

Equality and Safety Impact Assessment

The **Public Sector Equality Duty** (Section 149 of the Equality Act) requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people carrying out their activities.

The Equality Duty supports good decision making – it encourages public bodies to be more efficient and effective by understanding how different people will be affected by their activities, so that their policies and services are appropriate and accessible to all and meet different people's needs. The Council's Equality and Safety Impact Assessment (ESIA) includes an assessment of the community safety impact assessment to comply with Section 17 of the Crime and Disorder Act and will enable the Council to better understand the potential impact of proposals and consider mitigating action.

Name or Brief Description of Proposal	Gas Safety Policy
Brief Service Profile (including number of customers)	
<p>Southampton City Council ("Council") manages building safety in Council-owned residential buildings. Building safety refers to the measures that are in place to protect tenants in buildings and what the Council are doing to improve the safety of the building. Southampton City Council owns 15,833 residential council-owned dwellings (2021/22) across 1934 buildings. There are 2108 leasehold properties and 98 Shared Ownership properties. Southampton City Council is responsible for the building safety of these buildings.</p> <p>The Council is responsible for gas safety as landlord duties under the Gas Safety (Installation and Use) Regulations 1998 for gas appliances, which it owns in properties in which it lets.</p> <p>The gas safety policy will apply to all Council staff, its agents and contractors and to residential domestic tenants, licensees and leaseholders. All council owned gas appliances need to be checked annually in accordance with the gas regulations</p> <p>Further residents may be affected by this policy as the overall number of dwellings owned by Southampton City Council is due to increase with RTB purchases.</p>	

Summary of Impact and Issues
<p>The policy will affect all households that have a gas system that Southampton City Council are responsible for.</p> <p>Tenants will be required to comply with the Gas Safety policy to ensure their appliances are managed properly and to enhance safety. SCC is required to carry out a visual inspection of all gas appliances owned by the tenant when undertaking any and all gas works in SCC Property meaning pre-arranged access will be required during the working day.</p> <p>The council will perform annual safety checks, including at least one full landlord gas safety inspection within a 12-month period. SCC will take all reasonable steps to ensure access to a property to complete the gas safety check and enable maintenance work to be completed. These procedures will be documented in detail in the Gas Access procedure document.</p> <p>If tenants do not co-operate with the councils access process it may lead to SCC commencing legal proceedings or forced entry. All costs due to forced entry or legal proceedings will be charged to the tenant for their failure to adhere to the tenancy agreement.</p> <p>Tenants will be required to report all faults to the council via the online service or by telephone.</p>
Potential Positive Impacts
<p>The implementation of this policy will ensure Southampton City Council complies with its legal obligations on Gas Safety.</p> <p>This policy will promote safer living conditions for all tenants and provide them with reassurance that SCC will perform their functions in a professional and timely manner. The policy will ensure that all gas systems, gas appliances pipework, fittings, meters and associated safety equipment, flues and ventilation are safe, properly managed and operated. This will reduce the risk of fire, carbon monoxide poisoning and gas leaks.</p> <p>This policy ensures carbon monoxide detectors are present in all properties where an SCC gas appliance is located. SCC will also take responsibility for the annual servicing and maintenance of detectors, giving peace of mind to tenants.</p>

This policy will ensure there is a clear and robust process in place for how SCC discharges its responsibilities as a landlord and how it will take every reasonable step to obtain access to properties to fulfil its duties under the Gas Safety (Installation and Use) Regulations 1998. This will allow tenants/residents to have a greater awareness of safety responsibilities.

Responsible Service Manager	
Date	
Approved by Senior Manager	
Date	

Potential Impact

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
Age	<ul style="list-style-type: none"> Older residents are likely to have an increased use of gas, especially during winter months. Older residents may face mobility, memory, or communication difficulties affecting access during inspections or responses to gas leaks. 14.5% of Southampton's population are aged 65 and over (38,472 people) Young children are particularly vulnerable to unsafe gas conditions. Children between the ages 0 to 5 make up 6.3% (16,808) of Southampton's population. 	<ul style="list-style-type: none"> Ensure communications are clear and accessible. Consider alternative methods if possible. Tenants are provided with a telephone number when they are unable to use email. Offer flexible appointments for older residents or families. Prioritise vulnerable households for inspections/repair.

