

## Carmarthenshire County Council

### Equalities Impact Assessment

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| <b>Department:</b><br><br>Communities Department  | <b>Completed by (lead):</b><br><br>Gareth Williams   | <b>Date of initial assessment:</b><br><br>January 2021<br><br><b>Revision Dates:</b> |
| <b>Area to be assessed: (i.e. name of policy, function, procedure, practice or a financial decision)</b>  | Carmarthenshire Homes Standard PLUS (CHS+) Business Plan 2021/2024   |  |
| <b>Is this existing or new function/policy, procedure, practice or decision?</b>  | New delivery plan to explain the vision and detail of the Carmarthenshire Homes Standard Plus over the next three years, and what it means for tenants.<br><br>To confirm the financial profile, based on current assumptions, for the delivery of the CHS+ over the next three years.<br><br>The Plan enables us to submit the annual application to Welsh Government (WG) for Major Repairs Allowance (MRA) for 2021/22, equating to £6.2m |  |
| <b>What evidence has been used to inform the assessment and policy? (please list only)</b>  |  |  |
| <ul style="list-style-type: none"> <li>• Tenant Profile</li> <li>• Housing Register Applicant Profile – Canfod Cartref</li> <li>• Universal Credit Tenant Payment Profile</li> <li>• Resident Choice acceptable fail Profile</li> <li>• Details of our Housing Assets</li> <li>• Analysis of the delivery programmes of repair, maintenance and improvement, as well as potential redevelopment of some of the most uneconomic stock. Set in the context of maintaining 100% compliance against WG’s, Welsh Housing Quality Standard (WHQS), which we will continue to do through the CHS+</li> <li>• Latest stock condition information</li> </ul> |  |  |

- Updated financial information
- Welsh Government Guidance
- STAR Tenant Satisfaction Survey June-July 2019

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| <p><b>1. Describe the aims, objectives or purpose of the proposed function/policy, practice, procedure or decision and who is intended to benefit.</b></p>        | <p>This equality impact assessment covers our Carmarthenshire Homes Standard PLUS (CHS+) Business Plan 2021/2024. The WHQS is the WG's standard of social housing quality. The WHQS was first introduced in 2002 and aimed to ensure that all homes are of good quality and suitable for the needs of existing and future residents. WG set a target for all social landlords to improve their housing stock to meet the WHQS as soon as possible, but in any event by 2020.</p> <p>The plan is intended to benefit Carmarthenshire Councils tenants, who developed their own standard, called the CHS+. This was successfully delivered in 2015, well in advance of the WG timescales.</p> <p>The purpose of the Plan is to explain the vision and detail of the CHS+, and what it means for tenants. It also confirms the financial profile, based on current assumptions, for the delivery of the CHS+ over the next three years. The approved Plan enables us to submit our annual application to WG for Major Repairs Allowance (MRA) for 2021/22, which amounts to £6.2m.</p> <p>Whilst engaging with tenants and stakeholders in the lead up to developing this business plan has been difficult because of the pandemic we have considered their views and included these within the plan. The Plan is updated annually taking into account these views, the latest stock condition information, updated financial information, WG Guidance and any revised Council policies.</p> <p>All actions in the Plan will be monitored on a bi-monthly basis by the CHS+ Working Group. This group provides strategic direction and corporate leadership to ensure appropriate progression on the initiatives included. The CHS+ Working Group is also responsible for monitoring progress, reviewing and managing the overall 30-year financial plan that supports our planned investment.</p> <p>The Plan will affect all tenants regardless of the type of accommodation they live in, their age, disability, gender, transgender, relationship arrangements, race, religion and sexual orientation.</p> |  |  |
| <p><b>The Public Sector Equality Duty requires the Council to have “due regard” to the need to:-</b></p> <p>(1) eliminate unlawful discrimination, harassment</p> | <p><b>2. What is the level of impact on each group/ protected characteristics in terms of the three aims of the duty?</b></p> <p><b>Please indicate high (H) medium (M),</b></p>  | <p><b>3. Identify the risk or positive effect that could result for each of the group/protected characteristics?</b></p> | <p><b>4. If there is a disproportionately negative impact what mitigating factors have you considered?</b></p> |

