

## **Equality Analysis Report**

<b>Title of activity / Budget Proposal title and number</b> Consultation on the draft Older Persons' Accommodation Strategy 2018-2023	<b>Committee meeting (decision maker) and date</b> Housing Committee 20 <sup>th</sup> February 2019 Executive 5 <sup>th</sup> March 2019
<b>Service area</b> Environment, Planning and Housing	<b>Lead officer</b> Gill Cowie, Service Manager Planning & Housing Strategy
<b>Approved by</b> Jon Shortland, Chief Officer for Planning and Highways	<b>Date of approval</b> 16.01.19
<b>Description of activity:</b>  The draft Older Persons' Accommodation Strategy (OPAS) is for the period 2018-2023. When finalised it will replace the OPAS 2011-2016.  Public Consultation on the draft strategy was completed during early autumn 2018. Responses were noted and appropriate changes to the strategy have been made. This Equality Analysis has been completed post public consultation.  The Strategy assesses and identifies the housing needs of older persons – identified in the Strategy as those aged 65 and over - in Bedford Borough.  All local authorities with strategic housing responsibilities need to plan to meet the housing needs of local residents. The Borough Council and its partners have a key role to play in meeting the housing needs of all of the Borough's citizens, in particular those vulnerable members of the community. As part of an overarching Care and Support Accommodation Strategy the Older Persons Accommodation Strategy focuses on the housing needs of Bedford Borough's older population. It analyses the types of accommodation available to older persons and considers their possible future housing requirements.	

## **Relevance Test**

1. The outcomes of the activity directly and significantly impact on people, e.g. service users, employees, voluntary and community sector groups.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
2. The activity could / does affect one or more protected equality groups.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
3. The activity could / does affect protected equality groups differently.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4. One or more protected equality groups could be disadvantaged, adversely affected or are at risk of discrimination as a result of the activity.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
5. The activity relates to an area where there are known inequalities.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
6. The activity sets out proposals for significant changes to services, policies etc. and / or significantly affects how services are delivered.	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
7. The activity relates to one or more of the three aims of the Council's equality duty.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
8. The activity relates to the Council's Corporate Plan objectives, is a significant activity and / or presents a high risk to the Council's public reputation.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
9. An equality analysis of this activity is required.	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
This activity has no relevance to Bedford Borough Council's duty to eliminate unlawful discrimination, harassment and victimisation; to advance equality of opportunity; and to foster good relations. An equality analysis is not needed.				<input type="checkbox"/>
<b>Explanation why equality analysis is not needed</b>				
N/A				

## **Scope of equality analysis**

<b>Who is / will be impacted by the activity's aims and outcomes?</b>	As the Older Persons' Accommodation Strategy focuses on meeting the accommodation needs of Older Persons in the Borough, it may potentially affect members of the community who are covered by the protected characteristics as defined by the Equality Act 2010. In particular age, disability but also race as the Strategy contains the Recommendation to 'Understand and consider the specific housing needs of older ethnic minority people, particularly those ethnic minority groups with a higher prevalence of disability'.
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<p><b>Which particular protected equality groups are likely / will be affected?</b></p>	<p>Older Persons, those with disabilities and those from minority ethnic communities.</p> <p>Older Persons will have their accommodation needs met by the delivery of the strategy.</p> <p>The strategy recommendation to adopt Building Regulations Part M (Dwellings) M4 (3) Category 3 (full wheelchair standard) for older persons housing wherever possible will increase access to housing for those with physical disabilities.</p> <p>Those from minority ethnic communities should have their needs for Older Persons accommodation better understood and met by implementing Recommendation 7 – ‘Understand and consider the specific housing needs of older ethnic minority people, particularly those ethnic minority groups with a high prevalence of disability.’</p>
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#### **Evidence, data, information and consultation**

