



Somerset Equality Impact Assessment

Before completing this EIA please ensure you have read the EIA guidance notes – available from your Equality Officer

Organisation prepared for	Rent Increase 2023/2024		
Version	V1	Date Completed	22nd January 2023
Description of what is being impact assessed			
The rent increases for the tenants of Homes in Sedgemoor and Somerset West and Taunton for the financial year 2023/2024			
Evidence			
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			
The Government in the Autumn Statement 2022 set out a limit to rent increases for 2023/24. In their own EIA, they said ‘ The objective of this change of policy is to protect households in our council housing from being required to pay particularly high nominal-terms rent increases due to much of higher levels of inflation than were anticipated when the current policy was introduced... The proposed 7% ceiling would ensure that our annual housing rent increases cannot exceed this level’ ‘The change would benefit (a) social renters who pay their rents without assistance from Housing Support (i.e. housing benefit or the housing element of Universal Credit), and (b) those who receive Housing Support but at a level that or (or would be) limited by the benefit cap or the removal of the spare room subsidy			

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1100981/Annex D - impact assessment - social housing rents consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1100981/Annex_D_-_impact_assessment_-_social_housing_rents_consultation.pdf)

For Somerset:

1. General rents – 7% in line with rent cap
2. Service charges
 - a. Sedgemoor - continue on the basis on recovery of costs, in current year based on 21/22 actuals.
 - b.

Somerset West and Taunton – will be capped on the same level as the rent cap at 7%, (with the exception of Piper Lifeline at 3%, communal areas at 37%, the introduction of a new management fee at 10%, a new charge for utility for internal areas charge and a new charge for door entry system).

3. Sheltered housing - 7%
4. Shared ownership – 7%
5. Garage rents
 - a. Sedgemoor - 7%
 - b. Somerset West and Taunton – where tenanted 7%, where non-tenanted inflation 10.1%

There has been joint consultation about the overall rent policy as follow:

Consultation and regular meetings with the SWT's Tenants' Strategic Board – Special meeting planned Dec / Jan 2022

- As part of our consultation on the proposed changes the Council contacted the following groups in 2022, who were identified as having an interest in the proposals for change: - Compass Disability Services, Taunton (Disability); - Age UK, Somerset (Age); - Mind in Somerset, Taunton (Disability); - Moving Together in Somerset (Age); - RAISE, Somerset (Race); and - Caring Minds CIC, Taunton (Carers). In summary the groups were invited to provide comment and feedback on the 7% increase in rent as per Autumn Statement from Chancellor

- Consultation and regular meetings with HIS's Sedgemoor Tenants Assurance Committee (STAC) – next planned meeting January 2023
- Discussion and review with HIS Board at their Away-Day 27th /28th October 2022
- HIS aim to consult with wider tenant body in early 2023

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

Every year the housing service reviews rents. This takes into account inflation and any other financial factors in order to ensure there is enough income to deliver services. When doing so the housing service must observe government legislation and guidance. The cost rise to tenants itself is below inflation and is required to ensure the housing service can continue to deliver services for tenants and provide support.

Rental income will finance the continued investment in maintaining our existing homes, other assets and neighbourhoods to a high standard with a comprehensive 30 Year HRA Business Plan that sets out a planned programme of capital expenditure, adaptations and routine repairs in place. The rental income will also enable the housing service to continue providing and improve upon the strong community support offered to tenants providing them with additional support to sustain individual tenancies as well as investing in a range of community-based projects and groups.

It could be argued that a group such as those with a disability experience greater challenges to access services based on a lower average income than non-disabled people and therefore may be disproportionately adversely affected by any rent and service charge rise.