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| and victimisation;<br><br><b>(2)</b> advance equality of opportunity between different groups; and<br><br><b>(3)</b> foster good relations between different groups (see guidance notes) |                   | <b>low (L), no effect (N) for each.</b> | <b>Risks</b>  | <b>Positive effects</b>   |  |
| <b>Protected characteristics</b>   | <b>Age</b>        | Medium                                  | From the current data available all the groups will be affected by Priorities in the Plan to some extent. No one age group will be disproportionately affected or singled out. Our plan makes provision for young people who have previously been marginalised through national policy changes. | STAR survey results show that residents aged 65+ had significantly higher level of satisfaction (90%). Unlike most other STAR surveys, the very youngest respondents aged 25 and under were also very satisfied (91%).  | The Plan sets out how we have been able to keep the rent increase to the minimum allowed under the current WG recommendations.<br><br>At the same time, we have also been able to maintain our significant investment in existing homes as well as providing much needed, additional affordable homes.<br><br>We will continue to engage with our tenants and consult on improvements to their homes, their rents and communities. |
|  | <b>Disability</b> | Medium                                  | Ensuring that we support our most vulnerable tenants and allowing them to remain independent through adapting their homes is a high priority and this is reflected within the plan.   | The Plan commits £4m to deliver adaptations to support people with disabilities over 3 years. Adaptations will be prioritised based on individual's needs.<br><br>The Plan also sets out how we will continue to utilise our stock through the Accessible Housing | We are continuing our programme of providing adaptations for our tenants to ensure that our homes meet their needs.<br><br>We continually monitor the AHR to ensure that adaptations are delivered in a timely manner or alternative housing is sourced in the area of choice.<br><br>We may also decide to build or buy   |

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|                                |             |   | Register (AHR), where a void property with existing adaptations is matched to a client on the AHR whose needs will be met.   | properties that are suitably adapted to meet our tenants needs.   |
| <b>Gender reassignment</b>     | Low         | No risks have been identified within the plan that would negatively impact this group     | The Plan will not discriminate against people individuals within this group and their needs assessed on an individual basis and appropriate measures put in place.   | We will continually review the Plan so that it is reflective of individuals needs. This will be done through tenant engagement.   |
| <b>Race</b>                    | As previous | As previous   | As previous  | As previous   |
| <b>Religion/Belief</b>         | As previous | As previous   | As previous  | As previous   |
| <b>Pregnancy and maternity</b> | As previous | As previous   | As previous  | As previous   |
| <b>Sexual Orientation</b>      | As previous | As previous   | As previous  | As previous   |
| <b>Sex</b>                     | As previous | As previous   | As previous  | As previous   |
| <b>Welsh language</b>          | Medium      | Of those that responded to the STAR survey results only 4% of surveys completed in Welsh. | Increasing the supply of affordable homes in the County will provide community benefits. Employment and training opportunities may encourage people to stay in their local communities. Helping people stay in the county will have a positive impact on the Welsh | Providing affordable homes and supporting the local economy may promote and encourage the Welsh language and Welsh culture across the County particularly in rural areas. |

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|  |        |   | language.   |  |
| <b>Rent Setting Policy (Affordability)</b> | Medium | <p>The proposed Rent Policy may affect tenants that make a Universal Credit claim, are in deprived Wards and/ or those that currently paying below the target rent where the £1 progression will apply.</p> <p>Since we became a full- service UC County December 2018 Carmarthenshire 1855 households have migrated to UC with a further 3693 that could if their circumstances changed. However, the impact of Covid on unemployment is unknown and this number could increase.</p> <p>Based on current information, 13% of our tenants who will be affected by our current rent progression Policy receive Universal Credit and 35% receive full Housing</p> | <p>The Plan sets out how we have been able to keep the rent increase (an average of 1.5% i.e. CPI plus 1%) to the minimum allowed under the current WG's social housing rents policy. Considering the circumstances and the effects of Covid this is the lowest it has been for the past 20 years.</p> <p>Applying the £1 progression means that for the majority of our tenants will receive an increase of 1.3%</p> <p>We anticipate that in the short to medium term arrears will rise and to ensure sustainability we have allowed for this within this plan in terms of our bad debt provision and prevention fund to mitigate the impact on the affected household, prevent homelessness and preserve the budget.</p> <p>Increasing the rent in line with WG Policy will help</p> | <p>To mitigate the impact we will:</p> <p>Continually monitor tenants' arrears and take appropriate action to mitigate any risk so that they are able to maintain the tenancy.</p> <p>For those where the £1 progression applies (approximately 19% of our tenants) we will isolate those that are likely to be adversely affected and ensure that the Housing Officers contact them to offer support and assistance to ensure they continue to pay their rent. All reasonable measures will be taken to mitigate the risk of homelessness.</p> <p>Supporting tenants to pay their rent will ensure that the income consistent and to delivering the CHS+ programme is maintained.</p> <p>Through our capital monitoring programme we will continually monitor the spending against the budget to maintain the CHS+ programme and deliver more affordable homes.</p> |