<p><b>What evidence have you used to analyse the effects on equality?</b></p>	<p><b><u>General</u></b></p> <ul style="list-style-type: none"> <li>• Population estimates and forecasts June 2015, BBC</li> <li>• Housing Strategy Review 2016-2020, BBC</li> </ul> <p><b><u>Age</u></b></p> <ul style="list-style-type: none"> <li>• Projecting Adult Needs and Service Information (PANSI)</li> <li>• Projecting Older People Population Information System 2017, POPPI</li> <li>• Strategic Housing Market Assessment Update December 2016, ORS</li> </ul> <p><b><u>Disability</u></b></p> <ul style="list-style-type: none"> <li>• Projecting Adult Needs and Service Information (PANSI)</li> <li>• Joint Strategic Needs Assessment 2017, BBC</li> <li>• Joint Commissioning Strategy for People with Physical Disabilities and Sensory Impairments 2013 – 2017 BBC/NHS BCCG</li> </ul> <p><b><u>Race</u></b></p> <ul style="list-style-type: none"> <li>• Ethnicity Composition March 2011, BBC</li> </ul>
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	<ul style="list-style-type: none"> <li>Population estimates and forecasts June 2015, BBC</li> <li><a href="https://www.ethnicity-facts-figures.service.gov.uk/housing">https://www.ethnicity-facts-figures.service.gov.uk/housing</a></li> </ul>
<b>What consultation did you carry out with protected equality groups to identify your activity's effect on equality?</b>	<p>A public consultation on the draft Older Persons Accommodation Strategy was undertaken in autumn 2018. This consultation offered all sectors of the community the opportunity to comment on how they are affected by the proposed Strategy.</p> <p>A number of respondents questioned why Recommendation 7 which states 'Understand and consider the specific housing needs of older ethnic minority people, particularly those ethnic minority groups with a higher prevalence of disability' and action 1.5 'Investigate the need for an Asian Elders Scheme' had been included. The officers' response was that Under Section 149(1) of Equality Act 2010 the Council has a duty to advance equality of opportunity for protected groups. The strategy considers ethnicity, the growing population of older ethnic persons and the increased likelihood of persons from those communities experiencing disability outcomes at paras 3.39ff.</p> <p>The Strategy does not aim to provide a scheme specifically to meet the needs of a particular group, rather that the Council should seek to 'Understand and consider the specific housing needs of older ethnic minority people, particularly those ethnic minority groups with a higher prevalence of disability' (Recommendation 7). Once these needs are understood, the way in which they and our obligations under the Equalities Act 2010 should be met will be clearer.</p> <p>It is acknowledged that the action identified at 1.5 'investigate the need for an Asian Elders scheme does not reflect Recommendation 7 and this action will be amended accordingly'</p>
<b>What does this evidence tell you about the different protected groups?</b>	<p><u>Age</u></p> <ul style="list-style-type: none"> <li>In 2011, there were 12,976 pensioner households in the Borough, of which 7,616 were pensioners living alone. Pensioner households formed 20.3% of all households compared to 20.8% in England and 22.4% in the East of England.</li> <li>Bedford Borough's population rose from 148,100 in 2001 to 163,900 in 2014, an increase of 11%. Growth was concentrated in older age groups, including a 45% rise in the number of people aged 85+.</li> </ul>

- The Borough's total population is forecast to increase by 7% between 2014 and 2021, but older age groups will increase at a much higher rate with the 65+ population rising by approximately 16%. Most notably, the 85+ population is forecast to increase by around 32%. This will represent a significant ageing of the Borough's population profile, and this trend will continue beyond 2021.
- It is estimated that the population of over 65s will increase by 16,300 (55%) by 2035.

<b>Age Range</b>	<b>2017</b>	<b>2020</b>	<b>2025</b>	<b>2030</b>	<b>2035</b>	<b>% Change 2017-2035</b>
Population aged 65-69	8,600	8,300	9,500	11,100	11,600	35
Population aged 70-74	7,500	8,300	7,900	9,000	10,600	41
Population aged 75-79	5,200	5,900	7,700	7,300	8,400	61
Population aged 80-84	4,200	4,400	5,200	6,800	6,500	55
Population aged 85-89	2,800	3,000	3,400	4,100	5,400	93
Population aged 90+	1,600	1,800	2,300	2,900	3,700	131
<b>Total population aged 65+</b>	<b>29,900</b>	<b>31,700</b>	<b>36,000</b>	<b>41,200</b>	<b>46,200</b>	<b>55</b>

- The 65-69 population is projected to increase by 35% between 2017 and 2035 whereas the older age ranges are expected to increase by higher levels with those aged 85-89 increasing by 93% and 90+ by 131%.

