

Equality impact assessment



Name of policy, service or decision: Asset Management Strategy

Lead directorate: Housing Services

1. Description – what is being assessed?

The Dudley MBC Housing Services Asset Management Strategy sets out a 10 year vision for the investment in, and provision of, affordable council housing from 2019 to 2029.

The strategy sets out how the Council will invest at least £660 million over the years from 2019-2029. This is set against an estimated £1.5 billion investment need if the existing property portfolio was retained and repaired over that period alongside the need to service historic debt that costs around £18 million per year.

2. Lead officer on assessment: Jo Forbes/Paul Griffiths

3. Head of service: Paul Griffiths

4. Members of assessment team:

Mark Rodgers – Chief Housing Officer

Paul Griffiths – Head of Housing Assets and Development

Jo Forbes – Strategy Manager

5. Date assessment began: August 2019

Background

6. What are the aims and objectives or purposes of the policy or service?

Dudley MBC has a property portfolio of 21,757 homes. They vary by property type and size. Also the supply of housing is not even throughout the Borough:

Table 2: Overview of the Council's housing stock by type

House Type	Brierley Hill	Dudley	Halesowen	North Dudley	Stourbridge	Grand Total
Houses	2655	4551	1581	2132	1350	12269
Bungaows	646	420	366	328	268	2028
High Rise Flats	492	236	282		191	1201
Low Rise Bedsits	92	100		45	97	334
Low Rise Flats	446	1609	518	1374	1322	5269
Low Rise Maisettes	127	28	275	89	127	646
Hostel Unit	2		7	1		10
Grand Total	4460	6944	3029	3969	3355	21757

Table 3: Overview of the Council's housing stock by tenure

Tenure	Brierley Hill	Dudley	Halesowen	North Dudley	Stourbridge	Grand Total
General Needs	4422	6852	2907	3878	3309	21368
Supported Housing	7	14		12	8	41
Sheltered Housing Scheme	31	78	122	79	38	348
Grand Total	4460	6944	3029	3969	3355	21757

Table 4: Overview of the Council's housing stock by size

Bedrooms	Brierley Hill	Dudley	Halesowen	North Dudley	Stourbridge	Grand Total
0	92	108		45	97	342
1	1282	1620	695	1123	1114	5834
2	1529	2120	937	972	872	6430
3	1449	2843	1323	1710	1222	8547
4	104	241	73	117	43	578
5	3	6	1		7	17
6	1	6				7
7				2		2
Grand Total	4460	6944	3029	3969	3355	21757

In essence DMBC has an old and aging property portfolio and the investment, repairs and maintenance liability over the next 30 years is estimated at around £1.5 billion.

There is a mis-match between the supply and demand for social housing, with some types of properties no longer popular because of condition, location or the impacts of welfare reforms such as the removal of the spare room subsidy (commonly known as the Bedroom Tax) and some properties have high investment needs.

A balanced approach to investment is proposed in terms of investing and strategic de-investment in existing stock and replenishing the supply of social housing by building new properties. The strategy also addresses the on-going need to service historic housing debt.

78% of the council's stock works well and contributes positively to the Housing Revenue Account in financial terms, the remaining stock, which is more challenging and includes properties which are no longer viable and for which there is no certain demand, will have to

be addressed. This includes investment decisions about 2,250 homes (10% of the Council's housing stock) that are assessed as 'amber' and 2,500 units (12%) that are assessed as 'red' where full investment in these properties would still leave them as 'unviable' in terms of asset management retention and use.

Of these:

1130 are high flats

1001 are low rise flats

351 are houses or bungalows

7. Who is it intended to affect or benefit (the target population)?

Current Dudley MBC Housing Services tenants and future tenants.

The implementation of the Strategy will also have wider impacts in terms of contributing to the regeneration of area of the Borough and providing a revenue income stream to the Council form rental income.

The strategy also contributes to meeting local housing need and preventing homelessness. Overall, 19.8% of the Borough's housing stock is social rented housing (Census 2011).

