



Title of the Assessment:	Park Homes in Central Bedfordshire	Date of Assessment:	December 2014
Responsible Officer	Name:	Ramone Nurse	Extension Number:
	Title:	Policy and Performance officer	
	Email:	Ramone.nurse@centralbedfordshire.gov.uk	

Stage 1 - Setting out the nature of the proposal and potential outcomes.

Stage 1 – Aims and Objectives	
1.1	<p>What are the objectives of the proposal under consideration?</p> <p>The Offer to park homes residents sets out the Councils approach and commitment to creating a better offer and choice for older people living in Central Bedfordshire.</p> <p>The Council carried out a survey of park homes residents in October 2014 to help understand what it like is to live in a park home, the things that matter to residents and the challenges they face. The survey provided 426 responses from residents, which provides good insight into the needs and aspirations. The council has used the information captured during the survey to design an offer which aims to enhance and protect the positive aspects of the park home lifestyle whilst helping residents to meet the challenges of living in a park home.</p> <p>The following four priorities have been identified to help to meet this objective:</p> <ul style="list-style-type: none"> ▪ Priority one: To develop the park home environment into lifetime neighbourhoods where people can live independently in their home for as long as they wish to. ▪ Priority two: To develop and provide good quality, accessible information for park homes residents. ▪ Priority three: To improve the experience of residents living in park homes. ▪ Priority four: To provide more opportunities for residents to become involved and to work in collaboration with residents to strengthen the development of the park homes communities
1.2	<p>Why is this being done?</p> <p>Residents have told us that they want to remain living in their homes for as long as they are able to. Central Bedfordshire Council will work with residents and site owners to explore the lifetime neighbourhood concept. The council will join up work across housing, adult social care, health and transport departments so that residents are able to plan their lives and their housing needs now and in the future.</p> <p>Our vision is that all park home residents will enjoy an independent living lifestyle in a unique community environment that meets the needs and aspirations of older people in Central Bedfordshire.</p> <p>The Council recognises that park homes are a unique place to live, the council is committed to providing information, advice and support to park home residents that is tailored to reflect the residents needs and aspirations.</p>
1.3	<p>What will be the impact on staff or customers?</p>

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Park Homes residents will benefit from information, advice and support to them to plan for their care and support and to help their care needs from developing.

Park home residents will receive better information and advice to enable them to understand their rights and responsibilities and to ensure they are able to access support in the wider community to prevent social isolation.

Park homes residents will receive support to form residents associations.

Central Bedfordshire staff will be encouraged to work creatively and collaboratively across departments to help to develop park homes sites into lifetime neighbourhoods.

1.3 How does this proposal contribute or relate to other Council initiatives?

The offer to park homes residents supports the council's key priority to promote health and well being and protect the vulnerable.

The Care Act 2014

The Care Act overhauls the social care system in England, reforming and streamlining much of the legislation on access to, administration of, and responsibilities for care services.

The new statutory principle of individual wellbeing underpins the Act, and is the driving force behind care and support.

The council (and partners in health, housing, welfare and employment services) has a duty to take steps to prevent, reduce or delay the need for care and support for all local people. The council will aim to provide high quality information and advice about services that operate in the community, or commission universal services that seek to promote well-being and improve people's independence.

The implementation of the Care Act in Central Bedfordshire will transform the way care and support is delivered for potential and current people in need of support and their carers.

Lifetime Neighbourhoods Concept

The Centre for Housing Policy at York University developed a concept known as Lifetime Neighbourhoods, brought together in a report, commissioned by the Department for Communities and Local Government. Lifetime neighbourhoods are places designed to be inclusive regardless of age or disability.

The report contributes to the government's commitment to help older people live independently. It should help to prompt thinking around how, for example, ageing; design, housing, transport, participation and green spaces can be linked when creating lifetime neighbourhoods.

