



## Equality Impact Assessment Form

Version 3 (Jan 2018)

What is being analysed?	<b>Somerset Strategic Housing Framework</b>
Name body responsible for the analysis	<b>Somerset Strategic Housing Officers Group (SSHG)</b>

### Sources of information used in this impact assessment

The Somerset Strategic Housing Framework sets out a sub-regional housing strategy framework for Somerset to be complemented by a multi-agency delivery plan and individual District Action Plans. This framework approach enables the coordination of partner interventions supported by specific actions within individual local authority areas supported by the overarching common priorities and ambitions identified within the strategic framework.

The draft SSHF is being drawn up by a project team consisting of representatives from the following organisations:

- Mendip District Council
- Sedgemoor District Council
- South Somerset District Council
- Taunton Deane Borough Council

- West Somerset Council
- Exmoor National Park Authority
- Somerset County Council – Somerset Strategic Planning Conference
- Somerset County Council – Public Health
- Somerset County Council – Adult Social Care

The process of developing this Framework began in 2017. We produced a 'Housing Benchmarking Report' that established key data and facts relating to the local housing market. A number of partners provided help, including Somerset Intelligence Partnership, Public Health and Town Planners. We used the Benchmarking Report and other evidence to produce district based and county wide Housing Market Profiles. These were published in July 2017 and identified key facts, issues, challenges and opportunities. On July 8<sup>th</sup> 2017 we facilitated a Stakeholder Engagement Event where 100+ people representing the local housing sector and associated services met to discuss key topics of concern, and to suggest possible priorities and ideas. All this background material (housing market profiles, speaker presentations, workshop material) can be accessed via Mendip District Council (<http://www.mendip.gov.uk/somersethousingstrategy>). We have now gathered and analysed all this information to shape the content of this draft Somerset Strategic Housing Framework which seeks to identify the key priorities and ambitions for housing within Somerset.

Other sources of background information that supports this analysis include:

- Somerset Joint Strategic Needs Assessment <http://www.somersetintelligence.org.uk/jsna>
- Somerset Health & Wellbeing Strategy  
[www.somerset.gov.uk/EasySiteWeb/GatewayLink.aspx?allId=45804](http://www.somerset.gov.uk/EasySiteWeb/GatewayLink.aspx?allId=45804)
- Strategic Housing Market Assessments <https://www.sedgemoor.gov.uk/shma>
- Somerset Homeless Strategy [https://www.southsomerset.gov.uk/media/628572/homeless\\_strategy\\_appendix\\_1.pdf](https://www.southsomerset.gov.uk/media/628572/homeless_strategy_appendix_1.pdf)
- Somerset Youth Housing Strategy & Action Plan  
<https://www.bing.com/search?q=somerset+youth+housing+strategy+and+action+plan&src=IE-SearchBox&FORM=IESR3N>
- Avon & Somerset Rough Sleepers Steering Group Action Plan  
[https://www.southsomerset.gov.uk/media/677668/ap\\_homeless\\_strategy\\_2013.xlsx](https://www.southsomerset.gov.uk/media/677668/ap_homeless_strategy_2013.xlsx)
- Somerset Gypsy and Traveller Accommodation Assessment Update

<https://www.westsomersetonline.gov.uk/getattachment/Planning---Building/Planning-Policy/Evidence-Base-Information/Housing---Community-Evidence/Gypsy-and-Traveller-Accommodation-Assessment/Final-GTAA-update-October-2013.pdf.aspx>

- Somerset Financial Inclusion Strategy <http://www.somersetintelligence.org.uk/financial-inclusion.html>
  - Somerset Tenancy Strategy [https://www.southsomerset.gov.uk/media/677783/tenancy\\_strategy\\_v1\\_1.pdf](https://www.southsomerset.gov.uk/media/677783/tenancy_strategy_v1_1.pdf)
  - Somerset Sustainable Community Strategy  
<http://www.somerset.gov.uk/policies-and-plans/plans/somerset-minerals-plan/minerals-plan/?entryid100=57149&cord=DESC&cid=1504978&p=9>
  - Local Development Frameworks and Key Strategies  
<https://www.westsomersetonline.gov.uk/Planning---Building/Planning-Policy/Local-Development-Framework>  
<https://www.southsomerset.gov.uk/planning-and-building-control/spatial-policy/local-development-framework/>  
<http://www.mendip.gov.uk/localplan>  
<https://www.tauntondeane.gov.uk/planning-policy/taunton-deane-core-strategy/>  
<https://www.sedgemoor.gov.uk/corestrategy>
  - Somerset Dementia Strategy <http://www.somersetintelligence.org.uk/somerset-dementia-strategy-priorities-2013-2016.pdf>
  - Somerset Extra Care Housing Strategic Review  
<http://www.somersetintelligence.org.uk/downloads/Somerset%20Extra%20Care%20Housing%20Strategic%20Review%202008.pdf>
  - Somerset Growth Plan 2014 – 2020: Strategic Framework <http://www.somerset.gov.uk/EasySiteWeb/GatewayLink.aspx?allid=47709>
- Heart of the South West Productivity Strategy

