




APPENDIX 2 Somerset Equality Impact Assessment

Before completing this EIA please ensure you have read the EIA guidance notes – available from your Equality Officer or www.somerset.gov.uk/impactassessment

Organisation prepared for (mark as appropriate)	 Somerset Council					
Version	1.0		Date Completed	October 2023		
Description of what is being impact assessed						
<p>The impact of failing to fund the core costs of citizens advice services in Somerset at the level proposed in the Key Decision report.</p> <p>The precise impacts would be dependent on the level of any cuts below the level of the report’s recommendations, which could range from a small reduction in service, to significantly reduced, right through to closure.</p> <p>Citizen Advice services make a significant contribution to individuals and communities providing a universal, free, confidential and impartial information and advice service to everybody regardless of race, gender, age, religion, sexuality or disability. Without this service many people would not have an alternative. It is local and holistic, often supporting on more than one issue at a time which is known to be a common factor with people with problems such as depression.</p> <p>CA help to address negative effects of social issues such as debt that impacts on both emotional and physical aspects of health and helps to address health inequalities through this process. This investment recognises the impact of social determinants on health and health outcomes.</p> <p>Emerging evidence on the economic and social impact of the coronavirus (COVID-19) pandemic shows that young people aged 12–24 years are one of the worst-affected groups, particularly in terms of the labour market and mental health outcomes (The Health Foundation). Young adulthood is a crucial time to build the foundations for a healthy adulthood. Making a successful transition to adulthood depends in large part on access to good-quality work, housing and strong relationships. However, to secure these, young people need financial, practical and emotional support, along with skills and the right connections. Typically, advice</p>						

services are aimed at adults in both the modes of delivery and promotion.

The impact of Covid-19 and the cost-of-living crisis has reinforced the importance of ensuring appropriate advice services are in place. An important aspect of CA community service is the provision of general advice (covering a wide range of topics) that is easily accessed by phone, email or in person. It is vital that everyone can engage with help when they need it because if people's problems are not resolved their health, well-being and finances suffer. What is especially important about this service is the fact that CA offer immediate assistance when needed and follow-on specialist help for those with complex problems including financial distress. Often clients present in the general advice service with several interlinked problems (employment dispute leading to loss of income causing rent arrears)

Through the support provided by Citizens Advice the following benefits are able to be realised:

- Household incomes increase because people can access their full entitlements and are better able to tackle debts.
 - The bulk of this increased income is then spent locally.
- People are enabled to better manage their resources in the future with less risk of debt or financial hardship.
- More people keep their jobs or find new ones, so they can contribute to the local economy.
- Individuals and families are supported from evictions and are in more stable, affordable, sustainable housing arrangements.
- More residents have lower fuel tariffs and live in a more energy-efficient home with less risk of falling into fuel poverty.
- People have better understanding of financial services, consumer and legal matters.
- The most vulnerable will get help in an immediate crisis.
- Stigma is minimised by the holistic/generalist nature of the advice given and the impartial way it is delivered.

<https://citizensadvice Somerset.org.uk/>

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 key evidence that has been used in this EIA is that provided by CAS and CAWS which is available in an interactive report that has been created in partnership with National Citizens Advice and draws on extensive data capture about all aspects of CA's work. The equalities specific data as it applies to clients from Protected Characteristics can be seen in the two tables below.

There are also a wide number of data sets, research studies and reports that speak of the benefits of CA services and their

contribution to health and wellbeing and tackling the wider social determinants of poor health (e.g. poor housing, low incomes) as well as their role during the Covid-19 pandemic and current cost of living crisis.

