

APPENDIX C: Equality Impact Assessment

Organisation prepared for	Somerset West and Taunton Council		
Version	V2	Date Completed	June 2020
Description of what is being impact assessed			
Hinkley Housing Fund Strategy – SWT (Phase 3) 2020-2023			
Evidence			
<p>What data/information have you used to assess how this policy/service might impact on protected groups? Sources such as the Office of National Statistics, Somerset Intelligence Partnership, Somerset’s Joint Strategic Needs Analysis (JSNA), Staff and/ or area profiles,, should be detailed here</p>			
<p>Below we have collated current evidence from three sources to help inform equalities considerations within the development of the HPC Housing Funding Strategy (Phase 3) and Action Plan :</p> <p>Strategic: The Somerset Homelessness and Rough Sleeper Needs Assessment 2019 (see report to SWT Executive – February 2020)</p> <p>Strategic & Operational: HPC workforce and impact on the local housing market – issues and need (see Appendix A to main report)</p> <p>Operational: Direct evidence from those delivering HPC Housing Fund supported services</p> <p><u>Somerset Homelessness and Rough Sleeper needs assessment 2019</u></p> <p><i>The HPC development cannot (in isolation) be held accountable for the trends highlighted below. However, it is part of the complex picture of pressures on the local housing market. In that context, the information below is relevant and should be used to inform relevant interventions via HPC (EDF) funded housing interventions.</i></p>			

The assessment outlines the extent of homelessness and rough sleeping across Somerset at district authority level, evaluating existing provision and identifying gaps in provision

Main points relevant to this EIA:

- As at date of needs assessment (December 2019) there were 10,043 people across the county currently expressing a need for affordable housing, of this 4,065 are within the SWT area (although noting that 'data cleansing' is required). One bedroom accommodation is most in demand, especially in the former Taunton Deane
- The highest age prevalence is in the age range 25-59, except West Somerset, where the highest age group is 45-59 and 65-74.
- In Taunton there is a slightly higher proportion of 25-44 year olds
- In West Somerset 42% are 60 year or over, compared to 33% for Somerset as a whole
- To afford to buy a home in Somerset would require 7.6 time their earnings, although there is wide disparity in affordability across the Somerset districts. The highest ratio is in Mendip and West Somerset where in 2017 a household would have required more than 10 times their earnings to afford a home.
- There is a widening gap in affordability to rent, with median monthly rent accounting for an average of 36% of gross monthly pay, an increase since 2015
- In all districts the highest need is for social rented dwellings which account for 70-80% of overall need
- Taunton Deane has the highest combined number of 'Gold' and emergency need households
- There were 223 (West Somerset) and 453 (Taunton Deane) long term empty dwellings (October 2018)
- In 2018/19 indicative figures indicate that the districts delivered the following number of affordable homes
 1. Mendip – 100
 2. Sedgemoor – 130
 3. South Somerset – 122
 4. Taunton Deane – 218
 5. West Somerset – 3
- The outcome of homeless applications can be seen as follows

	Mendip	Sedgemoor	South Somerset	Somerset West and Taunton
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Eligible, unintentionally homeless and is priority need	10	84	83	62
Eligible, homeless, in priority need but intentionally homeless	4	7	9	0
Eligible, homeless but not in priority need	18	38	25	7
Eligible but not homeless	2	14	2	2
Lost contact prior to assessment	2	3	0	0
Withdrew prior to assessment	1	0	1	89
Not eligible for assistance	0	1	4	10
Total	37	147	124	170

- There are a number of reasons why an individual contacts the local authority with a threat of Homelessness, including
 1. Loss of Assured Shorthold Tenancy
 2. Family no longer able/willing to accommodate
 3. Non-violent breakdown in relationship
 4. Domestic abuse
- In 2018/19 the following number of applicants were accepted by the Somerset local authorities as homeless and in priority need:
 1. Mendip - 10
 2. Sedgemoor – 84
 3. South Somerset – 80
 4. Taunton Deane and West Somerset – 41
- Priority need groups include:
 1. Households with dependent children
 2. Pregnant women
 3. People who are 'vulnerable' in some way, e.g. because of mental illness and physical disability
 4. Aged 16-17

