

## Kent County Council - Growth, Environment and Transport Directorate (GET).

### Equality Analysis / Impact Assessment (EqIA) template

#### Name of decision, policy, procedure, project or service:

The Gypsy and Traveller Pitch Allocation and Site Management Policy.

Changes to the allocation process to come into effect for the financial year 2020-2021

#### Brief description of policy, procedure, project or service

This EQIA review focuses on the Pitch Allocation and Site Management policy, to which the changes are shown in the table 1.

Table 1

	<b>Change</b>	<b>Description</b>
<b>A)</b>	Pitch allocation application process	A standardised process in-line with social housing to include housing need criteria and a priority banding system
<b>B)</b>	Allocation process	An allocation system including an automated option to enable choice and flexibility to applicants through a 'bidding' process.
<b>C)</b>	Site Management	This includes changes to financial requirements such as two weeks pitch fees in advance and service charges, the site maintenance approach prioritising required works, and assistance with licence obligations

The Allocation Process will change from a paper-based application form to a streamline system that bands applicants when they first apply. The GTS will be offering support with the new process, through pre-tenancy support, auto bidding and where appropriate partner agency support. After registering the applicant can bid for accommodation mirroring what takes place in social housing.

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The KCC Gypsy and Traveller Service's (GTS) Allocations Policy was last reviewed in 2012. There have been changes to GDPR and transformation within the service bringing the opportunity to fully review the Policy ensuring parity with social housing allocation.

The service provides accommodation for Gypsy and Travellers on eight sites within Kent and in the past the income generated from pitch fees has been used for reactive maintenance, it has not previously benefitted from an asset management approach. The new Policy utilises an asset management approach, looks at how individuals can apply for the accommodation and how the sites are to be managed. Registered Social Landlords deliver services on behalf of district and borough councils providing social housing locally through an online allocation process. The GTS recently consulted on a proposed change to the allocation process and found that many of the licence holders were confused to why the provision was not like other social housing. As a result, the new policy proposal brings the allocation process closer to district and borough social housing delivery.

Full details of the proposals can be found by reviewing the Environment and Transport Cabinet Committee Paper 10<sup>th</sup> October 2019 that accompanies this report, as well as the Policy itself which is also available alongside the cabinet committee paper at [kent.gov.uk/committees](https://democracy.kent.gov.uk/ieListDocuments.aspx?CId=831&MId=8247&Ver=4) or via this link <https://democracy.kent.gov.uk/ieListDocuments.aspx?CId=831&MId=8247&Ver=4>

## **Aims and Objectives**

The policy seeks to bring social housing parity, better promoting sustainable and economically active communities, providing a clearer more transparent understanding for the prioritisation of applicants for Gypsy and Traveller pitches. Kent has an estimated 4,522<sup>1</sup> Gypsy and Travellers some of which may wish to apply to KCC public sites. The policy seeks to allocate pitches in a fair, consistent open manner through a housing need banding system.

- The aim of this EQiA is to ensure the Pitch Allocation and Site Management Policy does not unlawfully discriminate against the Gypsy and Traveller community in delivering the policy objectives.

## **JUDGEMENT**

Set out below the implications you have found from your assessment for the relevant Protected Groups. If any negative impacts can be justified, please clearly explain why.

- **Adjust and continue** - adjust to remove barriers or better promote equality- see Action plan at the end

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<sup>1</sup> Office for National Statistics: Census 2011, CT0769 Metadata – Ethnic group: Gypsy, Traveller, Roma, Gypsy/Romany