8. What are the main potential equality issues to be looked at?

General comment on the strategy as a whole:

The housing demand for particular property types is governed by Dudley MBC's designations of property types. This means that the Council has made a decision to only allow people on the housing register to bid for properties (using a Choice Based letting system) depending upon their age and household type. For example households with children are prevented from bidding for high-rise flats. The designations do impact on the levels of demand for particular property types and this follows through to decisions about whether the properties are worth future investment. The designations work will be covered by a separate Equalities Impact Assessment. For information purposes the current designations are set out below:

Table 7: Designations by area and household

Area	Singles only any age	Singles over 30, couples, families	Singles over 30, couples	Singles, couples over 40	Any age	Total
North Dudley	0	823	0	565	15	1403
Dudley	45	630	4	941	3	1623
Brierley Hill	106	245	71	221	0	643
Stourbridge	153	587	4	729	0	1473
Halesowen	0	474	2	197	0	673
Total stock	304	2759	81	2653	18	5815

Dudley MBC Housing Asset Management Strategy - Potential equality issues:

The strategy sets out five priority areas for housing investment. The priorities and the potential impacts on equalities are set out below:

1. Provision of quality affordable housing to provide safe, affordable homes that people want to live in:

- **Investment in our core stock to an agreed Investment Standard**

This proposes that the properties will be repaired to a standard that exceeds the minimum of the Government's Decent Homes Standard so that it includes an emphasis on fuel poverty, health and well-being and home safety. It also includes an emphasis on addressing the specific housing needs of older more vulnerable residents including those with a disability. The aim of the investment/repairs is to promote independence so that they can live independently for longer. This means that the strategy could favour the following demographic groups:

- Older people
- People with disabilities

- **Tackling empty homes efficiently through an agreed Occupation Standard**

This proposes that the review of designations (mentioned earlier in this document) proceeds. This could potentially benefit people aged under 30 years of age as they have least access to the current supply of Dudley MBC owned housing stock.

The process for repairing and reviewing empty properties is reviewed and speeded up. This will benefit all types of households that are in need of social housing.

Prioritising 'in demand' properties ahead of known 'low demand' properties. This will need to be monitored to see over the longer term the impact that it has on meeting local housing needs.

Disposal of financially non-viable empty homes that are 'high cost' to repair and replace them with a new, modern, warm affordable home on a 1-1 basis. This will need to be monitored to see over the longer term the impact that it has on meeting local housing needs.

- **Managing our stock through an agreed Repairs Standard**

The agreed Repairs Standard will prioritise the health and safety of residents in their homes and ensure that there is legal compliance with gas safety, electrical installations, asbestos management, water hygiene and fire risk assessments. In addition to this there are further specialist systems such as lift safety and fire and smoke detection in flatted developments. The prioritisation of these things will be of benefit to all households.

2. Managing our stock strategically to ensure future viability of affordable housing in Dudley

- **Measuring and identifying stock quality and performance**

The Council has adopted a stock appraisal that includes financial and non-financial metrics that includes rental income stream compared to management, maintenance and investment costs and demand for property types. It does not specifically take into account any of the protected characteristics but the implementation of non-financial metrics such as anti-social behaviour and demand for property types from local households is likely to be of benefit to all household types.

- **De-investment demolition and disposal of non-viable stock**

This is potentially where the strategy could have the most positive or negative impacts on equalities issues. It is also intrinsically linked to the work on property designations as changes to the designations could mean that the level of demand for the various property type changes depending on the decisions made.

If investment decisions are taken to remove or reduce the number of certain property types this could have an adverse impact on various demographic groups. An example being if a decision is made to reduce the number of high-rise blocks (21 blocks currently occupied plus 4 awaiting demolition) this will reduce the availability of housing predominantly for:

- Households without children
- People aged 30+ as 17 of the high-rise blocks are designated for people over this age

3. Provision of more affordable housing to meet our diverse housing needs

Chapter 4 of the strategy sets out the need to balance investment in existing housing stock, strategic dis-investment/disposal and the Council's ability to deliver approximately 60 new affordable homes per year. It should be noted that the properties most likely to be rated as 'red' or amber' are high or low-rise flats i.e. homes that are built to a relatively high density compared to houses or bungalows. This means that the implementation of the strategy could lead to a net loss in social housing stock over the lifetime of the strategy. This could impact on meeting local housing need and needs to be monitored in terms of its impact on households with protected characteristics.

- **Developing more affordable housing and mixed tenure estates**

The proposal to deliver on average 60 new affordable homes per year provides the Council with the opportunity to deliver the type and size of homes that are most required by people on the housing waiting list. Other factors such as the size and topography of the land also need to be taken into account. Over recent years the Council has, where possible, prioritised the delivery of 1,2 and 4/4+ bedroom properties as we know that this is where the most acute demand lies and this is where we have the shortfall in the existing housing stock portfolio. This also aligns with the projected future housing needs that are identified in the Black Country and South Staffordshire Strategic Housing Market Assessment completed in 2017 that is being used to inform and update the Black Country Core Strategy.