#### **Disability**

- The PANSI estimates that in 2015 there were 2,414 people aged 18 and over in the Borough who have a Learning Disability. This is expected to increase to 2,615 in 2030. Of the 2414, approximately 500 (20%) are in contact with Adult Services.
- By 2030 there are expected to be 841 people aged 64 and over with a learning disability, which
- The population of people with learning disabilities aged over 65 is predicted to increase from 589 in 2015 to 841 in 2030.
- The following table shows the number of people in Bedford Borough who have a moderate or serious physical disability analysed by age

	2014	2015	2020	2025	2030
People aged 18-24 predicted to have a moderate physical disability	586	590	566	562	627
People aged 25-34 predicted to have a moderate physical disability	874	878	924	945	907
People aged 35-44 predicted to have a moderate physical disability	1,215	1,221	1,249	1,310	1,355
People aged 45-54 predicted to have a moderate physical disability	2,260	2,289	2,270	2,192	2,250
People aged 55-64 predicted to have a moderate physical disability	2,727	2,742	3,114	3,397	3,382
<b>Total population aged 18-64 predicted to have a moderate physical disability</b>	<b>7,662</b>	<b>7,720</b>	<b>8,122</b>	<b>8,406</b>	<b>8,522</b>
People aged 18-24 predicted to have a serious physical disability	114	115	110	110	122
People aged 25-34 predicted to have a serious physical disability	83	84	88	90	86
People aged 35-44 predicted to have a serious physical disability	369	371	379	398	411

People aged 45-54 predicted to have a serious physical disability	629	637	632	610	626
People aged 55-64 predicted to have a serious physical disability	1,061	1,067	1,212	1,322	1,317
<b>Total population aged 18-64 predicted to have a serious physical disability</b>	<b>2,257</b>	<b>2,274</b>	<b>2,422</b>	<b>2,530</b>	<b>2,563</b>

*SOURCE: PANSI*

- At 2015 there were 189 people on the housing register who needed to move for medical reasons which included grounds relating to a disability.
- Information on disability / health in relation to those over 65 years of age is contained in POPPI. Breakdowns are provided for Bedford Borough for a significant number of medical conditions but are not given by moderate or serious disability as categorised by PANSI. These statistics are available here:

<http://www.poppi.org.uk/index.php?pageNo=342&loc=&mapOff=1>

POPPI is for use by local authority planners and commissioners of social care provision in England. Registration is restricted to those who work in local & national government, NHS, provider and academic organisations. If further information is required by a third party please contact: [housing.strategy@bedford.gov.uk](mailto:housing.strategy@bedford.gov.uk).

### **Race**

- Bedford Borough has an ethnically diverse population. The 2011 Census indicates that 28.5% of the population was from minority ethnic groups (BME), compared to 20.2% nationally (and 13.9% excluding London Boroughs). The BME population increased by 16,400 between 2001 and 2011, whereas the 'White British' population declined by 6,900.
- The BME population is concentrated in the urban area of Bedford and Kempston, with particularly large BME communities in Queens Park (75%) and Cauldwell (59%) wards. The BME level is highest among younger age groups and a majority (51%) of the 0-4 population in Bedford and

	<p>Kempston is non-‘White British’.</p> <ul style="list-style-type: none"><li>Asian/Asian British groups form just 2% of the 85+ population and 3.5% of those aged 75-84, but they represent 4.7% of the 65-74 and 7.1% of those aged 55-64.</li></ul> <table><tr><th></th><th>White</th><th>Mixed/ multiple ethnic group</th><th>Asian/ Asian British</th><th>Black/ African/ Caribbean/ Black British</th><th>Other Ethnic Group</th><th>TOTAL</th></tr><tr><td>People aged 55-64</td><td>16,337</td><td>123</td><td>1,301</td><td>352</td><td>107</td><td><b>18,220</b></td></tr><tr><td>People aged 65-74</td><td>11,774</td><td>51</td><td>605</td><td>297</td><td>34</td><td><b>12,761</b></td></tr><tr><td>People aged 75-84</td><td>8,111</td><td>36</td><td>307</td><td>200</td><td>26</td><td><b>8,680</b></td></tr><tr><td>People aged 85 and over</td><td>3,296</td><td>12</td><td>67</td><td>45</td><td>7</td><td><b>3427</b></td></tr><tr><td><b>Total population aged 55 and over</b></td><td><b>39,518</b></td><td><b>222</b></td><td><b>2280</b></td><td><b>894</b></td><td><b>174</b></td><td><b>43,088</b></td></tr></table>		White	Mixed/ multiple ethnic group	Asian/ Asian British	Black/ African/ Caribbean/ Black British	Other Ethnic Group	TOTAL	People aged 55-64	16,337	123	1,301	352	107	<b>18,220</b>	People aged 65-74	11,774	51	605	297	34	<b>12,761</b>	People aged 75-84	8,111	36	307	200	26	<b>8,680</b>	People aged 85 and over	3,296	12	67	45	7	<b>3427</b>	<b>Total population aged 55 and over</b>	<b>39,518</b>	<b>222</b>	<b>2280</b>	<b>894</b>	<b>174</b>	<b>43,088</b>
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What further research or data do you need to fill any gaps in your understanding of the potential or known effects of the activity?	None																																										