I have found the Adverse Equality Impact Rating to be Low

## GET Document Control

### Revision History

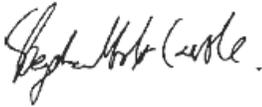
Version	Date	Authors	Comment
V0.1	02.10.18	Jayne Collier-Smith	
V0.2	26/02/2019	Jayne Collier-Smith / Helen Forster	It was decided to separate the EQiAs into two separate documents, allocation and fees.
V0.3	24/06/19	Jayne Collier-Smith / Helen Forster / Pal Sandher	We have been asked to put the two EQiAs into one
V0.4	30.08.19	Jayne Collier-Smith / Helen Forster	It was decided to have two separate docs again - allocation and fees as there are two separate policies
V0.5	26.09.19	Akua Agyepong	
V1 (this should be assigned to the version the Director signs off)	02.10.19	Jayne Collier-Smith / Pal Sandher	Final

**Document Sign-Off (this must be both the relevant Head of Service and the relevant Director)  
Attestation**

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I have read and paid due regard to the Equality Analysis/Impact Assessment. I agree with the actions to mitigate any adverse impact(s) that has /have been identified.

Name	Signature	Title	Date of Issue
Pal Sandher	Pal Sandher	Head of Gypsy and Traveller Service	02.10.19
Helen Page	Helen Page	Interim Head of Countryside and Community Development	
Stephanie Holt-Castle	Stephanie Holt-Castle	Interim Director of Environment, Planning and enforcement	
Barbara Cooper	Barbara Cooper	Corporate Director, Growth, Environment and Transport Growth, Environment and Transport	

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## Part 1 – Screening (further information included in the Action Plan)

Regarding the decision, policy, procedure, project or service under consideration,

Could this policy, procedure, project or service, or any proposed changes to it, affect any Protected Group (listed below) less favourably (negatively) than others in Kent?

Could this policy, procedure, project or service promote equal opportunities for this group?

**Please note that** there is no justification for direct discrimination; and indirect discrimination will need to be justified according to the legal requirements

The following has considered the three changes in policy as referred earlier in the brief description of the policy:

**A)** pitch allocation application process **B)** Allocation process **C)** site management.

Protected Group	You <b>MUST</b> provide a brief commentary as to your findings, or this EqlA will be returned to you unsigned			High/Medium/Low Favourable Impact
	High Negative Impact	Medium Negative Impact	Low Negative Impact	
Age			<p><b>A)</b> <i>Older potential applicants may not be computer literate or have limited access to the internet / computers making it difficult to register online.</i></p> <p><b>Action 1)</b> The GTS will look to promote the online application process through a mobile phone/ tablet application and provide</p>	<p>Standardising the allocation process in line with social housing will make the process simpler for the applicant.</p> <p>Promoting the use of digital will increase accessibility and reduce inconvenience for those living remotely or those unable to leave the home.</p> <p>Many of the younger generation use</p>

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			<p>alternative options where necessary to ensure all applicants find it easy to access the process reducing barriers to applying.</p> <p><b>Action 2)</b> Alongside the GTS ‘pre-tenancy’ support we will be working with the district/borough councils’ and the Library Service to facilitate any further ICT access and/or support necessary. External agencies will also be able to support applicants with the online process.</p> <p><b>Action 3)</b> Staff training will take place to ensure confident delivery of the face to face offer. In addition, supporting documents will be provided in a variety of accessible formats including easy read leaflets and for digital a screen reader.</p>	<p>SMART phones to access services; the online process will increase accessibility for mobile phone users and keep applicants up to date with their application.</p> <p>Keeping track of the application online will increase control for the applicant reducing anxiety.</p> <p>Clearer information will increase understanding of the process. This will be available in a variety of formats in line with current accessibility standards.</p> <p>Staff will have increased knowledge of the process and be better equipped to support applicants through the process.</p>
			<p><b>B)</b> <i>‘Bidding’ for available pitches may be difficult for older people with little or no computer skills or have limited access to the internet / computers.</i></p> <p><b>Action 4)</b> The GTS will develop an auto bid process that can be accessed for those applicants unable to use the online process. Applicants will be kept up to date regularly through their chosen communication method, their</p>	<p>Applying online will speed up the process of moving into suitable accommodation.</p> <p>Auto-bidding will assist those unable to access the online process reducing any inconvenience to the applicant.</p> <p>Being in regular contact about the application will help to reduce anxiety.</p>

