Equality Impact Assessment
Regeneration Programme and Service EqIA
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Working with the people of Milton Keynes as citizens and tenants, the Regeneration Programme and Service works to meet the general service aim of working with individuals, businesses and communities to make Milton Keynes a safe and vibrant place to live, work and visit.

A.   Equality duty

To achieve its aims and to meet its statutory duties service managers will have due regard to the equality.

This includes the Public Sector Equality Duty (PSED), which is section 149 of the Equality Act[1]. This requires the council to consider specific characteristics of individuals when carrying out their day to day functions by having due regard to the need to:

- eliminate discrimination,
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;, and
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

B.   Context

The service has the following functions:

- Borough wide partnership lead on development & delivery of the RegenerationMK Strategy and Plan

- Lead on community engagement (for regeneration) and resident (including tenant) involvement

- Commissioned service to build social capital in priority neighbourhoods

- Borough wide partnership lead on Economic Regeneration, with a delivery focus on employment support and tackling worklessness

- Borough wide partnership lead on housing led regeneration

The key equality statistics are:

- The Borough of Milton Keynes is one of the fastest growing districts in the country. Between 1991 and 2010, its population increased by 35%, whereas the population of England increased by only 9%

- 26.1% of the Milton Keynes population in 2011 were from a black and minority ethnic group. This compares to 13.2% in 2001 and 20.2% for England as a whole

- By 2026 Milton Keynes will still have fewer older people than the national average but many more than today. In 2010 there were 40,620 people aged 60 and over in the Borough, and this number is expected to

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[1] Section 149 http://www.legislation.gov.uk/ukpga/2010/15/section/149

increase by 70% to over 69,080 by 2026. The corresponding percentage increase nationally is 32

- Single person households have risen between 1991 and 2001. They make up around 29% of all household types in the Borough. Of these, almost 10% contain a single elderly person. By 2026 over 36% of all households in Milton Keynes will contain a single person

- The highest levels of deprivation are in 8 wards - Woughton, Eaton Manor, Bletchley and Fenny Stratford, Denbigh, Campbell Park, Bradwell, Stantonbury and Wolverton – social housing is concentrated and over represented in these wards

- Unemployment in these wards is relatively high; at the time of writing approximately three times the MK average, with the same picture for those 'in work poor'

- Unsurprisingly 'child poverty' is also high across these wards – 20% of all children in MK are living in poverty with 40% of all children living in poverty living in just the 4 wards of Eaton Manor, Woughton, Campbell Park and Wolverton. That is 4,940 children in these wards alone

- As at May 2012 the Council had 34 households in "Band 1" of its Housing Options scheme who urgently needed wheelchair standard housing

C.   Objectives

Regeneration is one of the three service equalities challenges identified in the Service Plan. To meet these challenges the service is:
- Regenerating identified priority neighbourhoods in Milton Keynes
- Improving access to training and job opportunities, especially for those with no or low skill levels, to provide greater opportunities for individuals to obtain sustainable employment (ED strategy priority 2)
- Preventing homelessness

The Service Plan recognises that: "many of our services are delivered to the most vulnerable in our community either because they have life limiting conditions or are living in poverty."[2] Also, it recognises that quality, and the manner of service delivery is essential, as outlines in these service values:

"To make this happen we will:
- Think innovatively
- Listen and act
- Be bold, enthusiastic and work together to explore what is possible
- Use evidence to inform our actions
- Create opportunities for social mobility
- Encourage resilience
- Target resources to protect those who struggle to help themselves
- Value difference
- Make difficult decisions where we need to"[3]

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[2] Housing and Community Group, Service Plan 2014-15 section 2 page 1
[3] Housing and Community Group, Service Plan 2014-15 section 1 page 1

D. Assessment

The following assessment looks at each of the three aspects of the Public Sector Equality Duty (PSED) and provides recommendations to support the service meeting both its statutory duties and service objectives.

