

# Equality Analysis

Please refer to the guidance for carrying out Equality Impact Assessments is available on the intranet  
Text in blue is intended to provide guidance – you can delete this from your final version.

What are the proposals being assessed?	Annual Increase to Traveller Site Licence Fee
Which Department/ Division has the responsibility for this?	Housing and Sustainable Development

Stage 1: Overview	
Name and job title of lead officer	Steve Webb – Business Support and Relationship Manager
1. What are the aims, objectives and desired outcomes of your proposal? (Also explain proposals e.g. reduction/removal of service, deletion of posts, changing criteria etc)	A 7.7% increase in the Brickfield Road Traveller Site Licence Fee. This is in accordance with the government's social housing rent setting formula (CPI+1%), as recommended by the Council's managing agents, Clarion Housing.
2. How does this contribute to the council's corporate priorities?	<p>Ownership of the travellers' site at Brickfield Road, SW19 was retained by the council at stock transfer in March 2010. The council entered into a management agreement for the site with Merton Priory Homes (now Clarion Housing) and this forms part of the legal transfer agreement.</p> <p>The council aims to ensure every resident lives in well managed and good quality accommodation. The increase supports Clarion's ability to carry out the terms of the management agreement.</p> <p>This proposal ensures the Council's compliance with a legal contract.</p> <p>In order for the Council to comply with the management agreement, there needs to be an annual review of the Licence Fee.</p>
3. Who will be affected by this proposal? For example who are the external/internal customers, communities, partners, stakeholders, the workforce etc.	The 15 households at Brickfield Road Traveller Site.

<p>4. Is the responsibility shared with another department, authority or organisation? If so, who are the partners and who has overall responsibility?</p>	<p>The decision is shared with Clarion Housing.</p> <p><i>Under the management agreement the weekly licence fee for renting a pitch on the site is to be set by the council and reviewed at least annually. The licence fee shall be no less than the level recommended by Clarion Housing (acting reasonably) from time to time.</i></p> <p>Clarion Housing have recommended that the licence fee be increased by 7.7% from April 2024, increasing the weekly fee from £109.49 to £117.92.</p> <p>The 7.7% increase to be applied by Clarion Housing has been calculated in accordance with the Government's current rent setting formula. Since stock transfer the standard increase (or reduction), as applicable to social housing, has been applied each year. The rent setting formula is <math>CPI + 1\%</math>, where <math>CPI = 6.7\%</math> at September 2023.</p>
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## Stage 2: Collecting evidence/ data

### 5. What evidence have you considered as part of this assessment?

Provide details of the information you have reviewed to determine the impact your proposal would have on the protected characteristics (equality groups).

15 households are affected on site who receive housing management support from Clarion Housing.

We do not have data on employment rates.

The application of the rent increase is in accordance with national guidance.

## Stage 3: Assessing impact and analysis

9. From the evidence you have considered, what areas of concern have you identified regarding the potential negative and positive impact on one or more protected characteristics (equality groups)?

Protected characteristic (equality group)	Tick which applies		Tick which applies		Reason Briefly explain what positive or negative impact has been identified
	Positive impact		Potential negative impact		
	Yes	No	Yes	No	
Age			X		Older residents of pension age could have a reduced income compared to working age neighbours.
Disability			X		Disabled residents could be negatively affected as people with disabilities tend to face higher levels of unemployment.
Gender Reassignment				X	
Marriage and Civil Partnership				X	
Pregnancy and Maternity				X	
Race			X		Some Gypsies and Travellers are protected against discrimination on the basis of their ethnic origins. These residents could have lower employment rates due to discrimination.
Religion/ belief				X	
Sex (Gender)				X	

<b>Sexual orientation</b>				x	
<b>Socio-economic status</b>			x		<a href="#">Some households claim Housing Benefit / Universal Credit</a>

## 7. If you have identified a negative impact, how do you plan to mitigate it?

Romany Gypsies and Irish Travellers are protected against race discrimination. This is because Romany Gypsies and Irish Travellers are ethnic groups under the Equality Act. All households on the Traveller site are affected equally by this increase regardless of their ethnic group.

