

Somerset Equality Impact Assessment

Organisation prepared for	Homefinder Somerset		
Version	V0.1	Date Completed	6 December 2022

Description of what is being impact assessed

This is an assessment of the Homefinder Somerset scheme to ensure that it works as fairly and effectively as possible for everyone.

The assessment is being undertaken as it is several years since the last assessment was undertaken. In August 2021 a new online application form and website were introduced following a transfer of IT systems. Changes have also been agreed to the Homefinder Somerset Policy because of a policy review. These changes will take effect on 1 January 2023, and are as follows (new text underlined where relevant):

- That the Homefinder Somerset register is open to anyone over the age of 16 who is eligible and has mental capacity, and that 'An explanation of what is meant by mental capacity and how it is assessed is [provided on the Homefinder Somerset website](#)'.
- That local connection is gained from having immediate family members who have lived in Somerset for the last five years.
- In exceptional circumstances a single parent who doesn't have the main caring responsibility for a child/ren will be awarded an additional bedroom. For example, they share the caring responsibilities for a disabled child who needs a lot of equipment/and or adaptation, where without an additional bedroom the child wouldn't be able to stay with that parent.
- The section covering Victims of Domestic Abuse has been amended to ensure that it is consistent with the definition of the Silver (Other Homeless) category in section 21, and to confirm that applicants in a refuge who are ready to move on will only be assessed as Gold Band (Move on) if the applicant is in a refuge in Somerset, or has been placed in a refuge outside Somerset by one of the Somerset local authorities.
- A new section has been added to cover people who are in custody pending trial or are in prison
- That requests for Emergency Band and Gold Band Harassment can only be made by agencies, and not the applicant themselves
- That applications in Gold Band Harassment will be reviewed every 28 days, that applications will only be placed in this category if the police confirm that the risk can be safely managed in the applicant's current home for this 28-day period, and how this risk can be managed, that applications will not be placed in this category if the applicant has moved out of their home (e.g. into temporary accommodation or staying with friends/ family etc.), and that for existing social tenants to be

placed in this category the landlord will need to demonstrate that they have exhausted all housing management options

- That applications assessed as Gold Band Care Leavers will be reviewed every 3 months
- The policy has been amended as follows to ensure that it is consistent throughout that applicants will not be eligible to join the Homefinder Somerset register if they own a property that is reasonable for them to occupy

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

Equalities Issues in Somerset

Age

The latest Census data (2021) reveals that Somerset population is significantly older than that of England or the South West region as a whole. 25% of the Somerset population is aged over 65, compared to 18% for England and 22% for the South West region. The largest growth in Somerset between the 2011 and 2021 Censuses was in the 70-74 year old age band, with over 13,000 more people than in 2011.

Race

In Somerset, 94.6% of the population said they were White British in the 2011 Census.

In Somerset, 'other Asian' is the largest sub-group (39%), followed by Chinese (26%) and Indian (22%). People born in the Philippines form a key part of the 'Other Asian' category. The population is concentrated in urban communities

The BME (Black and Ethnic Minority) population of Somerset was estimated at 10,717 in 2011, at that time making up 2% of Somerset's overall population, which is well below the national average of 14.0%.

Disability

Around 4% of people aged under 25 in Somerset have a long-term health problem or disability, increasing to 83% of people aged 85 and over. (Census, 2011). People with disabilities are more likely to be living in rented accommodation (English Housing Survey, 2011/12), less likely to have internet use, and can be more vulnerable to the negative health and safety issues caused by

poor housing conditions and hazards.

Rurality

Somerset is a semi-rural area and rural isolation is likely to compound other issues of vulnerability and service awareness and accessibility. Homes located off the gas network and hard to reach may also be more commonly located in rural areas.

Social isolation and loneliness are key factors contributing to the health and wellbeing of older people in particular. Thousands of older people rely on public transport to get out and about, which can be problematic in rural areas. 1 in 5 Somerset residents aged 65 or more have no access to car or van. The proportion is even higher in some rural towns and villages and amongst women (2011 Census).

Housing in Somerset

The ratio of house price to earnings is greater than the national average in all the Somerset housing authorities. In West Somerset, house prices at market entry levels are ten times the average earnings figure, making it especially difficult for young people to afford their own homes.