1. Eliminating lawful discrimination

Unlawful discrimination means treating a person (or group of people) less favourably than another person (or group of people), because they (or someone associated with them) possesses a particular protected characteristic. The following characteristics are the protected characteristics we have a duty to consider in this part of the Act— age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation. To these the council adds the characteristic of social deprivation and disadvantage as part of its policy. Discrimination isn't always unlawful; however the council has a duty to work to eliminate conduct that is prohibited by the Equality Act.

1.1 Possible of disability discrimination

The definition of disability discrimination is different the definition associated with other characteristics in that it includes a concept of having to make reasonable adjustments. These adjustments are pre-emptive actions that ensure that people with a disability do not encounter barriers and have the support to access society, the built environment and further opportunities.

The Regeneration Programme and Service will have to think of people with a disability in the planning and design stages of the development of services and activities. This is best done with engaging with people with a disability directly and benefiting from their expertise and experience.

1.2 Possible discrimination by exclusion and neglect in engagement

One of the most common forms of discrimination is the exclusion or neglect of people in the engagement process. This is particular crucial for Regeneration because the service and its programmes are built upon engagement.

This assessment has not considered the current form of these engagement structures and it would help the service to do an 'internal' review of engagement to ensure it is meeting expectations. These expectations should include the following engagement principles:

- Engagement occurs at the beginning of a process to inform the services thinking, planning and action, and not at the end after the planning and action are agreed.

- Support is provided to ensure that everyone's voice is heard in the decision making process.

- Record is kept of who (with basic characteristic monitoring) and where engagement is taking place, so that a review can consider who reflective the engagement is of the 'impacted' community.

1.3 Other forms of subtle discrimination at work

Other forms of discrimination can be subtle and the following is an exemplar, but not an exhaustive list:

- Lack of practical details such as child care in activities for parents, especially women, or language needs for communities

- Lack of sufficient follow-up to understand whether important messages have been understood and that services are listening

- Lack of respect for privacy and of people's homes.

- Lack of any flexibility with boundaries and criteria in plans and policies that produce indirect discrimination

- Lack of advertised principles/expectations that provide an understand of what the community can expect from the service

- Lack of consideration of the capacity of some citizens to engage

1.4 Assessment

This assessment recommends that:

- People with a disability are considered in the planning and design stage of projects and that the Disability Advisory Group is engaged with the possibility of supporting a specific Access Consultative Group for the Regeneration Programme

- An 'internal' review, with the support of the Corporate Equality & Diversity Officer if needed, is contacted to consider the quality of engagement and the Service's engagement principles

- The list of subtle forms of discrimination is used to inform the risk register, project and programme plans

2. Advancing Equality of Opportunity

Advancing Equality of Opportunity refers to the positive activities the council completes that deliver opportunities and benefits to its residents.

2.1 Homelessness and poor housing

The report "*How Fair is Britain"* received evidence specifically about the inequalities faced by the homeless, from the University of York[4]. This evidence showed that the following characteristics are associated with a disproportionate risk of homelessness and poor housing, with evidence to indicate that these inequalities are persistent and, in some cases, growing:

- Age - young people face a much higher risk of being accepted as statutorily homeless by British local authorities than do older people, with those in the middle age ranges most at risk of rough sleeping;

- Gender and household type – women, especially female lone parents, are over-represented amongst statutorily homeless households, but single men are heavily over-represented amongst rough sleepers and other non-statutory homeless groups. Homeless women tend to be younger than homeless men;

- Ethnicity – BME communities are strongly over-represented across most forms of homelessness; and some ethnic groups are more likely to live in overcrowded housing and poor housing;

- Disability – mental ill-health is the most important type of disability associated with homelessness and poor housing;

- Socio-economic status – there are high levels of worklessness amongst all homeless groups and poor housing

The Hills Report[5] notes the following with regards to people living in social housing:

"The composition of tenants has changed, with tenants much more likely to have low incomes and not to be in employment than in the past or than those in the other tenures. Seventy per cent of social tenants have incomes within the poorest two-fifths of the overall income distribution, and the proportion of social tenant householders in paid employment fell from 47 to 32 per cent between 1981 and 2006.

