

Solihull Metropolitan Borough Council

FAIR TREATMENT ASSESSMENT FORM

1. FTA Lead & Team	
Directorate	Economy and Infrastructure
Team	Stronger Communities – Housing and Communities
Role of person completing the FTA	Housing Strategy Officer for Affordable Housing
2. FTA Timescales	
Key dates	<p>July 2022 – August 2022 – Development of FTA to inform first draft of Housing Strategy 2023-2032</p> <p>Consultation from 21 September to 2 November 2022</p> <p>FTA sign off date: 21 February 2023</p>
3. Context	
Name of function/strategy/policy /procedures	Housing Strategy 2023-2032
Purpose and intended aim of the function, strategy, policy, procedures	This Housing Strategy sets out the Council’s housing vision, ambition and priorities for the 10-year period to the end of 2032. An Implementation Plan, the first covering the 3-year period 2023 - to 2025, sets out specific actions and outcomes.
Is this a new function/strategy/policy/procedure?	Yes

For whom is the policy or process intended? Tick all that apply.	Borough residents & public	Specific service users	Employees	Elected members	Others
		Yes, welcome to comment but not primary audience of this Strategy.	No	Yes	Yes
Consultation and stakeholder engagement	Is consultation required? Yes	<p>The following documents were consulted on for the 6-week period 21 September – 2 November 2022:</p> <ul style="list-style-type: none"> • Draft Housing Strategy (and Executive Summary) • Draft Implementation Plan • Health Equalities Assessment Tool • Fair Treatment Assessment • Housing Data Dashboard. <p>A consultation webpage with each of these documents was created with an online response form. Responses could also be received by email or post.</p> <p>A wide range of organisations were contacted directly to make them aware and invite their responses including:</p> <ul style="list-style-type: none"> • Solihull Council Members • Parish and Town Councils • Solihull MPs • West Midlands Combined Authority • West Midlands Local Authorities • Department for Levelling Up, Housing and Communities • Homes England • Regulator of Social Housing • Housing associations operating in Solihull • National Residential Landlords Association • Housing and advice organisations contracted with the Council • Use of 'Stay Connected' and 'Latest News' to make the consultation known more generally. 			

		<p>In addition, notification was provided to members of a range of multi-agency boards and groups including the Solihull Health and Wellbeing Board, SCH Board, Strategic Housing Options with Care Group, Multi Agency Homelessness Forum and the Voluntary and Community Sector Engagement group.</p>
<p>Business risks from proposals</p>	<p>Yes</p>	<p>The Strategic Housing Board reviews housing risks at every meeting.</p>
<p>4. Equalities data</p>		
<p>What equalities data is available to inform this FTA?</p>	<p>The Council’s vision for the Strategy is that, “Everyone in the Borough is able to access housing at the point of need and has opportunities to create sustainable homes in thriving communities”.</p> <p>The Strategy and Delivery Plan focus on working towards an outcome where everyone has a home that is safe, secure, affordable, accessible and suitable and is able to make a positive contribution to climate change.</p> <p>Housing is everybody’s business. For most people in the Borough, the housing market works well but for some this is not the case. Low income and vulnerable people may need assistance over the longer-term while other people may need help at points of crisis or at different stages of the life course.</p> <p>In the period to 2030 the population of Solihull is forecast to increase from 217,700 to 230,400. There will be more smaller households, and a continued growth of the older person population and in the number of people with disabilities.</p> <p>The HEDNA (Housing and Economic Development Needs Assessment) 2019 identified the housing needs of different groups including - those who require affordable housing, families with children, older people, students, people with disabilities, service families, people who rent their homes and people wishing to commission or build their own homes</p> <p>Housing is one of the wider determinants of health. It is fundamental to whole-life well-being with a very strong connection to health. Housing can positively contribute to each of the ‘life course’ stages identified in the Council’s Health and Wellbeing Strategy.</p> <p>National research suggests that the location and suitability of alternative housing options, including whether these are culturally appropriate, are significant issues for some BAME elders, who are particularly likely to express a desire to</p>	

