



## Equality Impact Assessment

<b>Name of project/strategy/service being assessed</b>	<b>Future provision of Temporary Accommodation in Wycombe – new build scheme in place of Saunderton Lodge</b>	<b>Cabinet meeting date <i>If applicable</i></b>	<b>13 November 2017</b>
<b>Service area</b>	<b>Housing Service</b>	<b>Date EIA created</b>	<b>17<sup>th</sup> September 2018</b>
<b>Name of Completing Officer</b>	<b>Brian Daly</b>		
<b>Approved by Head of Service</b>	<b>Nigel Dicker</b>	<b>Date approved</b>	<b>26<sup>th</sup> November 2018</b>

Equality Impact Assessments (EIA's) are designed to ensure that Wycombe District Council complies with all relevant legislation and fulfils its duty under the Public Sector Equality Duty (PSED). This comprises of three limbs which are set out in Section 149(1) of the Equality Act 2010. This requires that all public bodies, in the exercise of its functions, to have '**due regard**' to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Each service area has an Equality Champion (see the Equalities tab on WySpace for an up to date list). Please ensure that the relevant Champion is aware that an EIA is being undertaken as, if needed, your Equality Champion can provide advice and guidance on completing the EIA. Guidance on the completion of an EIA, along with information on the PSED and protected



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characteristics can be found in the documents section of the Equality page on WySpace (via the Corporate tab), along with a quick reference guide located here as Appendix 1.



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### Stage 1 – Initial Scope of the Equality Impact Assessment

Please answer the five questions below to determine whether a full EIA needs to be conducted.

Will the service/policy/strategy affect any people or groups of people directly (including staff/members of the public)?	Yes	X	No	
Will it affect how other services are provided?	Yes	X	No	
Will it have employment implications?	Yes	X	No	
Do you have information suggesting that this service/policy/strategy will affect particular groups of people?	Yes	X	No	
Do you need further information or to undertake further research to answer any of the above questions?	Yes	X	No	

If the answer to any of the above is ‘yes’, then a full EIA will need to be carried out and Sections 2- 4 will need to be completed.

If the answer to all of the above is ‘no’ then a full EIA does not need to be carried out, but to ensure consistency in approach, the EIA will need to go through the Challenge Process. Please e-mail the EIA to Catherine Herries-Smith, Principal Solicitor at [Catherine.Herries-Smith@wycombe.gov.uk](mailto:Catherine.Herries-Smith@wycombe.gov.uk) who will review and discuss as necessary. Then, if following the Challenge Process:

- a) it is agreed with the Policy Officer that no further stages need to be completed the Head of Service needs to approve the assessment and return a Word electronic copy to the Policy Officer for publication.

OR

- b) it is agreed with the Policy Officer that Stages 2 - 4 need to be completed, then the Head of Service will need to approve only once the full EIA is completed at which point a Word electronic copy should be returned to the Policy Officer for publication.