Tenants have high rates of disability, are more likely than others to be lone parents or single people, and to be aged over 60. More than a quarter (27 per

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[4] Fitzpatrick, S., Pleace, N., and Wallace, A., 2010. Evidence Analysis for Equality and Human Rights Commission: Homelessness. York: York University 2010 – see link below for more details
http://www.york.ac.uk/inst/chp/publications/PDF/EHRCHomelessnessTriennialReview.pdf

[5] *'Ends and means: the future roles of social housing in England*: John Hills, ESRC Research Centre for Analysis of Social Exclusion, 2007, pp 2-3.

cent) of all black or minority ethnic householders are social tenants (including around half of Bangladeshi and 43 per cent of black Caribbean and black African householders), compared to 17 per cent of white householders*".*

2.2   What are the challenges to equality of opportunity?

A report for the Joseph Rowntree Foundation has noted that:

"Although age alone does not determine whether or not people have high support needs, it is a good guide and it is likely that over the next twenty years the numbers requiring such support will rise considerably… Over the coming decades, the older population will also become more diverse with people from black and minority ethnic backgrounds comprising an increasing share of the population. Changes in both social norms and the legal context mean that it is likely that in future there will be more older people living in civil partnerships and openly gay relationships. There is clear evidence that the prevalence of disability, however it is measured, rises with age – with the increase being most pronounced at ages after 74. For example, the prevalence of severe disability as measured by the ability to perform various activities of daily living is less than 5% amongst those aged under 55 compared with around 40% amongst those aged 85 and over."[6]

In 2008 the Government published *'Lifetime Homes Lifetime Neighbourhoods - A National Strategy for Housing in an Ageing Society'.* Key findings of the report were as follows:

"30 per cent of all households are already headed by someone over retirement age. Older people will make up 48 per cent of the increase in new households by 2026, with this figure reaching as high as 90 per cent in some areas. Older people are key to the housing market and may become even more dominant in a less buoyant market. Because the housing market is dynamic, housing decisions that older people make – whether to move, stay put, make improvements or adaptations – will impact across the entire market."[7]

The report also noted particular pressures around the lack of wheelchair housing:

"Projected numbers of people needing wheelchair accessible housing are due to rise considerably, reflecting projected increases in numbers of people with disabilities and mobility impairments. Whereas Lifetime Homes are designed to adapt to changing needs overtime and do include features helpful to wheelchair users, fully wheelchair accessible homes are purpose built to suit the needs of wheelchair users. These are designed with the necessary circulation space and level access to provide full wheelchair access to all parts of the home. They are also equipped with adjustable

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[6] *'Demographic issues, projections and trends: Older people with high support needs in the UK'*, Jane Falkingham, Maria Evandrou, Teresa McGowan, David Bell and Alison Bowes, ESRC Centre for Population Change, October 2010 - pages 5-6
http://www.jrf.org.uk/sites/files/jrf/high-support-needs-demographic-issues.pdf

[7] 'Lifetime Homes Lifetime Neighbourhoods - A National Strategy for Housing in an Ageing Society', page 24

fixtures and fittings to enable occupants to live more independently and enjoy a better quality of life."[8]

The Equalities and Human Rights Commission has noted that there are also links between disability, employment and pay:

"Evidence shows that some disabled employees experience a significant pay gap when compared to non-disabled employees. In addition, disabled women suffer from a gender pay gap, and earn less than disabled men. Estimates of the disabled hourly pay gap vary from six to 26 per cent (this variation is due to the use of different data sources and definitions of disability). Recent research has found that when compared to non-disabled men, disabled men have a pay gap of 11% and disabled women of 22%".

