

Appendix D - HRA Equality Impact Assessment



Somerset Equality Impact Assessment

Organisation prepared for

Somerset West and Taunton Council

Version

1

Date Completed

January 2021

Description of what is being impact assessed

Somerset West and Taunton Council (SWT) Housing Revenue Account (HRA) updated (2021) 30 year Business Plan

The strategic objectives of the business plan are to: Deliver more new homes; Provide great customer service; and Improve existing homes and neighbourhood.

HRA budget setting 2021/22

The HRA budget setting report enables the council to set a balanced budget for 2021/22 that reflects SWT's HRA business plan and takes into account councillor's priorities. The report provides an overview of the finances for the HRA. It covers both HRA revenue and housing capital spending, highlighting the inter-relationships between the two.

Council housing rents for 2021/2022

To increase council housing rents to ensure continued investment in the management, maintenance and development of council housing stock to ensure the needs of existing and potential tenants are met, and to provide enhanced support for families and communities experiencing hardship.

HRA fees and charges for 2021/2022

To increase the fees and charges for 2021/2022 for the HRA to ensure sufficient financial resources are in place to deliver the services.

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

Data:

- Major changes in national rent policy 2019/20;
- Somerset West and Taunton's Full Council decision on council housing rent policy - February 2021; and
- Tenant profiling data.

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

Engagement:

- Consultation and regular meetings with the SWT's Tenants' Strategic Board - January 2021;
- As part of our consultation on the proposed changes the Council contacted the following groups, who were identified as having an interest in the proposals for change:

- Compass Disability Services, Taunton (Disability);
- Age UK, Somerset (Age);
- Mind in Somerset, Taunton (Disability);
- Diversity Voice, Somerset (All);
- Moving Together in Somerset (Age);
- RAISE, Somerset (Race);
- Stand Against Racism and Inequality, Somerset (Race); and
- Caring Minds CIC, Taunton (Carers) – December 2020.

In summary the groups were invited to provide comment and feedback on the following:

- More council homes to be built to zero carbon standards;
- Additional investment in safety (for example fire safety and electrical safety) works to ensure we meet relevant standards, regulatory requirements, inspection and testing;
- Consumer Price Index (at September 2020) + 1% increase in council housing rent; and
- Consumer Price Index (at September 2020) + 1% increase in council housing fees and charges (for example the grounds maintenance charge).

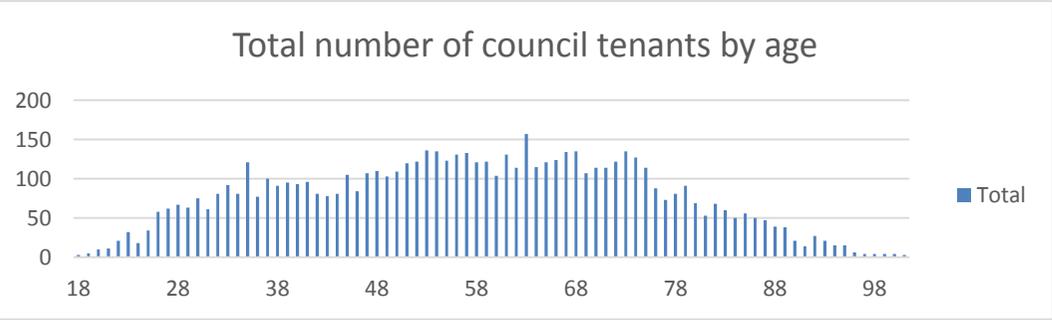
Specific questions requiring a response:

1. Any indication or evidence that any part of the proposed changes could discriminate, directly or indirectly?
2. Any potential for the proposed changes to adversely affect equality of opportunity for all?

