




## Appendix D: Equalities Impact Assessment

Somerset Equality Impact Assessment			
Before completing this EIA please ensure you have read the EIA guidance notes – available from your Equality Officer or <a href="http://www.somerset.gov.uk/impactassessment">www.somerset.gov.uk/impactassessment</a>			
<b>Organisation prepared for (mark as appropriate)</b>	 <b>Somerset</b> Council	 <b>Somerset</b>	 <b>Somerset</b> NHS Foundation Trust
<b>Version</b>	<b>1.0</b>	<b>Date Completed</b>	<b>24/12/24</b>
<b>Description of what is being impact assessed</b>			
<p><b>Rent Setting and Service Charges for Somerset Council social housing for 2025/26 – ie the annual uplift in rent and service charges for 2025/26.</b></p> <p>Rent setting for 2025/26 is calculated in accordance with the Regulator of Social Housings’ 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>			
<b>Evidence</b>			
<p><b>What data/information have you used to assess how this policy/service might impact on protected groups?</b> Sources such as the <a href="#">Office of National Statistics</a>, <a href="#">Somerset Intelligence Partnership</a>, <a href="#">Somerset’s Joint Strategic Needs Analysis (JSNA)</a>, Staff and/ or <a href="#">area profiles</a>,, should be detailed here</p>			
<p>An Impact Assessment was done when the Policy was adopted by Somerset Council 14/12/2022 which approved the increases</p>			

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 as set out in the 'Policy statement on rents for social housing'<sup>1</sup>, which stated that social housing rents would rise by CPI+1% between 2020 and 2025. This has since been extended to 2026. The government has confirmed that this will apply for 2025/26 meaning that our rent will increase by 2.7% next year. We have also aligned some of our service charge increases to this. This is a much lower increase than last year's increase of 7.7% when CPI was higher

Tenant profiling data. We have data that shows us that 27% of our tenants are disabled (average across inhouse landlord and Homes in Sedgemoor). We also have data that shows us the age of our tenants, ethnicity and the proportion of tenants who claim benefits (which is relevant as most of the charges including rent and most service charges are benefit eligible). We have a project in place to contact our tenants in 2025/26 to update our tenant data and our records to allow us to better target tenants and support them.

**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. Consultation has also taken place on Somerset Council landlord's changes to service charges for cleaning of communal areas (targeted consultation and all tenants written to). Consultation on the new Housing Related Support service has taken place with tenants of the Extra Care Housing schemes.

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<sup>1</sup> [Policy statement on rents for social housing - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/social-housing-rent-control)

## 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><b>Summary</b></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 tenants is marginally above inflation and is required to ensure the housing service can continue to deliver services for tenants and provide support.</p> <p>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.</p> <p>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.</p> <p>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</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

rise.

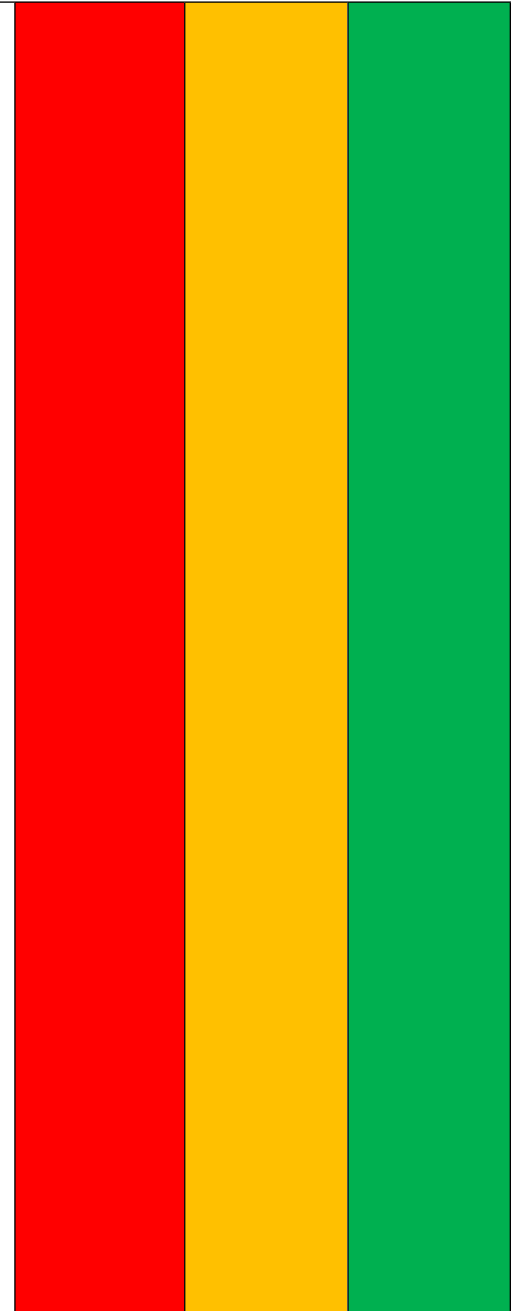
However, all people on low incomes will (if they fulfil the conditions) qualify for housing benefit, universal credit or pension credit and will therefore be protected from significant negative financial impacts of both the rent and service charges (which are eligible for benefits).