Meeting the Accommodation Needs of Older People Program

Central Bedfordshire has developed a program approach towards the delivery of accommodation for older people. The vision for the program is that older people across all of Central Bedfordshire have access to a choice of local, high quality, value for money accommodation that enable them to lead healthy, independent lives within their community. The council will ensure the appropriate links are made between the delivery of the park homes

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offer and learning from good practice happening elsewhere in the council.

1.5 In which ways does the proposal support Central Bedfordshire’s legal duty to:

- Eliminate unlawful discrimination harassment and victimisation and other conduct prohibited by the Act

The Offer aims to protect vulnerable residents from exploitation from site owners by providing clarity in how the Council will administer and enforce the new duties of the Mobile Homes Act 2013.

- Advance equality of opportunity between people who share a protected characteristic and people who do not share it
- Foster good relations between people who share a protected characteristic and people who do not share it

1.6 Is it possible that this proposal could damage relations amongst groups of people with different protected characteristics or contribute to inequality by treating some members of the community less favourably such as people of different ages, men or women, people from black and minority ethnic communities, disabled people, carers, people with different religions or beliefs, new and expectant mothers, lesbian, gay, bisexual and transgender communities?

The Offer is aimed specifically at older people in park homes. However, some actions will also benefit other groups - e.g. provision of universal information and advice about park homes.

Stage 2 - Consideration of national and local research, data and consultation findings in order to understand the potential impacts of the proposal.

Stage 2 - Consideration of Relevant Data and Consultation

In completing this section it will be helpful to consider:

- **Publicity** – Do people know that the service exists?
- **Access** – Who is using the service? / Who should be using the service? Why aren't they?
- **Appropriateness** – Does the service meet people’s needs and improve outcomes?
- **Service support needs** – Is further training and development required for employees?
- **Partnership working** – Are partners aware of and implementing equality requirements?
- **Contracts & monitoring** – Is equality built into the contract and are outcomes monitored?

2.1. Examples of relevant evidence sources are listed below. Please tick which evidence sources are being used in this assessment and provide a summary for each protected

characteristic in sections 2.2 and 2.3.

Internal desktop research		
	Place survey / Customer satisfaction data	✓ Demographic Profiles – Census & ONS
✓	Local Needs Analysis	Service Monitoring / Performance Information
	Other local research	
Third party guidance and examples		
✓	National / Regional Research	Analysis of service outcomes for different groups
✓	Best Practice / Guidance	✓ Benchmarking with other organisations
	Inspection Reports	
Public consultation related activities		
✓	Consultation with Service Users	Consultation with Community / Voluntary Sector
	Consultation with Staff	Customer Feedback / Complaints
Data about the physical environment e.g. housing market, employment, education and training provision, transport, spatial planning and public spaces		
Consulting Members, stakeholders and specialists		
	Elected Members	Expert views of stakeholders representing diverse groups
✓	Specialist staff / service expertise	

Please bear in mind that whilst sections of the community will have common interests and concerns, views and issues vary within groups. E.g. women have differing needs and concerns depending on age, ethnic origin, disability etc

Lack of local knowledge or data is not a justification for assuming there is not a negative impact on some groups of people. Further research may be required.

**2.2. Summary of Existing Data and Consultation Findings: - Service Delivery
Considering the impact on Customers/Residents**

- Age:

National research:

At the last census (2011), almost 160,000 people were living in approximately 84,000 park homes across 2,000 sites in the UK.

Census 2011		
	Total Number of Mobile Homes in the UK	Mobile Homes as a Percentage of all UK
Total number of people	160,000	0.3%
Total number of households	90,000	0.3%
Total number of dwellings	112,000	0.4%
Berkeley Hanover Consulting (2002) Study for the Office of the Deputy Prime Minister		
	Park Homes	All of the UK
Proportion of households that are elderly	48%	33%
Proportion of households with children	4%	29%
Average Monthly Incomes	£600	£1,800
Proportion of households with savings	81%	65%
Households with savings less than £1,500	45%	58%

The Economics of the Park Homes Industry (2002) study estimated that there were some 69,000 households residing in park homes in England and Wales, representing a population of approximately 114,000 adults and 2,400 children. The social profile of park home households is quite distinct. Sixty-eight percent are elderly (48% elderly couples), compared with 33% of households in the UK. Only 4% of park home households have children living with them compared to 29% in the population. The dominance of the elderly has increased significantly since 1990 when it stood at 55%.

