

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	4 Councils in Somerset including Mendip DC, Sedgemoor DC, South Somerset DC and Somerset West and Taunton Council
----------------------------------	--

Version	V1	Date Completed	November 2019
----------------	-----------	-----------------------	----------------------

Description of what is being impact assessed

Somerset Homelessness and Rough Sleeper Strategy 2019 to 2023

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

Somerset Homelessness and Rough Sleeper needs assessment 2019

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:

- South Somerset is the largest district geographically
- Sedgemoor is expected to experience the largest population change
- As at date of needs assessment (June 2019) there were 8795 people currently expressing a need for affordable housing, with one bedroom accommodation the most in demand, especially in 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. Sedgemoor has also seen a sharp ratio increase
- 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, followed by South Somerset
- There are 2041 (October 2018) long term vacant dwellings in Somerset
- 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
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. Over the past year Positive Lives have
 - Supported 850 people
 - Supported 400 people at any one time
 - 380 people engaged in education and training
 - 266 people moved into independent living
 - 47 people obtained employment
 - 38 very vulnerable/high risk people moved into independent living
 - 20 people engaged in formal volunteering as a preparation for work
 - 262 people from local communities have provided voluntary support
- Step together 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	

Somerset Homelessness and Rough Sleeper Strategy 2019 to 2023

Priorities

Priority One – Provision of adequate, affordable housing stock

Priority Two – Support clients to remain in their existing accommodation where appropriate

Priority Three – Support specific client groups to access suitable accommodation through effective support

Priority Four – Support the government’s commitment to combat rough sleeping

Priority Five – Maintain strong working relationships across the partnership

Priority Six – Track and respond to the impacts of the Homelessness Reduction Act 2017

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

1. A homelessness survey was available throughout November and December 2018. The survey was sent to a sample of homeless applicants and all stakeholders.
2. Responses received by districts is as follows:

District	Applicants	Stakeholders
Mendip	7	32
Sedgemoor	12	22
South Somerset	11	12
Taunton Deane	11	4
West Somerset	2	3
Total	43	73

3. Feedback
 - More work is needed with applicants on how to improve Personalised Housing Plans (PHP), as only 10 found them useful and referred to them again
 - Temporary accommodation not always suitable for client's needs, including disability
 - Stakeholders were asked how relevant a number of issues were to them in their role. The top 2 were housing options for single, non-priority households and the occurrence of rough sleeping. Other issues include:
 - Community outreach to prevent homelessness
 - Adequate suitable temporary accommodation
 - Difficulty assessing the private rented sector
 - Housing options for people with disabilities

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 captured on all homeless and housing need customers • There no evidence that those in any age group are disadvantaged in their access to the service or housing assistance • The needs assessment (June 2019)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 • P2i works to prevent youth homelessness for the age 16 to 25. In 2018 21 16/17 year olds, 88 18/21 year olds and 35 22 and over used the service • 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 • In 2018/19 there were 14 households accepted as owed a mina homelessness duty who were over 60 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<ul style="list-style-type: none"> For the period January to March 2019, of the 36 identified as rough sleeping, the majority were over 26, with only 1 between 18 and 25 			
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. The project has supported 850 people during 2018 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 For the period January to March 2019 who are in priority need owed a main duty by the LA, of the 56, 5 had physical disabilities and 4 had Mental Health issues. It is unclear whether any of these had both a physical and a mental health issue. The term mental health covers a wider spectrum of conditions and it is unclear when the term is used what sort of mental illness the client is suffering from 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 strategy They may be at risk of homelessness arising from transphobic reactions, Hate Crime and harassment by family, neighbours or members of local communities 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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 homelessness/homeless prevention services • Registered civil partners have the same rights as married heterosexual spouses in relation to proper 	□	□	☒
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 out 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"> • Gypsy and Traveller communities; Romany Gypsies and Irish Travellers a recognised ethnic categories within the Equality Act 2010 • The GTAA in 2013 identified pitch, transit and showpeople yards. At the present time, there is no transit facility in Somerset although there is work being undertaken to see if at least one site can be got off the ground in 2020. Unauthorised encampments of Gypsy and Travellers has increased over the past 18 months with particular areas vulnerable to returning encampments including Sedgemoor and Taunton Deane • Currently due to the above there is no potential provision for Gypsy's and Travellers should they become homeless in the majority of Somerset 	□	☒	□

