




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		 NHS Somerset		 NHS Somerset NHS Foundation Trust	
Version	1.0		Date Completed	17/1/24		
Description of what is being impact assessed						
<p>Rent Setting and Service Charges for Somerset Council social housing for 2024/25 – ie the annual uplift in rent and service charges for 2024/25.</p> <p>Rent setting for 2024/25 is calculated in accordance with the Regulator of Social Housing’s Consumer Standards - The Rent Standard (April 2020) and the Government’s Policy Statement on Rents for Social Housing 2019 (Rent Policy Statement) thereafter.</p> <p>Housing rents ensure continued investment in the management, maintenance and development of council owned homes and other assets held within the Housing Revenue Account so that the needs of existing and potential future tenants are met and can provide enhanced support for families and communities experiencing hardship.</p> <p>The proposed rent and service charge increases are in line with government rent setting policy and the Policy agreed by Somerset Council Executive 14/12/2022.</p>						
Evidence						
<p>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</p>						

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An Impact Assessment was done when the Policy was adopted by Somerset Council 14/12/2022 which approved the increases proposed in the policy in line with the governments rent standard.

When setting rents the Council must comply with the Government’s updated Rent Standard. On 25 February 2019 the Government confirmed that increases to social housing rents will be limited to the Consumer Price Index (CPI) plus 1% for 5 years from 2020/21 to 2025/26, as per the 2019 Rent Standard. Although they updated this last year and capped this at 7%, they have removed this cap for 2024/25 and therefore the basis for the rent and service charge increases will be at CPI+1%, ie 7.6%.

Tenant profiling data (SC tenants and Homes in Sedgemoor tenants)

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 report has been consulted on with the representative body of Somerset Council Tenants (the Tenants Strategic Group) and the Housing Board which includes tenant representation for Homes in Sedgemoor.

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
<p>Summary</p>	<p>Every year the housing service reviews rents. This takes into account inflation and any other financial factors in order to ensure there is enough income to deliver services. When doing so the housing service must observe government legislation and guidance. Increasing rent does put financial strain on tenants (those whose rent is not covered by benefits) – however this does not adversely affect any protected group worse than a tenant without a protected characteristic. The cost rise to</p>			

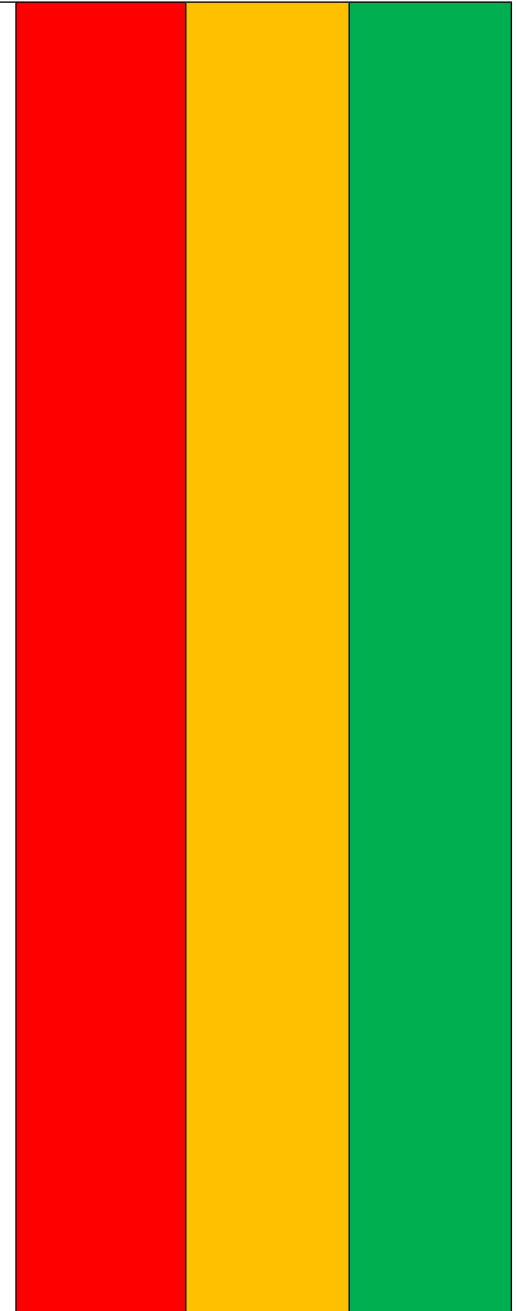
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tenants is marginally above inflation and is required to ensure the housing service can continue to deliver services for tenants and provide support. Rental income will finance the continued investment in maintaining our existing homes, other assets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