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 and service charges as well as sets the budgets that apply to the housing and garage stock. 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.</p> <p>Increasing rent and service charges and setting budgets by the amounts specified in the report will have a neutral effect on protected groups. The cost rise to tenants itself is a relatively modest one.</p> <p>The housing service has an ambitious new build social development programme to add zero carbon homes to its housing stock. This will require significant investment and the need to use rental income to fund interest payments on borrowing and the repayment of debt.</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 planned programme of expenditure, adaptations and routine repairs in place.</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</p>		<p style="text-align: center;">✓</p>	

	<p>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 will tend to have a lower average income than non-disabled people and therefore will be disproportionately adversely affected by any rent and service charge rise. However people on low incomes will (if they fulfil the conditions) qualify for housing benefit or Universal Credit and will therefore be insulated from negative financial effects.</p> <p>It is understood that there may be an increase in the level of rent arrears as a result of the shift to Universal Credit, however that risk is being mitigated by the housing service working closely with Citizens Advice to provide advice and support services to Universal Credit claimants. The housing service also 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.</p> <p>The HRA business plan makes provision for an amount of bad debt.</p>																																																																																					
<p>Age</p>	<p>The graph below provides the number of council tenants by age:</p>  <p style="text-align: center;">Total number of council tenants by age</p> <table border="1"> <caption>Approximate data from the bar chart</caption> <thead> <tr> <th>Age Group</th> <th>Number of Tenants</th> </tr> </thead> <tbody> <tr><td>18-20</td><td>10</td></tr> <tr><td>20-22</td><td>15</td></tr> <tr><td>22-24</td><td>20</td></tr> <tr><td>24-26</td><td>30</td></tr> <tr><td>26-28</td><td>40</td></tr> <tr><td>28-30</td><td>50</td></tr> <tr><td>30-32</td><td>60</td></tr> <tr><td>32-34</td><td>70</td></tr> <tr><td>34-36</td><td>80</td></tr> <tr><td>36-38</td><td>90</td></tr> <tr><td>38-40</td><td>100</td></tr> <tr><td>40-42</td><td>110</td></tr> <tr><td>42-44</td><td>120</td></tr> <tr><td>44-46</td><td>130</td></tr> <tr><td>46-48</td><td>140</td></tr> <tr><td>48-50</td><td>150</td></tr> <tr><td>50-52</td><td>160</td></tr> <tr><td>52-54</td><td>170</td></tr> <tr><td>54-56</td><td>180</td></tr> <tr><td>56-58</td><td>190</td></tr> <tr><td>58-60</td><td>200</td></tr> <tr><td>60-62</td><td>190</td></tr> <tr><td>62-64</td><td>180</td></tr> <tr><td>64-66</td><td>170</td></tr> <tr><td>66-68</td><td>160</td></tr> <tr><td>68-70</td><td>150</td></tr> <tr><td>70-72</td><td>140</td></tr> <tr><td>72-74</td><td>130</td></tr> <tr><td>74-76</td><td>120</td></tr> <tr><td>76-78</td><td>110</td></tr> <tr><td>78-80</td><td>100</td></tr> <tr><td>80-82</td><td>90</td></tr> <tr><td>82-84</td><td>80</td></tr> <tr><td>84-86</td><td>70</td></tr> <tr><td>86-88</td><td>60</td></tr> <tr><td>88-90</td><td>50</td></tr> <tr><td>90-92</td><td>40</td></tr> <tr><td>92-94</td><td>30</td></tr> <tr><td>94-96</td><td>20</td></tr> <tr><td>96-98</td><td>10</td></tr> </tbody> </table>	Age Group	Number of Tenants	18-20	10	20-22	15	22-24	20	24-26	30	26-28	40	28-30	50	30-32	60	32-34	70	34-36	80	36-38	90	38-40	100	40-42	110	42-44	120	44-46	130	46-48	140	48-50	150	50-52	160	52-54	170	54-56	180	56-58	190	58-60	200	60-62	190	62-64	180	64-66	170	66-68	160	68-70	150	70-72	140	72-74	130	74-76	120	76-78	110	78-80	100	80-82	90	82-84	80	84-86	70	86-88	60	88-90	50	90-92	40	92-94	30	94-96	20	96-98	10			
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All tenants will benefit from the overall investment in council housing.

No group is discriminated against in the allocation of council housing (or in renting garages from the council). All groups benefit equally.

Additional housing supply will provide an increased choice of affordable housing type, 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.

The table below provides information on the number of council tenants in receipt of housing benefit (HB) or universal credit (UC):

Benefit type	Count of tenancies
UC	1425
Self-funder	2095
HB	2057
Total	5577

Note: Self- funder = Not in receipt of housing benefit or universal credit. Approximately 62% of our existing tenants are in receipt of help with housing costs i.e. Housing Benefit or Universal Credit. The housing service provides additional specialised help to support all tenants into employment.