The survey asked whether operators set any age restrictions. Out of 153 operators who answered this question, 65% stated that a minimum age is set. According to the data gathered from the survey, the most common age limit is set 50. Fewer parks have an age limit higher than 50 and none of the parks has an age limit higher than 60. After 50, the most common age limit set is 45–100% of the parks surveyed require that their residents are at least 45 years old. Several parks do not allow residents with children younger than 10 and several others have minimum age of 16, 18 or 25. Whilst this is not specifically a physical attribute of a park, this section is included here as the importance of age restrictions is becoming a defining characteristic of the industry.

Seven million people are estimated to be under-saving for retirement which means they may find themselves living in poverty in retirement and 2.1 million Pensioners live in poverty after housing costs are taken into account, while the figure rises to 2.5 million before housing costs (DWP).

Over 65s are estimated to spend 80% of their time in the home (90% for over 85 year olds) (Help the Aged) and one million people over 65 report feeling trapped in their homes (DWP).

90% of older people live in 'mainstream housing (Department of the Environment, Transport and the Regions) and 2.1 million households with at least one person aged over 60 (28% of this age group) are living in a non-decent home. This includes 900,000 households with someone over 75 (31% of the age group) (DCLG).

Around a quarter of a million people aged 65 and over need specially adapted accommodation because of a medical condition or disability and 130,000 of them report living in homes that do not meet their needs (DCLG).

In 2006, 63% of people aged 65 to 74 reported having a longstanding illness and 38% said longstanding illness limited their ability to carry out daily activities. (ONS)

Local Research

A key characteristic of park homes is the age profile of its residents, with the majority of park homes occupied by older people. 80.2% of residents in park homes who responded to the needs analysis survey are over 65 years old. The age breakdown of the survey respondents are provided below:

Age	
Under 16	-
16-19	-
20-29	-
30-44	0.7%
45-59	9.5%
60-64	9.5%
65-74	43%
75+	37.2%

The feedback from the consultation offer to park homes residents recorded a similar trend with 57% of residents who responded being aged 65+.

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- Disability:

- The income of disabled people is on average less than half that of non-disabled people. (EFD)
- Disabled people are at greater risk of experiencing violence than non-disabled people. (Equality and Human Rights Commission (EHRC))
- Disabled people face harassment. One in four has experienced hate crime. (EHRC)
- Ongoing 'low-level' incidents are widespread and may go undetected but may escalate at some point. These incidents are often ignored by public agencies even though they have a significant impact on disabled people. (EHRC)
- Disabled people restructure their lives to minimise real and perceived risk to themselves even if they have not experienced targeted violence personally. (EHRC)
- 47% of disabled people had either experienced physical abuse or had witnessed physical abuse of a disabled companion. (Scope).
- 90% of people with learning disabilities have experienced harassment and bullying, with 32% stating that bullying was taking place on a daily or weekly basis. (Mencap)

Local Research

25% of residents who responded to the needs analysis had a disability.

Disability	
Yes	25.5%
No	74.5%

Residents were asked to consider why they may move from a park home, 23.8% of residents felt that ill-health or disability would prevent them from being able to live in their homes.

Providing support to enable park homes residents to remain in their homes for as long as they wish is a key priority for the Council.

The Adult Social Care and Housing needs of Park Homes residents

A review of all the adult social care interventions that took place between 2011 and 2014 was undertaken. 287 adult social care assessments leading to a service for park homes residents took place during this period. These services were received by 141 individual clients; this represents around 10% of park home residents.

42 of these residents received occupational health assessments,

As of December 2014, there are only 11 park home residents on the housing register waiting for re-housing. 7 of these require a move as their park home is no longer suitable. The majority of these cite health reasons whilst one applicant needs to move due to a breach of the rules around allowing children to reside in a park home.