## Stage 2 – Information Gathering/Data Collection

<p><b>What are the aims of the strategy/policy/procedure/Project?</b> Why is it necessary? What is it trying to achieve?</p>	<p>Saunderton Lodge provides temporary accommodation (TA) to homeless households to fulfil Wycombe District Council's (WDC) statutory duties. It is over 90 years old, has small bedsit units, drainage issues and increasing repair bills. Work has been carried out to consider future options for provision of temporary accommodation and designs and costs have been developed for two options – 1) a refurbishment of the Lodge and 2) a new build scheme based in High Wycombe town centre providing a total of 57 units (23 more than Saunderton Lodge). This EIA considers the implications of a new build, town centre scheme with circa 57 Temporary accommodation units in High Wycombe town centre on the current Desborough Road Car Park Site</p> <p>The new build would deliver a new, fit for purpose scheme of 57 residential units with low ongoing maintenance costs, substantial revenue savings from the increased provision and a much-improved location for access to facilities and services. It would also use a method of construction that is emerging as a significant alternative to current 'traditional' building methods, with high potential to contribute to easing the national housing shortage.</p> <p>The Lodge is situated in an attractive countryside location. However, the location is also a problem in terms of accessibility, with a long walk from the main road to the building, lack of public transport and no amenities close by at all. The nearest shop is in Princes Risborough, the nearest school is in Lacey Green and the nearest GP surgery and Police Station are in Princes Risborough.</p> <p>The rooms in Saunderton are all bedsit in nature with the average room size approximately 19m<sup>2</sup>. The largest family rooms are approximately 21m<sup>2</sup>. Staff facilities are poor with little more than a cupboard for officers to work from at present.</p>
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	<p>One officer has accommodation on site, for which WDC receives a reduced rent, and officers are also on 24/7 cover for emergencies.</p> <p>The hostel was used at one point as a women's refuge, however the vast majority of its residents are now families that have either been evicted from their parental home, or have lost their private rented accommodation. Refurbishment of the Lodge would address some of the most immediate issues of the old building but it would still remain an ageing building with increasing maintenance and repair costs, the rooms would remain very small and not fit for purpose, and all the location issues would also remain. With respect to the new build scheme, not only would it provide a more revenue efficient solution to meet need; the service provided to customers would be enhanced greatly both in terms of the size and suitability of units provided, and the location of the accommodation in terms of access to amenities and travel to the wider district.</p> <p>Security measures such as gated entry would be provided to ensure only residents and their visitors can access the units, thus reducing the risk of external anti-social behaviour affecting households. The proposed units will be self-contained flats for use for temporary periods - no different from social or private rented housing in the district.</p> <p>The location of self-contained units in the town centre will be closer to the main WDC offices for easier access for both staff and residents to access. Residents will also benefit from access to all town centre amenities and no longer be reliant upon the Service to provide assistance due to the lack of nearby facilities. Local services will be easier to access, including access to medical and welfare services.</p>
<b>Which aspects of the policy/strategy/procedure are relevant to equalities?</b>	The provision of accommodation for a diverse client group



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NB A list of impacts is NOT required at this stage, just identify areas – can be a bullet point list.	
<b>Identify the main data sources/information gathered</b> e.g. Workforce reports, census data, staff survey etc.	Locata (housing service system software), Census Data and national homelessness statistics.
<b>How have you engaged with service users/members of the public/staff?</b> e.g. staff forums, consultations, questionnaires etc.	We have consulted with Staff, Members and former service users as well as stakeholders in various housing and homelessness forums. Questionnaires have been used for contact with former service users.
<b>Is the responsibility for this strategy/policy/procedure shared with another service/organisation/agency?</b>	No
<b>Is further consultation/research or data collection planned or required?</b> Is so, what is the aim of the research? Why is it needed?	Yes, a formal planning application is being prepared and will be submitted in due course. A public consultation event was held in the area in October 2018.



### Stage 3 – Impact Assessment & Analysis

Areas to consider	Impact Identified Y/N	Description of impact and likelihood of occurrence (positive, negative, no impact; high/medium/low likelihood)
<p><b>Protected Characteristics</b> (i.e. age, disability, gender reassignment, marriage &amp; civil partnership, pregnancy &amp; maternity, race, religion &amp; belief, sex and sexual orientation)</p>	<p>Y</p>	<p style="text-align: right;">Occurrence= high Impact= low</p> <p><u>Age</u>: The vast majority of temporary residents are now families that have either been evicted from their parental home, or lost their private rented accommodation. The new build proposal would offer better facilities for such families who are often young.</p> <p><u>Disabilities</u>- positive impact in that the new build will be designed to incorporate at least 2 purpose built adapted units for disabled applicants. All other units will be required to meet current building regulations and standards. In addition the ease of access to all town centre amenities should be beneficial to those with disabilities as it will for those without cars. Security measures such as gated entry would be provided to ensure only residents and their visitors can access the units, thus reducing the risk of external anti-social behaviour affecting vulnerable people or households</p> <p><u>Gender Reassignment</u>- No Impact</p> <p><u>Sex</u>- A higher proportion of applicants are women with access to facilities and increased security of benefit, therefore the impact is positive.</p> <p><u>Maternity &amp; pregnancy</u>- a number of homeless households present while pregnant, therefore the likely occurrence of pregnant residents in high, the impact is assessed as being positive as the units are all self-contained and located in an area close to resources including Wycombe Hospital.</p>