House prices vary considerably across the county. Median prices range from over £390,000 in the Wedmore area of Sedgemoor to under £130,000 in parts of Bridgwater (2016).

As of 28 November 2022, there were 26,073 people in 11,658 households registered with Homefinder Somerset. On average one in five households is housed each year.

Homefinder Somerset Equalities Report

The Homefinder Somerset Equalities Report (July 2022) is available on the [Homefinder Somerset website](#). The key findings from the report are set out below. This report draws on data from:

- Homefinder Somerset
- [Somerset Joint Strategic Needs Assessment](#)
- 2021 and 2011 Census
- [Annual Population Survey 2019](#)

Age

- Half (50%) of households registered with Homefinder Somerset have a main applicant aged between 18 and 39 years old. This is significantly higher than the proportion of the Somerset population aged between 20 and 39 (21% - 2021 Census).

This is perhaps not surprising as people in this age will include people most likely to be: moving to their first home, forming a relationship and seeking a place to live together, or having children and so needing a bigger home.

- Conversely the proportion of households registered with Homefinder Somerset headed by someone over 60 is 20%, compared to 32% for the Somerset population (2021 Census)

Disability

- 16% of households registered with Homefinder Somerset reported that at least 1 member of their household has a disability.
- The most common disability reported was a physical disability, followed by mental health issues. It should be noted that the data relates to one member of a household. In many cases that person will have more than 1 disability (which explains the difference between 1,713 households stating that someone in their household has a disability, and the 2,799 disabilities reported in Table 5 below). It should also be noted that a number of households include more than 1 person with a disability.

Gender Reassignment

- Most households (94%) reported that their gender was the same as the sex they were registered at birth. 5% of households chose not to answer this question, whilst 1% reported that their gender was not the same as the sex they were registered at birth

Marriage & Civil Partnership

- Just over a quarter (28%) of households included a joint applicant reported as 'partner' to the main applicant

Pregnancy & Maternity

- As stated above, two thirds (66%) of households registered with Homefinder Somerset have a woman identified as the main applicant. 8% of these women reported that they are pregnant

Race & Ethnicity

- Most households (86%) are headed by main applicants who describe their ethnic origin as White British. This is lower than proportion of the Somerset population (95% - 2011 Census).
- The next most common ethnic group is White Other at 6%.
- Somerset West & Taunton had a lower proportion of main applicants describing themselves as White (89% compared to 94% in the other 3 local authority areas), but this is accounted for by a higher proportion of applicants who preferred not to

answer this question (8% compared to 3% in the other 3 local authority areas).

Religion or belief

- Most applicants (59%) stated that they had no religion. This varied from 57% in Somerset West & Taunton and South Somerset to 63% in Mendip and Sedgemoor. A quarter of applicants described themselves as Christian, whilst 8% preferred not to answer this question

Sex

- Two thirds (66%) of households registered with Homefinder Somerset have a woman identified as the main applicant. This is significantly different to the profile of the Somerset population, where 51% of the population are female (2021 Census). The reasons for this are not clear.

Sexual orientation

- Most applicants (86%) described themselves as heterosexual. This proportion is lower than the 94% for the UK population as a whole ([Annual Population Survey 2019](#)).
- The proportion of applicants who identified as lesbian, gay or bisexual was 5%, nearly double that for the UK population as a whole (2.7% - [Annual Population Survey 2019](#)).

Other, e.g. carers, veterans, homeless, low income, rurality/isolation, etc.

Veterans

- 156 applicants across Somerset who have applied or updated their application since 2 August 2021 reported that they had served in the regular British Armed Forces (Army, Navy or RAF) or British Reserve Forces. This accounted for 3% of all households.
- 27 of these applicants reported that they are currently serving in the regular British Armed Forces (Army, Navy or RAF) or left in the last 5 years. Such applicants are exempt from the local connection requirement to register with Homefinder Somerset.
- 20 applicants reported that they need to move because of a serious injury, medical condition (including mental health) or disability sustained as a result of their service. 8 of these applicants reported that they are currently serving or left in the last 5 years.