The draft SSHF has been signed off by the Somerset Strategic Housing Partnership (SSHP) that consists of representation from the District Councils, County Council (Adults Social Care, Strategic Planning & Public Health), Homes & Community Agency and Registered Providers

**Identify the effect or potential effect of this policy on each of the diversity groups (Equality Act 2010). Refer to Equality Analysis Checklist if necessary.**

(PCs of marriage and civil partnership and pregnancy and maternity to be considered if relevant)

*Add new rows for repeating protected groups as required*

Protected group	Effect Positive / negative / neutral	Comments / Recommendations	Actions
Age	Positive	<p>The Somerset JSNA highlights that the population is ageing and that there will be a substantial increase in the proportion of older people in Somerset by 2025. Healthy life expectancy is not improving. The prospect is that people will be living longer but with long-term health conditions.</p> <p>The Somerset Homelessness Strategy recognises the high rate of tenancy failure amongst young people and includes actions to ensure that support will continue to be provided. The JSNA and Youth Housing Strategy (to be superseded by the Children and Young People's Plan) highlight the difficulties that young people face when trying to access housing. Housing enforcement policy can make a real difference to the quality of children's lives, especially those</p>	<p>Consult with <b>older people</b> on their housing issues, needs and support.</p> <p>Evaluate existing supported accommodation units to help inform future planning for older people.</p> <p>Develop preventative services such as minor adaptations and repairs, information advice centres and Home Improvement Agency services that will help older people remain independent in their own homes for as long as possible. Improve home from hospital arrangements and develop social prescribing. Exploit the potential of new technology. Seek to list local services available to support a person in their own home (e.g. Somerset Choices); support agencies to help. Increase the supply of housing for older people and develop the right tenures and letting plans to allocate these, keeping in mind the rural housing need of older people as well.</p> <p>Through P2i, strengthen prevention activities aimed at <b>young people</b> to better facilitate a planned progression into independent living. E.g. allow for improved access to housing advice and information, which is designed to meet the needs of younger people. Develop private rented sector access schemes to facilitate shared rented housing for single people aged under 35. E.g. Ensure there is adequate and affordable, good quality accommodation for people under 35, on the lowest level of Local Housing Allowance.</p>

		<p>who are living in poor quality, overcrowded and inappropriate accommodation.</p>	<p>Further, the Framework also seeks to achieve the following:</p> <ul style="list-style-type: none"> <li>- Support both the young people and the rural economy via the creation of sustainable rural communities by providing more affordable rural homes.</li> <li>- Develop suitable housing options for the under 35s due to welfare reform.</li> <li>- Align activities with the Somerset Growth Plan and promote the establishment of a University and apprenticeships to upskill the local labour force to provide better opportunities.</li> <li>- Housing and support services working with under 35s to have a focus on assisting people into work, and utilise initiatives such as Social Impact Bond to enable providers and landlords to build links with employment, education and training initiatives.</li> <li>- Aim to ensure all housing, but particularly rented housing (in areas where there are concentrations of poor housing standards) is safe, does not give rise to injury or illness to the occupiers, and is warm and energy efficient.</li> </ul> <p>The above actions will be coordinated by the SSHF Delivery Plan and given further consideration in the following (among others): SSHF District Action Plans, review of SCC commissioning contracts (various services), Health &amp; Wellbeing Strategy, Private Sector Housing /Housing Standards Strategies, Somerset Choices, Children &amp; Young People Plan, Registered Provider Business Plans, district based Local Plans</p>
Disability	Positive	<p>Statistics data from the Home Improvement Agency, Homefinder Somerset and Health and Wellbeing Strategy indicates that there may be a shortage of accessible housing for some</p>	<p>Through a revised jointly commissioned Home Improvement Agency and Integrated Community Equipment Service and through cooperative working between local housing authorities, public health and adult social care achieve the following:</p>

disabled people leading to a lack of choice and inappropriate housing. There are also issues in matching the correct adaptations on properties to applicant's disabilities. There are particular challenges around accommodation provision for people with mental health problems or learning disabilities.

The statistics also indicate that the independence of disabled people is restricted and that means instances of poverty, social exclusion and isolation among disabled people is higher than average, with many disabled people restricted to certain local areas.