A report by the Demos looked in detail at the barriers faced by people with disabilities, particularly in the areas of transport, education, employment, status, leisure and housing. It was found that:

- More than 40% of disabled people in England and Wales experienced difficulty with travel.

- While almost two-thirds of households that include a disabled person do not have access to a private car, only 27% of non-disabled households don't have a car.   But the general trend in public transport shows an improvement, though in the words of the authors, "massive barriers remain".

- The lack of accessible housing in the UK was described as "chronic". While it estimated that nearly 1.5m people require adapted accommodation, almost a quarter of them don't have it.

- The report highlights a lack of reliable information about the availability of accessible housing as contributing to the problem.

2.3   Assessment

This assessment recommends the service:

- Adopts the "Life time homes" standard for all Regeneration Housing Programmes as a proxy to advancing opportunities.

- Increases the availability of wheelchair standard housing in the Regeneration programme

- Ensures that those with a disability, especially those with a Mental Illness, are included in the Services' projects and activities

- Plans people's transitions in the Major Housing Regeneration so that disruption to their access to health and schooling is minimal

- Make sure that outcomes in Basic Skills Training are linked to sustainable employment for all groups.

- Improve the data analysis, identifying potential areas for future work base on communities of need: both geographical communities and communities of type

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[8] Ibid, pages 91-92

3.   Fostering Good Community Relations

There are various aspects to good community relations, the most important being: combating prejudice, ensuring communities are not segregated and encouraging greater awareness and understanding.

There is a link between poor community relations, unsafe communities and poor life chances, as a government report suggests

> "One core theme which arises across all topics is the pervasive and corrosive impact of experiencing racism discrimination and poor community relations throughout an entire lifespan and how this links to unemployment, social and public issues"[9]

There is also a link between poor housing design and poor community relations, unsafe communities and poor life chances. In the Cantle report in 2001 into the disturbances in 'Northern Cities', two aspects were noticed:

- the manner in which people lived in parallel lives, encouraged by services that failed to help people integrate in their services and projects – particularly languages and basic skills services and activities with tenants were criticised

- the "warren of urban design", which both segregated people and produced unsafe areas where 'gang' mentality thrived and community relations were dominated

3.1   Assessment

This assessment recommends:

That due regard is given to prejudice and segregation and how services, projects and programmes sustain integration between communities (in terms of age, disability, religion, culture and race); in design of housing schemes, in community development and in basic skills training.

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[9] '*Inequalities experienced in communities: a review*', page iv

4. Summary

This assessment has looked in detail at the equality issues presented by the Regeneration Programme and Service. It recommends, that the service in considering all options and the recommendations of the review has due regard to the following:

Elimination of Discrimination

This assessment recommends that:

- People with a disability are considered in the planning and design stage of projects and that the Disability Advisory Group is engaged with the possibility of supporting a specific Access Consultative Group for the Regeneration Programme

- An 'internal' review, with the support of the Corporate Equality & Diversity Officer if needed, is contacted to consider the quality of engagement and the Service's engagement principles

- The list of subtle forms of discrimination is used to inform the risk register, project and programme plans

Advancing Equality of Opportunity

This assessment recommends the service:

- Adopts the "Life time homes" standard for all Regeneration Housing Programmes as a proxy to advancing opportunities.

- Increases the availability of wheelchair standard housing in the Regeneration programme

- Ensures that those with a disability especially those with a Mental Illness are included in the Services' projects and activities

- Plans people's transitions in the Major Housing Regeneration so that disruption to their access to health and schooling is minimal

- Make sure that outcomes in Basic Skills Training are linked to sustainable employment for all groups.

- Improve the data analysis, identifying potential areas for future work base on communities of need: both geographical communities and communities of type

Fostering Good Community Relations

That in looking at the options due regard is given to prejudice and segregation and how services, projects and programmes sustain integration between communities (in terms of age, disability, religion, culture and race); in design of housing schemes, in community development and in basic skills training.