	<ul style="list-style-type: none"> • Using ONS Local Area Migration Indicators for 2018, Somerset population totals 546,000, with Non UK born population approximately 7.9% (about 43,000) • 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. • Of the 702, 0.7% with from Gypsy and Traveller origins and determining housing requirements for them will be needed as they have their own culture. • 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 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 	□	□	⊗

	<p>breakfast accommodation for more than six weeks, which has put increased pressure on the housing system</p> <ul style="list-style-type: none"> • 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 the new service from April 2019, Step Together. 			
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 rural county with South Somerset the largest geographically • Rough sleepers may well go unseen due to the rural nature of the 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 • 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 		x	
-----------------	---	--	---	--

Negative outcomes action plan

+Where you have ascertained that there will potentially be negative outcomes, you are required to mitigate the impact of these. Plea

se detail below the actions that you intend to take.

Action taken/to be taken	Date	Person responsible	How will it be monitored?	Action complete
Make sure that the homeless case management system can record information about race	01/04/2020	Homeless Managers Group (HMG)	Update – December 22. The following groups are identified as part of the latest H-CLIC specification for the lead applicant. White: English/Welsh/Scottish/Northern Irish/British White: Irish White: Gypsy or Irish Traveller Any other White background	<input checked="" type="checkbox"/>

			Mixed/Multiple ethnic groups: White and Black Caribbean Mixed/Multiple ethnic groups: White and Black African Mixed/Multiple ethnic groups: White and Asian Any other Mixed/Multiple ethnic background Asian/Asian British: Indian Asian/Asian British: Pakistani Asian/Asian British: Bangladeshi Asian/Asian British: Chinese Any other Asian background Black/ African/Caribbean/Black British: African Black/ African/Caribbean/Black British: Caribbean Any other Black/African/Caribbean background Other ethnic group: Arab Any other ethnic group Don't know / refused	
Provide yearly District specific reports on race from the housing system to establish if there are any trends or issues	01/04/2020	Homeless Managers Group (HMG)	Yearly stats	<input type="checkbox"/>
Work with Planning Policy Group to make sure there is appropriate resource available for the Gypsy Traveller community that may become homeless	01/04/2020	Homeless Managers Group (HMG)	Analyse information on the case management system to identify how many people from the Gypsy and Traveller community are owed a S193(2) duty and whether a suitable offer was made.	<input type="checkbox"/>

Work with planning teams, housing enabling teams and Developers to deliver smaller and more financially accessible accommodation to meet the needs of young people.	01/04/2020	Homeless Managers Group (HMG)	This workstream is ongoing.	<input type="checkbox"/>
Work with Housing Associations to make sure processes are in places to quickly and efficiently provide accessible accommodation when required for when disabled people become homeless.	01/04/2020	Homeless Managers Group (HMG)	This workstream is ongoing.	<input type="checkbox"/>
Complete research into the needs of physical and learning disabilities to understand the potential impact of becoming homeless on this group.	01/04/2020	Homeless Managers Group (HMG)		<input type="checkbox"/>
When reviewing the Commons Letting Policy confirm how victims of hate crime in Social Housing will be supported to retain accommodation	01/04/2020	Homefinder Somerset Co-ordinator		<input type="checkbox"/>

If negative impacts remain, please provide an explanation below.

Completed by:	SEOG members AF/TR
Date	16/12/19
Signed off by:	Jai Vick, Head of Housing Services, Mendip District Council
Date	09/12/2022
Equality Lead/Manager sign off date:	Public Health Promotion Manager – Equalities - 09/12/2022
To be reviewed by: (officer name)	Peter McGuire, Strategic Housing Manager, Mendip District Council
Review date:	New homelessness strategy will be created in 2024 as this strategy will expire in March 2025