There are currently 2,458 households on the Dudley MBC social housing waiting list. Their housing need is broken down by the number of bedrooms that they require as follows:

1 bedroom	2 bedroom	3 bedroom	4 bedroom	5 bedroom	6 bedroom
1137	860	347	98	12	4

In addition to this there are an additional 1,346 households who already live in Dudley MBC properties who are seeking to transfer to another property. Their housing need is broken down by the number of bedrooms that they require as follows:

1 bedroom	2 bedroom	3 bedroom	4 bedroom	5 bedroom	6 bedroom	7 bedroom
669	329	230	79	29	8	2

Our recent track record on delivering new homes since 2017 is as follows:

1 bedroom	2 bedroom	3 bedroom	4 bedroom	5 bedroom	6 bedroom	7 bedroom
52	95	21	18	2	0	0

The figures demonstrate that the delivery of new homes with an emphasis on delivering properties containing 1, 2 and 4/4+ bedrooms is already happening and will form part of the

ongoing work within the implementation of the strategy to address the mismatch of housing supply and demand.

The proposal to deliver mixed tenure estates also helps to cross subsidise new housing development sites so that ultimately we can deliver more social/affordable rented homes whilst building mixed and sustainable communities.

- **Improving the offer for supported living to meet the needs of an aging and vulnerable population.**

The strategy sets out a series of action plan objectives aligned to reviewing the quality of accommodation offered to older people (sheltered housing) and to build at least one new supported housing scheme. This is likely to mean that future investment in specialist housing is targeted towards expenditure that will benefit older people. This aligns with needs of Dudley's current population and takes into account the predicted growth of older person's households. Dudley's population is, on average, older than that for England, with a higher proportion aged over 45ⁱ. Between 2016 and 2031 Dudley's population is expected to increase by 13,990 (4.4%)ⁱⁱ. Most of the increase is in the 65+ age group, with the number of people aged 85+ increasing by nearly 70%ⁱⁱⁱ.

The strategy also gives examples of how Dudley's new build housing programme has met some unmet specialist housing need in recent years see Leabank Rd/Murray Grey Mews, Ketley Hill (Golden Eagle Rise) and Margaret Vine and Holloway Court case studies (Appendix 2 of the Asset Management Strategy document)

4. Addressing the housing and community needs of our residents and estates

- **Addressing fuel poverty**

The investment strategy will deliver benefits to all households renting homes from the Council by reducing fuel poverty – the strategy sets out how it intends to invest money so that all homes are at least 'D' energy rated and higher.

- **Promoting Independent Living**

The investment strategy will deliver benefits to all households renting homes from the Council by promoting independent living. This is likely, however, to favour older person households as they are likely to have a higher level of health or care/support needs. The strategy proposes retaining and investing £3 million per year to adapt properties, give Disabled Facilities Grants to owner occupiers, funding Housing Assistance Grants, promoting Winter Warmth services and looking at opportunities to build new specialist housing to promote independent living for older people and vulnerable residents.

- **Delivering community and estate regeneration**

The investment strategy will deliver benefits to all households renting homes from the Council by assessing through a structured process the likely strategic impact of investment in specific local areas. This will include seeking to balance local housing markets through its new build programme. In short, the strategy takes into account the impacts that bricks and mortar regeneration alongside how the actions in the strategy can contribute to community cohesion and the well-being of local residents. For example, by providing them with homes that are safe to live in and are fuel efficient to run.

5. Ensuring value for money through our housing services

- **Maximising resources**
- **Maximising income**
- **Maximising opportunities for commercialism**
- **Efficient Procurement**

This element of the strategy acknowledges the impact of this investment upon local communities and businesses. It acknowledges the obligations of the Public Service (Social Value) Act 2012 and the opportunities to develop local supply chains and create local employment opportunities.

Evidence gathering

9. Provide details of all information about the policy, service or decision which will help with the assessment.

Equality monitoring data:

What monitoring data is collected for each of the protected characteristics? Set out relevant details of this data.

No specific data is collected in terms of asset management, however, the protected characteristics of applicants for social housing, lettings and homelessness are monitored at least annually through CORE housing returns and homelessness data that is reported annually.

Engagement and customer feedback:

What engagement has been carried out with users, customers, potential customers, employees as appropriate? What was the feedback?

The strategy has been developed in consultation with the Housing Board and Dudley Federation of Tenants and Residents Associations (DFTRA). In addition to this, we have worked with 24 individual tenants and residents associations via roadshows, conferences and individual meetings, and worked with the High-Rise Living Forum, Community Improvement working group and the Anti-social Behaviour Focus Group.