5. Aged 18 to 20 who were previously in care
 6. Vulnerable as a result of time spent in care, in custody, or in HM Forces
 7. Vulnerable as a result of having to flee their home because of violence or the threat of violence
- The main reason for priority need is having dependent children
 - 55% of applicants who are owed a main housing duty are aged 25-44
 - 16-24 year old, who disproportionately make up 25% of the applicants
 - Using MOD data from 2017, they estimated that 49,000 veterans live in Somerset of which 75.64% own a house, 23.19% rent a property. The balance, 1.17% (568) would imply are potentially homeless
 - P2i is a multi-agency homelessness prevention service for young people aged 16-25 who reside in or have a local connection to the Somerset area. The age demographic for P2i as at 28/3/19 is as follows:

	16/17	18/21	22 and over
Mendip	4	30	5
Sedgemoor	10	19	9
South Somerset	5	17	9
West Somerset and Taunton	2	22	12
Total	21	88	35

- There 2 predominant reasons why the P2i service is contacted and they are threatened with homelessness (71.6%) and Homeless tonight (25.2%).
- Positive lives is a multi-agency, cross sector alliance, which delivers creative solutions for entrenched adults with complex needs.
- Step Together is commissioned by SCC for adults in Somerset who are homeless or at risk of homelessness and also have a mix of mental health needs, drug and alcohol problems, behavioural issues, debt or have been involved in the criminal justice system
- Rough sleeping – based a single snapshot in autumn every year using street counts and intelligence drive estimates, in 2018 the following numbers were the extent of rough sleeping:

Mendip 14 Sedgemoor 3 South Somerset 3 Taunton Deane 14 West Somerset

Initial assessment of statutory homelessness duties owed – ethnicity- January to March 2019

	Total owed a duty	White British	White Irish	White Gypsy and Traveller	White Other	Black, African Caribbean	Asian	Mixed	Other	Unknown
SDC	155	134	3	2	9	1	2			4
SSDC	127	115			8		3		1	
MDC	236	199	3	2	10	1		3	2	16
Taunton	149	128		1	7	3	7	1	1	1
West Somerset	35	33				2				

Priority need category of households owed a main duty by LA – January to March 2019

	Total	HH with dependent children	HH with pregnant women	Total Vulnerable household	Old Age	Physical, ill health	Mental Health	Young	Other
SDC	26	19	0	7	0	3	2	0	0
MDC	2								
Taunton	7	4	0	3	0	1	1	0	1
West Somerset	2								
SSDC	19	12	3	4	0	1	1	0	1

Rough Sleeping by age, nationality and gender – January to March 2019

	Total	UK	EU	Non EU	Not known	Under 18	18-25	26 and over	Not known	Male	Female
SDC	3	1	1	0	1			3		3	
MDC	14	11	2	1	0			13	1	9	5
SSDC	3	3						3		3	
Taunton	14	13	1				1	12	1	14	
West Somerset	2	2						2		2	

HPC workforce and impact on the local housing market – issues and need

(please refer to Appendix A of the main report)

Specific equalities related issues include:

- Young people and people with young families are under-represented on housing needs surveys
- Young people are not actively engaging with homefinder – this is a consistent theme across recent studies and is a particular issue for rural localities
- There has been a sharp rise in elderly people seeking advice and support from West Somerset Advice – many of these currently live within the private rented sector

- Young people are probably under-represented on all calculations of need

Direct evidence from those delivering HPC Housing Fund supported services

YMCA

The YMCA (Dulverton Group) provide a range of housing support services to vulnerable individuals across the SWT area, including Pathways to Independence (youth housing) and Positive Lives (housing for vulnerable adults). They have specific units of accommodation in Minehead (P2I and Positive Lives) and Taunton. They also provide the HPC (EDF) funded Tenant Ready Scheme

The information below is gathered mainly from non HPC funded projects, but is included as it demonstrates the complexity of the more vulnerable who are homeless and are trying to access housing

Taunton & Minehead - Supported Housing for 16- 25 year olds- Pathways to Independence Contract

- Mental Health issues – increasing (both in numbers and complexity).
- Drugs and Alcohol – a definite increase in the number of young people smoking cannabis (most use cannabis). A reduction in those who have issues with alcohol
- Disability – a consistently low level of referrals for people with physical disabilities
- Age – referrals are getting younger (majority less than 20 years of age)
- Gender – out of 40 residents, 25 identify as male (which includes 4 who previously identified as female and are transitioning)
- Support – it has been a consistent pattern that young people who are coming out of private provision have arrived with very few life-skills and not able to care for themselves properly. The 16+ panel is aware of this and SCC have been doing a lot of work on what is expected of those private providers.

