

## Equality Impact Assessment (EqIA)

Before completing this EqIA please ensure you have read the guidance on the intranet.

### Initial Information

Name:	Richard Conway
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Members of the assessment team:	
Date assessment started:	
Date of completion:	
Version Number:	V2

### Part 1: Background Information

Is this (please tick or expand the box to explain)

Existing	
Changing, updating or revision	✓
New or proposed	
Other	

Is this (please tick or expand the box to explain)

Internal (employees only)	
External (residents, communities, partners)	✓
Both of the above	

What is the name of your policy, strategy, project or service being assessed?

**Park Home Fees Policy**

What is the policy, strategy, project or service designed to do? (include the aims, purpose and intended outcomes of the policy)

This policy sets out the fees the Council will charge for functions under the Mobile Homes Act 2013. The policy covers park home sites also known as relevant protected sites as defined by the Act but does not cover holiday caravan or tented sites.

The policy includes fees for:

1. New Park Home Licence
2. Annual Park Home Licence
3. Amendments to existing park home licences
4. Lodging of Park Home Site Rules
5. Fit and Proper Person application

The policy states how fees are calculated and how they will be reviewed in the future.

What is the background or context to the proposal?

The Mobile Homes Act 2013 introduced a regime where Councils could charge for a number of activities, they carry out on park home sites. In order to charge fees, the council must have adopted a policy to show how they will calculate and charge these fees.

**Legacy policies and public consultation:** When Dorset Council was formed in 2019 four different policies novated from the legacy district and borough councils. These policies now cease to have effect and must be replaced by a new single policy for Dorset.

Fees are paid by site owners however residents may have a proportion added to their annual “pitch fee”. Guidance on how annual fees are calculated allows different methodologies to be used thus allowing councils to adopt the most appropriate for their area. The four legacy policies used different methodologies and there was significant variance in how fees were calculated across Dorset. The aim of the new policy is to introduce a single method of calculation. This meaning that this year some site fees for similar sized sites will rise whilst others will fall, the overall income received from fees remains unchanged.

The actual amount potentially charged to each resident (by the site owner) for the annual fee is small (on average under £10 per year) a public consultation has been carried out to allow residents and site owners to give their views and for officers to understand the impact of the new policy.

New Regulations came into force in June 2021 mean that all owners and persons managing park home sites must now apply to be added to a “fit and Proper Person” register administered by the Council.

### **Part 2: Gathering information**

What sources of data, information, evidence and research was used to inform you about the people your proposal will have an impact on?

Information about the park home stock and the opinions of park home residents and site owners in Dorset is primarily from historical surveys, national statistics, local knowledge and local statistics gathered in the course of administering site licences on sites.

In 2010 a survey of all park home sites in Dorset was conducted specifically looking at the condition and levels of insulation in park homes. This survey also gathered information about the age and financial status of residents living on sites.

In March 2021 a public consultation was carried out by Dorset Council seeking the views of stakeholders on the impact of the policy whilst gathering information about the age, gender and ethnicity of respondents.

What did this data, information, evidence and research tell you?

### **About the Sites**

- There are currently 45 licenced park home sites in Dorset with approximately 1850 mobile homes situated on them. This equates to just over 1% of the total housing stock in Dorset (Census 2011 ONS).
- Mobile homes are considered as an affordable housing option for older people. Many park home sites provide a secure (gated) community environment and many are in attractive areas of Dorset close to ANOB and other protected environments.
- Virtually all mobile homes are owned by residents who rent a plot from the site owner. Legislation provides residents with security of tenure on their plot, specific protection from harassment similar to that protecting tenants in rented “bricks and mortar” properties.
- All 45 mobile home sites (defined as “Relevant Protected Sites” by the Mobile Homes Act 2013) are currently licenced by the Council.
- Each site licence contains conditions related to the maintenance of standards and safety on sites.