- No Health Without Mental Health - Delivering better mental health outcomes for people of all ages - <https://www.gov.uk/government/publications/no-health-without-mental-health-a-cross-government-outcomes-strategy>
- Mental health and prevention: taking local action for better mental health, Mental Health Foundation 2016 <https://www.mentalhealth.org.uk/sites/default/files/mental-health-and-prevention-taking-local-action-for-better-mental-health-july-2016.pdf>
- Better Mental Health For All: A public health approach to mental health improvement, Faculty of Public Health/Mental Health Foundation 2016 <https://www.mentalhealth.org.uk/sites/default/files/Better%20MH%20for%20all%20web.pdf>
- Health Policy Monitor – Recent developments in health inequalities policy http://hpm.org/en/Surveys/LSEUK/13/Recent_developments_in_health_inequalities_policy.html
- Five Year Forward View for Mental Health <https://www.england.nhs.uk/wp-content/uploads/2016/02/Mental-Health-Taskforce-FYFV-final.pdf>
- Somerset Mental Health Needs Assessment <http://www.somersetintelligence.org.uk/files/Mental%20Health%20Needs%20Assessment%202023.pdf>
- Covid19 and mental health - Provided insights into how the pandemic and the response to it, has impacting some people and communities more significantly than others and recommended activities and approaches needed to address these inequalities. [COVID-19 mental health and wellbeing recovery action plan - GOV.UK \(www.gov.uk\).](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/544217/COVID-19_mental_health_and_wellbeing_recovery_action_plan_-_GOV.UK.pdf)
- Build Back Fairer: The COVID-19 Marmot Review | The Health Foundation
- Joint Strategic Needs Assessment and Somerset Intelligence – <http://www.somersetintelligence.org.uk/jsna>
- National Citizens Advice Impact and cost of living reports <https://www.citizensadvice.org.uk/impact/>

A CAS/CAWS review into the advice needs of young people has highlighted the key areas that need attention:

- employment: mistreatment under zero hours contracts (which are more prevalent in younger employees); employers paying cash wages but failing to make NI contributions; employers failing to make workplaces Covid safe; young people being made or redundant or hours being reduced without due process.
- housing: homeless applications and appeals (following estrangement, relationship breakdown, or Leaving Care); budgeting advice regarding the costs of independent living.
- benefits: lack of income from losing a job or having hours reduced; moving into own home and having rent to pay; young carers asking questions on the other person's behalf (often about disability benefits which can be complex).

CAS/CAWS also reports -

- Noticeable changes for clients with increasing numbers of people living on very low incomes (under £999 a month) and needing help with money problems, rent arrears and benefit claims, with people struggling to afford their heating and food bills.
- Clients increasingly present with complex, interrelated problems that

National Citizens Advice forecast of changes in clients' advice needs due to cost of living crisis identifies that 1 in 4 people are not going to be able to pay their energy bills.

- The National Citizens Advice public website (www.citizensadvice.org.uk) page views demonstrate a very steep increase in visits to the Personal Independence Payments (PiP) pages and access to advice for those affected by the Cost-of-Living Crisis.

CA Users from Protected Characteristics

CA collect data on sex; disability/long term health, age, marital status and ethnicity.

The data presented below comprises that from the local authority funded core service as compared with that for all services (core plus separately funded projects) from the 2022-2023 financial year.

The statistics are compiled from clients who provided the required information so that a client profile could be produced. Clients whose details are not recorded or prefer not to say etc. are excluded.

Profile information is only collected where advice is provided, so the figures do not include the 3,784 clients assisted with 'Simple Queries'.

	Core		All services	
	No	%'age	No	%'age
Total of unique clients	13,960	100%	21,408	100%
Total No of issues	49,705	100%	82,174	100%
SEX				
Male	5,039	40%	7,072	41%
Female	7,417	59%	10,120	59%
RACE				
Black Asian	133	1%	172	1%
Black African/Caribbean	69	1%	94	1%
Black Other	20	0%	64	0%
Mixed	84	0%	135	1%
Gypsy/Irish Traveller	13	0%	48	0%
Other - Any Other	73	1%	82	1%
White	7,659	93%	10,282	94%
DISABILITY/LONG TERM HEALTH				
Disabled	756	9%	1,203	10%
Long-Term Health Condition	4,090	49%	6,305	52%
MARRIAGE/CIVIL PARTNERSHIP				
Married/Cohabiting/Civil Partnership	1952	35%	3,106	39%
AGE				
15-24 years	667	5%	857	4%
25-49 years	6,115	45%	7,743	37%
50-64 years	3,708	28%	6,820	33%
65-104 years	2,804	22%	5,261	26%

Issues

The following data shows the top 2 issues that clients with protected Characteristics are advised on.

