

EQIA Submission – version 2

Section A

EQIA Title

GRT Resident Service Pitch Allocations Policy

Responsible Officer

Natalie Liddiard - GT GC

Approved by (Note: approval of this EqIA must be Applicable within the EqIA App)

Tom Marchant - GT GC

Type of Activity

Service Change

No

Service Redesign

No

Project/Programme

No

Commissioning/Procurement

No

Strategy/Policy

Strategy/Policy

Details of other Service Activity

No

Accountability and Responsibility

Directorate

Growth Environment and Transport

Responsible Service

GRT Residents Service, Growth & Communities

Responsible Head of Service

Tom Marchant - GT GC

Responsible Director

Stephanie Holt-Castle - GT GC

Aims and Objectives

The current version of the Policy was last updated in 2023 and can be found on our website: www.kent.gov.uk/leisure-and-community/gypsies-and-travellers/find-a-gypsy-and-traveller-site/pitch-allocation-policy. The Policy applies to all new people wanting to apply for a pitch on one of KCC's sites and also to existing residents wishing to transfer between sites. We are updating the Policy to make sure that pitches are allocated in a fair way and that KCC's policy is more aligned/similar to housing allocation policies within the District and Borough Councils in Kent. To do this, we are proposing strengthening the evidence requirements to support an application, and to revise the process to make it simpler.

Aims of the policy

- Make best use of permanent pitches.
- Ensure fair and transparent allocation based on priority need.
- Provide pitches for eligible Gypsies and Travellers.
- Recognise the diversity within GRT communities.

Summary of equality impact

Screening of the project has not highlighted any significant direct negative impact on any of the protected groups. However, some specific areas for consideration have been highlighted and due consideration has been taken for these as part of the formal consultation process.

Adverse Equality Impact Rating: Low

| Section B – Evidence |
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| Do you have data related to the protected groups of the people impacted by this activity? |
| Yes |
| It is possible to get the data in a timely and cost effective way? |
| Yes |
| Is there national evidence/data that you can use? |
| Yes |
| Have you consulted with stakeholders? |
| Yes |
| Who have you involved, consulted and engaged with? |
| <p>To help shape the new policy, we have:</p> <ul style="list-style-type: none"> • listened to feedback from frontline staff who have experience of using the 2023 policy and process • reviewed complaints and appeals from applicants about the policy and how it works • looked at how other councils allocate housing, so our policy is more in line their policies for bricks and mortar housing • watched how Tonbridge and Malling Borough Council's Housing team works, to learn from their process. <p>The formal consultation sought views of a number of stakeholders, including:</p> <p>Applicants on the existing waiting list Existing site residents with adult children (as future applicants) Existing site residents GRT Residents from the settled community who live near sites Potential site residents / future applicants who wish to live in Kent / onsite KCC Elected Members KCC services – Intel, Internal Audit, Counter Fraud GTS in other local authority outside of Kent – accessed via NAGTO Kent Housing Group – Housing Options Group Kent District and Borough Council Housing Teams Friends, Families and Travellers Equality & Human Rights Commission</p> |
| Has there been a previous Equality Analysis (EQIA) in the last 3 years? |
| Yes |
| Do you have evidence that can help you understand the potential impact of your activity? |
| Yes |
| Section C – Impact |
| Who may be impacted by the activity? |
| Service Users/clients Service users/clients |
| Staff Staff/Volunteers |
| Residents/Communities/Citizens No |
| Are there any positive impacts for all or any of the protected groups as a result of the activity that you are doing? |
| Yes |
| Details of Positive Impacts |
| Positive Impact for age: The new policy has been designed to be accessible and inclusive for applicants of all ages. More detail and clarity on the process is being provided. Monthly 'drop-in session' will be introduced to provide assistance with completing the application form, as well as continuing with telephone support for applicants. |

Positive impact for disability: The new policy has been designed to be accessible and inclusive for applicants with disabilities. More detail and clarity on the process is being provided. Monthly 'drop-in session' will be introduced to provide assistance with completing the application form, as well as continuing with telephone support for applicants.

Positive impact for race: the sites owned by KCC, managed by the GRT Resident Service, are provided and managed specifically for those from within these communities. In addition, the proposed application process provides monthly 'surgeries' to provide assistance with completing the forms, as well as continuing with telephone support for applicants.

Positive impacts for Carer's Responsibilities: the application form incorporates this role and scoring reflects the severity of the need.

Negative impacts and Mitigating Actions

19. Negative Impacts and Mitigating actions for Age

Are there negative impacts for age?