	<p>stay living within familiar neighbourhoods and communities – the location of alternative housing, rather than the support services available, was seen to be key.</p> <p>Homelessness data is also available from returns to government, Solihull Community Housing and partner organisations.</p> <p>The homelessness service is provided by partners and during 2021/22 there were 2200 homelessness approaches. Of these 386 homeless households helped through prevention and 547 homeless households helped through relief. However there were 291 homeless acceptances in 2021/22 and 151 Council lettings to homeless households in priority need.</p>	
<p>Does the data show positive or negative impact on any specific groups?</p>	<p>The following negative impacts have been identified, before mitigation from the Housing Strategy has been applied as evidenced in section 5:</p> <ul style="list-style-type: none"> • Young People aged 16 – 25-year-olds are more likely to be homelessness and rough sleeping, including ‘sofa surfing’. • House prices are comparatively high and affordability is a major challenge. This makes it hard for young people and other newly forming households those on average salaries to afford to buy property in Solihull. • Domestic abuse is consistently one of the top reasons for approaches to the Housing Options service for homelessness in Solihull, accounting for nearly 15% of approaches. • People in the lower socio-economic groups are more likely to be affected by poor housing, homelessness and the ability to pay essential costs. 	
<p>5. Analysis</p>		
<p>Protected characteristics</p>	<p>Please include below the identified impact positive, neutral or negative, and what has informed the assessment (eg consultation, service user statistics, research, etc)</p>	<p>Please say what actions you intend to take to eliminate any negative impact or make other improvements and include how the actions will be tracked/monitored.</p>
<p>Age</p>	<p>In the period to 2030 the population of Solihull is forecast to increase from 217,700 to 230,400. There will be more smaller households, and a continued growth of the older person population and in the number of people with disabilities – HEDNA, section 9.</p>	<p>The Strategy will support the local economy and promote improved housing pathways assist people across the different life-stages. This will not only help first time buyers, and other newly forming households. Development that meets local housing needs will also</p>

	<p>First data from the 2021 Census shows a 30.3% increase in people aged 70 – 79 and a 21.8% increase in those 85+ compared to 2011.</p> <p>House prices are comparatively high, and affordability is a major challenge. This makes it hard for young people and other newly forming households those on average salaries to afford to buy property in Solihull.</p> <p>One of the reoccurring themes from the consultation in September to November 2022 was ‘the need for more attention to be given to young people and help for first time buyers’.</p> <p>Another one of the reoccurring themes from the consultation in September to November 2022 was ‘strengthening the connections between housing, social care and health’ and ‘older people should have a range of housing options and be able to receive good advice on what is best for them’.</p> <p>Warmer homes help to tackle the effect of cold homes on poor respiratory, cardiovascular, mental health and child health. Energy efficiency delivers energy cost savings and is a key driver in reducing fuel poverty. Tackling this part of the</p>	<p>provide improved housing choice for older households wanting to ‘downsize’.</p> <p>The Strategy will promote opportunities for low-cost home ownership by,</p> <ul style="list-style-type: none"> • Supporting direct delivery by Registered Providers of shared ownership housing • Requiring shared ownership and/or First Homes under planning agreements on private-led sites (Local Plan policy P4A) • Supporting direct delivery of low-cost home ownership housing by SCH on Council land <p>The Local Plan review which is subject to a separate FTA sets a policy for meeting the housing needs of older people and those who are disabled including accessibility issues for older people and futureproofing design so layout can be easily adapted to enable independent living as residents grow older.</p> <p>The allocations review which will be completed in 2023 will look at existing priority in the Council’s Housing Allocations Scheme that actively prioritise older residents wanting to downsize.</p> <p>The Strategy will improve homes working to maximise the number of properties having an EPC rating of C or better. This will result in lower carbon emissions and domestic energy bills, increased comfort and improved health and wellbeing. Also see “social economic”.</p> <p>The Strategy will continue to work with St Basils to develop an offer that meets the needs of young people.</p>
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	<p>Climate Change agenda therefore also has a direct benefit to vulnerable people.</p> <p>Young People aged 16 – 25-year-olds are more likely to be homelessness and rough sleeping, including ‘sofa surfing’.</p>	<p>This will include providing access to affordable live-work accommodation and initiatives to support young people to secure work and transition out of supported accommodation.</p>
<p>Disability</p>	<p>In the period to 2030 the population of Solihull is forecast to increase from 217,700 to 230,400. There will be a continued growth of the older person population and in the number of people with disabilities – HEDNA, section 9. Mobility is most prevalent impairment reported nationally.</p> <p>Warmer homes help to tackle the effect of cold homes on poor respiratory, cardiovascular, mental health and child health. Energy efficiency delivers energy cost savings and is a key driver in reducing fuel poverty. Tackling this part of the Climate Change agenda therefore also has a direct benefit to vulnerable people.</p>	<p>We will build and commission housing to higher space and accessibility standards and use national and local policy to help deliver this in the private market. This will ensure wheelchair-friendly homes are factored in at design/planning stage.</p> <p>The Local Plan review which is subject to a separate FTA sets a policy for meeting the housing needs of older people and those who are disabled including accessibility issues for older people and futureproofing design so layout can be easily adapted to enable independent living as residents grow older. This will also include homes are designed for older and disabled people including space for storing and charging mobility scooters and electric wheelchairs?</p> <p>The Strategy will improve homes working to maximise the number of properties having an EPC rating of C or better. This will result in lower carbon emissions and domestic energy bills, increased comfort and improved health and wellbeing, which will be especially beneficial for those who are disabled. Also see “social economic”.</p> <p>A number of services help those with disabilities to live independently at home: Assistive Technology and Telecare, Disabled Facilities and Minor Works grants, ‘handyperson’ and the ‘Safe and Sound’ services</p>
<p>Sex</p>	<p>Domestic abuse is consistently one of the top reasons for approaches to the Housing Options service for homelessness in Solihull, accounting for nearly 15% of approaches.</p>	<p>The new Domestic Abuse Act 2021 has supported local authorities to develop the support available for those experiencing domestic abuse. The Strategy will continue</p>