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. Homes in Sedgemoor provide similar support, albeit through patch based teams. The HRA business plan makes provision for an amount of bad debt.

We also have a hardship fund set aside to support inhouse tenants who qualify and are struggling to pay rent. Homes in Sedgemoor have similar arrangements in place for customers in the North. Work with community teams also helps to fulfil this support.

Training on ‘reasonable adjustments’ has been provided to all inhouse frontline housing staff in November 2024 to January 2025 and we have updated our Reasonable Adjustments Policy. [Landlord Service Policies](#)

The paper also proposes that the position previously taken by Taunton

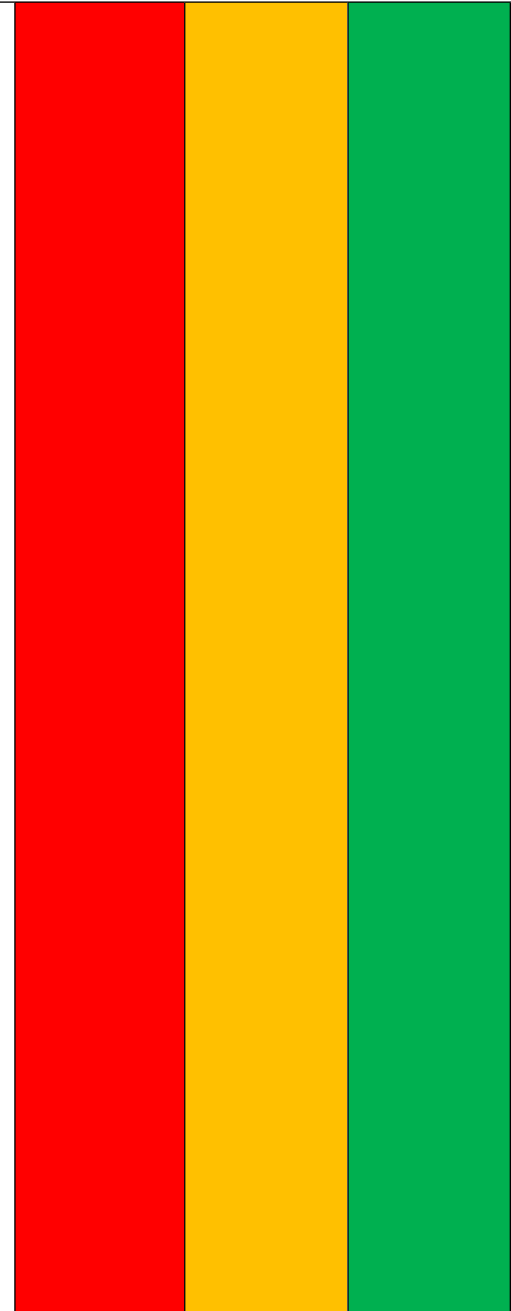


Deane Borough Council in December 2015 to subsidise and pay for the lifeline service for all of our tenants that are on benefits should cease for new tenants from 1<sup>st</sup> April 2025. The reasons for this is that it is common practice to apply this charge and Homes in Sedgemoor and all other Housing Providers in Somerset charge tenants for this whether they are on benefits or not. The lifeline service is part of the package that comes with all Sheltered Housing and Extra Care Housing and as with other landlords is a requisite part of those services. We propose to keep the subsidy in place for all existing inhouse landlord tenants on benefits, but require all new tenants to pay this from April. We will ensure that on viewing the property and before signing the tenancy agreements that tenants are fully sighted on this requirement.

Despite all of the above, we recognise that some tenants at Kilkenny Court Extra Care Housing and Broomfield House Sheltered Housing schemes will face higher service charge increases than normal. Although most of these tenants are on benefits and the charges will largely be covered through benefits, not all of the charges are benefit eligible and 16 of these tenants are self-funders. We have therefore identified actions in the action plan below to mitigate this.

In Homes in Sedgemoor properties there are 6 schemes that will significantly be affected by an uplift in the communal heating service charge. Their current utility contract ends on the 31st March 2025. Predictions for 2025/26 are anticipating service charge of £165k is based upon the average consumption over the last three years and the forecast unit charges for 2025/26. The average weekly charge in these settings is anticipated to be between £11 and £19 per week per household and this includes heating of the tenants' individual properties.