West Somerset –Supported Housing for Over 25- Referrals from Council

- Prospect House – clients are mainly male and the majority have some sort of Mental Health need.

Floating Support for 16-25 years olds Pathways to Independence Contract

- Mental health

The majority of referrals include clients with MH needs, with increasingly complex issues and significantly less, to no MH support from other professionals. FS is often the only support they receive.

- Disability

Very few referrals with physical disabilities. However, at least 50% of current caseload has learning difficulties, mainly dyslexia (moderate to severe). This has impacted significant areas of their lives, such as how they are able/unable to read letters, manage tenancies, manage money, etc.

Tenancy Training

- There is a growing demand for those aged 25+ to access the course

Magna

Magna provide the HPC funded Home Moves Plus project. Included below are their observations on equalities related issues:

The proportion of downsizers with complex social, financial, personal and/or health issues increased over phases 2 and 3 of the project reaching at least 33% at any point in time. Developing an action plan with multi-discipline/agency support is essential to successfully working with this cohort. Rent arrears and property condition are the most frequent barriers to these downsizing moves with mental health a common issue. These tenancies are at risk. The Magna downsizing fund and any other sources of financial support in these cases is an essential component of the tenant(s) achieving their action plan and becoming move ready rather than providing an “incentive” to move. These moves would not be possible without Home Moves Plus support and have

taken a minimum of 7 months with work on-going with many and exceeding 1 year. The fact that the project funding has run over 3 phases has meant that it has been possible to provide a high level of support over long periods to these households. The number of households with landlords other than Magna supported by the project has increased with the majority having complex issues as barriers to their moves. These landlords may have hardship funds but do not generally have a downsize incentive fund so effort needs to be made to find funding from other sources if possible.

The most cost effective means of downsizing moves by mutual exchange. The project has run to a target of to a target of 33% of moves by mutual exchange. The opportunity for exchanges has decreased and therefore the trend is towards achieving bed-spaces through transfer. Working in the lettings team to use preference labelling of adverts has achieved a significant number of up and downsizing moves. The factors that limit opportunities for mutual exchange include:

Availability of 3 plus bedroom properties in high demand areas

Availability of ground floor 1 and 2 bedroom properties. This is exacerbated by the fact that those 55+ with sheltered housing(SH) support needs who are of working age and on UC do not have the sheltered support service charges covered by housing element of UC. This often makes SH properties an unaffordable option.

These factors also influence the chance to achieve downsizing moves by transfer.

A significant number of households overcrowded in smaller properties benefit from the project as supporting them releases properties for downsizers.

Who have you consulted with to assess possible impact on protected groups? If you have not consulted other people, please explain why?

The HPC Housing Fund Strategy – Phase 3 is an amendment to existing strategy and so a full and comprehensive consultation exercise is deemed unnecessary. Many of the suggested projects are a continuation of successful initiatives. However, we have sought and used appropriate evidence:

To support the development of the Somerset Homelessness and Rough Sleeper needs assessment 2019, a homelessness survey was available throughout November and December 2018. The survey was sent to a sample of homeless applicants and all stakeholders. Responses were received from 43 applicants and 73 stakeholders

We have sought feedback from those providers and services who are supporting the vulnerable, including YMCA, Magna, West Somerset Advice and SWT Housing Options Service













It is acknowledged that we need to be more proactive in capturing equalities data and input – and this will be included as an action going forward

Analysis of impact on protected groups

The Public Sector Equality Duty requires us to eliminate discrimination, advance equality of opportunity and foster good relations with protected groups. Consider how this policy/service will achieve these aims. In the table below, using the evidence outlined above and your own understanding, detail what considerations and potential impacts against each of the three aims of the Public Sector Equality Duty. Based on this information, make an assessment of the likely outcome, before you have implemented any mitigation.

