



## Somerset Equality Impact Assessment

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

<b>Organisation prepared for</b>	<b>Private Sector Housing - Somerset</b>		
<b>Version</b>	<b>1.1</b>	<b>Date Completed</b>	<b>1.0 created on the 7.11.22</b>
<b>Description of what is being impact assessed</b>			
<p>The strategic objectives of the Policy are to: improve the health and wellbeing of vulnerable people; reduce fuel poverty; bring empty properties back into use; increase the supply and affordability of good quality private rented accommodation; reduce the number of households with preventable ill health and housing inequalities; improve housing conditions; deal with inadequate energy efficiency and carbon emissions ratings; and ensure local people have sufficient choices of housing to meet their needs, at a standard and price they can afford, where they want to live. The Somerset Housing Assistance Policy 2023/28 provides the framework for the types of financial assistance that the Council can offer owner occupiers, tenants of privately and socially rented accommodation and landlords to carry out essential repairs on their property, disabled adaptations and bringing empty properties back into use. The policy would need to be amended in order to continue to be relevant with ever changing demands and circumstances offering the types of grants and assistance which the Council would need in order to assist the most vulnerable in society.</p>			

## 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

Evidence and Data used for assessment

- Private Sector housing staff performance data
- Joint Strategic Needs Assessment 2022
- Older Persons Evidence 2022 ongoing
- Housing Market Assessment 2019-2023
- ONS data 2021.

To put Somerset into perspective, Somerset has an aging population and higher proportion of people with disabilities. Amongst the 65-74 age group, the annual rate of growth is estimated to be 3.4%, five times the average growth rate. One in six of the population identified themselves as having a long-term health problem or disability, which limited their day-to-day activity. (2021 census). The Joint Strategic Needs Assessment (JSNA) was updated for Somerset in 2022. The JSNA sets out the needs of disabled persons and an aging population. Data suggests that there are over 115,800 people aged over 65 residents in Somerset. This is 21% of the County's population. 29.1% are in the West Somerset area and 20% in the Taunton area, larger than the regional and national average for both areas. 47.3% of residents living in Minehead are over 65 and 34.6% of the population in the Taunton area are aged over 65. The number of older people in the Housing Market Area is expected to increase by 41.1% in the next 20 years in the Taunton area and by 36% in West Somerset. The Taunton area has a higher-than-average dependency ratio due to there being proportionately more pensioners, and fewer 15 - 44-year olds. The dependency ratio is a measure of the proportion of a population who are too young or too old to work. A rising dependency ratio is a concern in Taunton and West Somerset both facing an ageing population, since it becomes difficult for pension and social security systems to provide for a significantly older, non-working population. In West Somerset the ratio of older people to younger persons is proportionally higher than the national average.

Estimates suggest that, by 2030, the number of people over 65 with mobility problems and a limiting long-term illness will also increase by over 40% across the County. More than a quarter of these older households in 2018/19 reported a 'support need', most

commonly for a physical disability. For households who would prefer to stay in their homes, 40% of those who needed adaptations did not have them. It is important to promote the service as inequalities are generated in pockets of rural outposts. The most commonly required adaptations are a downstairs toilet and handrails. Many older person households with support needs required further adaptations such as a low-level shower and stair lift. This all points to a need to support adaptations funding through the Better Care Fund, in response to these changing demographics and demands.

There are many residents in the partnership area who are living in the most rurally isolated areas of Somerset with less access to services for example the Somerset Levels and Exmoor. Many parts of Somerset rank amongst England's lowest population density, meaning that vulnerable households living in these very rural areas have even less mainstream support than households living elsewhere. In addition, there are an estimated 10,310 households in Somerset who are without gas central heating, living within the 25% most deprived areas in the UK, but who could be connected to the gas network.

11.6% (28,000 households) were in fuel poverty in 2015, 0.6% higher than the national average. In some areas the fuel poverty was as high as 27.3%. Puriton, Woolavington, Wellington Rockwell Green and West and Taunton Eastgate being some of the areas most affected.