- Maximized use of existing stock, ensuring that people are offered appropriate housing to meet their particular needs.
- Improved access to adaptations and adapted stock, and improved efficiency in the current system for accessing adaptation, aids and support.
- Include number of fully wheelchair accessible units alongside units suitable for ambulant disabled individuals in new builds.

Further, the Framework also seeks to achieve the following:

- Increase the choice of supported accommodation.
- Promote the use of Health Impact Assessments within housing development and the lived environment.
- Foster the partnerships with developers around the delivery of lifetime homes/ space standards to ensure well designed homes that are built for adaptability.
- Improve the matching of need with available property through Homefinder Somerset.
- Ensure that individuals with additional and/ or complex support needs have the necessary support to live independently in a home that meets their needs
- Review pathways into employment for people with mental or physical disability
- Work in partner agencies to tackle issues of social isolation and loneliness

The above actions will be coordinated by the SSHF Delivery Plan and given further consideration in the following (among others): SSHF District Action Plans, review of SCC commissioning contracts (various services), Health & Wellbeing Strategy, Private Sector Housing /Housing Standards

			Strategies, Somerset Choices, Children & Young People Plan, Registered Provider Business Plans, district based Local Plans
Gender reassignment	Neutral	Transgendered people may be particularly at risk of housing crisis and homelessness arising from transphobic reactions, hate crime and harassment by family, neighbours and members of their local community. Transgendered people may also fear disclosing their identity to housing officers for fear that they will not be treated with dignity and respect. The result can be that they do not receive the housing services that they need or receive a service inappropriate to their needs.	<p>These issues are addressed to a degree in the Homelessness Strategy, which the Housing Strategy Framework supports</p> <p>Monitoring of hate crime and subsequent recommendation for action and ensuring this is linked to the allocation of housing through Homefinder and housing options teams</p> <p>The above actions will be coordinated by the SSHF Delivery Plan and given further consideration in the following (among others): SSHF District Action Plans, Homelessness Strategy, Homefinder Somerset, Safer Somerset Partnership</p>
Race	Neutral	<p>BME groups may have differing housing needs due to multi-generational households for cultural or financial reasons.</p> <p>People from a different race or culture may be vulnerable to hate crime</p> <p>Life expectancy for Gypsy and Traveller men and women is 10 years lower than the national average. Gypsy and Traveller mothers are 20 times more likely than the rest of the population to have experienced the death of a child.</p> <p>Unlawful pitches can have problems including</p>	<p>Facilitate for larger and cheaper private sector rented accommodation of varied types</p> <p>Strengthened Housing Options arrangements will include a commitment to mitigating effects of language barriers that might hinder access to services</p> <p>Monitoring of hate crime and subsequent recommendation for action and ensuring this is linked to the allocation of housing through Homefinder and housing options teams</p> <p>The Gypsy and Traveller Accommodation (Assessment) 2011 &amp; (Update) 2013 (GTAA) sets out the needs of this community and pitch requirements which the Housing Strategy Framework supports and will seek to deliver. Further, there has been commitment by the Somerset Strategic Planning Group to update the GTAA. Exploring opportunities to use public sector</p>

		<p>health hazards (such as contamination by vermin), decayed sewage and water fittings, poor-quality utility rooms, and failings in fire safety. Roadside stopping places, with no facilities and continued instability and trauma, become part of the way of life. Health deteriorates, while severe disruptions occur to access to employment opportunities. Racism towards Gypsies and Travellers is still common, frequently overt and seen as justified.</p>	<p>land. Actions to develop transit sites for gypsies / travellers households arriving in Somerset.</p> <p>There are several different races and ethnicities of Gypsy and Traveller Communities within Somerset and they cannot be grouped as one. Careful consideration must be made when allocating sites as well as being mindful of their accommodation needs.</p> <p>The above actions will be coordinated by the SSHF Delivery Plan and given further consideration in the following (among others): SSHF District Action Plans, Gypsy and Traveller Accommodation Assessment Review, Homelessness Strategy, Registered Provider Business Plans, Homefinder Somerset, district based Local Plans</p>
Religion or Belief	Neutral	<p>There could be concerns that different religious groups could be disadvantaged in seeking assistance due to particular cultural aspects.</p> <p>There could be concern that insufficient information is available on the housing needs and aspirations of people from minority faith groups.</p>	<p>In some religious cultures, it is more difficult for a female member of a household to seek her own accommodation. More liaison needs to be undertaken with support groups to assess the effectiveness of the strategy in terms of assisting people/households from minority religions</p> <p>An on-going dialogue will be created with representatives of community groups (SARI) who can provide information on the housing needs of minority faith populations.</p> <p>The above actions will be coordinated by the SSHF Delivery Plan and given further consideration in the following (among others): SSHF District Action Plans, Homefinder Somerset</p>
Sex (Gender)	Neutral / Positive	<p>- There may be a differential outcome in terms of allocations between genders. However, evidence does not support concerns in this area.</p>	<p>Monitoring information on gender will be collected e.g. through Choice Based lettings.</p> <p>Current allocations have to reflect other legislative requirements</p>