	Core Service		All Services	
	Top 2 advice issues	%'age of all issues	Top 2 advice issues	%'age of all issues
SEX				
Male	Benefits Housing	37.7% 13.1%	Benefits Debt	43.6% 13.8%
Female	Benefits Housing	37.8% 12.6%	Benefits Debt	40.8% 15.4%
RACE				
Black Asian	Benefits Housing	20.5% 15.8%	Benefits Debt	23.4% 15%
Black African/Caribbean	Benefits Housing	21.6% 20.3%	Benefits Housing	23.8% 14.9%
Black Other	Employment Benefits	37.9% 20.7%	Benefits Employment	34.6% 21.1%
Mixed	Benefits Housing	29.2% 18.3%	Benefits Housing	27.8% 19.9%
Gypsy/Irish Traveller	Benefits Debt	44.3% 22.9%	Benefits Debt	43.3% 24.4%
Other	Benefits Housing	27.4% 12.6%	Benefits Housing	41.8% 10.8%
DISABILITY/LONG TERM HEALTH				
Disabled	Benefits Housing	44.1% 10.6%	Benefits Debt	52.5% 10.7%
Long-Term Health Condition	Benefits Debt	47.1% 11.9%	Benefits Debt	50.5% 17.5%
MARRIAGE/CIVIL PARTNERSHIP				
Married/Cohabiting/Civil Partnership	Benefits Housing	41% 11.4%	Benefits Debt	51% 14.7%

AGE				
15-24 years	Benefits Housing	26.8% 19.7%	Benefits Housing	1.15% 0.8%
25-49 years	Benefits Housing	30.1% 15.3%	Benefits Debt	12.6% 7.8%
50-64 years	Benefits Housing	44.9% 10.5%	Benefits Financial Services	13.8% 4.1%
65-104 years	Benefits Housing	48.4% 10.5%	Benefits Financial Services	17.1% 2.5%

Financial benefits of the work of Citizens Advice to Somerset residents, Somerset's economy and Somerset Council and the wider public sector

Public Sector

Councils

In 2022/23 Somerset's Local Citizens' Advice reduced costs to the council as follows:

- Reduced cost of mental health interventions - **£93,307**
- Preventing housing evictions inc. reduced costs of legal proceedings and repair of property - **£269,157**
- Statutory homelessness, reduced cost of temporary housing - **£441,902**
- Council tax Arrears repayments scheduled - **£108,106**

A total of **£912,472**

- They also saved all housing providers, of which the council is one, **£2,341,666** by preventing housing evictions.

Across the wider public sector system

- the NHS was saved **£1,362,777** by reducing use of health services and an additional **£272,167** by helping to keep people in work.
- the Department of Work and Pensions **£4,263,948** of savings by helping to keep people in work and
- the Criminal Justice System **£94,414**

This represents a grand total of **£9,247,444** of savings to the public sector.

Debt

- The fiscal benefit of their Debt Advice work was **£3,132,510**

Return on Investment

- For every **£1** invested in their service
 - **£3.46** in fiscal benefit was delivered (financial savings to local and national Government due to fewer payments for out-of-work benefits, costly evictions, re-housing evicted tenants and less demand on the NHS (National Health Service)).
 - **£26.46** in public value (when people have fewer problems they have higher levels of wellbeing, participation in society and productivity).
 - **£12.76** in value to the people helped (help individual clients to achieve financial outcomes like getting back-dated benefits, writing-off debts and refunds for consumer issues).

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

This equality impact assessment has been developed by a Partnerships and Localities VCFSE working group comprising officers who have worked with and contract managed funding agreements with their respective LCA's over many years and builds on previous equality impact assessments. It has also been informed by detailed and up to date CA data regarding service users from the Protected Characteristics, and the top advice issues they seek help with.