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

To inform this Equality Impact Assessment an invitation to complete a short online survey was sent to a wide range of external stakeholders. This included:

- A range of colleagues at Somerset County working with people with mental health issues, care leavers and young people, people with disabilities, and the Equalities lead
- CAB
- Defence Medical Welfare Service
- Diversity Voice
- Exmoor Young Voices
- Nelson Trust
- Organisations representing people with disabilities (e.g. Somerset Sight, Mind in Somerset etc.)
- People working in the National Health Service
- Somerset Diverse Communities
- Somerset Parent Carer Forum
- Spark Somerset
- Support Organisations (e.g. Second Step, Home Group etc.)
- Supported Accommodation providers
- Veterans Liaison Service
- Village/ Community Agents
- Young Somerset

The following email was sent on 7 November

We are keen to ensure that Homefinder Somerset works as fairly and effectively as possible for everyone.

An Equalities Impact Assessment is being undertaken to check that Homefinder Somerset does not discriminate or disadvantage any groups.

We would be grateful if you could take the time to complete a [short online survey](#) by **Tuesday 6th December** to provide your views.

The Homefinder Somerset Equalities Report (July 2022) is available on the [Homefinder Somerset website](#)

17 people completed the survey.

- Mark Shields CCS
- Jackie Hayes CCS Village Agent Service
- Rhoda Cooke Citizens Advice Taunton
- Ali Porter DWP
- Cheryl Lewis Julian House
- Helen Blundell-Smith SCC
- Karen Murdoch-North Second Step
- Jemma Stovell Second Step
- Catherine O'Donnell Somerset County Council
- John Shipley Somerset County Council
- Sally Pluck Somerset County Council
- Lucy Clapp Somerset County Council
- Val Marshall Somerset County Council - Leaving Care
- Diana South Somerset DC
- Andrew Kirby Step Together
- Lilli Bigwood YMCA Dulverton Group
- Lisa Farley Young Somerset

Respondents were asked if they felt that Homefinder Somerset works fairly and effectively for all groups in society.

- 10 (59%) answered Yes (e.g. that Homefinder Somerset does work fairly and effectively for all groups in society)
- 7 (41%) answered No

Those who stated that Homefinder Somerset does not work fairly and effectively for all groups in society were asked to select which groups that they felt Homefinder Somerset does not work fairly and effectively for. The following groups were identified:

- People with disabilities (6 respondents)
- Other, e.g. veterans, rurality/ isolation, ex offenders etc. (4 respondents)
- Race (2 respondents)
- Age (1 respondent)

Respondents were asked to provide details of why Homefinder Somerset does not work fairly and effectively for the group(s) they had selected. The following comments were made:

- Mental health is a disability, but it is not always included unless there is a medical diagnosis. Also having an impairment caused by substance misuse is not always acknowledged as a disability.
- The two groups I have selected (disability and race) most commonly contact Citizens Advice for help navigating the claiming process, bidding system and managing their applications. For foreign nationals (i.e. non-white British) there are barriers due to language. For people with disabilities, the common theme relates to a lack of skills/confidence or competencies using the internet - this could be due to sight loss, Deaf people who speak BSL as their first language, cognitive or learning difficulties etc.
- Race being those for whom English is not first language - hard to negotiate system and get through verification. Disability - those with cognitive difficulties - it can be a struggle to use the system or get registered. Those who are digitally isolated e.g. those not on email - it's an email sign-up so difficult/problematic and disabling
- I have found it is more difficult for clients who cannot get to the council offices to meet with a member of the housing team for support with Homefinder registration, access and bidding. It is also more difficult for those with no internet, or who have difficulty using online services for reasons of language, literacy etc.
- The digital world is failing those who don't have internet and those who do not understand technology
- Homefinder does not take into account the difficulties some individuals face which impacts on their mental health and wellbeing which can be connected to where they are living. There is no provision that I am aware of that takes into account additional information that may help to support their request to move/application. Whilst I have supported many applications to increase an individual's banding this from my experience provides little help in moving them on and the support we as individuals face when trying to help is restricted by a process we know very little about.
It is also important to add that some individuals with complex mental health needs may not have access to IT or struggle with the process as a result of conditions they are living with. This I believe puts them at an unfair disadvantage.