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

However, all people on low incomes will (if they fulfil the conditions) qualify for housing benefit, universal credit or pension credit and will therefore be protected from significant negative financial impacts of both the rent and service charges (which are eligible for benefits).

In addition, people who have difficulties with daily activities and or mobility problems may qualify for other benefits (e.g Disability Living Allowance or its replacement Personal Independence Payment). It is understood there may be an increase in the level of rent arrears due to the transition to Universal Credit, however this risk is being mitigated by the housing service working closely with Citizens Advice to provide advice and support services to Universal Credit claimants. The in-house team has a dedicated team of officers who provide early intervention to support tenants to sustain their tenancy and where necessary assist them to maximise their entitlement to welfare benefits – more than half of our tenants are in receipt of full or partial help with paying their housing costs i.e. housing benefit or universal credit. The HRA business plan makes provision for an amount of bad debt.



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<p>Age</p>	<p>43% of Homes in Sedgemoor tenants and 30% of SC directly managed tenants are aged over 60. All tenants will benefit from the overall investment in council housing. No group is discriminated against in the allocation of council housing. All groups benefit equally. Additional housing supply is addressed through new development (afforded from the rent) will provide an increased choice of affordable homes, size and tenure, providing housing options for all age groups. Improvements in energy efficiency will help to protect tenants, whatever their age or the hardships they experience, from fuel poverty. Over 50% of tenants are in receipt of help with housing costs i.e. Housing Benefit or Universal Credit. However for those in Sheltered Housing this percentage increases considerably</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Disability</p>	<p>Approximately 27% of SWT (35% in Sedgemoor) current tenants have declared that either they or the other person on the tenancy has a disability. The types of disability declared include for example: dementia, hearing, mobility, visual etc. Again, it could be argued disabled adults are more likely to be living as a low income household. Additionally, disabled people are more likely to not be working and where they are working, are more likely to be earning less than non-disabled people. It is evident therefore that an increase in rent is likely to specifically impact this protected characteristic. However, our proposed rent increase is only marginally above inflation and the welfare benefit system should be able to protect people. We provide advice, help and support via our specialist officers and through working with Citizens Advice. We also fund MIND to provide mental health support to our tenants and the levels of rent allow us to fund this. We are therefore assessing any impact as low. Tenants will benefit from the overall financial investment in council housing. Ongoing investment in disabled facilities adaptations and other minor adaptations will continue.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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<p>Gender reassignment</p>	<p>Tenants will benefit from the overall investment in council housing. Investment in our communities will ensure information about our services is accessible so that people can benefit from all our activities.</p> <p>Tenants experiencing alarm, distress and harassment will benefit from investment being made into providing great customer services which will be community inclusive.</p> <ul style="list-style-type: none"> • There is not expected to be any particular negative impact on this specific group 	□	⊗	□															
<p>Marriage and civil partnership</p>	<ul style="list-style-type: none"> • Tenants will benefit from the overall investment in council housing. There is not expected to be any particular negative impact on this specific group. 	□	⊗	□															
<p>Pregnancy and maternity</p>	<p>Tenants will benefit from the overall investment in council housing.</p> <p>Within the business plan there is potential for investment in better quality and additional family housing.</p> <ul style="list-style-type: none"> • There is not expected to be any particular negative impact on this specific group. 	□	⊗	□															
<p>Race and ethnicity</p>	<p>The table below provides information on the number of council tenants by ethnicity:</p> <table border="1" data-bbox="562 1134 1561 1337"> <thead> <tr> <th>Ethnic Background</th> <th>SC direct managed</th> <th>HiS</th> </tr> </thead> <tbody> <tr> <td>White British</td> <td>68%</td> <td>72%</td> </tr> <tr> <td>BME</td> <td>1%</td> <td>1%</td> </tr> <tr> <td>No data provided</td> <td>1%</td> <td>3%</td> </tr> <tr> <td>Other</td> <td>30%</td> <td>24%</td> </tr> </tbody> </table> <p>Tenants will benefit from the overall investment in council housing.</p>	Ethnic Background	SC direct managed	HiS	White British	68%	72%	BME	1%	1%	No data provided	1%	3%	Other	30%	24%	□	⊗	□
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No data provided	1%	3%																	
Other	30%	24%																	