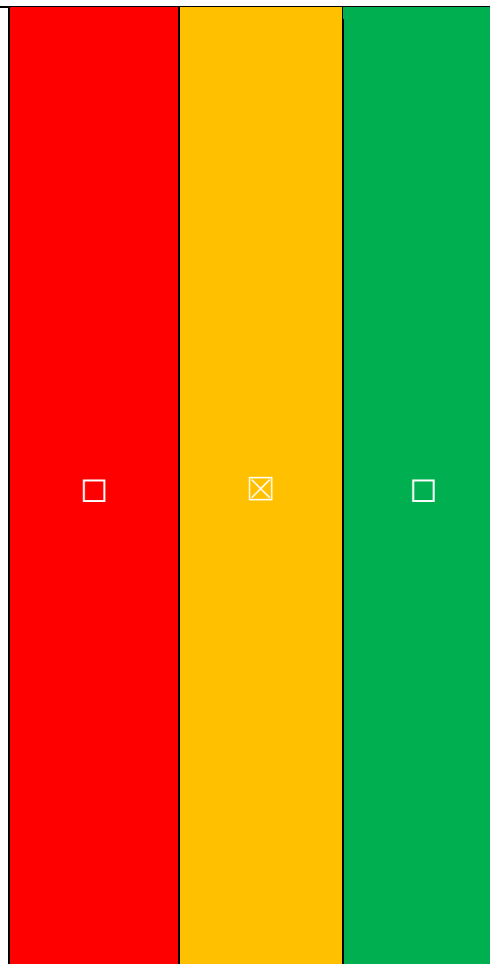
However, people on low incomes will (if they fulfil the conditions) qualify for housing benefit or universal or pension credit and will therefore be protected from significant negative financial impacts. In addition, people who have difficulties with daily activities and or mobility problems may qualify for other benefits (e.g. Disability Living Allowance or its replacement Personal Independence Payment). It is understood there may be an increase in the level of rent arrears due to the transition to Universal Credit, however this risk is being mitigated by the housing service working closely with Citizens Advice to provide advice and support services to Universal Credit claimants. The SWT housing service also has a dedicated team of officers who provide early intervention to support tenants to sustain their tenancy and where necessary assist them to

maximise their entitlement to welfare benefits – currently 56% of SWT existing tenants (72% of HiS) are in receipt of full or partial help with paying their housing costs i.e. housing benefit or universal credit. The HRA business plan makes provision for an amount of bad debt.

The total number of self funders are 2407 (ie 44%). The percentages are lower than the overall for extra care (24%) and sheltered (29%); 1106 (28%) in Sedgemoor.

Age

- 43% of Homes in Sedgemoor tenants and 30% of Somerset West and Taunton tenants are aged over 60
- 56% of Somerset West and Taunton tenants and 72% of Homes in Sedgemoor tenants are in receipt of help with housing costs, whether that is housing benefit or universal credit
- For tenants in sheltered housing this increases to 71% and 76% in Extra Care Housing, receiving support with housing costs
- All tenants will be affected by the rent increase within each area at 7%.
- Tenants where they have to pay a service charge as well, will see increases to these charges, especially in the Sedgemoor area where service charges will be set to recover the actual costs of the services provided. This could impact households who are self-funders, or where a service charge is not supported by support
- People of pensionable age will see their pensions increase in line with the triple lock (approximately 10.1%) and therefore it could be seen that for people of pensionable age the increase will be covered by the increase in income.
- People in receipt of Universal Credit and other benefits will also see an increase of approximately 10.1% and will therefore see an increase in income