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			preferences considered, and an automatic bid submitted.	
			<p><b>C) <i>The youngest and oldest applicants may find it difficult to maintain a two-week balance on account.</i></b></p> <p><b>Action 5)</b> The GTS will provide ‘pre-tenancy’ support to increase budget management skills. Further support will be given where appropriate to apply for awards and grants. The GTS review residents accounts regularly and where necessary will support with payment plans or signpost.</p> <p><b>D) <i>Older applicants may find it difficult to keep the pitch to the standard required as per the pitch licence agreement.</i></b></p> <p><b>Action 6)</b> The asset management approach used by the GTS will assist with the ongoing monitoring of the site enabling site managers to identify whether any intervention or signposting is required. This will help reduce the number of pitch licence agreement breaches.</p>	<p>Having two weeks on account will benefit the individual should they depart from the pitch without notification reducing any unpaid debt. It can also assist with budget management should they fall into arrears.</p> <p>Payment plans can assist those who may require help getting back up to date rather than continuing in debt.</p> <p>Regular asset management checks monitoring the condition of the pitches will highlight areas of concern, prompting quicker assessment and resolution for vulnerable residents.</p> <p>Monitoring the asset will also ensure that repair works are prioritised for vulnerable residents.</p>
<b>Disability</b>			<b>A) <i>People with disabilities and long-</i></b>	Standardising the process will bring

		<p><i>term illnesses who may have a low income, may not have access to the internet or may find accessing the online application difficult.</i></p> <p><b>Action 7)</b> The GTS will promote ways to register for accommodation through mobile phones / tablets or where appropriate alternative methods. Support will be made available from the GTS and partners such as district/borough councils, library (LRA) or CAB to facilitate access to the internet including support in setting up an email account etc.</p> <p><b>Action 8)</b> Staff training will take place to ensure confident delivery of the face to face offer. In addition, supporting documents will be provided in a variety of accessible formats including easy read leaflets and screen reader.</p>	<p>parity with social housing. The banding process will assess housing need ensuring that those with disabilities are prioritised appropriately.</p> <p>Clearer information will increase understanding of support available.</p> <p>The information will be available in a variety of formats in line with current accessibility standards. Staff will also be available to give face to face support or liaise with any designated advocate.</p> <p>With increased support from the GTS applicants can feel more confident about making their application and ready for site accommodation.</p>
		<p><b>B)</b> <i>People with disabilities and long-term illnesses may not be able to access the internet to utilise the 'bidding' process for pitches</i></p> <p><b>Action 9)</b> The GTS will focus on promoting auto-bidding to reduce barriers. In addition, district and borough councils, CAB or libraries where the LRA have IT buddies may be able to assist with access to</p>	<p>Utilising the auto-bid facility will increase the speed to which the applicant can move into suitable accommodation.</p> <p>Promoting the use of the online process and auto-bidding will increase accessibility and reduce inconvenience for those unable to leave their home due to disability/longer illness.</p> <p>Keeping track of the application online</p>

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			digital where appropriate.	will increase control for the applicant reducing anxiety.
			<p><b>C) <i>Those with disabilities may find it difficult to maintain a two-week balance on account due to possible low income.</i></b></p> <p><b>Action 10)</b> The GTS will provide 'pre-tenancy' support and facilitate specialist service support to ensure all aspects are taken into account and where appropriate Information and Guidance (IAG) and budget management skills can be delivered. Further support will be given where appropriate to understand any impact to disability benefits and apply for awards such as discretionary grants from Local Authorities etc. The GTS review residents accounts regularly and where necessary will support with payment plans or signpost. <i>Those with disabilities may find it difficult to keep the pitch in order.</i></p> <p><b>Action 11)</b> The asset management approach will assist with the ongoing monitoring of the site, enabling site managers to identify whether any intervention or signposting is required.</p>	<p>Having two weeks on account will benefit the individual should they depart from the pitch aiding budget management reducing debt.</p> <p>Discretionary grants can assist those who may require help with moving onto a pitch reducing the chance of debt.</p> <p>Regular asset management checks monitoring the condition of the pitches will highlight areas of concern, prompting quicker assessment and resolution for vulnerable residents.</p> <p>Monitoring the asset will also ensure that repair works are prioritised for vulnerable residents.</p>

