Equality Impact Assessment:

Initial Assessment

Name: Mobile Homes Act 2013 fees Policy

1). What is the aim of your policy, project or strategy/purpose of activity?

The Mobile Homes Act 2013 came into effect on 1 April 2014 it has amended The Caravan Sites and Control of Development Act 1960, and introduced a new licensing regime for all Mobile Home Parks. The Act introduces additional powers to ensure compliance with site licence conditions. The Council can also now charge a fee for these licensing functions, serve enforcement notices and oversee and publish any site rules relating to a site within the City of Peterborough.

2). Will your policy/project/strategy have a disproportionate effect on members of the equality groups below? (See Appendix A for further information)**:**

Equality Group	(✓)	Is the effect Positive, Negative, Neutral or Unclear? Please comment where applicable
Particular age groups		Negative on those aged over 55 as these are predominantly the age group of the tenants on these sites
Disabled people		Neutral
Married couples or those entered into a civil partnership		Neutral
Pregnant women or women on maternity leave		Neutral
Particular ethnic groups, including Gypsy and Travellers and new arrivals		Neutral
Those of a particular religion or who hold a particular belief		neutral
Male/Female		Neutral
Those proposing to undergo, currently undergoing or who have undergone gender reassignment		Neutral
Sexual orientation		Neutral

If there are any negative or unclear affects, you are required to do a full EqIA.
Need for a full EqIA? Please circle: **No**

Date Initial EqIA completed:	26th May 2015
Assessment completed by:	Belinda Child

Policy Review Date:	May 2016
Signed by Head of Service:	Adrian Chapman

Equality Impact Assessment:

Full Assessment

1). Name of the policy area or programme with which this assessment is concerned:

Mobile Homes Act 2013 fees Policy

Lead officer: Belinda Child

2). Provide a summary of your policy area/programme in no more than 350 words (see Appendix A for further guidance)**:**

The Mobile Homes Act 2013 came into effect on 1 April 2014 it has amended The Caravan Sites and Control of Development Act 1960, and introduced a new licensing regime for all Mobile Home Parks. The Act introduces some important changes to the buying, selling or gifting of a park home and the pitch fee review process. For site licensing functions, the Act introduces additional powers for Local Authorities to ensure compliance with site licence conditions. The Council can also now charge a fee for these licensing functions, serve enforcement notices and oversee and publish any site rules relating to a site within the City of Peterborough.

3). Why do you feel your policy area/programme will impact the groups identified in the initial assessment? What information/data do you have to support this? (See Appendix A for further guidance)**:**

Many of the residents, but not all, of the sites are over the age of 55, some sites have lettings policies identifying the minimum age of the residents some don't. The policy is specifically applied to the regulation of the Mobile Homes sites in the City and therefore the residents will be directly affected. This has been identified following work with the individual residents of the sites and with the Managers/owners of the sites.

4). What does your evidence show? (See Appendix A for further guidance)**:**

Many of the residents, but not all, of the sites are over the age of 55, some sites have lettings policies identifying the minimum age of the residents some don't. The policy is specifically applied to the regulation of the Mobile Homes sites in the City and therefore the residents will be directly affected. This has been identified following work with the individual residents of the sites and with the Managers/owners of the sites.
The impact on the residents will be that the first year costs of the site licence only, can be recovered by the owner of the site through a rent increase. This can only take place in the first year.

5a). Who have you consulted with?	5b). If you haven't consulted yet, please list who you are going to consult with and when by:
Full consultation has taken place with the individual residents on each site and the owners/managers of each site in the City's boundary.	

6). Please give examples of how you have or are going to consult with specific groups or communities (e.g. meetings, surveys):

- Each individual resident of each site has been written to explaining the changes and offering individual meetings with council officers.
- Council officers have spent pre- arranged days on each site so that residents could meet with them
- Two day time and evening meetings were arranged with the owners and managers of the sites
- A dedicated telephone line and appointments service, email inbox and website page was launched
- A Public Notice was placed in the Peterborough Evening Telegraph.
- Details of the Consultation was sent to local and national bodies including LEASE (The Leasehold Advisory Service), The National Association of Park Homes Residents, The British Holiday and Park Homes Association

7). What will your policy do to mitigate existing inequalities?

The Mobile Homes Act 2013 was passed in order to mark the Government's commitment to giving better rights and protection to park home owners, whilst ensuring honest professional site owners can flourish. Peterborough City Council's Fees Policy is intended to support the Governments Policy and the wider policies of the Housing and Health Improvement team. The Fees Policy will enable the Council to better discharge its responsibility to protect the vulnerable across the City in line with corporate objectives.

8). Tick which one of the following best summarises your Equality Impact Assessment:

A	A positive impact is explicitly intended and very likely.	
B	There is a clear *potential* to have a positive impact by reducing and removing barriers and inequalities that currently exist.	
C	An adverse impact is unlikely. However, there is insufficient evidence to confirm this statement	x
D	There will be a neutral effect, neither positive nor negative	
E	Adverse impact is probable, since certain groups are likely to be disadvantaged, either proportionately or absolutely, or both. Remedial action is therefore necessary.	
F	Adverse impact is certain for certain groups but the policy as a whole can nevertheless be justified.	

PLEASE NOTE:
If you select "E" or "F" from the above list, it will be necessary to obtain legal advice.

Legal advice obtained Yes/No Legal Officer ……..

