

## Appendix C - HRA Equality Impact Assessment



# Somerset Equality Impact Assessment

Organisation prepared for

Somerset West and Taunton Council

Version

1

Date Completed

December 2021

Description of what is being impact assessed

### **Somerset West and Taunton Council (SWT) Housing Revenue Account (HRA) updated (2021/22) 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 2022/23**

The HRA budget setting report enables the council to set a balanced budget for 2022/23 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 2022/2023**

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 2022/2023**

To increase the fees and charges for 2022/2023 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:

- Regulator of Social Housing – Limit on annual rent increases 2022-23;
- 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 – December 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);
  - Moving Together in Somerset (Age);
  - RAISE, Somerset (Race); and
  - Caring Minds CIC, Taunton (Carers).

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 property repairs;
- 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 2021) + 1% increase in council housing rent; and
- Consumer Price Index (at September 2021) + 1% increase in council housing fees and charges (for example the grounds maintenance charge).

Specific questions requiring a response:

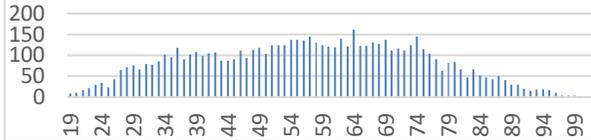
1. Any indication or evidence that any part of the proposed changes could discriminate, directly or indirectly?
2. Any potential for the proposed changes to adversely affect equality of opportunity for all?

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><b>Summary</b></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. Of the 347 affordable homes in the Council's development programme 115 homes will be zero carbon in occupation on the first letting and other homes will be zero carbon if customers use green tariffs or when the grid decarbonises. All homes in development will provide significantly lower fuel bills to customers than other similar sized Council homes. This development programme will require significant investment and we will 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</p>			

	<p>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 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. In addition, people who have difficulties with daily activities and or mobility may qualify for Disability Living Allowance or its replacement Personal Independence Payment.</p> <p>It is understood there may be an increase in the level of rent arrears as a result of the continuing shift 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 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 – currently 65% of our existing tenants are in receipt of full or partial help with paying their housing costs i.e. housing benefit or universal credit.</p> <p>The HRA business plan makes provision for an amount of bad debt.</p>			
<b>Age</b>	<p>The graph below provides the number of council tenants by age:</p>		<input checked="" type="checkbox"/>	



All tenants will benefit from the overall investment in council housing.

No group is discriminated against in the allocation of council housing (or in the allocation of garages). 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) at 07/12/21:

Benefit type	Count of tenancies
UC	1739
Self-funder	1959
HB	1908
<b>Total</b>	<b>5606</b>

Note: Self- funder = Not in receipt of housing benefit or universal credit.

Approximately 65% of our existing tenants are in receipt of help with housing costs i.e. Housing Benefit or Universal Credit.

	<p>Somerset West and Taunton Council makes provision to help residents into employment.</p> <p>Communications on any plans that substantially affect tenants i.e. modernisations or improvement works to their home or estate may disproportionately worry tenants in sheltered or supported housing.</p>			
<p><b>Disability</b></p>	<p>Approximately 20% of our current tenants have declared to us that they have a disability. The types of disability declared include for example: dementia, hearing, mobility, visual etc.</p> <p>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, we believe our proposed rent increase is modest 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 are therefore assessing any impact as low.</p> <p>Tenants will benefit from the overall financial 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>Our ongoing investment of over £300,000.00 in disabled facilities and other adaptations continues and is not affected by the report proposals.</p>			<input checked="" type="checkbox"/>

<b>Gender</b>	<p>The table below provides information on the number of council tenants by gender:</p> <table border="1" data-bbox="495 316 972 552"> <thead> <tr> <th>Gender</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>FEMALE</td> <td>4201</td> </tr> <tr> <td>MALE</td> <td>2482</td> </tr> <tr> <td>OTHER</td> <td>7</td> </tr> <tr> <td><b>Grand Total</b></td> <td><b>6690</b></td> </tr> </tbody> </table> <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	4201	MALE	2482	OTHER	7	<b>Grand Total</b>	<b>6690</b>			<input checked="" type="checkbox"/>
Gender	Total													
FEMALE	4201													
MALE	2482													
OTHER	7													
<b>Grand Total</b>	<b>6690</b>													
<b>Marriage and civil partnership</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>			<input checked="" type="checkbox"/>										
<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> <p>There is not expected to be any particular negative impact on this specific group.</p>			<input checked="" type="checkbox"/>										

**Race and ethnicity**

The table below provides information on the number of council tenants by ethnicity:

<b>Ethnicity</b>	<b>Count</b>
ANY OTHER	6
ASIAN - BANGLADESHI	5
ASIAN - INDIAN	2
ASIAN BRITISH	8
ASIAN OTHER	14
BLACK AFRICAN	13
BLACK BRITISH	2
BLACK CARIBBEAN	6
BLACK OTHER	5
CHINESE	2
GYPSY	2
MIXED OTHER	16
MIXED WB AFRICAN	7
MIXED WB CARIBBEAN	4
NOT KNOWN	2037
REFUSED	7
TRAVELLER	3
WHITE BRITISH	4255
WHITE IRISH	33
WHITE OTHER	263
<b>Grand Total</b>	<b>6690</b>

Tenants will benefit from the overall investment in council housing.

Wider tenant participation and engagement will increase the proportion of tenants providing feedback to inform service improvements.



	<p>Any proposed re-development of the housing stock could potentially have a negative impact on a specific group of tenants, depending upon the location.</p> <p>Communication about the business plan may not fully reach those for whom English is not their first language.</p>			
<b>Religion or belief</b>	<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"/>
<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>			<input checked="" type="checkbox"/>
<b>Sexual orientation</b>	<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.**

Although the service is proposing a reduction in support for voluntary sector organisations, for example: Inspire to Achieve and Citizens Advice, these have been offset by an increased investment in benefit and welfare staff in the last 18 months and the introduction of a Council employment hub scheme which will therefore replace the existing service provided by Inspire to Achieve. In addition, we will encourage our One Team Coordinators to work with funding agencies to encourage financial bids to provide projects and support for vulnerable tenants to offset the reductions. We know that many of the agencies our One Teams have worked closely with this year were successful in leveraging money and projects into communities. We therefore believe that our offer to tenants will be at least as good as they experienced last year.

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 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.

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:

- 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.



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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 or supported housing. We will communicate with all tenants to explain any significant changes affecting them.	2022 - 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 the re-supply of appropriate housing to meet the needs of ethnic groups as part of any future regeneration/ redevelopment.	2022 - 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.	2022 - 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 the 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>2022 - 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 to 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"> <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; and</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.</li> </ul>	<p>2022– 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 2022/23 make provision for bad debt.</p>	<p>2022/23</p>	<p>Case Management Lead – Finance</p>	<p>Regular meetings. Annual review of the HRA financial model.</p>	
<p>The impact of both investment prioritisation and improvements to service delivery will be assessed in more detail as part of an annual planning process in order to identify more precisely the potential for both negative and positive impacts of the business plan.</p>	<p>2022 – ongoing</p>	<p>Director of Housing</p>	<p>Annual review of the HRA business plan.</p>	

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

N/a

<b>Completed by:</b>	Stephen Boland
<b>Date</b>	December 2021
<b>Signed off by:</b>	
<b>Date</b>	December 2021
<b>Equality Lead/Manager sign off date:</b>	
<b>To be reviewed by: (officer name)</b>	Stephen Boland
<b>Review date:</b>	31 <sup>st</sup> March 2023