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 provided CA data shows that Older People are a significant demographic of CA services with those aged 50 years and above representing 50% of the users of core services and 59% of users of all services. As Somerset has an aging demographic the proportion of older people using CA services is therefore likely to increase. With benefits and financial services being the top 2 issues older people seek help with any reduction in service bought about by reduced service will have a direct impact on older people's income and a likely increase in other issues such as debt and fuel poverty as a direct consequence. Any significant reduction in the level of annual funding proposed, resulting in a reduced level of service, would result in a negative impact on users of all ages but with a significant impact on older people aged 50 plus. Any reduction in the level of CA services as a consequence of a reduced award would impact on the number of older people that could be assisted; a retrograde step at a time when the older people population is growing, and we know that whilst living longer the quality of life in later years worsens. Reduced access to CA services could lead to reduced incomes, unresolved housing issues, increased debt and fuel poverty for some of the county's most vulnerable residents (see section 16i in the key decision report). A reduction in the level of funding could result in significant unmet needs with a greater call on, and recourse to, council resources at a direct cost to the council. Reduced access to CA services could lead to reduced incomes, unresolved housing issues, increased debt and fuel poverty for some of the county's most vulnerable residents (see section 16i in the key decision report). If the council is required to put in place complementary or replacement services to pick up the advice 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	<p>needs that can no longer be met by CA this is likely to be at higher cost than the CA can provide due to the efficiencies generated through the utilisation of volunteer advice workers.</p>			
<p>Disability</p>	<ul style="list-style-type: none"> • National data (POPPI and PANSI) demonstrates that in addition to an increasingly ageing population the number of people aged 16 plus who will have physical or learning disabilities or mental health and care needs will also increase. • With the number of CA clients (all services) having a disability or long-term health issue already being 62%, then any significant reduction in funding could result in increasing number of people with this protected characteristic being unable to access support resulting in a greater call on, and recourse to, council resources at a direct cost to the council. • Disabled people experience considerably higher levels of health inequality than the general population; this is often exacerbated by low income. • The steep increase in seeking advice for PIP is evidence that the Cost-of-Living Crisis is really affecting disabled people and Cost of Living issues are now the biggest issues for disabled people using Citizens Advice compared with two years ago. • The extra costs of disability are linked to higher energy use and therefore a disproportionately increased impact (e.g. dialysis, oxygen and equipment at home). • Reduced access to CA services could lead to reduced incomes, unresolved housing issues, increased debt and fuel poverty for some of the county's most vulnerable residents (see section 16i in the key decision report). • If the council is required to put in place complementary or replacement services to pick up the advice needs that can no longer be met by CA this is likely to be at higher cost than the CA can provide due to the efficiencies generated through the utilisation of volunteer advice workers and the existing national CA 	<p>☒</p>	<p>☐</p>	<p>☐</p>

	infrastructure.			
Gender reassignment	<ul style="list-style-type: none"> No specific impacts identified - Citizens Advice give free, confidential information and advice to everybody regardless of Protected Characteristic. 	☐	☒	☐
Marriage and civil partnership	<ul style="list-style-type: none"> No specific impacts identified - Citizens Advice give free, confidential information and advice to everybody regardless of Protected Characteristic. 	☐	☒	☐
Pregnancy and maternity	<ul style="list-style-type: none"> No specific impacts identified - Citizens Advice give free, confidential information and advice to everybody regardless of Protected Characteristic. 	☐	☒	☐
Race and ethnicity	<ul style="list-style-type: none"> Whilst users of CA services represent around 3% of all CA users this is fully in line with the percentage of ethnic minorities that make up the total population in Somerset. To this end any significant reduction in core funding would therefore have a negative impact on this section of the community as a result of a reduced service resulting in fewer people who would be able to access the service. Where race equality is combined with other protected characteristics (for example age, low income or disability) the impacts multiply. In the year to the end of July 2023, CA dealt with 973 immigration related issues; issues which will be specific to people from ethnic minorities. Reduced access to CA services could lead to reduced incomes, unresolved housing issues, increased debt and fuel poverty for some of the county's most vulnerable residents (see section 16i in the key decision report). If the council is required to put in place complementary or 	☒	☐	☐

	<p>replacement services to pick up the advice needs that can no longer be met by CA this is likely to be at higher cost than the CA can provide due to the efficiencies generated through the utilisation of volunteer advice workers and the existing national CA infrastructure.</p>			
Religion or belief	<ul style="list-style-type: none"> No specific impacts identified - Citizens Advice give free, confidential information and advice to everybody regardless of Protected Characteristic. 	□	⊠	□
Sex	<ul style="list-style-type: none"> Women are proportionately the larger group of CA users at 59% of all users, although as a universal service it is accessible to and used by both men and women. All men and women would therefore be negatively impacted by any reduction in service. If the council is required to put in place complementary or replacement services to pick up the advice needs that can no longer be met by CA this is likely to be at higher cost than the CA can provide due to the efficiencies generated through the utilisation of volunteer advice workers and the existing national CA infrastructure. 	⊠	□	□
Sexual orientation	<ul style="list-style-type: none"> No specific impacts identified - Citizens Advice give free, confidential information and advice to everybody regardless of Protected Characteristic. 	□	⊠	□
Armed Forces (including serving personnel, families and veterans)	<ul style="list-style-type: none"> Somerset has a sizable population of service and ex-service personnel (conservative estimate of 43,200) and their families whose particular needs are well recognised in the Military Covenant. Whilst CA doesn't currently collect user data based on armed forces status (serving or veteran) it is likely that a significant number of veterans will be amongst their users, particularly as 	⊠	□	□