Communications on any complex changes may disproportionately worry tenants in sheltered/supported housing.

Disability

The table below provides information (held within our Housing System – tenant profiling information) on the types and number of disabilities reported by council tenants:

Disability	Count of Disability
ALCOHOL RELATED PROBLEM	7
DEMENTIA	23
DISABLED	705
DISABLED HEARING IMPAIRMENT	214
DISABLED LEARN DIFFICULTY	65
DISABLED MENTAL HEALTH	350
DISABLED MOBILITY	671
DISABLED (OTHER)	1106
DISABLED VISUAL IMPAIRMENT	130
DRUG RELATED PROBLEM	2
DISABLED SPEECH IMPAIRMENT	7
MOBILITY SCOOTER	57
REGISTERED DISABLED	86
TERMINALLY ILL	1
UNABLE TO READ OR WRITE	4
VULNERABLE	187
WHEELCHAIR USER	59

As has been stated, it could be argued disabled adults are more likely to be living in low-income households than non-disabled adults. 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 rents is likely to specifically impact this protected characteristic. However, we believe that as the rises proposed are modest; that as the welfare benefit system should be able to protect people; and that as we can provide advice, help and support both



	<p>from ourselves and through working with Citizens Advice, any impact will be low.</p> <p>Tenants will benefit from the overall investment in council housing.</p> <p>Specific provision for a range of new adapted properties will be made to provide a housing choice for those with a disability.</p> <p>Eligible tenants will particularly benefit from the provision of disabled adaptations (major and minor) to existing council housing.</p>															
Gender	<p>The table below provides information on the number of council tenant/s by gender:</p> <table border="1" data-bbox="495 746 972 1015"> <thead> <tr> <th>Gender</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>FEMALE</td> <td>3388</td> </tr> <tr> <td>MALE</td> <td>2037</td> </tr> <tr> <td>NOT ANSWERED</td> <td>6</td> </tr> <tr> <td>NOT KNOWN</td> <td>1008</td> </tr> <tr> <td>Grand Total</td> <td>6439</td> </tr> </tbody> </table> <p>Note: Not known: Is where our records show that gender fields within our housing system have not been had the information entered.</p> <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>	Gender	Total	FEMALE	3388	MALE	2037	NOT ANSWERED	6	NOT KNOWN	1008	Grand Total	6439			
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Marriage and civil partnership	<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>			<input checked="" type="checkbox"/>																																
Pregnancy and maternity	<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> <p>There is not expected to be any particular negative impact on this specific group.</p>			<input checked="" type="checkbox"/>																																
Race and ethnicity	<p>The table below provides information on the number of council tenants by ethnicity:</p> <table border="1" data-bbox="495 826 1021 1437"> <thead> <tr> <th data-bbox="495 826 797 863">Ethnicity</th> <th data-bbox="797 826 1021 863">Count</th> </tr> </thead> <tbody> <tr><td data-bbox="495 863 797 900">ANY OTHER</td><td data-bbox="797 863 1021 900">1</td></tr> <tr><td data-bbox="495 900 797 936">ASIAN - BANGLADESHI</td><td data-bbox="797 900 1021 936">5</td></tr> <tr><td data-bbox="495 936 797 973">ASIAN - INDIAN</td><td data-bbox="797 936 1021 973">2</td></tr> <tr><td data-bbox="495 973 797 1010">ASIAN BRITISH</td><td data-bbox="797 973 1021 1010">5</td></tr> <tr><td data-bbox="495 1010 797 1046">ASIAN OTHER</td><td data-bbox="797 1010 1021 1046">15</td></tr> <tr><td data-bbox="495 1046 797 1083">BLACK AFRICAN</td><td data-bbox="797 1046 1021 1083">14</td></tr> <tr><td data-bbox="495 1083 797 1120">BLACK BRITISH</td><td data-bbox="797 1083 1021 1120">3</td></tr> <tr><td data-bbox="495 1120 797 1157">BLACK CARIBBEAN</td><td data-bbox="797 1120 1021 1157">6</td></tr> <tr><td data-bbox="495 1157 797 1193">BLACK OTHER</td><td data-bbox="797 1157 1021 1193">4</td></tr> <tr><td data-bbox="495 1193 797 1230">CHINESE</td><td data-bbox="797 1193 1021 1230">2</td></tr> <tr><td data-bbox="495 1230 797 1267">GYPSY</td><td data-bbox="797 1230 1021 1267">2</td></tr> <tr><td data-bbox="495 1267 797 1303">MIXED OTHER</td><td data-bbox="797 1267 1021 1303">9</td></tr> <tr><td data-bbox="495 1303 797 1340">MIXED WB AFRICAN</td><td data-bbox="797 1303 1021 1340">6</td></tr> <tr><td data-bbox="495 1340 797 1377">MIXED WB</td><td data-bbox="797 1340 1021 1377"></td></tr> <tr><td data-bbox="495 1377 797 1414">CARIBBEAN</td><td data-bbox="797 1377 1021 1414">4</td></tr> </tbody> </table>	Ethnicity	Count	ANY OTHER	1	ASIAN - BANGLADESHI	5	ASIAN - INDIAN	2	ASIAN BRITISH	5	ASIAN OTHER	15	BLACK AFRICAN	14	BLACK BRITISH	3	BLACK CARIBBEAN	6	BLACK OTHER	4	CHINESE	2	GYPSY	2	MIXED OTHER	9	MIXED WB AFRICAN	6	MIXED WB		CARIBBEAN	4		<input checked="" type="checkbox"/>	
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Religion or belief	<p>Tenants will benefit from the overall investment in council housing.</p> <p>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>			<input checked="" type="checkbox"/>														