<b>Sex</b>			This Policy will have no distinct impact on this protected characteristic however the GTS will track data and monitor any variance in outcomes based on sex.	This Policy will have no distinct impact on this protected characteristic
<b>Gender identity/ Transgender</b>			This Policy will have no distinct impact on this protected characteristic	This Policy will have no distinct impact on this protected characteristic
<b>Race</b>			<p><b>A &amp; B)</b> <i>Applicants may have low literacy levels or lack the ICT skills needed to access the internet or fully understand the pitch licence agreement.</i></p> <p><b>Action 12)</b> GTS will ensure that the process is compatible with smart technologies such as screen reader etc and is easy to use to increase accessibility for those with low literacy levels or ICT skills.</p> <p><b>Action 13)</b> Alongside the GTS ‘pre-tenancy’ support, we will be working with the district/borough councils’ and the Library Service to facilitate any further ICT access and/or support necessary e.g. an ICT buddy would be able to assist individuals with the online process. Other external agencies will also be able to support applicants with the online process.</p>	<p>SMART technologies can be utilised increasing accessibility, flexibility and understanding of the application process increasing control and opportunities for those with low literacy or ICT skills.</p> <p>Clearer information will ensure that those who need support know what is available.</p> <p>The information will be available in a variety of formats in line with current accessibility standards. Staff will also be available to give face to face support.</p>

			<p><b>Action 14)</b> Staff training will take place to increase knowledge of the process and the information available for site residents regarding site management. There will be easy to read literature for applicants regarding the new process and a handbook for site residents.</p>	
			<p><b>C)</b> <i>Many may find themselves in the lower income bracket for a variety of reasons, including low literacy levels or their role as a carer for others. It may prove difficult for them to maintain a two-week balance on account.</i></p> <p><b>Action 15)</b> The GTS will provide 'pre-tenancy' support to increase budget management skills. Further support will be given where appropriate to apply for awards such as discretionary grants from Local Authorities etc. The GTS review residents accounts regularly and where necessary will support with payment plans or signpost.</p>	<p>Having two weeks on account will benefit the individual should they depart from the pitch without notification reducing any unpaid debt. It can also assist with budget management should they fall into arrears.</p> <p>Payment plans can assist those who may require help getting back up to date rather than continuing in debt.</p>
<b>Religion and Belief</b>			This Policy will have no distinct impact on this protected characteristic	This Policy will have no distinct impact on this protected characteristic
<b>Sexual Orientation</b>			This Policy will have no distinct impact on this protected characteristic	This Policy will have no distinct impact on this protected characteristic