	<p>specialist armed forces charities (e.g. British Legion and SSAFA) refer clients to CA.</p> <ul style="list-style-type: none"> Any significant reduction in core funding would therefore have a negative impact on this section of the community as a result of a reduced service resulting in fewer people who would be able to access the service. Reduced access to CA services could lead to reduced incomes, unresolved housing issues, increased debt and fuel poverty for some of the county's most vulnerable residents (see section 16i in the key decision report). If the council is required to put in place complementary or replacement services to pick up the advice needs that can no longer be met by CA this is likely to be at higher cost than the CA can provide due to the efficiencies generated through the utilisation of volunteer advice workers and the existing national CA infrastructure. 			
<p>Other, e.g. carers, low income, rurality/isolation, etc.</p>	<ul style="list-style-type: none"> Impact on the challenges of rurality and isolationism. Support to rural communities to maintain/provide needed local services, for whom access to services may be difficult. Carers have known health needs and benefit enormously from being able to take time out to maintain their own health and wellbeing. Health outcome is closely associated with income inequality and financial exclusion. Taking positive action to support low-income groups or homeless to participate community activities and / or to engage in activities which might support their education or employment opportunities are all likely to have extremely positive health benefits. Pre pandemic the highest housing issue that our clients experienced was being threatened with homelessness. Since the cost-of-living crisis across the Citizens Advice Network the highest demand for housing advice is now from people who are experiencing actual homelessness or seeking advice on making 	<p>☒</p>	<p>☐</p>	<p>☐</p>

	<p>applications to local homelessness services.</p> <ul style="list-style-type: none"> • Pre-pandemic the most common debt advice among Citizens Advice clients was Council Tax and Rent Arrears. Energy debt is now the biggest debt advice need and the amount of debt per client has increased considerably. • Access to the internet can be a challenge for some groups in rural areas, particularly in West Somerset, and so other more traditional mechanisms to ensure awareness may need to be put in place. • Reduced access to CA services could lead to reduced incomes, unresolved housing issues, increased debt and fuel poverty for some of the county's most vulnerable residents (see section 16i in the key decision report). 			
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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?	Action complete
The negative impacts identified above will go some way to being mitigated if elected members support the recommendation to core fund Citizens Advice Somerset and Citizens Advice West Somerset at the level of £629,000 per annum, and for the proposed period.	08/11/2023	Executive Members	Outcome of key decision report	<input type="checkbox"/>
If members choose to either significantly reduce the level of funding below that requested, or the period for which CA will be funded they will need to instruct officers from Partnerships and Localities to conduct a detailed appraisal of the likely impacts to the service based on the suggested level/s of funding. A final member decision would therefore need to be take place following submission of a further report.	08/11/2023	Executive Members Sara Skirton	Outcome of key decision report followed by detailed cost appraisal.	<input type="checkbox"/>
If a decision is made not to provide a sustainable level of annual funding for 3 years as proposed, resulting in the	08/11/2023	Executive Members	Partnerships and Localities	<input type="checkbox"/>

closure of CAS and CAWS, the only realistic mitigation will require the council to consider possible options to provide an alternative service including the possibly of delivering in-house.			to monitor actions agreed by Executive	
	Select date			<input type="checkbox"/>
	Select date			<input type="checkbox"/>
If negative impacts remain, please provide an explanation below.				
Completed by:	David Crisfield - Communities Specialist Partnerships and Localities			
Date	16/10/2023			
Signed off by:	Chris Phillips – Public Health Strategic Manager Commissioning			
Date	12/10/2023			
Equality Lead sign off name:	Angela Farmer			
Equality Lead sign off date:	19/10/23			
To be reviewed by: (officer name)	Sara Skirton, Service Director Partnerships and Localities			
Review date:	November 2023			