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|  |  |  | Benefit. | maintain the CHS investment programme and bring with it other community benefits. |  |
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| <p><b>5. Has there been any consultation/engagement with the appropriate protected characteristics?</b></p>   | <p>Yes</p> <p>Tenant and community engagement have always underpinned the delivery of the CHS+, but we want to do more. We want to get better by engaging as widely as possible and maximising opportunities to help build stronger communities.</p> |
| <p><b>6. What action(s) will you take to reduce any disproportionately negative impact, if any?</b></p> <p>We have reviewed the participation techniques we currently use, and it showed that newsletters are by far the most popular means of communication for tenants. There are three further methods of participation that we can use to improve the way we communicate with tenants. These are:</p> <ul style="list-style-type: none"> <li>• More use single issue meetings</li> <li>• Increased use of digital participation</li> <li>• Strengthening challenge and responsibility</li> </ul> <p>We aim to deliver on these principles by introducing the following new activities:</p> <ul style="list-style-type: none"> <li>• Changing the current structures of tenant involvement to encourage more involvement from under-represented groups</li> <li>• Improving systems for gathering and acting on tenant feedback</li> <li>• Using 'Planning for Real' as a method of engagement and consultation on estate issues</li> <li>• Increasing the use of digital services to reach out to under-represented groups and to those who do not want to attend meetings</li> <li>• Putting forward proposals for a Challenge Panel for our tenants</li> <li>• Holding single issue meetings</li> <li>• Using the baseline data established from the 2019 STAR survey results to identify areas of improvement and further increase tenant involvement in how we shape our service. Re-survey every three years and periodically on single issues that have been identified.</li> </ul> |  |
| <p><b>7. Procurement</b></p> <p><b>Following collation of evidence for this assessment, are there any procurement implications for the activity, proposal or service.</b></p>   |  |

**Please take the findings of this assessment into your procurement plan. Contact the corporate procurement unit for further advice.**

Many of the projects which form part of the Plan e.g. building new homes and upgrading homes to the CHS+ will have implications for the building and construction industry. All building and construction works are currently carried out through the Council's contractor partnering frameworks which are procured through the Council procurement policies and procedures. This will continue to be the case for all projects relating to this Plan. The Council is committed to ensuring Community benefits are delivered through this programme by:

- Contributing to the social, economic and environmental well-being of the wider community
- Asking tenderers to deliver community benefits in our tendering activities through the delivery of the contracts or frameworks awarded
- Maximising the value for every pound we spend, applying a community benefits approach to any tender valued over £1million
- Capturing and recording community benefits utilising Value Wales Measurement Toolkit

#### **8. Human resources**

**Following collation of evidence for this assessment, are there any human resource implications for the activity, proposal or service?**

The delivery of this Plan considers the additional staffing resources required for meeting the decarbonisation agenda and developing a new standard.

The impact of Universal Credit on our tenants and on us as a Business will be closely monitored by the CHS+ Working Group on a regular basis to identify any potential resource issues.

**9. Based on the information in sections 2 and 6, should this function/policy/procedure/practice or a decision proceed to Detailed Impact Assessment?** (recommended if one or more H under section 2)

YES

NO

**Approved by:**

Head of Service

**Jonathan Morgan**

**Date:**