	<p>Ex-Offenders often men, are more likely to be at risk of homelessness, rough sleeping and sofa surfing.</p>	<p>the development of housing options for those experiencing domestic abuse, including providing domestic abuse safe accommodation. There is also a dedicated Women's refuge located in the borough provided by Women's Aid.</p> <p>Women are more likely to benefit from positive interventions, for example: tackling domestic abuse, supporting carers.</p> <p>Through the development of Solihull's Reducing Reoffending Strategy we will review our existing service provision for housing and homelessness in relation to ex-offenders, assessing the impact of our specialist housing and developing actions to overcome any barriers currently faced by ex-offenders and those who support them, in preventing homelessness and accessing housing.</p>
Gender identity	<p>Public and private landlords are required to offer housing regardless of someone's gender identity.</p>	<p>The information currently available suggests that there are no specific housing related interventions required.</p>
Race	<p>National research suggests that the location and suitability of alternative housing options, including whether these are culturally appropriate, are significant issues for some BAME elders, who are particularly likely to express a desire to stay living within familiar neighbourhoods and communities – the location of alternative housing, rather than the support services available, was seen to be key.</p> <p>Gypsy and Travellers are less well integrated into educational, health and care services. It is important that housing policy and practice works to promote effective integration for all.</p>	<p>The information currently available suggests that whilst there are no ethnic / racial concentrations that would require specialised accommodation or services at present this may be the case in future given a continuation of current trends and commissioners will need to be aware of this.</p> <p>The provision of additional pitches for Gypsies and Travellers is addressed through the Local Plan. The Strategy recognises that there is likely to be a need for</p>

		further work with travellers in respect of health, social care and education.
Religion or belief	The draft Strategy is based on information on the number of people from different religious groups at the Borough level which has been issued by the Solihull Observatory following the 2011 Census.	The information currently available suggests that whilst there are no religious concentrations that would require specialised accommodation or services at present this may be the case in future given a continuation of current trends and commissioners will need to be aware of this.
Sexual orientation	<p>Equalities monitoring of service users can be problematic, as people are not always willing to record their sexual orientation for numerous reasons, including fear of being stigmatised.</p> <p>Particular challenges facing lesbian, gay and bisexual people include:</p> <ul style="list-style-type: none"> • More likely to live alone • May lack viable social support mechanisms which most heterosexual older people rely on to enable them to remain in their homes, e.g. from children and partners, or from wider family members. • Concerns about allowing a stranger to enter their home to provide formal care and support given fears around homophobia. • If they have to move into specialised housing, they will have particular concerns around how their sexual orientation may affect them moving into a new community - there is the risk of being stigmatised by both staff and other residents. • If a move into specialised housing involves moving out of their own community, there may be additional fears around the potential homophobia within a new neighbourhood. • Fear of discrimination and distrust of official agencies (particular for older LGBT people) based on historical legal discrimination 	The Strategy commits to review our existing pathways and ensure that they deliver the right support, at the right time, to households who are, or are at risk of homelessness and rough sleeping including lesbian, gay and bisexual people.