- Carers:

Over 2 million people become carers every year. 3 in 5 people will become a carer at some point in their lives. Over 65's account for around a third of those carers providing more than 50 hours of care a week, including many who provide informal care for grandchildren. Many also look after older relatives as well. (Department for Work and Pensions)

Over 1 million people experience ill health, poverty and discrimination at work and in society because they are carers. 18% of carers have left a job or been unable to take one due to caring responsibilities.

Among those of working age, 36% of carers were 'struggling to make ends meet'. 38% said they were 'managing on the money coming in', while 26% were 'reasonably comfortable financially'. Carers who are

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struggling financially are more likely to be: in poor health (34%); unqualified (21%); caring for 20+ hours per week (88%).

Ethnic minority carers were especially likely to say they felt restricted in using services because they lacked information, or because services were too expensive, lacked flexibility, or were not suitable for their individual needs.

Rural carers are very slightly more likely than urban carers to mention a lack of suitable services in their area, to say they do not know what is available locally, or to be held back in using services because they are too expensive.

Local Research

25.8% of residents who responded to the needs analysis had caring responsibilities.

Caring responsibility	
None	74.2%
1-19 hours a week	13.4%
20-49 hours a week	2.3%
50 or more hours a week	10.1%

- Gender Reassignment:

No issues relating to gender reassignment have been identified.

- Pregnancy and Maternity:

No issues relating to pregnancy and maternity have been identified.

- Race:

- Black, Pakistani and Bangladeshi households are more likely to live in homes that fall below the Decent Homes Standard than white households. (Department for Communities and Local Government)
- Nationally, in 2005 the police recorded 50,000 racially or religiously motivated hate crimes. (Home Office (HO))
- The Police estimate that most racial hate crime is not reported because victims are too frightened or embarrassed. (HO)

Local research

98.8% of those who responded to the needs analysis defined themselves as White British.

Ethnic group	
White British	98.8%
Other Ethnic group	1.2%

The council is currently administering site licenses for 82 park home and gypsy and traveller sites across Central Bedfordshire with the total number of units across all sites exceeding 1200.

47 of these 82 sites are more traditional gypsy and traveler occupied mobile home sites, which are different in character and not generally recognised as "Park homes". Many of these 47 sites contain single unit gypsy and traveler homes.

The gypsy and traveller sites differ from more traditionally known park home sites. Whilst licensing

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responsibilities for the council are similar for park homes and gypsy and traveller sites, there are significant differences in the residential occupation of the sites.

The intention of this document is to focus primarily on park homes sites, whilst recognising that some of the issues for older residents on gypsy and traveller sites are going to be similar in nature to residents on park homes sites.

- Religion or Belief:

- The Police estimate that most religious hate crime is not reported because victims are too frightened or embarrassed. (Home Office)
- In 2006 there were 260,00 racially or religiously motivated offences (British Crime Survey)

- Sex:

- For females, the majority of the violence experienced is in the home and the offender is known to them. (ER)
- It is estimated that at least 1.7 million single older men could be living in isolation in the UK. Nearly 400,000 of these are single older men aged 75 and over. Furthermore, it is estimated that 289,000 single older men are living in poverty. (Age Concern)

- Sexual Orientation:

- Police estimate that 90% of homophobic crime goes unreported because victims are too frightened or embarrassed to report the crime. (Equality Review)
- One in five lesbian and gay people have experienced a homophobic hate crime or incident in the last three years. One in eight has been a victim in the last year. (Stonewall)
- Three in four of those experiencing hate crimes or incidents did not report them to the police. Only 6% reported them to third parties. (Stonewall)
- Seven in ten did not report hate crimes or incidents to anyone. (Stonewall)
- One in six experiencing homophobic hate incidents in the last three years experienced a physical assault. (Stonewall)
- 8% of all black and minority ethnic lesbian and gay people have experienced a physical assault as a homophobic hate incident, compared to four per cent of all lesbian and gay people. (Stonewall)
- One in six lesbian and gay people have been insulted and harassed in the last three years because they are gay. (Stonewall)
- Overall, three in five lesbian and gay people have been a victim of any crime or incident in the last three years. (Stonewall)
- Of the UK population over State Pension Age, it is estimated that between 500,000 to 800,000 people are lesbian, gay or bisexual. (Age Concern)
- Older LGB people are 2 ½ times more likely to live alone and 4 ½ times less likely to have no children to call upon in times of need be without informal care and support networks, making their need for appropriate social care services even more acute. (Stonewall)