Respondents were then asked what can be done to address these issues and ensure that Homefinder Somerset works fairly and effectively for the group(s) they selected. The following comments were made:

- Be very specific in what is included as an impairment and give staff making the decisions the correct training, so their decisions are not biased
- More accessibility options e.g. we consistently hear that a paper form is desired and the option to make an application/bids via telephone (with/without support), and also face-to-face support.
- More understanding of the need for translation. Consideration as to why it's now email sign-up when some don't have one.
- More partnership working with organisations such as Julian House that support ex-offenders and housing providers to be challenged on their decisions

- Easier access to help in using Homefinder from the housing team at Mendip District Council would be an improvement. I am aware that as Village Agents we are often asked to help people with this, but I feel this is the council's responsibility.
- Homefinder co-ordinators on the ground helping these individuals by carrying out home visits when required
- Greater shared support for professionals who work to try to find solutions for the individuals we work with. Maybe a dedicated helpline where we are able to speak with housing and discuss cases and problem solve together. By working together, I believe solutions can be found and this can help the same individuals we are working with but also finding ways of overcoming the difficulties as professionals we also face. Community working helps people to thrive and grow and we need to join forces to help individuals to move 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"> • The age profile of households registered with Homefinder Somerset is significantly younger than the Somerset population. However, there is a significant minority of households registered and concern has been raised that the online nature of the scheme disadvantages some older people who cannot use the internet, or do not find this easy. • The paper application form was withdrawn in August 2021 following the introduction of a new online application, that is easier for people to complete. It was agreed in August 2021 that where people are not able to complete the online application form, and don't have family/ friends or a support 	☒	☐	☐

	<p>worker to help them, local authorities have agreed to complete the application over the phone with an applicant. Given the survey feedback more needs to be done to make applicants and support agencies aware of this</p>			
Disability	<ul style="list-style-type: none"> • Concern has been raised that some people with disabilities find it difficult to register with Homefinder Somerset and bid for homes due to difficulties using the internet (e.g. due to sight loss) • The policy does provide priority to those households whose health (physical or mental) or welfare is adversely affected by their current home • Adverts for homes do make provide information on any adaptations, and if they are suitable for people who use a wheelchair. Preference for adapted and wheelchair accessible homes is given to applicants who have been assessed by a Housing OT as having a need for this type of home 	☒	☐	☐
Gender reassignment	<ul style="list-style-type: none"> • We have no evidence to suggest that customers from this group would be disadvantaged in any way by the service or policy. People from this group may also be less inclined to approach services for assistance and so periodic staff training is critical to ensure awareness of needs and issues. 	☐	☒	☐
Marriage and civil partnership	<ul style="list-style-type: none"> • People are not disadvantaged by either being married/ in a civil partnership or not when applying to Homefinder Somerset and bidding for homes. Registered civil partners have the same rights as married heterosexual spouses in relation to property and tenancy rights. 	☐	☒	☐
Pregnancy and maternity	<ul style="list-style-type: none"> • People who are pregnant or have a child in the previous 26 weeks are not disadvantaged by the policy. The size of home that a household has been assessed as needing will be increased, where appropriate (e.g. dependent on the age and 	☐	☒	☐

	sex of any other children) on receipt of proof of pregnancy (e.g. a MAT B1 certificate)			
Race and ethnicity	<ul style="list-style-type: none"> • People who do not speak English as their first language can find it difficult to register with Homefinder Somerset and bid for homes. • The website can be translated using a Google Translate widget built into the site. However the online application form cannot be translated (as this would require the responses to be translated) 	☒	☐	☐
Religion or belief	<ul style="list-style-type: none"> • We do not have any data or evidence to suggest that the policy or practice would negatively affect households in respect of religion or belief. • Although not explicitly addressed, the Homefinder Somerset Policy does recognise multi-generational households through the assessment of the size of home that they require, and their Band where appropriate (e.g. if they are currently living in overcrowded accommodation, or if they are living in separate households not by choice but due to the lack of suitable accommodation available) 	☐	☒	☐
Sex	<ul style="list-style-type: none"> • We do not have any data or evidence to suggest that the policy or practice would negatively affect applicants based on their sex • Two thirds of households registered with Homefinder Somerset have a woman as the main applicant 	☐	☒	☐
Sexual orientation	<ul style="list-style-type: none"> • We do not have any data or evidence to suggest that the policy or practice would negatively affect applicants based on their sexual orientation. 	☐	☒	☐