What other relevant information do you hold e.g. are you aware of any barriers to any groups in accessing the service?

N/A

What evidence is missing? What will be done to collect it?

N/A

Data analysis

10. What does the information tell you? What patterns or trends are there? What comparative data is there - how does your data compare with background data e.g. from the Census, national data or research, or other authorities?

Dudley has a higher level of social housing stock in the Borough at 19.8% compared to the England average at 17.7% (Census 2011).

The English Homes Condition Survey 2016 reported that nationally 8% of local authority stock was built after 1980 compared to 37% of housing association homes and high-rise flats are more common in local authorities (7%) than housing associations (3%) of stock. For Dudley MBC only 3% of its stock was built after 1980 and 6% of its stock is high-rise. This means that Dudley has on average an older housing stock and more high-rise homes. The combination of this means that the older stock is less likely to meet current or future housing aspirations.

11. From your data analysis, what are the main issues relating to each protected characteristic (if any)? Consider all three parts of the public sector equality duty.

All protected characteristics

Age

28% of the households that will be impacted by the implementation of this strategy are aged 65+. The need to cater for older people and their predicted growth in numbers is taken into account in the strategy.

Age of Head of Household	Count of Tenancy Number
18-64	15202
65+	5980
Grand Total	21182

	<p>People aged under 30 have the least access to Dudley MBC owned housing stock. This issue will be addressed through the work on housing designations rather than through the asset management strategy.</p>										
<p>Disability</p>	<p>We hold this data on our management systems, as set out below, but we know that there are at least two different data fields that can be populated. This needs to be addressed as part of wider housing services work rather than just in relation to this particular strategy. We cannot, therefore, regard this data as reliable.</p> <table border="1" data-bbox="564 678 1339 846"> <thead> <tr> <th colspan="2">Has Disability</th> </tr> <tr> <th>Row Labels</th> <th>Count of Tenancy Number</th> </tr> </thead> <tbody> <tr> <td>No</td> <td>19313</td> </tr> <tr> <td>Yes</td> <td>1869</td> </tr> <tr> <td>Grand Total</td> <td>21182</td> </tr> </tbody> </table> <p>The 2011 Census indicated that 20.3% of the Borough's residents have a limiting long term illness that limits their daily activities^{iv}. The number of people aged 65+ with a limiting long term illness is predicted to grow by almost 6,000 by 2030 as the number of older people in the Borough increases^v. There are also smaller scale increases predicted for people aged under 64 with serious physical disabilities and people of all ages with a moderate or severe learning disability^{vi}. The strategy acknowledges and seeks to meet some of this identified need.</p>	Has Disability		Row Labels	Count of Tenancy Number	No	19313	Yes	1869	Grand Total	21182
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<p>Gender reassignment</p>	<p>We do not hold sufficient data to assess the impact of this strategy against this particular protected characteristic.</p>										
<p>Marriage or civil partnership</p>	<p>We do not hold sufficient data to assess the impact of this strategy against this particular protected characteristic.</p>										
<p>Pregnancy or maternity</p>	<p>We do not hold sufficient data to assess the impact of this strategy against this particular protected characteristic. However we do know that 6,745 households contain dependent children.</p> <table border="1" data-bbox="564 1765 1339 1933"> <thead> <tr> <th colspan="2">Has Dependants</th> </tr> <tr> <th>Row Labels</th> <th>Count of Tenancy Number</th> </tr> </thead> <tbody> <tr> <td>No</td> <td>14437</td> </tr> <tr> <td>Yes</td> <td>6745</td> </tr> <tr> <td>Grand Total</td> <td>21182</td> </tr> </tbody> </table>	Has Dependants		Row Labels	Count of Tenancy Number	No	14437	Yes	6745	Grand Total	21182
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	The issue of pregnancy or maternity is not monitored in relation to this strategy but it is monitored in the implementation of other Dudley MBC strategies such as the Homelessness Prevention Strategy.																						
Race	<p>Currently 88% of our households (head of household) have identified themselves as White British and 11% as Black and Minority Ethnic. 0.7% have refused to answer or their race is not recorded on our systems. These percentages are similar to the residents of the Borough as a whole.</p> <table border="1"> <thead> <tr> <th colspan="2">Ethnicity</th> </tr> <tr> <th>Row Labels</th> <th>Count of Tenancy Number</th> </tr> </thead> <tbody> <tr> <td>Answer Refused</td> <td>54</td> </tr> <tr> <td>Asian or Asian British</td> <td>688</td> </tr> <tr> <td>Black or Black British</td> <td>766</td> </tr> <tr> <td>Chinese/Arab or other ethnic group</td> <td>431</td> </tr> <tr> <td>Mixed</td> <td>466</td> </tr> <tr> <td>Not Stated</td> <td>112</td> </tr> <tr> <td>White</td> <td>18662</td> </tr> <tr> <td>(blank)</td> <td>3</td> </tr> <tr> <td>Grand Total</td> <td>21182</td> </tr> </tbody> </table>	Ethnicity		Row Labels	Count of Tenancy Number	Answer Refused	54	Asian or Asian British	688	Black or Black British	766	Chinese/Arab or other ethnic group	431	Mixed	466	Not Stated	112	White	18662	(blank)	3	Grand Total	21182
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Religion or belief	We do not hold sufficient data to assess the impact of this strategy against this particular protected characteristic.																						
Sex	We do not hold sufficient data to assess the impact of this strategy against this particular protected characteristic.																						
Sexual Orientation	We do not hold sufficient data to assess the impact of this strategy against this particular protected characteristic.																						
Are there any significant issues relating to other groups of people e.g. through social class or in particular parts of the borough?																							
<p>The Dudley MBC housing stock is not located evenly throughout the Borough. The supply varies from ward to ward with Halesowen South having the smallest supply at 157 homes compared to the largest supply in Brierley Hill ward containing 1723 homes. The housing supply by property type is also not evenly spread throughout the Borough with high concentrations of flats in certain areas such as Brierley Hill (Chapel Street) and Halesowen (Highfields estate). Decisions about investment or dis-investment are likely to have a more acute impact in areas with higher densities of Dudley MBC housing stock.</p>																							
Identifying adverse impacts																							