<p>Marriage or civil partnership</p>		<p>The allocations review which will be completed in 2023 will consider the housing needs for ‘merging families’ – where two partners form a family from previous relationships and could need larger homes.</p>
<p>Pregnancy and maternity</p>	<p>Pregnant women are a specific priority need group recognised in the Homelessness legislation and are given appropriate support to meet their needs (this includes the provision of supported housing for young parents and emergency temporary accommodation if they have nowhere else to stay).</p>	<p>The Strategy will review the experience of homeless families and implement initiatives to better meet their needs, including reducing their length of stay in budget hotels and temporary accommodation, recognising the adverse impact this can have on families.</p>
<p>Socio economic factors.</p>	<p>Housing and Economic Development Needs Assessment (2019) identifies the need for 578 affordable dwellings per year (This reduces to 224 affordable dwellings if households already in accommodation are excluded).</p> <p>Of these affordable dwellings, the HEDNA identifies that 90% are needed for rent.</p> <p>One of the reoccurring themes from the consultation in September to November 2022 was ‘the need for more attention to be given to young people and help for first time buyers’.</p> <p>People in the lower socio-economic groups are more likely to be affected by poor housing, homelessness and the ability to pay essential costs. The Housing Strategy aims to mitigate this disadvantage in a wide range of ways.</p> <p>The ambition of the governments Clean Growth Strategy is that as many homes as possible achieve EPC band C by 2035</p>	<p>The Strategy will increase the number of social rented homes in both Council and housing association ownership.</p> <p>We will do this by,</p> <ul style="list-style-type: none"> • Requiring social rented housing under planning agreements on private-led sites (Local Plan policy P4A) • Supporting direct delivery by SCH on behalf of the Council and housing associations of social rented housing • Redeveloping Council-owned garage sites to provide new social rented housing <p>Through its Asset Management Strategy and the SCH Energy and Environmental Sustainability Strategy, the Council will invest in annual capital programmes that will ensure every Council-owned home achieves Band C as a minimum.</p> <p>We will work to improve our evidence base and understanding. Different approaches are likely to be required. For example, the approach for low income and vulnerable households who are likely to be eligible for</p>

	<p>where practical, cost effective and affordable. Solihull has over 93,000 residential properties and EPC data shows that of the properties with a rating, 70% were rated 'D' or below. The majority of people surveyed between 22 September and 3 October 2021 (81%) were not considering making any improvements to their homes, for some this is because they do not own their home (29%), and because making improvements would cost too much (28%).</p>	<p>grant funding may differ from households with higher income or where the owner is a private landlord.</p> <p>We will continue to review all available EPC, property type, low income data and other market intelligence to better understand the scope for area and/or tenure targeted approaches to retrofitting.</p>
Care leavers	<p>The Council has a duty to assess and meet the needs of young people who are in care or care leavers.</p> <p>The Council recognises its role as 'Corporate Parent' and will use its assets to help ensure care leavers are effectively helped. In its housing role this mainly relates to ensuring timely advice and support and the availability of good accommodation when it is required.</p> <p>Young care leavers are more likely to experience homelessness (15% youth homelessness applications).</p>	<p>A joint housing / children's services protocol exists to facilitate the transition from care into an independent social housing tenancy, where this is assessed as being the appropriate pathway for the young person concerned.</p> <p>The Strategy will continue to work with St Basils to develop an offer that meets the needs of young people including young care leavers. This will include providing access to affordable live-work accommodation and initiatives to support young people to secure work and transition out of supported accommodation.</p>
Carers	<p>Foster carers and those approved by the Council to adopt are given the highest priority (Band A) in the Housing Allocation Scheme where they need to move to a larger home in order to accommodate a looked after child. This priority is also given to special guardians, holders of a residence order or family and friends carers who have taken on the care of a child because the parents are unable to provide care and the child/children is/are waiting to be placed pending the provision of appropriate housing.</p>	<p>The Council recognises its role as 'Corporate Parent' and will use its assets to help ensure care leavers are effectively helped. In its housing role this mainly relates to ensuring timely advice and support and the availability of good accommodation when it is required.</p>
Groups covered under Safeguarding arrangements	<p>Safeguarding issues, particularly for adults, are important to the objectives of the Strategy and will be considered by</p>	<p>The Strategy recognises the contributions of foster carers and others to their communities and notes the important</p>