Linked to fuel poverty is disrepair. Invariably the reason for poor energy efficiency is down to the age of the property and the person's ability to afford or manage to effect repairs. It is estimated that over 65% of the stock across Somerset was built pre 1945 and 70% is owner occupied (6% higher than the national average). It is estimated that 54% of the stock in the partnership area was built before 1945 with the largest proportion being built pre the First World War as is evidenced in the market towns. One in seven properties will have one or more Category One hazards again above the national average.

There is a strong correlation between unsatisfactory housing conditions and households in economic and social disadvantage. Elderly and vulnerable private sector households are over-represented in non-decent housing. There are limited resources available for private sector housing renewal but increasing dependency levels in the private rented sector and among vulnerable owner-occupiers who may be capital rich but revenue poor.

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

- Public Health Somerset County Council
- The four District Councils in Somerset
- NHS Somerset
- Foundations
- Centre for Sustainable Energy
- Adult Social Care Somerset County Council
- Childrens services Somerset County Council
- Contractors

**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	Central Government recognise that a reduction in capital funding to help vulnerable private sector housing residents would have an adverse impact on the independence, health and well-being of older people which would, in turn, increase their need for care and support services. Improvements to private sector housing properties to	☐	☒	☐

	<p>facilitate independent living, energy efficiency, better housing conditions, and housing functionality, will allow older people to live more meaningful lives in their own homes for longer – and thus for housing standards in this sector to move closer to those in the social housing sector, leading to a more balanced housing market.</p> <p>Understanding older people’s position in the housing market is important: around 75% of older people live in private sector housing and more than 25% of these reported a “support need,” most commonly for a physical disability, yet 40% of older person households did not already have an existing adaptation in their home. Health and social care policy encourage older people to remain living at home, but their living costs are under extreme pressure from fuel and food price inflation, and declining pension values in real terms.</p> <p>Central Government are mindful of these factors and with an increasingly elderly population, Central Government have increased the funding for DFG’s.</p>			
<p><b>Disability</b></p>	<p>Disabled households benefit greatly in increased mobility and independence from Disabled Facilities Grants. Increasing the capital budget will reduce customer waiting times for adaptations and therefore reduce discomfort and distress to disabled people, fulfilling the LA’s duty to assist disadvantages faced by this group. It is an ideal opportunity for promoting equality and more equal outcomes for disabled people in all tenures. The work of the County Council Independent Living Teams in assessing needs earlier and putting in place early measures has resulted in a reduction in demand for DFGs, however there is a fear that these measures provide temporary</p>	<p>□</p>	<p>□</p>	<p>⊗</p>

	<p>alleviation and simply delay the need for more permanent measures paid for from Disabled Facilities Grants.</p> <p>The current legislation around DFGs requires the District Council to provide a DFG where the need has been identified by an Occupational Therapist. There is no requirement about the length of time before an application process is commenced by the Local Authority, however once started then it has to be completed within 12 months unless there are mitigating factors that complicate the process. In practice unreasonable delays can be challenged through an ombudsman and there is case history of councils being challenged about unreasonable delays and losing under the Humans Right Act. If the Council found that unacceptable waiting lists were accruing, then it could revisit the capital allocation to DFGs in future years.</p>			
<b>Gender reassignment</b>	<p>There is 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 service so periodic staff training is critical to ensure awareness of needs and issues.</p>	□	⊗	□
<b>Marriage and civil partnership</b>	<p>Residents are not disadvantaged by either being married/ in a civil partnership or not when accessing the Policy. Registered civil partners have the same rights as married heterosexual spouses in relation to property and tenancy rights. Households and vulnerable groups are based on national statistics and are not impacted by marital status.</p>	□	⊗	□