12. What are the main potential adverse impacts on particular protected characteristics that need to be taken into account in changing the service or policy/making a decision? Indicate any positive impacts.

The adverse or positive impacts of this strategy have been identified in other sections of this document, particularly section 8.

Alternatives/mitigating actions

13. How will any adverse impacts identified be reduced or removed? Explain if it is decided that an adverse impact is unavoidable.

The strategy will be reviewed periodically over the 10 year implementation period.

Monitoring arrangements

14. How will the equality impact of the policy/service be monitored in future?

It will be monitored as part of the period review of the strategy.

Action planning

15. Provide details of actions or improvements identified during the EIA.

Actions required:

• **Tackling empty homes efficiently through an agreed Occupation Standard**

Prioritising 'in demand' properties ahead of known 'low demand' properties. This will need to be monitored to see over the longer term the impact that it has on meeting local housing needs.

• **De-investment demolition and disposal of non-viable stock**

a) Disposal of financially non-viable empty homes that are 'high cost' to repair and replace them with a new, modern, warm affordable home on a 1-1 basis. This will need to be monitored to see over the longer term the impact that it has on meeting local housing needs.

b) The de-investment decisions also need to be monitored and kept under review as the work on designations progresses as alterations in property designations may cause levels of demand for certain property types to increase or decrease.

• **Disability data**

As mentioned earlier in this document. We have highlighted an issue with the recording of disability data that requires further investigation. It is not specific to this strategy and would be of benefit to Housing Services as a whole.

Decision making

16. Who will be making a decision relating to the policy or service (e.g. the Cabinet, a Cabinet member through a decision sheet, a director or chief officer through delegated authority) and when will a decision be made?

Council Decision – October 2019.

Note. The decision maker(s) need(s) to be briefed on the contents of the EIA.

Include a summary of the main impacts in the 'Equality Impact' paragraph of any committee report or decision sheet (attach a copy of the EIA where appropriate).

Signed assessment lead officer:

Date:

Chief officer/head of service:

Date:

ⁱ Understanding Dudley 2017 Chapter 2 – Population & Household Characteristics, Dudley MBC. Page 5

ⁱⁱ Understanding Dudley 2017 Chapter 2 – Population & Household Characteristics, Dudley MBC. Page 9

ⁱⁱⁱ Understanding Dudley 2017 Chapter 2 – Population & Household Characteristics, Dudley MBC. Page 9

^{iv} Strategic Housing Market Assessment Part 2 – Objectively Assessed Need for Affordable Housing -HDH Planning and Development Ltd June 2017 Page 87 para 6.15

^v Strategic Housing Market Assessment Part 2 – Objectively Assessed Need for Affordable Housing -HDH Planning and Development Ltd June 2017 Page 89 Table 6.3

^{vi} Strategic Housing Market Assessment Part 2 – Objectively Assessed Need for Affordable Housing -HDH Planning and Development Ltd June 2017 Page 89 Table 6.3