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		<p><u>Marriage &amp; civil partnership</u>- no impact currently anticipated but will be kept under review</p> <p><u>Race</u>- applicants who require assistance reflect the diversity in the population of the district. However there is a higher concentration of BME residents in and around the town centre which may be of attraction to any BME individuals needing temporary housing.</p> <p><u>Religion and belief (including no belief)</u> - As per the Race assessment above, the expected residents of the proposed New Build Accommodation reflects the diversity of the population. However, the location of the new build is close to a large number of faith centres from a wide range of beliefs and as such will provide a positive impact on the Religion and Belief characteristic as facilities will be more easily accessible for residents who wish to attend faith centres. Therefore, the assessment of this characteristic is positive with a high occurrence and high (positive) impact.</p> <p><u>Sexual Orientation</u>- no impact currently anticipated but will remain under review.</p>
<p><b>Other relevant groups</b> (e.g. low income, ex-armed forces personnel, homeless people etc.)</p>	<p><b>Y</b></p>	<p>The properties will be provided to homeless households and people.</p>

NB. Please note that when considering impacts in relation to marriage & civil partnership - the duty is solely to ensure that there is no unlawful discrimination against this protected characteristic.



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**Stage 4 - Equalities Improvement Plan**

<b>Protected Characteristic/Other relevant groups</b>	<b>Impact Identified Y/N</b>	<b>Measures identified to reduce/mitigate impact</b> (Also include all positive actions included in your proposals)	<b>Review date</b>	<b>Review update/ monitoring comments</b>	<b>Officer/Service Responsible</b>
People with Disabilities	Y	Ensuring the proposed provision is sufficient by assessing demand for units at regular intervals	Every 12 months post delivery	If insufficient units are provided, additional units to be adapted	Housing Service Manager

<b>Area of Consideration</b>	<b>How are/will we work to:</b> (Also include all positive actions included in your proposals)	<b>Review date</b>	<b>Review update/ monitoring comments</b>	<b>Officer/Service Responsible</b>
Eliminate discrimination, harassment & victimisation	Saunderton Hostel created a number of difficulties for residents in respect of location and proximity to shops and services which could be regarded as indirectly discriminatory by some groups with protected characteristics. The new build units will overcome many of these obstacles. <del>which</del> The units will be managed effectively (as per current management of Saunderton Lodge)	<b>Annually post delivery</b>		<b>Housing Options Team Leader</b>



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Advance equality of opportunity	The new build would bring particular advantages to certain protected characteristics, such as proximity to shops and services for the disabled, and for young families and also added security and space. Proximity to places of worship will also benefit those who wish to practice their religion and belief	<b>Annually post delivery</b>		
Promote good relations between groups (including community cohesion)	The positive outcomes for protected groups from proximity to shops and services and places of worship, greater space and security will help to put those affected on a more fair and equal footing <u>in comparison with others not from those protected groups</u> which will promote community cohesion.	<b>Annually post delivery</b>		<b>Project Manager</b>

NB. Please note that when considering impacts in relation to marriage & civil partnership - the duty is solely to ensure that there is no unlawful discrimination against this protected characteristic.



## Appendix 1 – Quick Reference Guide

For full guidance and further suggested reading please refer to documents located under the Corporate Equalities tab on WySpace. Documents include ‘Completing an Equality Impact Assessment.’ Below are a list of the key terms and definitions:

### Protected Characteristics

There are 9 specified Protected Characteristics as listed below:

**Age** – to include all age groups.

**Disability** – a person is considered to have a disability if they have a physical or mental impairment which has a substantial and long term adverse effect on their ability to carry out normal day-to-day activities. People with progressive illnesses such as cancer, multiple sclerosis (MS) and HIV are considered to be disabled from the point of diagnosis.