- **Other:** *e.g. Poverty / Social Class / Deprivation, Looked After Children, Offenders, Cohesion, Marriage and Civil Partnership*

National Data:

The Economics of the Park Homes Industry (2002) study found that 64% of park home households have incomes below £800 per month, compared to 30% in the population. A further 34% of residents have monthly incomes between £800–£2,000. This compares with average monthly pitch fees in the region of £80–£85 which shows that park homes play a significant role in providing low-cost accommodation.

While 45% of residents' households have less than £1,500 of savings, compared to 58% in the population, the elderly residents' households have 40% in this savings range compared to 30% in the population. About 40% of the residents' elderly households have savings in the range £1,500–£10,000. Thus residents are generally not income rich and a good proportion has no savings at all, though there is a significant number with very modest savings.

In the 2008 Westminster Hall debate Dan Rogerson (North Cornwall) said 'we are often dealing with

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residents who do not have the financial resources to pursue legal cases and, even if they are able to get access to legal advice, with support, they may be distressed by that process, so they are not best placed to represent their interests or to put those things across effectively. Therefore they may rather acquiesce in the face of bullying’.

Park Home Occupancy

The table below shows that nearly half of those who responded to the park homes survey are single people.

Park Home Occupancy	
1 adult	49.6%
2 adults	48.4%
3 adults	1.5%
2 adults + child	0.5%

Employment status

Nearly 80% of residents who responded to the survey are retired. Some residents responded to the consultation of the draft offer with specific feedback about the nature of park homes accommodation. Many residents felt that they should not be classified as retirement homes. The vision has been amended to reflect the fact that not all residents living in park homes are retired.

Employment status	
Employed – Full time	8.9%
Employed - Part time	4.5%
Self employed	1.7%
Unemployed and available for work	0.7%
Permanently sick/ disabled	3.7%
Retired	79.5%
Looking after the home	7.4%

Location

The location of some park homes was cited as a problem for a number of respondents. The lack of transport provision in some areas mean that residents felt isolated are unable to access amenities without the use of a car.

This view was also supported by residents who responded to the survey in the park Home Living in England report¹ which states “One negative issue was accessibility to shops and services, particularly for older people who could no longer drive. A feature of many parks is their rural location, and, just like any rural community, there is the potential for poor accessibility”.

2.3) To what extent are vulnerable groups experiencing poorer outcomes compared to the population or workforce as a whole?

Park homes residents tend to be over 60 years of age, some have disabilities and many have a low income. Nationally it is recognised that park home residents are therefore more vulnerable to harassment and intimidation by over-zealous site owners.

Park homes residents are not always able have choice over their gas/ electricity supplier which could result in increased costs for some vulnerable residents.

¹ Park Home Living in England: Prospects and policy Implications, Mark Bevan (2009)

2.4) Are there areas where more information may be needed?
None identified
2.5) Are there are any gaps in data or consultation findings?
None identified
2.6) What action will be taken to obtain this information?
n/a
2.7) To what extent do current procedures and working practices address the above issues and help to promote equality of opportunity?
The Council is also taking a pro-active approach to promoting equality by including in the licence the reminder that site owners should tackle discrimination on their sites and promote equality. Site owners are also signposted to a resource that can support them to achieve this.

Stage 3 - Providing an overview of impacts and potential discrimination.