### **About the residents**

- 88% of residents reported they were over 60 years of age (Site Consultation 2010 Legacy Councils). In 2021, 97.8% of residents reported they were older than 55 years of age. (Consultation 2021 Dorset Council)
- 45% were in receipt of a means tested benefit (Consultation 2010)
- 12% of respondents said they had a disability, the average for Dorset being 5% (Consultation 2021 Dorset Council)
- 96.7% of respondents to the consultation in 2021 identified as white British, 1.1% identified as “other ethnic group”

### **About the policy**

The Council is legally allowed to recoup the cost of administering the park home licensing function. The policy brings together several legacy policies of the former district and borough councils so that will be consistency across Dorset. This means in some areas, fees may rise and in others they may fall compared to how they were previously calculated. Overall there is will be no significant change in the total income the Council receives from administering this function.

The policy also includes new requirements for site owners and the managers of sites to apply to be added to the fit and proper person register administered by the Council.

Is further information needed to help inform this proposal?

It is considered that the Council has enough information to inform this proposal.

## **Part 3: Engagement and Consultation**

What engagement or consultation has taken place as part of this proposal?

A public consultation was carried out between 1 February 2021 until 21 March 2021. The consultation consisted of:

- An online consultation survey (also available in paper format) and larger print if requested.
- A landing page on the Council's website giving information about the consultation and a link to the survey.

A communication plan was implemented to publicise the consultation.

The lead member for Licensing provided a press release and various social media releases were made over the time the consultation was live.

Site owners were each sent a printable poster to place on site notice boards

Site owners were contacted by email and letter with a link to the survey.

All residents living in registered addresses on existing park home sites in Dorset were sent a letter informing them about the consultation.

### **About the consultation**

98 responses were received to the consultation which is considered a high return. Most responses were from residents, one from a resident's association and one from a site owner. The consultation report is provided as an appendix to this EQIA.

Representations were received from 1 or more residents on 26 of the 45 sites in Dorset.

- There was a small majority in favour of the policy overall (all those residents opposing the policy (33) lived on sites where the site fee would rise).
- There was a majority in favour of each of the proposed fees.
- There was a majority in favour of how the annual licence fee was calculated (banding sites into 5 groups)
- Concerns were raised by several respondents opposed to the annual fee structure that smaller sites paid proportionately more than larger sites.
- It was proposed that more bands should be added to "smooth out" the impact to residents on smaller sites.

### **Changes to the proposed policy:**

Comments were received that residents on small sites would pay more than those on large sites. As a result, the fees have been reviewed resulting in Bands 1 and 2 (smaller sites) being reduced. Band 3 remaining unchanged, Bands 4 and 5 being increased. The result of this change means that most residents will on average be charged £4 - £6 annually.

The 5 bands and the size of each band has remained the same, but the cost of each band has been amended.

How will the outcome of consultation be fed back to those who you consulted with?

It is intended that once the policy is approved and implemented a newsletter will be sent to all residents outlining the new policy and including other matters related to the management of park homes sites in Dorset.

**Please refer to the Equality Impact Assessment Guidance before completing this section.**

Not every proposal will require an EqIA. If you decide that your proposal does **not** require an EqIA, it is important to show that you have given this adequate consideration. The data and research that you have used to inform you about the people who will be affected by the policy should enable you to make this decision and whether you need to continue with the EqIA.

**Please tick the appropriate option:**

An EqIA is required (please continue to Part 4 of this document)	✓
An EqIA is <b>not</b> required (please complete the box below)	

This policy, strategy, project or service does not require an EqIA because:

Name:

Job Title:

Date:

Please send a copy of this document to [Diversity & Inclusion Officer](#)

**Next Steps:**

- The EqIA will be reviewed by Business Intelligence & Communications and if in agreement, your EqIA will be signed off.
- If not, we will get in touch to chat further about the EqIA, to get a better understanding.

**Part 4: Analysing the impact**

Who does the service, strategy, policy, project or change impact?

- If your strategy, policy, project or service contains options you may wish to consider providing an assessment for each option. Please cut and paste the template accordingly.

For each protected characteristic please choose from the following options:

- Please note in some cases more than one impact may apply – in this case please state all relevant options and explain in the ‘Please provide details’ box.