Protected group	Summary of impact	Negative outcome	Neutral outcome	Positive outcome
Age	<ul style="list-style-type: none"> • Age is being captured by all housing support services • There no evidence that those in any age group are disadvantaged in their access to a service or housing assistance • The needs assessment (June 2019) showed that 58% of applicants owed a main duty were aged 25-44 • 25% of the applicants were 16-24 years old • The highest proportion of youths needing help in 2018/19 were aged 18 to 21 years old with the main reason for presenting being the threat of homelessness 	☒	☐	☐

	<ul style="list-style-type: none"> • P2i works to prevent youth homelessness for the age 16 to 25. • West Somerset in particular has a significant over 60 year old population with 42% over 60 in comparison to 33% for Somerset as a whole • West Somerset Advice are seeing a greater percentage of elderly people seeking housing advice (see Appendix A to main report) 			
Disability	<ul style="list-style-type: none"> • Positive lives is a multi-agency, cross sector alliance, championing a new approach for the most entrenched adults with complex needs. • Step Together is a new support service (2019) for adults who are homeless or are at risk of homelessness and have a mixture of mental health needs, drug and alcohol problems, behavioural issues. • Finding suitable temporary accommodation for people with disabilities is an issue • The incidence of mental health is rising, as is the complexity of those who may be suffering with MH issues (often individuals can have MH, drug and alcohol problems, as well as other challenging circumstances). The creates problems for providing services and keeping people (all customers) safe • The term mental health covers a wider spectrum of conditions and it is often unclear when the term is used what sort of mental illness the client is suffering from (from anxiety to psychotic illness) 	☒	☐	☐

Gender reassignment	<ul style="list-style-type: none"> • We have no evidence to suggest that applicants from this group are disadvantaged in any way by the revisions to this strategy • They may be at risk of homelessness arising from transphobic reactions, Hate Crime and harassment by family, neighbours or members of local communities • Complex Needs – needs could be addressed? 			
Marriage and civil partnership	<ul style="list-style-type: none"> • Applicants are not disadvantaged by either being married or on a civil partnership or not when accessing affordable housing on terms of the housing register or by accessing an EDF funded support service • Registered civil partners have the same rights as married heterosexual spouses 			
Pregnancy and maternity	<ul style="list-style-type: none"> • Since the 1st April 2004, it has been unlawful for local authorities to house families with children and pregnant women in bed and breakfast accommodation for more 6 weeks, which has increased pressure on the housing system • Of the 56 in priority need where owed a main duty by local authority, for the period January to March 2019, 3 were pregnant 			
Race and ethnicity	<ul style="list-style-type: none"> • Using ONS Mid-Year Population estimates (2017), 94.06% of SWT residents are white British. 2.37% are from BME backgrounds, with the remainder being non British white, Irish white or white gypsy and traveller. • Based on the H-CLIC data for January to March 2019, of the 702 for that period where an initial assessment of statutory duty owed, 10.3% were from nationalities other White British. 			

	<ul style="list-style-type: none"> • In respect of rough sleeping for the period January to March 2019, of the 36 rough sleepers in the County, approximately 14% were from either the EU or non EU country • Language barriers and lack of understanding of the housing system are potential challenges in accessing support 			
Religion or belief	<ul style="list-style-type: none"> • There is no evidence to suggest that applicants from this group are disadvantaged in anyway by the strategy • Assessment of need and Personal Housing Plans should take account of specific beliefs and religion • Setting the Local Housing Allowance at 30% of the rate of private rents in the area, and not having an LHA for more than 4 bedrooms, could therefore disproportionately affect some religious groups who may be more likely to have multi-generational/larger families living in one property 	□	⊗	□
Sex (gender)	<ul style="list-style-type: none"> • Providing comprehensive advice services across all tenures will benefit women, especially those at risk of domestic abuse and who could be at risk through the impact of welfare reform • Since 1st April 2004, it has been unlawful for local authorities to house families with children and pregnant women in bed and breakfast accommodation for more than six weeks, which has put increased pressure on the housing system • For the period January to March 2019, of the 36 rough sleepers in Somerset, approximately 85% are male and 15% female, with Mendip and Taunton Deane having the highest percentage of rough sleepers • Programmes are in place to support vulnerable adults including Positive Lives and Step Together. You Trust has been 	□	⊗	□

