

# Somerset Equality Impact Assessment

Before completing this EIA please ensure you have read the EIA guidance notes – available from your Equality Officer

<b>Organisation prepared for</b>	<b>Somerset Council</b>		
<b>Version</b>	<b>V1</b>	<b>Date Completed</b>	<b>15<sup>th</sup> November 2022</b>
<b>Description of what is being impact assessed</b>			
<p>An Allocation of Caravan Pitches Policy has been successfully running at South Somerset District Council since March 2012. It is proposed to carry forward the policy to the new Somerset Council.</p> <p>The policy aims to ensure that allocations are fair and equitable, that applications are prioritised to reflect the housing needs of individual applicants, and that the sustainability and the security of the sites and the wellbeing of the existing residents are protected.</p>			
<b>Evidence</b>			
<p><b>What data/information have you used to assess how this policy/service might impact on protected groups?</b> Sources such as the <a href="#">Office of National Statistics</a>, <a href="#">Somerset Intelligence Partnership</a>, <a href="#">Somerset's Joint Strategic Needs Analysis (JSNA)</a>, Staff and/ or <a href="#">area profiles</a>,, should be detailed here</p>			
<p>The Policy will affect members of the Gypsy and Traveller community who are applying for a pitch on one of the sites. They may already be living on a private site, on an unauthorised encampment, in bricks and mortar accommodation or homeless.</p> <p>With a relatively low number (15) of pitches across the three sites, and a historically low turnover of vacancies, to date the policy has only been used 21 times to allocate pitches (on average two vacancies per year). Due to the small size of the sample it is difficult to draw any specific conclusions on how this policy impacts on protected groups. However the Policy acknowledges that Gypsy and Traveller families and individuals are a recognised ethnic group and that the sites are provided solely for their needs.</p>			

A [research briefing for the House of Commons Library dated May 2019](#) cites the 2011 census finding that 76% of Gypsies and Travellers in England and Wales lived in bricks and mortar accommodation, and 24% lived in a caravan or other mobile or temporary structure.

The [Somerset Intelligence Partnership](#) provides Somerset specific facts and figures on health, disability, housing and other intelligence drawn from a variety of local and national sources. The page on [Gypsy and Traveller accommodation](#) reports that in Somerset an even higher 87% of the Gypsy and Traveller community lived in bricks and mortar accommodation. It also refers to the Gypsy and Traveller Needs Assessment Update dated Oct 2013 (updated version in the pipeline) which highlights the challenges of providing adequate numbers of pitches and the importance of managing existing sites so that they are kept 'viable, accessible and safe '.

The allocation policy acknowledges that applicants may be occupying social housing (as opposed to more traditional sites) and awards some priority to those who have developed an aversion to it. Given the relatively high number of the community living in bricks and mortar, it was considered reasonable to require an applicant to provide a landlord reference. As above, the policy also seeks to ensure that allocations are made sensitively in terms of an applicant's needs and the wider needs of the site and the existing residents.

We have looked at the data that relates to applicants that approach the local authority as homeless or at risk of homelessness. The [Homelessness Case Level Information Collection \(H-CLIC\)](#) contains the core questions to be used in the monitoring of statutory homelessness by local authorities in England following commencement of the Homelessness Reduction Act 2017. This data is collected by local housing authorities in relation to households that are homeless or at risk of homelessness. The data for Somerset is broken down into the four district council areas and the latest data is for the year April 2021 until March 2022. H-CLIC data includes the following:

- Ethnicity of main applicant (in 2021/2022, 93% of people that are homeless or at risk of homelessness identified as White, 1% as Asian / British, 1% as Black/African/ Caribbean/Black British, 1% as mixed/multiple ethnic and 4% as Other/Not known)

We looked at the current breakdown of applicants on [Homefinder Somerset](#) and noted that as at 15<sup>th</sup> November 2022 there were 36 households who had given their ethnic origin as Gypsy and Traveller. About 75% of the households were living in bricks and mortar accommodation (evenly split between social and private rented accommodation).

Homefinder Somerset is a computer based system, but the Allocation of Pitches Policy relies on a paper application process. As shown above, a significant number of applications for Homefinder were made online by people who identified as members of the Gypsy and Traveller community. There were initial discussions around making pitch vacancies available for letting also via a choice based lettings but there were concerns that some of the Gypsy and Traveller community might still be disadvantaged by having to rely solely on computer and internet access to apply and bid for pitches.

**Who have you consulted with to assess possible impact on protected groups?** If you have not consulted other people, please explain why?

### **Gypsy and Traveller Forum**

The South Somerset Gypsy and Traveller Forum at its peak enjoyed a good attendance from numerous agencies (Police, Fire, Somerset Partnership, faith based support groups, independent community advocates) and representatives from other Councils including Somerset County Council and Gypsy site management staff from Dorset Council. It was successfully chaired for a period of time by a resident of one of the South Somerset sites, and often attended by residents from a couple of private Gypsy sites from around the area.

In early 2012, at the Forum's request, a working group was set up to review and update the allocation policy for the South Somerset District Council residential sites. The group comprised community workers and a representative from a local South Somerset private Gypsy site, and made recommendations around the wording used in the policy and the points structure. Of particular interest was the perception that the points system could make it difficult to achieve a mix of families on our sites.

Local applicants tended to come from the same, few, families and this could prevent households from outside of our area competing for pitches. The group recommended the removal of what was perceived as a heavy penalty for those who had not lived in the area. It was suggested that some members of the community without a residential local connection may still have a good reason to move to this area, would integrate well and contribute to the sites, and that, anyway, one of the factors of the Gypsy way of life was travelling.