Calculations over the previous 4 years indicate that customers in these six settings have been significantly underpaying for their heating charges since 2022/23. Under recovery in 22/23, 23/24 and 24/25 has






	<p>been calculated as £160k, £144k and £44k respectively. Continuing to under recover is not sustainable.</p> <p>Support and options to mitigate are being put in place by Homes in Sedgemoor.</p>			
<p><b>Age</b></p>	<p>45% of Somerset Council directly managed tenants and 41% of Homes in Sedgemoor tenants are aged over 60 (overall this is 43.4% of our tenants)</p> <p>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.</p> <p>Additional housing supply is addressed through new development (afforded from the rent) which will provide an increased choice of affordable homes, size and tenure, providing housing options for all age groups. A proportion of our properties are also set aside for Sheltered Housing (which targets those over 55 or 60 and those with disabilities) and Extra Care Housing (for those with assessed care needs).</p> <p>Improvements in energy efficiency will help to protect tenants, whatever their age or the hardships they experience, from fuel poverty. 65% of inhouse tenants and 75% of Homes in Sedgemoor tenants are in receipt of help with housing costs i.e. Housing Benefit or Universal Credit. However, for those in Sheltered Housing and for Extra Care Housing this percentage increases considerably (for example this increases to 72% and 77% respectively for the inhouse landlord).</p> <p>We note that the majority of tenants at Broomfield House (Sheltered) and Kilkenny Court (Extra Care) that are worst affected by service charge increases are older tenants and that 16 of these tenants are self-funders and therefore will not be able to rely on benefits to cover the increase. Also for new tenants that use the lifeline service, this will no longer be subsidised by the landlord and these tenants will be required to pay the £3.65pw charge themselves. All sheltered and extra care tenants have this service as part of their tenancy and again</p>	<p>⊗</p>	<p>□</p>	<p>□</p>

	<p>it is more heavily used by older tenants.</p> <p>For Homes in Sedgemoor properties, heating charge increases will predominantly affect customers living in extra care (98) and sheltered housing schemes (51). 81 tenants in a General Needs setting (La Ciotat House) will also be impacted by increased Heating Service Charges. The heating charge is not benefit eligible and therefore mitigations such as improvements in energy efficiency at schemes and access to hardship funds will be targeted at these customers where assessed income is challenging. Warm spaces are available to support wellbeing and to reduce isolation particularly for older people.</p>			
<p><b>Disability</b></p>	<p>Approximately 24% of Somerset Council directly managed tenants (32% in Sedgemoor) have declared that either they or the other person on the tenancy has a disability. Overall, this is 27.3%. 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 and service charge 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. The inhouse service provides advice, help and support via our specialist officers and through working with Citizens Advice. Similar support is offered for tenants of Homes in Sedgemoor. The inhouse team also funds MIND to provide mental health support to our tenants and the levels of rent allow us to fund this.</p> <p>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>	<p>⊗</p>	<p>□</p>	<p>□</p>

<b>Gender reassignment</b>	<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"> <li>• There is not expected to be any particular negative impact on this specific group</li> </ul>	□	⊗	□																				
<b>Marriage and civil partnership</b>	<ul style="list-style-type: none"> <li>• Tenants will benefit from the overall investment in council housing. There is not expected to be any particular negative impact on this specific group.</li> </ul>	□	⊗	□																				
<b>Pregnancy and maternity</b>	<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"> <li>• There is not expected to be any particular negative impact on this specific group.</li> </ul>	□	⊗	□																				
<b>Race and ethnicity</b>	<p>The table below provides information on the number of council tenants by ethnicity as at December 2024:</p> <table border="1" data-bbox="548 1090 1547 1321"> <thead> <tr> <th>Ethnic Background</th> <th>SC direct managed</th> <th>HiS</th> <th>Overall</th> </tr> </thead> <tbody> <tr> <td>White British</td> <td>63.5%</td> <td>71.6%</td> <td>66.7%</td> </tr> <tr> <td>BME</td> <td>6.6%</td> <td>4.8%</td> <td>5.9%</td> </tr> <tr> <td>No data provided</td> <td>3.2%</td> <td>10.7%</td> <td>6.1%</td> </tr> <tr> <td>Other</td> <td>26.7%</td> <td>12.9%</td> <td>21.4%</td> </tr> </tbody> </table> <p>Tenants will benefit from the overall investment in council housing.</p>	Ethnic Background	SC direct managed	HiS	Overall	White British	63.5%	71.6%	66.7%	BME	6.6%	4.8%	5.9%	No data provided	3.2%	10.7%	6.1%	Other	26.7%	12.9%	21.4%	□	⊗	□
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	<p>Wider tenant participation and engagement and improved Communications have been evidenced in 2024/25 and will continue to be a focus in 2025/26 and will increase the proportion of tenants providing feedback to inform service improvements.</p>			
<b>Religion or belief</b>	<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>	□	⊗	□
<b>Sex</b>	<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>	□	⊗	□
<b>Sexual orientation</b>	<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>	□	⊗	□
<b>Armed Forces (including serving personnel, families and veterans)</b>	<p>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 housing. This applies to all landlords in Somerset (of which council owned stock is one).</p>	□	⊗	□