	commissioned to deliver the Somerset integrated domestic abuse service (SIDAS) from April 1 st 2020			
Sexual orientation	<ul style="list-style-type: none"> Assessments of need and Personal Housing Plans may be a suitable way to determine what types of dwellings are required which could include location and neighbourhood to avoid harassment or discrimination In a survey with LGBT young people in Somerset, 85% of the respondents indicated that they had either been bullied, witness bullying or both with 86% had experienced verbal abuse 	□	⊗	□
Armed Forces Veterans	<ul style="list-style-type: none"> 568 Armed Forces Veterans who neither own or rent a property and who could potentially become homeless. Homeless veterans tend to be older and more likely to have alcohol-related problems Other factors that could contribute to homelessness amongst single veterans include their experience of service, including unfamiliarity with civilian life, making it difficult to secure housing and to manage tenancies 	⊗	⊗	□
Rurality	<ul style="list-style-type: none"> Somerset is a predominantly rural county Transport is a significant issue for Somerset and can lead to isolation in some of the more rural areas of the county In census 2011 around 10% of White British households in Somerset do not access to a car, compared to 15-16% of all other ethnic groups 	X		

	<ul style="list-style-type: none"> • Internet connectivity is an issue in a number of rural communities which can impact on people being to access services as they go increasingly online • Lambrook • Stogursey • WSA • HMP – Magna • Seaward Way 			
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Negative outcomes action plan

+Where you have ascertained that there will potentially be negative outcomes, you are required to mitigate the impact of these. Please detail below the actions that you intend to take.

Action taken/to be taken	Date	Person responsible	How will it be monitored?	Update / Action complete?
<p>Negatives are recorded against age, disability, ethnicity, armed services and rurality. This is due to the fact that impacts on the housing market tend to adversely affect the more vulnerable in society. The strategy proposes a range of interventions that will assist:</p> <ul style="list-style-type: none"> • Tenant Ready Scheme – will help vulnerable young people find affordable / supported accommodation • Home Moves Plus will enable elderly residents to downsize and create churn within the housing market for the benefit of all, including families with young children. It will also help secure adapted properties for those with disabilities 	To commence during 2020	The Delivery Officer will be responsible for coordinating the delivery of the various schemes (but noting that items such as Seaward Way will be subject to separate	The Delivery Officer will monitor scheme performance against agreed targets to include equalities related targets)	See below

<ul style="list-style-type: none"> • Debt and Housing Advice will help both young and elderly to become financially stable and find appropriate accommodation solutions • Lambrook House will provide temporary accommodation to those who are vulnerable to pressures within the housing market, including young (including pregnancy), elderly, those from different ethnic backgrounds and veterans. It will also contain adapted units for those with physical disabilities. • The Complex Needs project will provide accommodation to those who are vulnerable to pressures within the housing market, including young, elderly, those from different ethnic backgrounds, those undertaking gender reassignment who may find themselves homeless due to rejection, and veterans etc. It will provide support to those with complex mental and physical health problems (e.g. hep C). It will provide accommodation for rough sleepers (the majority of which are male) including female rough sleepers who are especially vulnerable • Seaward Way will provide 50+ units of affordable accommodation with a proportion designed to accessible housing standards <p>Lambrook House, Seaward Way, Complex Needs, community Action in Stogursey and Homes Moves Plus (West Somerset) will also help to mitigate the impact of</p>		project management)		
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housing pressures within the predominately rural setting of West Somerset				
Make sure that the EDF funded housing projects record and report appropriate equalities information – this to be agreed and monitored by the soon-to-be appointed 'HPC Housing Delivery Officer'	To commence during 2020	Craig Rossiter, HPC delivery officer	Monitored by Craig Rossiter, HPC delivery officer	See below
Delivery Officer to work with Housing Options team and analyse District specific reports on race from the housing system to establish if there are any trends or issues	To commence during 2020	Craig Rossiter, HPC delivery officer	Monitored by Craig Rossiter, HPC delivery officer	See below
Work with housing enablers and the housing options team on both housing needs surveys and Homefinder, to encourage young people to participate so that we obtain a clearer idea of demand and issues. This includes Stogursey where the response to the recent housing needs survey did not adequately capture the views of young people	To commence during 2020	Craig Rossiter, HPC delivery officer	Monitored by Craig Rossiter, HPC delivery officer	See below
<p>Update – 8th December 2022</p> <p>Tenant Ready Scheme – this is delivered by YMCA and targeted at CYP in supported accommodation (P2I). I've attached one young person's case study. Reports also say it has helped people engaged with the probation service. Contract extended to November 2023.</p> <p>HMP – This is accurate for HMP – scheme targeted at a range of protected characteristic. SWT scheme to run until May '24, the Magna scheme to run until Jan '24. The following is a message passed on from one resident that supports: <i>Extract of email from family member dated 17/2/22: "It was really great to meet yourself (Tony Knight) and Paul Hadley at Colin Mercer's (Dads) flat the other day. The real reason for the email is I wanted you to know and understand my gratitude towards everyone that was involved in the move of Colin to Trinity Rd. I have spent countless hours on the phone to Paul who has been exemplary throughout the</i></p>				