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<b>Pregnancy and Maternity</b>			<p><b>A) and B)</b> <i>These individuals may be on a lower income and not be able to access the internet or have the skills to do so. They could also find it difficult to access digital at alternative venues, as they may not have transport or find it difficult to use public transport.</i></p> <p><b>Action 16)</b> The GTS will promote auto bidding where appropriate and help with the mobile phone / tablet application where required.</p>	<p>If applicants are remote or unable to leave the home, they may be more likely to access services through the internet increasing flexibility and accessibility.</p>
			<p><b>C)</b> <i>Pitch upkeep may be difficult for a temporary period of time for this group</i></p> <p><b>Action 17)</b> The GTS will carry out welfare visits and asset checks periodically and prioritise any works accordingly. This will enable site managers to identify whether any intervention or signposting is required.</p>	<p>The asset management approach will help with keeping up to date with all maintenance issues. The prioritisation of works will ensure vulnerable people can be prioritised.</p> <p>Regular asset management checks monitoring the condition of the pitches will highlight areas of concern, prompting quicker assessment and resolution for vulnerable residents.</p>
<b>Marriage and Civil Partnerships</b>			N/A	N/A
<b>Carer's Responsibilities</b>			<p><b>A) and B)</b> <i>These individuals may find it difficult to leave the home, may not be able to access the internet or have the skills to do so. They may also find it difficult to access digital at alternative venues.</i></p>	<p>If applicants are remote or unable to leave the home, they may be more likely to access services through the internet increasing flexibility and accessibility.</p>

			<p><b>i)</b> The GTS will promote auto bidding where appropriate and help with the mobile phone / tablet application where required by offering support to them in the home.</p>	
			<p><b>C)</b> <i>Pitch upkeep may be difficult for this group.</i></p> <p><b>Action 18)</b> The GTS will carry out welfare visits and asset checks periodically and prioritise any works accordingly. This will enable site managers to identify whether any intervention or signposting is required.</p> <p><i>This group may find it difficult to maintain a two-week balance on account due to possible low income.</i></p> <p><b>Action 19)</b> The GTS will provide 'pre-tenancy' support to increase budget management skills. Further support will be given where appropriate to apply for awards such as discretionary grants from Local Authorities etc. The GTS review residents accounts regularly and where necessary will support with payment plans or signpost.</p>	<p>Regular asset management checks monitoring the condition of the pitches will highlight areas of concern, prompting quicker assessment and resolution for vulnerable residents.</p> <p>Monitoring the asset will also ensure that repair works are prioritised for vulnerable residents.</p> <p>Having two weeks on account will benefit the individual should they depart from the pitch aiding budget management reducing debt.</p> <p>Discretionary grants can assist those who may require help with moving onto a pitch reducing the chance of debt.</p>

## **Part 2 - Full Equality Analysis /Impact Assessment**

### **Information and Data used to carry out your assessment**

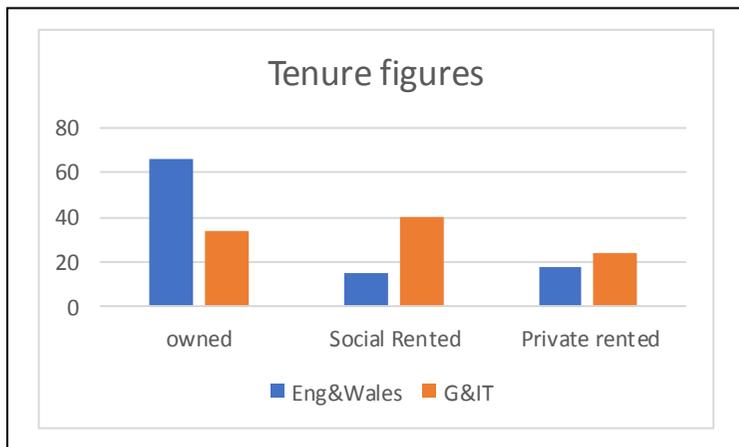
Data used for this review has been taken from the National Census 2011, the current analysis of the resident population on KCC sites and previous applications for KCC pitches.