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	Wider tenant participation and engagement and improved Communications (both part of our plans for 2024/25) will increase the proportion of tenants providing feedback to inform service improvements.			
Religion or belief	<p>Tenants will benefit from the overall investment in council housing. Developing and supporting staff to provide great customer service will ensure appropriate and sensitive services are delivered to the religious or belief requirements of tenants.</p> <p>There is not expected to be any particular negative impact on this specific group.</p>	☐	☒	☐
Sex	<p>Tenants will benefit from the overall investment in council housing.</p> <p>There is not expected to be any particular negative impact on this specific group.</p>	☐	☒	☐
Sexual orientation	<p>Tenants will benefit from the overall investment in council housing. Investment in our communities will ensure information about our services is accessible so that people can benefit from all our activities.</p> <p>Tenants experiencing alarm, distress and harassment will benefit from investment being made into providing great customer services which will be community inclusive.</p> <p>There is not expected to be any particular negative impact on this specific group</p>	☐	☒	☐
Armed Forces (including serving personnel, families and veterans)	This group is recognised within the existing Homefinder Somerset Policy which provides additional weighting in terms of Homefinder banding which therefore increases the likelihood over an average citizen of being successful on the Homefinder system for social	☐	☒	☐

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	<p>housing. This applies to all landlords in Somerset (of which council owned stock is one).</p> <p>There is not expected to be any particular negative impact on this specific group</p>			
<p>Other, e.g. carers, low income, rurality/isolation, etc.</p>	<p>Property lettings will be allocated via the choice based lettings system - Homefinder Somerset, which has equality and diversity policies in place to ensure protected groups are not disadvantaged.</p> <p>The increase to rent will be applied across our domestic dwelling housing stock. This increase will have a mostly neutral effect on protected groups. The cost rise to tenants is only marginally above inflation and will enable the council to continue to provide an excellent range of services.</p> <p>To help support tenants on low incomes the housing service will continue to provide a number of initiatives to enable them to manage their finances and maximise their income:</p> <ul style="list-style-type: none"> • Publish clear information on rent which helps tenants to manage their own finances; • Signpost tenants to a relevant benefit agency to help ensure they are maximising their income to meet their living costs; • Take action to raise the awareness of accessing a range of welfare benefits; and • Provide the opportunity for tenants to access direct support to check they are in receipt of the welfare benefits they are entitled to claim. 	<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
	Select date			<input type="checkbox"/>
	Select date			<input type="checkbox"/>
	Select date			<input type="checkbox"/>

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	Select date			<input type="checkbox"/>
	Select date			<input type="checkbox"/>
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	Select date			<input type="checkbox"/>
	Select date			<input type="checkbox"/>

If negative impacts remain, please provide an explanation below.

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Completed by:	Simon Lewis
Date	17/11/23
Signed off by:	
Date	
Equality Lead sign off name:	
Equality Lead sign off date:	
To be reviewed by: (officer name)	
Review date:	