		<ul style="list-style-type: none"> <li>- LGBTX may be subject to discrimination and low-level anti-social behaviour leading to increased fear of crime</li> <li>- Men are more at risk of rough sleeping</li> <li>- More women suffer domestic violence</li> </ul>	<p>that favour parental responsibility being given to the mother, rather than the allocations policy have an adverse impact due to applicants' gender</p> <p>Monitoring of hate crime and subsequent recommendation for action and ensuring this is linked to the allocation of housing through Homefinder and housing options teams</p> <p>Coordinated interventions between commissioned/non-commissioned domestic abuse services and housing providers</p> <p>The above actions will be coordinated by the SSHF Delivery Plan and given further consideration in the following (among others): SSHF District Action Plans, Homefinder Somerset, Safer Somerset partnership, Homelessness Strategy</p>
Sexual orientation	Neutral	People who are gay/lesbian may be more vulnerable to homelessness and housing need because of being asked to leave by family or forced to leave their current property because of harassment.	<p>All households who are forced to leave home by families or friends will be provided with appropriate housing advice and assistance. (Homelessness Reduction Act)</p> <p>Districts have policies and procedures in place to deal with harassment. A household suffering from harassment could be awarded priority for the allocation of accommodation under homelessness legislation. (District Action Plan)</p> <p>The above actions will be coordinated by the SSHF Delivery Plan and given further consideration in the following (among others): SSHF District Action Plans, Homefinder Somerset, Homelessness Strategy</p>
Poverty/ disadvantage/ location <i>(not a protected</i>	Neutral	Potential adverse impact on low income / unemployed households if homelessness prevention services are inaccessible or standards in low cost private rented housing are	<p>Target mortgage rescue advice and assistance at low-income households</p> <p>Target welfare and money management advice at low-income</p>

<i>characteristic)</i>		driven down.	<p>households in social housing.</p> <p>Protect housing conditions and standards in low cost private rented housing by working with landlords. Maintain outreach services through core services and third party providers.</p> <p>Further, the Framework also seeks to achieve the following:</p> <ul style="list-style-type: none"> <li>- Ensure a co-ordinated approach to combat poor quality or unsuitable homes of any tenure, specifically addressing cold homes, disrepair and accessibility which are usually caused by poverty/ disadvantage.</li> <li>- Adopt an asset-based approach to working with local communities, involving co-production to enable healthy and strong self-supporting communities that are partnered by effective service delivery.</li> <li>- Work as partners to share best practice and consolidate/ improve awareness of benefit changes and what it means for families and individuals to help prevent incidence of debt and rent arrears.</li> </ul> <p>The above actions will be coordinated by the SSHF Delivery Plan and given further consideration in the following (among others): SSHF District Action Plans, Financial Inclusion Strategy, Homelessness Strategy, Private Sector Housing/Housing Standards Strategies, Somerset Academy</p>
All Groups or General Comments		<ul style="list-style-type: none"> <li>- Plans for housing schemes for older people may not take into account the need for carers to live permanently or intermittently with their dependants.</li> <li>- The housing needs of ex-offenders may not have been taken into account.</li> </ul>	<p>Schemes, which are proposed in action plans, will incorporate excellent standards of design used by registered social landlords. These will include plans for two-bedroom accommodation.</p> <p>An ex-offender's application for assistance under homelessness legislation and the housing register is considered on its own</p>

			<p>merits. The Homelessness Code of Guidance advises on the factors to consider when deciding whether an ex-offender is entitled to assistance. (Homelessness Reduction Act)</p> <p>Further, the Framework also seeks to achieve the following:</p> <ul style="list-style-type: none"> <li>- As Local Plans are reviewed, they are to include appropriate policy responses that addresses the demands of changing demographics including specialist needs.</li> <li>- Communities are supported to develop community led plans (Neighbourhood Plans/ Parish Plans) to help identify community housing needs, sites for future housing and promote inclusive high quality design.</li> </ul> <p>The above actions will be coordinated by the SSHF Delivery Plan and given further consideration in the following (among others): SSHF District Action Plans, Homelessness Strategy, Homefinder Somerset</p>
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<b>Review</b> (date or timeframe)	Update during the drafting of the Somerset Strategic Housing Framework
Name of person/s completing (and involved in completing) form	Strategic Housing Framework Steering group
Date analysis to be completed	31 <sup>st</sup> March 2018
Name (and signature) of manager/board member approving	