- The Office for National Statistics (ONS) figures suggest that there are an estimated 4,522<sup>2</sup> Gypsy and Travellers living in Kent. This could include individuals living on private or local authority owned sites, 'bricks and mortar' housing, unauthorised developments or travellers in the literal sense. Kent County Council has approx. 343 residents<sup>3</sup> living on the eight sites owned and run by the KCC Gypsy and Traveller Service (GTS).
- The number of Gypsy or Irish Traveller households with dependent children in the 2011 Census was 45%. Higher than the average for England and Wales which was 29%. Of those Gypsy and Irish Traveller households with dependent children 45% stated they were lone parent families. Currently 27% of residents and applicants mixed are children.
- The 2011 Census showed that the number of Gypsy or Irish Traveller respondents living in the most common type of accommodation were those living in a whole house or bungalow at 61%. 24% of respondents stated they lived in a caravan or other mobile or temporary structure. Extrapolating the 24% of Gypsy and Travellers living in caravans or other mobile structures for Kent there would be 1084 of which KCC has 343 residing on KCC owned sites, nearly a third.
- The 2011 Census noted that the Gypsy and Irish traveller ethnic group had one of the highest proportions of people living in social rented accommodation at 41%. Currently 76% of KCC site residents are receiving housing benefit.

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<sup>2</sup> Office for National Statistics: Census 2011, CT0769 Metadata – Ethnic group: Gypsy, Traveller, Roma, Gypsy/Romany

<sup>3</sup> Gypsy and Traveller Service Census 2016.



- The consultation in 2017 highlighted concerns that the current allocation process did not mirror social housing. The new Pitch Allocation and Site Management policy has been developed in line with current social housing practice and as such data from the characteristic comparison<sup>4</sup> and district/borough councils<sup>5</sup> has been used as a comparison.

### Who have you involved consulted and engaged with?

The new policy has used the sources covered above to benchmark our policy against other social housing providing authorities and Registered Social Landlords (RSLs). The GTS has worked with Strategic and Corporate Services for both the asset management and policy development elements.

In addition, the GTS have raised the policy ideas with residents on KCC sites informally in advance of the second formal consultation gaining insight of how parity to social housing is preferred and that mobile phones are a preferred means for communication. This is in line with the comments made by respondents in the previous consultation.

### Analysis

<sup>4</sup> 2011 Census analysis: What does the 2011 Census tell us about the characteristics of Gypsy or Irish travellers in England and Wales

<sup>5</sup> Sample of district and borough council allocation policies.

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The GTS have in place currently an allocations scheme that is not suited to current social housing direction. There is a waiting list that is inadequate and opaque impacting directly on all protected characteristic groups above. The new Pitch Allocation and Site Management policy mitigates negative impact ensuring that the protected characteristic groups benefit from a more transparent and fair process. Data captured on Civica (case management system) shows the proportions of our current pitch applicants that fit into some of the different protected characteristic groups:

### **Disability**

There are no recorded applicants currently on the waiting list detailing disability, however 18% of applicants are recorded that they had a medical condition that required help with daily tasks. This ranges from coeliac disease to heart disease. The GTS will liaise with the individual and specialist services to ensure the appropriate support was available.

### **Ethnicity**

The current policy and application form requests that when applying for a pitch confirmation is given by the applicant that they are from the Gypsy and Traveller community. This would not change in the proposed Pitch Allocation and Site Management Policy.

### **Age**

The age profile of current applicants on the waiting list ranges from 0 – over 65. Currently 3% of applications on the waiting list are over 65 years old. The majority of applicants are between 18 and 40. 27% of applicants and residents mixed are children under 18. The GTS will provide appropriate support to ensure individuals are not disadvantaged by the proposed changes.

### **Adverse Impact**

The new Pitch Allocation and Site Management Policy may impact on the Gypsy and Traveller Community, including the protected characteristic groups, however areas of low concern are mitigated within the action plan.

The areas highlighted where this may have additional impact on the protected characteristic groups are:

#### **Age:**

- People over 65yrs and young people (18-40) may be affected.

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- Some older people have little or no experience with digital resources. By offering hard copy applications, it could be viewed older people are being penalised for this lack of ICT knowledge, but the GTS will focus on promoting ways that support, can be given with access to digital through partners and other agencies. 'Pre-tenancy' support from the GTS and other agencies would help those with limited skills, supporting people for example in setting up an email account, auto-bidding etc. This would enable individuals to access the process from their own homes.
- Alternative options such as agency support or auto-bidding could assist those who were unable to access the internet due to low income or low connectivity.