9). Expand and explain why that summary best describes your assessment:

10). Next Steps **(See Appendix A for further guidance)**:

What will be done	What expected outcomes as a result:	By whom:	By when:
• Individual inspections of each site will take place once a licence application has been received. At this point Officers will determine whether the licence fee is being passed on by the owners to the residents, and if so how much. (this can only happen for the first year)	• Owners may pass on fee costs in first year	• Housing Enforcement Officers	July 2016
• This will be reviewed the second year to ensure no costs are passed on for any subsequent years.	• Review shows no further costs passed on to residents	• Housing Enforcement Officers	July 2017

11). How are you going to review the policy, project or strategy, and who will be responsible?

The Policy will be reviewed in line with all the Council's fees and charges policy

When EqIA will be reviewed: July 2016

Date EqIA completed:	26th May 2015
Assessment completed by:	Belinda Child
Policy Review Date:	July 2016
Signed by Head of Service:	Adrian Chapman
Signed by Legal Officer	

Appendix A

Protected Characteristics

Age
Where this is mentioned, it refers to a person belonging to a particular age (i.e. 32 years old) or a range of ages (e.g. 18-30 year olds)

Disability
A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Marriage and civil partnership
Marriage is defined as a 'union between a man and a woman'. Same-sex couples can have their relationships legally recognised as 'civil partnerships'. Civil partners must be treated the same as married couples on a wide range of legal matters.

Pregnancy and maternity
Pregnancy is the condition of being pregnant. Maternity refers to the period of 26 weeks after the birth, which reflects the period of a woman's ordinary maternity leave entitlement in the employment context.

Race
Refers to the protected characteristics of Race. It denotes a group of people defined by their race, colour and nationality (including citizenship), ethnic or national origins. The following categories are currently used on recruitment application forms:

Group	Type	Group	Type
White	British/English/Scottish/Welsh Irish Italian Portuguese Other European Traveller Other White background	Asian or Asian British	Bangladeshi Indian Kashmiri Pakistani Other Asian background
Black or Black British	African Caribbean Other Black background	Other ethnic group	Chinese Other background
Mixed	White and Asian White and Black African White and Black Caribbean Other Mixed background		

Religion and belief

Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

***Religious groups*:**

Christian	Muslim
Hindu	Sikh
Jewish	Other

Sex

A man or a woman.

Gender reassignment

Gender reassignment refers to those proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex.

Sexual orientation

Where a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

Gay man	Bisexual
Gay woman/lesbian	Heterosexual

Appendix C

"Provide a summary of your policy area/programme"

350 words (3 or 4 paragraphs) should be enough to summarise what the policy is.

Bear in mind that what you write is a public document, so spell out any acronyms and abbreviations in full the first time they are used.

The people reading the description may well have specialist knowledge relating to equality issues. Your purpose, in these paragraphs about your policy, is to provide such people with sufficient preliminary information for them to comprehend the discussion that will follow.

Other things being equal, it will be appropriate to outline the following:

- The policy's rationale/basis and purposes
- How it operates or will operate in practice
- When it began/will begin
    - Have there been any pilots or trials done?
- How the policy fits in with other policies (e.g. is it a strand within a larger policy area?)
- An indication of the size of the budget

"Why do you feel your policy area/programme will impact the identified groups? What evidence do you have to support this?"

Explain what information you have obtained that has enabled you to come to the decision that these groups will be affected.

Provide the sources of relevant evidence with full biographical details (e.g. paragraph/page references, URLs for documents that can be accessed online). The word "evidence" here is used in the broad sense.
This can include:

- Administrative data (local authority returns, census data etc)
- Results of opinion surveys
- Interviews and focus groups
- Responses to draft equality impact assessments
- Feedback from groups as a result of consultation
- Case studies and project evaluations
- Literature reviews
- Responses to Green and White Papers
- Inspection reports

“What does your evidence show?”

Here you should detail:

- Which diverse groups have been identified as being disadvantaged by the proposals together
- A summary of the negative impacts
- The proposed changes as a result of the research
- Whether the changes to the policy lower the negative impact
- Whether the changes provide opportunities to promote equality of opportunity and improve relations between diverse groups?

“Next steps”

Here you should indicate the ways in which the EqIA will be followed up and kept under review, by showing progress detailed in a project plan, objectives set in an employees PDR/appraisal etc.

Make sure that, where appropriate, the statements about next steps reflect the “SMART” principles:

- **S**pecific
- **M**easurable
- **A**chievable
- **R**elevant
- **T**ime-bound

Also use the “next steps” section to emphasise the EqIA as a whole as a living document. Therefore, be sure to revise and update it when appropriate, in the light of further evidence, discussion and representations.

As a guide, here is some of what you could mention:

- Plans that are already underway or under active consideration to address challenges and priorities you have highlighted
- Arrangements for monitoring, and for periodic reports to certain groups.
- Arrangements for ensuring that monitoring systems are in place to guarantee regular checks are undertaken on the effects of the policy.
- Arrangements for ensuring that evaluations of any pilot projects take account of the concerns and discussions outlined in your assessment.
- Arrangements for discussing with other agencies and regulatory bodies the scope for taking account of the concerns and discussions in your assessment

- Arrangements for making sure that your assessment is brought to the attention of all relevant colleagues, and in this contributing to reviews of the Department's single equality scheme.
- Arrangements for disseminating information about your assessment to local authorities and other stakeholders
- Arrangements for improving the information base
- Intentions for drawing up a detailed action plan.