Older residents of pension age could have a reduced income compared to working age neighbours. Additionally, Disabled residents could be negatively affected as people with disabilities tend to face higher levels of unemployment.

Any households experiencing financial hardship, regardless of their ethnicity, age or disabled status, can apply for Housing Benefit or Universal credit for the licence fee of their pitch and can seek support from Clarion Housing if they have difficulties.

### Stage 4: Conclusion of the Equality Analysis

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#### Which of the following statements best describe the outcome of the EA (Tick one box only)

Please refer to the guidance for carrying out Equality Impact Assessments is available on the intranet for further information about these outcomes and what they mean for your proposal

- Outcome 1** – The EA has not identified any potential for discrimination or negative impact and all opportunities to promote equality are being addressed. **No changes are required.**
- Outcome 2** – The EA has identified adjustments to remove negative impact or to better promote equality. **Actions you propose to take to do this should be included in the Action Plan.**
- Outcome 3** – The EA has identified some potential for negative impact or some missed opportunities to promote equality and it may not be possible to mitigate this fully. **If you propose to continue with proposals you must include the justification for this in Section 10 below, and include actions you propose to take to remove negative impact or to better promote equality in the Action Plan. You must ensure that your proposed action is in line with the PSED to have 'due regard' and you are advised to seek Legal Advice.**
- Outcome 4** – The EA shows actual or potential unlawful discrimination. **Stop and rethink your proposals.**

## Stage 5: Improvement Action Pan

### 9. Equality Analysis Improvement Action Plan template – Making adjustments for negative impact

This action plan should be completed after the analysis and should outline action(s) to be taken to mitigate the potential negative impact identified (expanding on information provided in Section 7 above).

Negative impact/ gap in information identified in the Equality Analysis	Action required to mitigate	How will you know this is achieved? e.g. performance measure/ target)	By when	Existing or additional resources?	Lead Officer	Action added to divisional/ team plan?
Race, Age, Disability and Socio-economics. These households may have higher unemployment rates or reduced income. Page 20	Ensure households have access to the Housing Benefit or Universal Credit they are entitled to	Residents benefit from the use of Clarion's Tenancy Sustainment Service. As part of the management agreement, Clarion Housing have a responsibility to monitor the conduct of the licences, including rent accounts and take-up of housing benefit and will take preventative actions to enable residents to stay in their homes.  Clarion have reported that their tenancy sustainment team have had no referrals from Brickfield Road.	ongoing	Existing	Steve Webb	No

**Note that the full impact of the decision may only be known after the proposals have been implemented; therefore it is important the effective monitoring is in place to assess the impact.**

## Stage 6: Reporting outcomes

### 10. Summary of the equality analysis

This section can also be used in your decision making reports (CMT/Cabinet/etc) but you must also attach the assessment to the report, or provide a hyperlink

This Equality Analysis has resulted in an Outcome [2](#) Assessment

Some Gypsies and Travellers are protected against discrimination on the basis of their ethnic origins. The residents could have lower employment rates due to discrimination.

Additionally, older residents of pension age could have a reduced income compared to working age neighbours. Disabled residents could be negatively affected as people with disabilities tend to face higher levels of unemployment.

Some households claim Housing Benefit or Universal Credit and their eligibility will be unaffected by this increase.

**Stage 7: Sign off by Director/ Head of Service**

<b>Assessment completed by</b>	<a href="#">Steve Webb – Business Support and Relationship Manager</a>	<b>Signature: S Webb</b>	<b>Date: 01/03/24</b>
<b>Improvement action plan signed off by Director/ Head of Service</b>	<a href="#">Elliot Brunton – Head of Housing Needs and Strategy</a>	<b>Signature: E Brunton</b>	<b>Date: 01/03/24</b>