### **Disability:**

- People with disabilities and long-term illnesses may find themselves in the lower income bracket due to not being able to work full time or at all. This could impact accessibility to the allocation process or the ability to pay two weeks in advance. The GTS would offer support with this ensuring that individuals are not disadvantaged by the proposed changes.

### **Race:**

- People from the Gypsy and Traveller community may find themselves in the lower income bracket for a variety of reasons, such as low literacy levels or their role as carers.
- It could become a barrier for people trying to access wider material including in different formats e.g. speech to text, other languages, etc. in mitigation Kent does provide a variety of alternative accessible formats. Demand for specific languages are monitored by the GTS and support provided according to need ensuring accessibility.

### **Pregnancy and Maternity:**

- Low income or the inability to access transport could impact the accessibility to the process or to keep a two week in advance balance. Currently 3% of households on the waiting list are pregnant, pre-tenancy support will assist this group.

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## **Age**

- Many of the younger applicants use Smart phones and apps for transactions and communication. They can find the KCC application process slow and frustrating. Delivering the proposed changes will bring transparency and control to the applicant making it more accessible and fit for the future.
- The older generation receive the advice and support moving forward promoting accessibility.

## **Disability**

- Bringing parity with social housing and standardising the process helps reduce confusion increasing transparency.
- Great pre-tenancy support offered, increased information in a variety of formats and liaison with specialist services.

## **Race**

- Bringing parity with social housing and standardising the process reduces the risk of unlawful discrimination increasing clarity and transparency.

## **Pregnancy and Maternity**

The pre-tenancy support offered will benefit those on a low income or those who are unable to access transport.

## **Carer's responsibilities**

The pre-tenancy support offered and access to the auto-bidding system will benefit those with carer's responsibilities.

## **General to all characteristics**

The allocation banding process would benefit the Gypsy and Traveller community considering all characteristics by delivering an improved customer journey bringing parity with social housing. Increasing the transparency and accessibility of the process will improve the service received, ensuring those requiring assistance are supported.

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## **JUDGEMENT**

The GTS Pitch Allocation and Site Management policy is to be reviewed appropriately taking account of the impact this will have on the Gypsy and Traveller community. Based on the existing process and the actions put in the actions plan it is our judgement that the Pitch Allocation and Site Management Policy can progress.

- **Adjust and continue** - adjust to remove barriers or better promote equality- see Action plan

Please see action plan below. The policy should be reviewed on an annual basis along with this EQIA.

## Part 3 - Action Plan

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale	Resource implications
Age	<i>A) Older potential applicants may not be computer literate or have limited access to the internet / computers making it difficult to register online.</i>	<b>Action 1)</b> The GTS to provide support with mobile phone/ tablet applications or alternative access.	Applicants access opportunities increased.	PS	1 yr	GTS support staff
		<b>Action 2)</b> Training and support to GTS staff, and partners to help facilitate the support for the online process.	Increase in support for applicants.	PS	1 yr	GTS staff
		<b>Action 3)</b> staff training to enable delivery of face to face support. Information available in a range of formats.	Increase in resources for applicants.	PS	1 yr	GTS staff, Communication team
	<i>B) Older people may not be computer literate or have limited access to the internet / computers and may find it difficult to bid for</i>	<b>Action 4)</b> auto bid process developed and alternative access to ensure applicants who are unable to use the online process are supported.	Access for all.	PS	1 yr	GTS staff, ITC contractor