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>			<input checked="" type="checkbox"/>
Sexual orientation	<p>Tenants will benefit from the overall investment in council housing.</p> <p>Investment in our communities will ensure information about our services is accessible so that people can benefit from all our activities. 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>			<input checked="" type="checkbox"/>
Other, e.g. carers, veterans, homeless, low income, rurality/isolation, etc.	<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 and services charges will be applied across our housing stock. This increase will have a neutral effect on protected groups. The cost rise to tenants is a relatively modest one 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; 		<input checked="" type="checkbox"/>	

	<ul style="list-style-type: none"> • 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 to access direct support in checking they are in receipt of the welfare benefits they are entitled to claim. 			
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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
Communications on any complex changes may disproportionately worry tenants in sheltered/supported housing. We will communicate with all tenants to explain any significant changes affecting them and what we are investing in.	2021 - ongoing	Supported Housing Specialist.	Regular meetings and wider engagement with stakeholders.	<input type="checkbox"/>
There is potential to alienate specific ethnic groups when housing is identified for regeneration/redevelopment. We will consider re-supply of appropriate housing to meet the needs of ethnic groups as part of any future regeneration/ redevelopment.	2021 - ongoing	Development and Regeneration Lead	Regular meetings and wider engagement with stakeholders.	<input type="checkbox"/>
Those for whom English is not their first language are not made fully aware of changes. We will offer translation of communication into alternative languages. We will engage with minority groups using existing tenant involvement channels.	2021 - ongoing	Case Management Lead Tenancy Management and Supported Housing Specialist; Housing Performance Team.	Regular meetings and wider engagement with stakeholders.	<input type="checkbox"/>

<p>There is potential to alienate religious or belief groups when housing is identified for regeneration/redevelopment. We will consider re-supply of appropriate housing to meet the needs of any religious or belief groups as part of any future regeneration/redevelopment scheme.</p>	<p>2021 - ongoing</p>	<p>Development and Regeneration Lead</p>	<p>Regular meetings and wider engagement with stakeholders.</p>	<p><input type="checkbox"/></p>
<p>The increase rent and service charges will be applied across our housing stock. The cost rise to tenants is a relatively modest one 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 to access direct support in checking they are in receipt of the welfare benefits they are entitled to claim. 	<p>2021 – ongoing</p>	<p>Case Management Lead Tenancy Management and Supported Housing Specialist</p>	<p>Regular meetings and wider engagement with stakeholders.</p>	<p><input type="checkbox"/></p>
<p>The proposed budgets for rental income in 2021/22 make a provision for bad debt.</p>	<p>2021/22</p>		<p>Regular meetings.</p>	