<p>Other, e.g. carers, veterans, homeless, low income, rurality/isolation, etc.</p>	<p>Veterans</p> <ul style="list-style-type: none"> • The Armed Forces Covenant Duty came into force on 22 November 2022. The Guidance to the new duty highlights a number of areas in social housing allocation where veterans can face disadvantage. These include: a lack of knowledge about the social housing services available in their local area, or how to access them; Not building up sufficient 'local connection'; Not being prioritised to receive suitable social housing, or experience a lack of available social housing etc. • There is a specific section in the policy that addresses members of the UK armed forces. This includes confirmation that people who have served in the UK armed forces in last 5 years are exempt from the residency/ local connection criteria to register with Homefinder Somerset, and that additional priority will be awarded to veterans in urgent housing need • The application form asks everyone applying if they have served in the UK armed forces to ensure that we identify such applicants 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Other, e.g. carers, veterans, homeless, low income, rurality/isolation, etc.</p>	<p>Rurality/ isolation</p> <ul style="list-style-type: none"> • Concerns have been raised that some people in rural areas such as Exmoor struggle to register with Homefinder Somerset and bid for homes due to poor internet and mobile phone coverage. This is compounded by both the physical distance from offices/ services and the fact that there is an older age profile in the rural areas of the county (2011 Census – Somerset Intelligence). 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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
Publicise details of support from LAs, e.g. drop-in session times, any outreach sessions, how to request an appointment to complete an application, translation/ interpretation services etc. This information will be widely circulated to partner organisations and stakeholders but will also be explicitly targeted at agencies working with groups identified in the survey as being disadvantaged (e.g. people with disabilities, age, race etc.)	31/01/2023	Homefinder Somerset Coordinator/ Ops Group	The information will be circulated to partner agencies and posted on the website.	<input type="checkbox"/>
Develop a web page for veterans – following the good practice example of Hull CC cited in the Armed Forces Covenant Duty Guidance	31/01/2023	Homefinder Somerset Coordinator/ Ops Group	The new webpage will be live	<input type="checkbox"/>
Training for partner agencies and wider stakeholders – organise an on-going programme of training to raise awareness of what Homefinder Somerset is and how it works. As above, the training will be available to partner organisations and stakeholders but will also be explicitly targeted at agencies working with groups identified in the survey as being disadvantaged (e.g. people with disabilities, age, race etc.). Training will include a glossary of terms used in Homefinder Somerset to help understanding amongst people who do not speak English as their first language.	31/03/2023	Homefinder Somerset Coordinator/ Ops Group	Homefinder Somerset Management Board	<input type="checkbox"/>

Ensure Homefinder Somerset teams have access to Somerset wide translation and interpretation services through the Equalities team.	31/03/2024	Team Managers / Equalities team	Staff able to access translation / interpreting service.	<input type="checkbox"/>
Ensure all staff within the Homefinder Somerset teams have undergone equalities training and this is updated in line with corporate requirements as a minimum.	31/03/2024	Team Managers	Corporate training records	<input type="checkbox"/>
Work with relevant agencies to identify the best way to make the Homefinder Somerset website as accessible as possible for people with sight loss (e.g. a Screen reader etc.)	01/04/2023	Homefinder Somerset Coordinator/ Homefinder Somerset Management Board	Homefinder Somerset Management Board	<input type="checkbox"/>
Provide partner agencies and wider stakeholders with contact details for the Homefinder Somerset teams following the move to Unitary status	01/04/2023	Homefinder Somerset Coordinator/ Ops Group	Homefinder Somerset Management Board	<input type="checkbox"/>
That any review/ re-organisation of the Homefinder Somerset teams post Unitary prioritises making the scheme as accessible as possible.	30/06/2023	Somerset Council Housing Manager (to be appointed)	Homefinder Somerset Management Board	<input type="checkbox"/>
If negative impacts remain, please provide an explanation below.				

Given the pressure on resources there may be a tension with the desire of stakeholders to see more outreach services.

Completed by:	Rupert Warren, Homefinder Somerset Coordinator
Date	8th December 2022
Signed off by:	Jai Vick, Head of Housing Services, Mendip District Council
Date	9th December 2022
Equality Lead/Manager sign off date:	Tom Rutland, Public Health Promotion Manager – Equalities
To be reviewed by: (officer name)	Rupert Warren, Homefinder Somerset Coordinator
Review date:	1st April 2024 or before if significant policy changes