<p><b>Pregnancy and maternity</b></p>	<p>Applicants are not disadvantaged by pregnancy in relation to the application of the policy however, they will be more at risk from hazards and poor conditions. The policy is designed to protect all groups included all those who fall within a protected characteristic. Where some people are more at risk than others, then this is taken into account when deciding on the most appropriate course of action.</p>	<p>☐</p>	<p>☒</p>	<p>☐</p>
<p><b>Race and ethnicity</b></p>	<p>It is important to be culturally sensitive when providing private sector housing services, and statutory and/or enforcement interventions are not always the most appropriate in achieving equitable equality outcomes, particularly for households living in this sector for whom English is not their first language. For example, our statutory responsibility to inspect houses occupied by multiple households could inadvertently discriminate against minority ethnic groups in private rented sector housing where Black and Minority Ethnic (BME) households have a much higher proportionate presence than in other housing sector and tenures in the district.</p>	<p>☐</p>	<p>☒</p>	<p>☐</p>
<p><b>Religion or belief</b></p>	<p>It is important to be culturally sensitive when providing the service being aware that not one size fits all. There is no evidence to suggest that customers from this group are disadvantaged in any way by the services or the Policy. A property assessment is based on its merit in line with the policy and legislative framework. Officers must ensure that cultural needs are taken into account and respected throughout their contact and delivery of the services that are governed by this policy. Awareness training is critical to this understanding.</p>	<p>☐</p>	<p>☒</p>	<p>☐</p>

<b>Sex</b>	<p>No obvious direct impact identified although it is recognised that women generally have longer life expectancy than men and may therefore be a group which benefit most from the interventions outlined above and any reduction in funding for these interventions could disproportionately impact more female than males.</p>	□	☒	□
<b>Sexual orientation</b>	<p>Periodic staff training is critical for awareness of needs and issues in delivering our services effectively for LGBT individuals.</p>	□	☒	□
<b>Other, e.g. carers, veterans, homeless, low income, rurality/isolation, etc.</b>	<p>Somerset has a large geographical area with sprawling rural areas which present some challenges in terms of accessible locations and multiple urban settlements. Across Somerset, advice and other services are generally located in the urban settlements. Loneliness linked to rural isolation, isolation from access to services generally compounds other vulnerabilities and risks. Rurality increases the risk of inequalities. Therefore, it is important that the Team continue to ensure that the service has a high profile in all locations and is easy to access regardless of location, taking into account that not all households will have internet access or be comfortable with or afford mobile or computer technology.</p> <p>Travel and Access: Transport is limited and costly in rural areas and can lead to isolation of our more vulnerable residents, also challenging access to some services and facilities located in towns. Some people living in poor conditions as well as rural isolation could easily be under the radar and unaware of or not confident in contacting health or Council services.</p>	□	□	☒



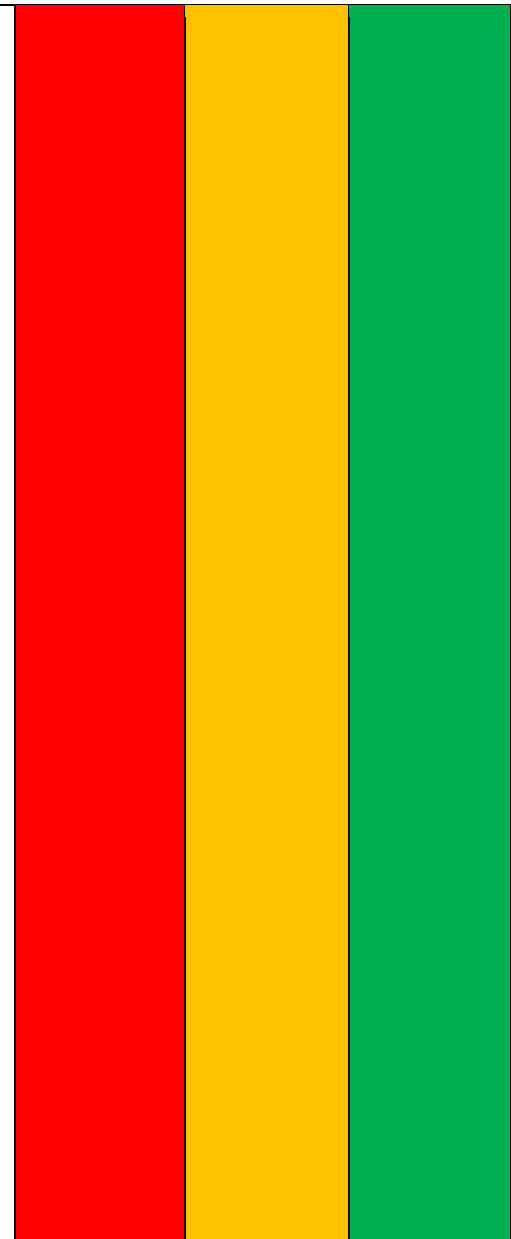
Around 10% of White British householders in Somerset do not have access to a car/van, compared to 15-16% for all other ethnic groups. (Census, 2011)