The group also highlighted the importance of the sustainability of the sites and whilst acknowledging that not all applicants would be able to provide a landlord's reference, most would and therefore recommended adjusting the points system to better reflect this.

The recommendations were reported back to the Gypsy and Traveller Forum and to the Equality Steering Group (see below) and the Policy adopted shortly after.

### **Equality Steering Group**

The group comprised of the then Community Cohesion Officer, a South Somerset District Council member, South Somerset Disability Forum, South Somerset Equalities Group, and Somerset Racial Equality Council.

Minutes: 20<sup>th</sup> March 2012

*Review of points system for all allocations of pitches on SSDC's residential Gypsy and Traveller sites.*

*Jon Batty, Policy and Performance Officer explained that at the Gypsy and Traveller Forum held in October 2011, a request was made to review the points system for all allocation of pitches on SSDC's residential Gypsy and Traveller sites. Concerns had been raised about the some of the wording used and it was hoped that the points scheme could be aligned where appropriate, to mirror the way in which access to housing in the settled community is prioritised.*

*The allocation process has now been updated and presented to the Group for comment and approval. The ESG commended the work undertaken on the policy and process and suggestions were made in relation to including an optional reference that incorporated social and community involvement.*

*The Equality Steering Group gave full approval to the points system for all allocations of pitches on SSDC's residential Gypsy and Traveller sites.*

### Analysis of impact on protected groups

The Public Sector Equality Duty requires us to eliminate discrimination, advance equality of opportunity and foster good relations with protected groups. Consider how this policy/service will achieve these aims. In the table below, using the evidence outlined above and your own understanding, detail what considerations and potential impacts against each of the three aims of the Public Sector Equality Duty. Based on this information, make an assessment of the likely outcome, before you have implemented any mitigation.

Protected group	Summary of impact	Negative outcome	Neutral outcome	Positive outcome
<b>Age</b>	<ul style="list-style-type: none"> <li>The Policy allows additional priority to be awarded to reflect both young and old in applicants' families. We do not have any data or evidence to suggest that this Policy has or will have a negative effect based on age.</li> </ul>	□	□	☒
<b>Disability</b>	<ul style="list-style-type: none"> <li>The Policy does allow additional priority to be awarded to reflect health difficulties, and some of the applicants rehoused via the Policy have gone on to have their accommodation adapted to make it more suitable for their existing or newly acquired difficulties. We do not have any data or evidence to suggest that this policy has or will have a negative effect based on disability.</li> </ul>	□	□	☒

<b>Gender reassignment</b>	<ul style="list-style-type: none"> <li>We do not have any data or evidence to suggest that this policy has or will have a negative effect based on gender reassignment.</li> </ul>	□	⊠	□
<b>Marriage and civil partnership</b>	<ul style="list-style-type: none"> <li>We do not have any data or evidence to suggest that this policy has or will have a negative effect based on marriage or partnership.</li> </ul>	□	⊠	□
<b>Pregnancy and maternity</b>	<ul style="list-style-type: none"> <li>The Policy does allow additional priority for applicants who are pregnant, and we do not have any data or evidence to suggest that this policy has or will have a negative effect based on pregnancy or maternity.</li> </ul>	□	□	⊠
<b>Race and ethnicity</b>	<ul style="list-style-type: none"> <li>The Policy acknowledges that Gypsy and Traveller families and individuals are a recognised ethnic group and that the sites are provided solely for their needs.</li> </ul>	□	□	⊠
<b>Religion or belief</b>	<ul style="list-style-type: none"> <li>We do not have any data or evidence to suggest that this Policy has or will have a negative effect based on religion or belief.</li> </ul>	□	⊠	□
<b>Sex</b>	<ul style="list-style-type: none"> <li>We do not have any data or evidence to suggest that this Policy has or will have a negative effect.</li> </ul>	□	⊠	□
<b>Sexual orientation</b>	<ul style="list-style-type: none"> <li>We do not have any data or evidence to suggest that this Policy has or will have a negative effect based on sexual orientation.</li> </ul>	□	⊠	□

<b>Other, e.g. carers, veterans, homeless, low income, rurality/isolation, etc.</b>	<ul style="list-style-type: none"> <li>The Policy allows additional priority to cases where a homeless duty has been accepted by the Council, and we do not have any data or evidence to suggest that it has or will have a negative effect based on any other factors.</li> </ul>	□	⊗	□
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**Negative outcomes action plan**  
 Where you have ascertained that there will potentially be negative outcomes, you are required to mitigate the impact of these. Please detail below the actions that you intend to take.

Action taken/to be taken	Date	Person responsible	How will it be monitored?	Action complete
	Select date			□
	Select date			□
	Select date			□
	Select date			□
	Select date			□
	Select date			□
	Select date			□
	Select date			□

**If negative impacts remain, please provide an explanation below.**

<b>Completed by:</b>	<b>Jon Batty (Housing Specialist – South Somerset District Council)</b>
<b>Date</b>	<b>15/11/2022</b>
<b>Signed off by:</b>	<b>Dave Crisfield (South Somerset District Council)</b>
<b>Date</b>	<b>16/11/2022</b>
<b>Equality Lead/Manager sign off date:</b>	<b>Public Health Promotion Manager – Equalities - 09/12/2022</b>
<b>To be reviewed by:</b> (officer name)	<b>Jon Batty (Housing Specialist – South Somerset District Council)</b>
<b>Review date:</b>	<b>01/04/2024</b>