	<p>There are plans to review this again through the Homefinder Management Board in January 2025 to reflect recent new guidance from government, which may result in further weighting for armed forces applicants.</p> <p>There is not expected to be any particular negative impact on this specific group</p>			
<p><b>Other, e.g. carers, low income, rurality/isolation, etc.</b></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. 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"> <li>· Publish clear information on rent which helps tenants to manage their own finances;</li> <li>· Signpost tenants to a relevant benefit agency to help ensure they are maximising their income to meet their living costs;</li> <li>· Take action to raise the awareness of accessing a range of welfare benefits;</li> <li>· Provide the opportunity for tenants to access direct support to check they are in receipt of the welfare benefits they are entitled to claim. <ul style="list-style-type: none"> <li>• Offer access to the landlord hardship fund for those tenants that are struggling to afford rent and who qualify for this fund</li> </ul> </li> </ul>			

**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.

<b>Action taken/to be taken</b>	<b>Date</b>	<b>Person responsible</b>	<b>How will it be monitored?</b>	<b>Action complete</b>
<p>Engage with tenants at directly affected schemes when rent and service charges are sent to their addresses, particularly the tenants that are self-funders and provide the following support:</p> <ul style="list-style-type: none"><li>- Review benefit eligibility for each household, offering specialist advice from housing debt and benefit officer</li><li>- Consider net impact of landlord increase in rent / service charges and the council reduction in the core care support charge to identify any tenants that are particularly adversely affected.</li><li>- Signpost tenants to hardship fund where their circumstances qualify</li><li>- Consider alternative options (e.g. move to a more affordable scheme) if cost is prohibitive</li><li>- Provide drop-ins at affected schemes to explain rationale for service charge increases</li><li>- Provide tailored communication to affected customers</li></ul>	31/03/2025	Dee Bradley and Sarah Wooton (SC); Jemma Birtley and Ian Richards (HiS)		<input type="checkbox"/>
<p>Review heating and utility costs at schemes with communal heating to ensure that the breakdown between personal charges (for heating and provision of hot water to tenants own flats which is not benefit eligible) and communal charge (for the communal areas and is benefit eligible) is reflective of use so that tenants on benefits can claim for the communal elements.</p>	31/03/2025	Simon Lewis, Kerry Prisco;  Ben Lane, Emma Birtley (HiS)		<input checked="" type="checkbox"/>
<p>Undertake review of heating system, insulation and energy efficiency at schemes with communal heating to identify opportunities to reduce future utilities costs</p>	31/03/2025	Ian Candlish Rik Saunders (HiS)		<input type="checkbox"/>

Provide an information leaflet to go out with the rent and service charge letter to explain all charges and signpost to advice and support. Offer this in alternative languages plus verbal support through the translation service for tenants whose first language is not English or may have additional communication requirements.	20/03/2025	Simon Lewis Ben Lane / Claire Tough (HiS)		<input type="checkbox"/>
Retain the landlord funded subsidy for all existing inhouse tenants on benefits for the Lifeline Service. Only apply the charge (£3.65pw) without subsidy to new tenants from 1 <sup>st</sup> April. Ensure that affordability assessments are undertaken as part of tenancy sign up and that tenants are fully aware of the requirement to pay this.	01/04/2025	Stephen Boland		<input type="checkbox"/>

**If negative impacts remain, please provide an explanation below.**

<b>Completed by:</b>	<b>Simon Lewis</b>
<b>Date</b>	<b>24/12/24</b>
<b>Signed off by:</b>	<b>Simon Lewis</b>
<b>Date</b>	<b>24/12/24</b>
<b>Equality Lead sign off name:</b>	<b>Tom Rutland</b>
<b>Equality Lead sign off date:</b>	<b>15/01/2025</b>
<b>To be reviewed by: (officer name)</b>	<b>Simon Lewis</b>
<b>Review date:</b>	<b>30/4/25</b>