People of Hindu and Muslim religions in Somerset are less likely than the general population to have transport: 23% of Hindu and 21% of Muslim householders do not have access to a car (or van) (Census 2011).

Only 33% of adults aged 75 years or over have ever used the Internet. (Internet Access Quarterly Update, Q2 2013).

Disabled people are less likely to live in households with access to the internet than non-disabled people. Over half (53%) of adults who have never used the Internet have a disability.

Officers implementing this policy and the key partners are able to visit residents in their own homes to assess their housing conditions and offer assistance. Partners such as Lendology CIC, the Centre for Sustainable Energy and social care and housing professionals are all able to offer home visits as well as their online and digital services. Fuel poverty in England is measured using the Low-Income Low Energy Efficiency (LILEE) indicator. Under this indicator, a household is considered to be fuel poor if: they are living in a property with a fuel poverty energy efficiency rating of band D or below and, when they spend the required amount to heat their home, they are left with a residual income below the official poverty line. There are 3 important elements in determining whether a household is fuel poor: household



	income, household energy requirements and fuel prices. People on lower income are more susceptible to fuel poverty as are people living in poor homes. This policy seeks to meet the needs of disabled people and improve homes to decent homes standard. Some of the poorer homes are likely to be lived in by lower income residents.			
--	---	--	--	--

**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
No negative impacts identified; however the following will help to improve service delivery				
Raise awareness of characteristics of all these protected groups in relation to local housing market. Close monitoring of waiting lists for DFGs and all types of assistance and impact and ensure councillors are kept apprised of any impact	31/03/2025	SIP Management Team	Scrutiny and information reports, staff briefings and housing briefings	<input type="checkbox"/>
Induction process for all new staff (including any temporary/agency staff); clear written procedures; effective staff supervision; and regularly reviewing all customer satisfaction returns and comments	31/03/2023	SIP Management Team	Quarterly SIP staff reports	<input type="checkbox"/>

Critically assessing affordability, choices of housing, the varied housing needs of local residents, and housing conditions, in the context of changing housing market conditions, public funding, and national housing policy	31/03/2025	Joint Housing Group	Regular reports	<input type="checkbox"/>
Regular meetings with relevant partner organisations; a common understanding of priorities and pressures; initiatives to utilise complimentary work skills and experience; joint awareness and information exchange sessions	31/03/2023	SIP Management Team	Agreed stakeholder meetings	<input type="checkbox"/>
Evaluation of housing needs and choices for older people beyond the traditional adaptations and small repairs at home approach	31/03/2025	Integrated Care Board	Reports to and from the group.	<input type="checkbox"/>
<b>If negative impacts remain, please provide an explanation below.</b>				
None				
<b>Completed by:</b>	<b>Christian Trevelyan Partnership Manager Somerset Independence Plus</b>			
<b>Date</b>	<b>8<sup>th</sup> February 2023</b>			
<b>Signed off by:</b>	<b>Christian Trevelyan</b>			

<b>Date</b>	<b>9<sup>th</sup> February 2023</b>
<b>Equality Lead/Manager sign off date:</b>	<b>Angela Farmer</b>
<b>To be reviewed by:</b> (officer name)	<b>Christian Trevelyan</b>
<b>Review date:</b>	<b>April 2026</b>