Stage 3 – Assessing Positive & Negative Impacts					
Analysis of Impacts	Impact?		Discrimination?		Summary of impacts and reasons
	(+ve)	(- ve)	YES	NO	
3.1 Age	✓			✓	Park home residents are predominantly aged over 60 and are more vulnerable to intimidation, social isolation and longstanding illness.
3.2 Disability	✓			✓	Due to their age many park home residents have long term life limiting illnesses.
3.3 Carers				✓	25% of park homes residents are carers. Rural carers are more likely to report a lack of services in their area.
3.4 Gender Reassignment	✓			✓	
3.5 Pregnancy & Maternity				✓	
3.6 Race	✓			✓	
3.7 Religion / Belief	✓			✓	
3.8 Sex	✓			✓	
3.9 Sexual Orientation	✓			✓	
3.10 Other e.g. Human Rights, Poverty / Social Class / Deprivation, Looked After Children,				✓	

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<i>Offenders, Cohesion Marriage and Civil Partnership</i>					
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Stage 4 - Identifying mitigating actions that can be taken to address adverse impacts.

Stage 4 – Conclusions, Recommendations and Action Planning																							
<p>4.1 What are the main conclusions and recommendations from the assessment? The offer to park homes residents focuses on making positive changes.</p> <p>The Offer aims to improve the living experience and environment of park homes residents, the vast majority of which are older people (90% are aged over 60yrs, 37% aged over 75yrs).</p> <p>In 2012 The Department of Communities and Local Government (DCLG) published ‘A better deal for mobile home owners – Changes to the local authority site licensing regime - Impact assessment’. In this it stated that ‘an unusual tenure arrangement, an aging resident population, and poor regulatory controls present risks that residents will be exploited by site owners. The Offer includes clarity in how the Council will administer and enforce the new duties of the Mobile Homes Act 2013.</p> <p>Comments from consultation suggested that the Council should not view park homes as a “retirement village” but more a type of lifestyle for a broader range of older people. Consequently, the vision has been changed to remove reference to “retirement” and the Offer actions are more aligned to improving the universal offer for all park homes residents. This includes wider issues such as social isolation that were highlighted from the needs assessment.</p>																							
<p>4.2 What changes will be made to address or mitigate any adverse impacts that have been identified?</p> <p>None identified</p>																							
<p>4.3 Are there any budgetary implications?</p>																							
<p>4.4 Actions to be taken to mitigate against any adverse impacts:</p> <table border="1"> <thead> <tr> <th>Action</th> <th>Lead Officer</th> <th>Date</th> <th>Priority</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>				Action	Lead Officer	Date	Priority																
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Stage 5 - Checking that all the relevant issues and mitigating actions have been identified



Stage 5 – Quality Assurance & Scrutiny: Checking that all the relevant issues have been identified	
5.1	What methods have been used to gain feedback on the main issues raised in the assessment?
Step 1:	
Has the Corporate Policy Advisor (Equality & Diversity) reviewed this assessment and provided feedback? <i>Yes/No</i>	
Summary of CPA's comments:	
Step 2:	
5.2	Feedback from Central Bedfordshire Equality Forum

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Stage 6 - Ensuring that the actual impact of proposals are monitored over time.

Stage 6 – Monitoring Future Impact	
6.1 How will implementation of the actions be monitored?	The Offer to Park Homes action plan has been developed to outline how the council will deliver its priorities.
6.2 What sort of data will be collected and how often will it be analysed?	The number of residents that are prevented to stay at homes The number of adult social care interventions Number of applicants to the housing register Number of new residents associations forming The effectiveness of the information and advice provided.
6.3 How often will the proposal be reviewed?	Every 3 months
6.4 Who will be responsible for this?	Terry Gilbey
6.5 How have the actions from this assessment been incorporated into the proposal?	The action plan has been amended to reflect the findings of the EIA.

Stage 7 - Finalising the assessment.

Stage 7 – Accountability / Signing Off	
7.1 Has the lead Assistant Director/Head of Service been notified of the outcome of the assessment	
Name: _____	Date: _____
7.2 Has the Corporate Policy Adviser Equality & Diversity provided confirmation that the Assessment is complete?	
Date: _____	