Positive Impact	<ul style="list-style-type: none"> <li>• the proposal eliminates discrimination, advances equality of opportunity and/or fosters good relations with protected groups.</li> </ul>
Negative Impact	<ul style="list-style-type: none"> <li>• Protected characteristic group(s) could be disadvantaged or discriminated against</li> </ul>
Neutral Impact	<ul style="list-style-type: none"> <li>• No change/ no assessed significant impact of protected characteristic groups</li> </ul>
Unclear	<ul style="list-style-type: none"> <li>• Not enough data/evidence has been collected to make an informed decision.</li> </ul>

## Appendix 2

Age:	<i>Choose impact from the list above</i>
What age bracket does this affect?	People aged 55 and over Neutral Impact
Please provide details:	Park home sites across Dorset generally have rules that permit only people above 55 to be in residence. For sites where annual fees are passed on to residents, there will be small changes to the amount charged annually. The policy has been amended to reduce the impact on those living on smaller park home sites.
Disability: (including physical, mental, sensory and progressive conditions)	<i>Choose impact from the list above</i>
Does this affect a specific disability group?	Neutral Impact
Please provide details:	The policy has been assessed to have no significant impact on this protected characteristic
Gender Reassignment & Gender Identity:	Neutral Impact
Please provide details:	The policy has been assessed to have no significant impact on this protected characteristic
Pregnancy and maternity:	Neutral Impact
Please provide details:	See above regarding age restrictions on park home sites.
Race and Ethnicity:	Neutral Impact
Please provide details:	The policy has been assessed to have no significant impact on this protected characteristic
Religion or belief:	Neutral Impact
Please provide details:	The policy has been assessed to have no significant impact on this protected characteristic
Sexual orientation:	Neutral Impact
Please provide details:	The policy has been assessed to have no significant impact on this protected characteristic
Sex (consider both men and women):	Neutral Impact
Please provide details:	The policy has been assessed to have no significant impact on this protected characteristic

## Appendix 2

Marriage or civil partnership:	Neutral Impact
Please provide details:	The policy has been assessed to have no significant impact on this protected characteristic
Carers:	Neutral Impact
Please provide details:	The policy has been assessed to have no significant impact on this protected characteristic
Rural isolation:	Neutral Impact
Please provide details:	The policy has been assessed to have no significant impact on this protected characteristic
Single parent families:	Neutral Impact
Please provide details:	The policy has been assessed to have no significant impact on this protected characteristic
Social & economic deprivation:	Neutral Impact
Please provide details:	The policy has been assessed to have no significant impact on this protected characteristic
Armed Forces communities	Neutral Impact
Please provide details:	The policy has been assessed to have no significant impact on this protected characteristic

## Part 5: Action Plan

Provide actions for **positive**, **negative** and **unclear** impacts.

If you have identified any **negative** or **unclear** impacts, describe what adjustments will be made to remove or reduce the impacts, or if this is not possible provide justification for continuing with the proposal.

Issue	Action to be taken	Person(s) responsible	Date to be completed by
Desire for residents to be kept informed on licensing issues	A newsletter will be drafted and sent to sites post implementation of the policy. The newsletter will cover the issues raised by residents in the consultation and other ongoing issues related to park home site management.	Richard Conway	1.1.22
Keeping the policy up to date	The policy will be formerly reviewed on a 3 yearly basis	Richard Conway	September 2024

## EqIA Sign Off

Officer completing this EqIA:	Richard Conway	Date:	16.8.21
Equality Lead:		Date:	
Equality & Diversity Action Group Chair:		Date:	

## Next Steps:

- Please send this draft EqIA to: [Diversity & inclusion Officer](#)

## Appendix 2

- The report author will be invited to an Equality & Diversity Action Group (these are held monthly - dates are available on the intranet)
- The Equality & Diversity Action Group will review the EqIA and you may be asked to make some alterations
- EqIAs are signed off and published
- The report author is responsible for ensuring any actions in the action plan are implemented.