No. Note: If Question 19a is "No", Questions 19b,c,d will state "Not Applicable" when submission goes for approval

Details of negative impacts for Age

Not Applicable

Mitigating Actions for Age

Not Applicable

Responsible Officer for Mitigating Actions – Age

Not Applicable

20. Negative impacts and Mitigating actions for Disability

Are there negative impacts for Disability?

Yes

Details of Negative Impacts for Disability

Some applicants may require support to complete the application process depending on their individual needs.

Mitigating actions for Disability

Assistance in completing an application form is available through the KCC GRT Resident Service, and disability is specifically considered in the points allocation criteria. To make sure applicants can access support if they need it, contact details for the team will be published on all application documentation.

Responsible Officer for Disability

Natalie Liddiard

21. Negative Impacts and Mitigating actions for Sex

Are there negative impacts for Sex

No. Note: If Question 21a is "No", Questions 21b,c,d will state "Not Applicable" when submission goes for approval

Details of negative impacts for Sex

Not Applicable

Mitigating actions for Sex

Not Applicable

Responsible Officer for Sex

Not Applicable

22. Negative Impacts and Mitigating actions for Gender identity/transgender

Are there negative impacts for Gender identity/transgender

No. Note: If Question 22a is "No", Questions 22b,c,d will state "Not Applicable" when submission goes for approval

Negative impacts for Gender identity/transgender

Not Applicable

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| Mitigating actions for Gender identity/transgender |
| Not Applicable |
| Responsible Officer for mitigating actions for Gender identity/transgender |
| Not Applicable |
| 23. Negative impacts and Mitigating actions for Race |
| Are there negative impacts for Race |
| Yes - Add details of the negative impacts and mitigations. |
| Negative impacts for Race |
| The Department for Education, the House of Commons Library, the Office for National Statistics, academic research, and systematic health reviews support that Gypsy, Roma, and Traveller communities in England have persistently lower literacy than other groups. These disparities are linked to high absenteeism, school exclusions, cultural misalignment with curricula, and structural disadvantages within both educational and healthcare systems. This may mean that some applicants are unable to understand the new policy or complete the application process/form due to lower literacy levels. |
| Mitigating actions for Race |
| The application process has been designed to be as accessible as possible. This includes the option to complete the application form online or in hard copy, and also the offer of assistance from the KCC GRT Resident Service in completing the form. This offer is available to anyone applying for a pitch and not just existing KCC residents. |
| Responsible Officer for mitigating actions for Race |
| Natalie Liddiard |
| 24. Negative impacts and Mitigating actions for Religion and belief |
| Are there negative impacts for Religion and belief |
| No. Note: If Question 24a is "No", Questions 24b,c,d will state "Not Applicable" when submission goes for approval |
| Negative impacts for Religion and belief |
| Not Applicable |
| Mitigating actions for Religion and belief |
| Not Applicable |
| Responsible Officer for mitigating actions for Religion and Belief |
| Not Applicable |
| 25. Negative impacts and Mitigating actions for Sexual Orientation |
| Are there negative impacts for Sexual Orientation |
| No. Note: If Question 25a is "No", Questions 25b,c,d will state "Not Applicable" when submission goes for approval |
| Negative impacts for Sexual Orientation |
| Not Applicable |
| Mitigating actions for Sexual Orientation |
| Not Applicable |
| Responsible Officer for mitigating actions for Sexual Orientation |
| Not Applicable |
| 26. Negative impacts and Mitigating actions for Pregnancy and Maternity |
| Are there negative impacts for Pregnancy and Maternity |
| No. Note: If Question 26a is "No", Questions 26b,c,d will state "Not Applicable" when submission goes for approval |
| Negative impacts for Pregnancy and Maternity |
| Not Applicable |
| Mitigating actions for Pregnancy and Maternity |
| Not Applicable |
| Responsible Officer for mitigating actions for Pregnancy and Maternity |

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| Not Applicable |
| 27. Negative impacts and Mitigating actions for Marriage and Civil Partnerships |
| Are there negative impacts for Marriage and Civil Partnerships |
| No. Note: If Question 27a is "No", Questions 27b,c,d will state "Not Applicable" when submission goes for approval |
| Negative impacts for Marriage and Civil Partnerships |
| Not Applicable |
| Mitigating actions for Marriage and Civil Partnerships |
| Not Applicable |
| Responsible Officer for Marriage and Civil Partnerships |
| Not Applicable |
| 28. Negative impacts and Mitigating actions for Carer's responsibilities |
| Are there negative impacts for Carer's responsibilities |
| No. Note: If Question 28a is "No", Questions 28b,c,d will state "Not Applicable" when submission goes for approval |
| Negative impacts for Carer's responsibilities |
| Not Applicable |
| Mitigating actions for Carer's responsibilities |
| Not Applicable |
| Responsible Officer for Carer's responsibilities |
| Not Applicable |