	<p>service commissioners and managers in relation to the implementation and delivery of the Strategy as required. All contracted providers of care and support must comply with the local arrangements for safeguarding children and adults, and their compliance is monitored.</p>	<p>role of landlords in assisting the Council in the work of adult and child protection</p>
<p>Human Rights</p>	<p>There are a number of aspects of human rights legislation that are pertinent, namely:</p> <ul style="list-style-type: none"> • Right to peaceful enjoyment of your property • Respect for your private and family life, home and correspondence • Protection from discrimination • Freedom of thought, belief and religion <p>The Housing Strategy is about providing suitable secure homes for people and their dependents.</p> <p>Human Rights legislation informs actions by landlords which may remove people from their homes such as eviction for non payment</p>	
<p>Military status</p>	<p>Section 8 of the Strategy considers Veterans. The Council is committed to ensuring the armed forces community and their families receive help and support to ensure effective crisis prevention and relief and a settled home that meets their requirements.</p>	<p>The Strategy will ensure that veterans are identified and supported to access housing and avoid homelessness in accordance with the Council’s commitments to the Armed Forces Covenant and Veteran Pledge with the WMCA.</p>
<p>Health inequalities</p>	<p>The Strategy takes full account of the Health and Wellbeing Strategy and the Health Inequalities Strategy. A ‘Health Equalities Assessment’ has been completed with the Council’s Public Health Directorate.</p> <p>The Strategy aims to improve the different aspects of housing that contribute to health inequality. For example: affordability, fuel poverty, poor housing, overcrowding,</p>	<p>The Strategy considers provision for increasing numbers of people suffering from complex health issues, in sections 6 – “Meeting the Housing Needs of Older People” and section 7 – “Helping People with Additional Support Needs.”</p>

	housing security, housing for older people and those with specific needs, homelessness.		
6. Decision making			
Evidence used to support the decision-making process and final decision	<p>The following documents were consulted on for the 6-week period 21 September – 2 November 2022:</p> <ul style="list-style-type: none"> • Draft Housing Strategy (and Executive Summary) • Draft Implementation Plan • Health Equalities Assessment Tool • Fair Treatment Assessment • Housing Intelligence Dashboard. <p>42 responses were received to the consultation. In general, consultation responses welcomed and were supportive of the Strategy and the Council’s approach. There was strong support for the proposed housing vision and ambitions,</p> <ul style="list-style-type: none"> • 25 of the 34 who responded agreed with the proposed vision. • 27 of the 31 agreed with the housing ambitions set out in the draft Housing Strategy. <p>The Draft Housing Strategy and Draft Implementation Plan was also reported to Economic Development and Managed Growth Scrutiny Board on the 17 November 2022.</p>		
Final decision & Summary of outcome	The Housing Strategy will be considered for approval by Full Cabinet on the 9 March 2023. The actions from this FTA have been included within the Housing Strategy Implementation Plan. The Housing Strategy Implantation Plan will be monitored by Strategic Housing Board and reported to Members so that progress and be reviewed on a regular basis.		
Key actions		Due by	Lead officer
	All mitigating actions from assessment in section have been included into the Housing Strategy Implementation Plan.	The on-going delivery of these will be monitored and reported to members on an annual basis.	John Pitcher

7. Communication

Arrangements for communicating the outcome of the FTA

Published on the Council's web site alongside the Housing Strategy

Expectation that FTA considered in relevant housing reports to elected Members.