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	<i>available pitches.</i>					
	<b>C)</b> <i>The youngest and oldest applicants may find it difficult to maintain a two-week balance on account.</i>	<b>Action 5)</b> 'pre-tenancy' support programme and resident payment programme developed.	Applicants are supported.	PS	1 yr	GTS staff, Communication team
	<b>D)</b> <i>Older applicants may find it difficult to keep the pitch to the standard required as per the pitch licence agreement.</i>	<b>Action 6)</b> ongoing monitoring of the site to identify whether any intervention or signposting is required.	Reduced number of pitch licence agreement breaches.	PS	1 yr	GTS staff,
<b>Disability</b>	<b>A)</b> <i>People with disabilities and long-term illnesses may not have access to the internet or find the online application difficult.</i>	<b>Action 7)</b> The GTS to provide support with mobile phone/ tablet applications or alternative access.	Applicants access opportunities increased.	PS	1 yr	GTS staff, ITC contractor
		<b>Action 8)</b> staff training to enable delivery of face to face support. Information available in a range of formats	Increase in support for applicants.	PS	1 yr	GTS staff, Communication team, HR
	<b>B)</b> <i>People with disabilities and long-term illnesses may not be able to access the internet to utilise the 'bidding' process</i>	<b>Action 9)</b> The GTS to develop an auto-bidding process and alternative arrangements.	Choice and accessibility increased.	PS	1 yr	GTS staff, ITC contractor

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	<i>for pitches</i>					
	<b>C) Those with disabilities may find it difficult to maintain a two-week balance on account due to possible low income.</b>	<b>Action 10)</b> 'pre-tenancy' support programme and resident payment programme developed.	Increased level of support for applicants.	PS	1 yr	GTS staff,
	<i>Those with disabilities may find it difficult to keep the pitch in order.</i>	<b>Action 11)</b> Intervention and support programme enhanced.	Increased level of support for residents.	PS	1 yr	GTS staff,
<b>Race</b>	<b>A &amp; B) Applicants may have low literacy levels or lack the ICT skills needed to access the internet or fully understand the pitch licence agreement.</b>	<b>Action 12)</b> Process to be developed in line with accessibility standards.	Applicants access opportunities increased.	PS	1 yr	GTS staff, ITC contractor
		<b>Action 13)</b> training to extend to partners to build knowledge base	Increase in support for applicants.	PS	1 yr	GTS staff, Communication team, HR
		<b>Action 14)</b> staff training to enable delivery of face to face support. Information available in a range of formats	Increased level of support for residents.	PS	1 yr	GTS staff, partner agencies
	<b>C) Many may prove difficult to maintain a</b>	<b>Action 15)</b> 'pre-tenancy' support programme and	Increased level of support for	PS	1 yr	GTS staff,

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	<i>two-week balance on account.</i>	resident payment programme developed.	residents.			
<b>Pregnancy &amp; Maternity</b>	<b>A) and B)</b> <i>May not be able to access the internet or find it difficult to access digital at alternative venues.</i>	<b>Action 16)</b> The GTS to provide support with mobile phone/ tablet applications or alternative access.	Applicants access opportunities increased.	PS	1 yr	GTS support staff
	<b>C)</b> <i>Pitch upkeep may be difficult for a temporary period of time for this group</i>	<b>Action 17)</b> Intervention and support programme enhanced.	Increased level of support for residents.	PS	1 yr	GTS staff,
<b>Carers' Responsibility</b>	<b>A) and B)</b> <i>may find it difficult to access the internet or alternative venues to seek help.</i>	<b>Action 18)</b> Process to be developed in line with accessibility standards.	Applicants access opportunities increased.	PS	1 yr	GTS staff, ITC contractor
	<b>C)</b> <i>This group may find it difficult to maintain a two-week balance on account due to possible low income.</i>	<b>Action 19)</b> The GTS will provide 'pre-tenancy' support and liaise with specialist services to ensure the appropriate support is given.	Increased level of support for residents.	PS	1 yr	GTS staff, external agencies

**Have the actions been included in your business/ service plan?** Yes, they have been embedded into the consultation plan and service plan.

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