

I recommend that the proposal:

- Is implemented with no amendments
- Is implemented taking into account the mitigating actions outlined
- Is rejected due to disproportionate negative impacts on protected groups or socio-economic disadvantage

Head of Service/Director Approval:

Name:

Position:

Date:

Please submit this impact assessment with any SLT/Cabinet Reports.