**Gender Reassignment** – any person, who has undergone, is undergoing or is considering gender reassignment. A person does not need to be seeing a doctor or under medical supervision to be covered by the Act.

**Sex** – both men and women are covered.

**Maternity & pregnancy** – the Act applies during a woman’s pregnancy and any statutory maternity leave.

**Marriage & civil partnership** – for both marriage and civil partnerships, the PSED only extends to ensuring that due regard is given in relation to eliminating discrimination.

**Race** - this includes all ethnicities, races, colours, national origins as well as nationalities. This includes Roma & Traveller communities as well as refugees/migrants.

**Religion and belief (including no belief)** – Religion refers to any religion with a defined structure and belief system. Belief refers to any religious or philosophical belief. The Act also provides protection for those with no belief (e.g. agnostic/atheist).

**Sexual Orientation** - the Act protects heterosexual, homosexual and bisexual people.



### Types of Discrimination

**Direct Discrimination** occurs when a person in the same situation as others is treated less favourably because of a protected characteristic they have (or are thought to have – perceptive discrimination) e.g. their age, race, sex etc.

**Indirect Discrimination** occurs when a condition or requirement, although applied equally, excludes, penalises or treats a person less favourably because of their race, disability etc.

**Institutional Discrimination** is the collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture or ethnic origin (taken from the *MacPherson Report, 1999*).

**Harassment** is defined in the Equality Act as ‘unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual’s dignity or creating and intimidating, hostile, degrading, humiliating or offensive environment for that individual.’ In deciding whether harassment has occurred the following must be considered; the perception of the person; the other circumstances of the case and whether it reasonable for the conduct to have that effect.

**Victimisation** is defined in the Equality Act as treating someone badly because they have done (or you believe they are going to do) a protected act. These include making a complaint of discrimination and helping someone else make a claim. NB The less favourable treatment does not need to be linked to a protected characteristic.

**Associative Discrimination** - This is direct discrimination against someone because they associate with another person who possesses a protected characteristic.



### **Quick Guide to the Stages**

#### **Stage 1**

The questions in this section are there to help you decide whether a full EIA should be undertaken. The questions should also help you to decide whether you have all the relevant information needed and if not, what further data/research is required to continue with the EIA.

#### **Stage 2**

Stage 2 is to help you consider the policy/strategy/service under assessment, analyse the data available, highlight areas requiring further research as well as encourage you to consider how equalities (across all strands and including community cohesion) is, in broad terms, relevant and/or impacted by this policy.

#### **Stage 3**

Within Stage 3, all protected characteristics should be considered and the Officer should consider each group individually to see if the policy/strategy/service will have an impact. Additionally, the Officer must consider the impact in relation to advancing equality of opportunity and promoting good relations between groups (including community cohesion). It is important that **active consideration and thought** are given to ensure that all possible impacts (negative, positive and no impact) are considered and thought is given to the likelihood of these impacts occurring.

#### **Stage 4**

Stage 4 comprises of two action plan tables. In the first table any impacts identified in Stage 3, need to be considered and the steps/actions that are to be taken to mitigate or reduce these impacts, or if positive impacts are required and necessary how these are to be sustained, are to be documented. In addition, the second table requires Officers to consider how the policy/strategy/service under assessment will impact on any of the three main PSED duties and what positive steps could be taken.

These steps need to be concise, measureable and have a realistic timeframe for completion alongside the name of the Officer and service responsible for the action plans. Additionally, there is a requirement for a review date and space for updates to be input into this table to show continuous monitoring and action planning in relation to the required steps.

Continuous monitoring and improvement can include consideration of how actions implemented will be measured, how any results will be analysed and over what time period will the actions/results be reviewed.