	<ul style="list-style-type: none"> • There could also be an impact on people who also rent a garage from the council as garage rent will also increase with Sedgemoor limiting the increase to 7% and Somerset West and Taunton in line with inflation. The increases could negatively impact this characteristic 			
Disability	<ul style="list-style-type: none"> • Approximately 27% of tenants in Somerset West and Taunton and 35% in Sedgemoor have declared that either they or the other person on the tenancy has a disability, which include dementia, hearing loss, mobility, visual loss for example. • Disabled adults are more likely to not be working and therefore could be seen to have a lower household income in comparison to households who are in work • Benefits will increase by 10.1% and therefore with a rent increase lower than benefit increases, it could be argued that the income increase will offset any rent increase at 7% • Service charges increases will be covered by increases in benefits unless the service charge is not covered by support or the actual cost for services charges, as Sedgemoor are proposing, is more than the increases in benefits. This could negatively affect this characteristic • There could also be an impact on disabled people who also rent a garage from the council as garage rent will also increase with Sedgemoor limiting the increase to 7% and Somerset West and Taunton in line with inflation. The increases could negatively impact this characteristic 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Gender reassignment	<ul style="list-style-type: none"> There are no impacts identified 	□	□	□															
Marriage and civil partnership	<ul style="list-style-type: none"> There are no impacts identified 	□	□	□															
Pregnancy and maternity	<ul style="list-style-type: none"> There are no impacts identified 	□	□	□															
Race and ethnicity	<p>The table below provides information on the number of council tenants by ethnicity:</p> <table border="1" data-bbox="490 890 1487 1129"> <thead> <tr> <th data-bbox="490 890 824 970">Ethnic Background</th> <th data-bbox="824 890 1158 970">Somerset West and Taunton</th> <th data-bbox="1158 890 1487 970">Sedgemoor</th> </tr> </thead> <tbody> <tr> <td data-bbox="490 970 824 1010">White British</td> <td data-bbox="824 970 1158 1010">68%</td> <td data-bbox="1158 970 1487 1010">72%</td> </tr> <tr> <td data-bbox="490 1010 824 1050">BME</td> <td data-bbox="824 1010 1158 1050">1%</td> <td data-bbox="1158 1010 1487 1050">1%</td> </tr> <tr> <td data-bbox="490 1050 824 1090">No data provided</td> <td data-bbox="824 1050 1158 1090">1%</td> <td data-bbox="1158 1050 1487 1090">3%</td> </tr> <tr> <td data-bbox="490 1090 824 1129">Other</td> <td data-bbox="824 1090 1158 1129">30%</td> <td data-bbox="1158 1090 1487 1129">24%</td> </tr> </tbody> </table> <ul style="list-style-type: none"> In line with other characteristics, people who are of pensionable age or on benefits will see their incomes increase in line with inflation (approximately 10.1%) and therefore the increase set out above will be covered by the increases in support received 	Ethnic Background	Somerset West and Taunton	Sedgemoor	White British	68%	72%	BME	1%	1%	No data provided	1%	3%	Other	30%	24%	□	⊗	□
Ethnic Background	Somerset West and Taunton	Sedgemoor																	
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BME	1%	1%																	
No data provided	1%	3%																	
Other	30%	24%																	

Religion or belief	<ul style="list-style-type: none"> • There are no impacts identified 	□	□	□
Sex	<ul style="list-style-type: none"> • There are no impacts identified 	□	□	□
Sexual orientation	<ul style="list-style-type: none"> • There are no impacts identified 	□	□	□
Other, e.g. carers, veterans, homeless, low income, rurality/isolation, etc.	<ul style="list-style-type: none"> • All tenants will be affected by the rent increase within each area at 7%. • Tenants where they have to pay a service charge as well, will see increases to these charges, especially in the Sedgemoor area where service charges will be set to recover the actual costs of the services provided. This could impact households who are self-funders, or where a service charge is not supported by support • People of pensionable age will see their pensions increase in line with the triple lock (approximately 10.1%) and therefore it could be seen that for people of pensionable age the increase will be covered by the increase in income. • People in receipt of Universal Credit and other benefits will also see an increase of approximately 10.1% and will therefore see an increase in income 	□	⊗	□

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?	Action complete
Publish clear information on rent which helps tenants to manage their own finances	Ongoing	Housing services		<input type="checkbox"/>
Signposting tenants to a relevant benefit agency to help ensure they are maximising their income to meet their living costs	Ongoing	Housing services		<input type="checkbox"/>
Provide the opportunity for tenants to access direct support to check they are in receipt of the welfare benefits they are entitled to claim	Ongoing	Housing services		<input type="checkbox"/>
Identify organisations that can offer additional or specialised support based on particular needs of the tenant	Ongoing	Housing services		<input type="checkbox"/>
Monitoring of rent arrears	Ongoing	Housing services		

If negative impacts remain, please provide an explanation below.

There are no specific negative impacts identified but there is a recognition that the impact of the increases could affect particular protected characteristics, in particular where increases are not necessarily supported by benefits or other means. Support will be available to all tenants as well as signposting.

Completed by:**Alison Turner**

Date	13th January 2023
Signed off by:	Angela Farmer
Date	
Equality Lead/Manager sign off date:	23rd January 2023 – Angela Farmer
To be reviewed by: (officer name)	Tom Rutland
Review date:	