### General Equality Duty



<b>Which parts of the general equality duty is the activity relevant to?</b>			
	<b>Eliminate discrimination, harassment and victimisation</b>	<b>Advance equality of opportunity</b>	<b>Foster good relations</b>
Age	.	The Older Persons Accommodation Strategy seeks to ensure the accommodation needs of older persons in the Borough are met.	
Disability		The implementation of the Strategy will ensure more properties are built to full wheelchair standard and improve accessibility to suitable housing for those with a disability	
Gender reassignment		N/A	
Pregnancy and maternity		N/A	
Race		The recommendation to 'Understand and consider the specific housing needs of older ethnic minority people, particularly those ethnic minority groups with a higher prevalence of disability' should ensure the needs of minority groups are met and, potentially, increase access to accommodation suitable for their needs.	
Religion or belief		N/A	
Sex		N/A	
Sexual orientation		N/A	

Marriage & civil partnership		N/A	

### **Impact on equality groups**

<b>Based on the evidence presented what positive and negative impact will your activity have on equality?</b>				
	Positive impact	Negative impact	No impact	Explanation
Age	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Strategy focuses on Older Persons and their accommodation needs and its implementation will increase access to suitable accommodation for this protected group.
Disability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The provision of more homes to full wheelchair standard will increase opportunity for those with disabilities to access accommodation suitable for their needs,.
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
Pregnancy and maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
Race	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Recommendation to 'Understand and consider the specific housing needs of older ethnic minority people, particularly those ethnic minority groups with a higher prevalence of disability' should assist in understanding the needs of minority ethnic communities and potentially improve equality of access to older persons accommodation for this client group.
Religion or belief	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
Sexual orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
Marriage & civil	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A

partnership				
Other relevant groups	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A

### **Commissioned services**

<b>What equality measures will be included in Contracts to help meet the three aims of the general equality duty?</b>	N/A
<b>What steps will be taken throughout the commissioning cycle to meet the different needs of protected equality groups?</b>	N/A

### **Actions**

	What will be done?	By who?	By when?	What will be the outcome?
<b>Actions to lessen negative impact</b>	N/A			
<b>Actions to increase positive impact</b>	N/A			
<b>Actions to develop equality evidence, information and data</b>	N/A			
<b>Actions to improve equality in procurement / commissioning</b>	N/A			
<b>Other relevant actions</b>	N/A			

## **Recommendation**

<b>No major change required</b>	<input checked="" type="checkbox"/>	The analysis shows a positive impact on older people, those with disabilities and those from minority ethnic communities. No negative effect or potential for discrimination has been identified. An appropriate and proportionate approach has been taken to advance equality of opportunity for these affected groups.
<b>Adjustments required</b>	<input type="checkbox"/>	
<b>Justification to continue the activity</b>	<input type="checkbox"/>	
<b>Stop the activity</b>	<input type="checkbox"/>	

## **Summary of analysis**

In preparing this report, due consideration has been given to the Borough Council's statutory Equality Duty to eliminate unlawful discrimination, advance equality of opportunity and foster good relations, as set out in Section 149(1) of the Equality Act 2010.

The Older Persons Accommodation Strategy 2018 – 2023 advances opportunity to access suitable housing for older persons, those with a disability and those from minority ethnic communities. No negative effects on protected groups has been identified.

The equality analysis concludes that no major change is required.

## **Monitoring and review**

<b>Monitoring and review</b> The Older Persons Accommodation Strategy will form part of an overarching Care and Support Accommodation Strategy which will be reviewed bi-annually.	<b>Review date</b> <b>March 2021</b>
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