whole process, reassuring me with regards to the move and giving me alternative solutions when circumstances dictated. Maxine Rowson has implemented so many different aids in Colin's house, nothing seems too much for the lady. Finally Dee Bradley although I have only emailed her a couple of times, I know she has been a Godsend to Colin, making sure he's on the right benefits etc and helping with his finances. The aforementioned people at Somerset West & Taunton Council have gone out of their way and helped me with moving Colin, which seemed an impossible task, they are all genuinely compassionate and concerned for Colin's welfare which made this possible. I would like to thank yourself (Tony) and everyone else for all their efforts.

Money & Debt Advice: Delivered by Citizens Advice Taunton – contracted until Nov '23. Between May & October (2022) 63% of clients described themselves as having a long-term health conditions, while 7% said they had a disability. More than 50% of clients were 39 or younger and 12% were over the age of 60.

Complex Needs: Lambrook House not proceeded with. Instead, we spent £82,191 initially on getting all homeless into Canonsgrove, and a further £20,000 in March 2022. £67,000 spent on staffing costs to support this. A further £55,000 is earmarked to cover decant costs. In addition, another £200,000 has been reserved for further initiatives including housing first. All this money has been used to support people with a range of protected characteristics – including physical and mental health issues.

Seaward Way - £470,000 funding provided to support the offer of affordable homes including an element of accessible homes. Scheme now under construction.

Delivery Officer has yet to undertake any detailed work with the housing options team to explore issues of race or other protected characteristics. However, detailed work was undertaken on single homelessness (2021) – this identified a range of needs for protected characteristics, including reflecting on the provisions of the recent Domestic Abuse Act. The results of this work were used to develop a delivery plan to deliver more appropriate accommodation solutions to meet a range of needs (disabilities, gender etc). More detailed work is somewhat frustrated by ongoing staffing issues (capacity) within the homelessness team.

Stogursey – a parish housing needs survey was undertaken during late 2022. Methods were deployed to reach protected characteristics. However, I cannot provide the detail as yet - the person who undertook the survey has left our employment, and the other person involved is on sick leave. I can provide information at a later date. On the back of this, we are now working with Magna on their 'Lime Street' site – to help deliver more affordable housing. The results of the Ho Needs Survey will also be used to help develop a Neighbourhood Plan

If negative impacts remain, please provide an explanation below.

The above interventions should move the negative impacts towards neutral/positive

Completed by:	Mark Leeman, Strategy Specialist, Somerset West and Taunton Council
Date	04/06/2020
Signed off by:	Craig Rossiter, HPC delivery officer
Date	09/12/2022
Equality Lead/Manager sign off date:	Tom Rutland - Public Health Promotion Manager – Equalities 09/12/2022
To be reviewed by: (officer name)	Mark Leeman, Strategy Specialist, Somerset West and Taunton Council
Review date:	This strategy expires at the end of 2023. A new EIA will be completed for the Phase 4 strategy.