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Disability	<ul style="list-style-type: none"> Disabled individuals (physical, sensory or cognitive) may struggle to provide access or understand gas safety information. There are currently 3,382 individuals known to SCC Adult Social Care as visually/hearing impaired and/or with a physical disability, living inside and outside the city boundary. Residents with a physical disability may have a deterioration of their condition in cold environments. 	<ul style="list-style-type: none"> Ensure accessible communication is provided. Safeguarding/awareness training/e-learning for staff. Prioritise vulnerable households for inspections/repair. Housing currently carrying out surveys to look at the needs of tenants and protected characteristics. This will help inform better recording.
Gender Reassignment	<ul style="list-style-type: none"> Transgender individuals may have safety concerns or feel uncomfortable with unfamiliar contractors entering their home. 	<ul style="list-style-type: none"> Staff to carry and provide identification when requesting access or attending appointments. Staff can attend Diversity & Inclusion session run by SCC.
Care experienced	<ul style="list-style-type: none"> May lack experience or adult support to manage gas safety responsibilities. May have lower trust with the local authority or services due to past experience. 	<ul style="list-style-type: none"> Information provided periodically on tenants link.

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Marriage and Civil Partnership	<ul style="list-style-type: none"> Join tenants or occupants in partnerships should both be informed/addressed about inspections and gas safety information. 	<ul style="list-style-type: none"> Ensure correspondence and safety information is addressed to all relevant adult occupants where possible
Pregnancy and Maternity	<ul style="list-style-type: none"> Pregnant residents and newborn children are more vulnerable to carbon monoxide exposure. New parents may struggle with access arrangements 	<ul style="list-style-type: none"> Prioritise inspections and servicing of monoxide detectors for households with newborn children or pregnant occupants. Every attempt will be made to accommodate childcare arrangements and out of hours services may be an option in exceptional circumstances.
Race	<ul style="list-style-type: none"> Language barriers may prevent understanding of gas safety information and access arrangements Cultural norms may differ for how residents interact with staff or allow access. 	<ul style="list-style-type: none"> When English is not an occupants first language it is important to provide decision communications in a variety of accessible formats and languages. Staff to carry and provide identification when requesting access or attending appointments.

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		<ul style="list-style-type: none"> • Staff can attend Diversity & Inclusion session run by SCC.
Religion or Belief	<ul style="list-style-type: none"> • Potential access issues around religious holidays or prayer times. 	<ul style="list-style-type: none"> • Offer flexible scheduling around religious holidays and prayer times where possible or requested.
Sex	<ul style="list-style-type: none"> • Single woman or survivors of domestic abuse may feel uncomfortable or less safe allowing staff into their homes. Domestic violence is a key driver of violent crime in Southampton, with 30.6% of violent crimes flagged as domestic in 2023/24. 	<ul style="list-style-type: none"> • Staff to carry and provide identification when requesting access or attending appointments. • Provide tenants with plenty of advance notice of appointments to allow them to prepare for visits.
Sexual Orientation	<ul style="list-style-type: none"> • Some LGBTQ+ residents may have experienced discrimination and be wary of people visiting their homes. The second most frequent motivating factor for hate crime in Southampton is sexual orientation. 	<ul style="list-style-type: none"> • Staff can attend Diversity & Inclusion session run by SCC. • SCC have a zero-tolerance approach to discrimination and bullying.
Community Safety	<ul style="list-style-type: none"> • Unsafe gas installations can provide risks to individuals and communities. • Older properties may have a higher risk of unsafe gas installations. 	<ul style="list-style-type: none"> • Annual services and a clear fault reporting system is in place. • Housing to work with local housing staff and partners to identify and

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	<ul style="list-style-type: none"> The criminal exploitation of vulnerable individuals through the takeover of their homes—commonly referred to as 'cuckooing'—where perpetrators use the premises for illegal activities such as drug dealing or trafficking. 	<p>mitigate the risks to individuals that may be the victims of crime.</p>
Poverty	<ul style="list-style-type: none"> Residents in poverty may delay repairs or avoid reporting issues due to cost fears. Residents in poverty may be at risk if gas installations are not used correctly or regularly due to cost fears. The proportion of people living in fuel poverty in Southampton is 12.5%, equating to about 13,400 households in the city. Single parents or individuals working on zero-hour contracts may struggle to take time off work to attend appointments. 	<ul style="list-style-type: none"> Clear information provided to residents regarding services in the tenant's handbook. Free carbon monoxide alarms provided to all tenants. Clear communication around risk of costs if access is not granted for inspections. Information available on SCC website regarding fuel poverty. Get help with your energy bills Housing staff make contact with tenants at the later stages of the appointment process to support flexible and out of hours appointments.

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Health & Wellbeing	<ul style="list-style-type: none"> • Poor gas safety can directly impact residents health. • Anxiety around gas safety issues, affordability and giving people access to their home can have an affect on mental wellbeing. 	<ul style="list-style-type: none"> • Provide clear communications to tenants for them to report faults and understand importance of inspections. • Southampton City Council will only install 'A' rated energy efficient condensing boilers. • Staff to carry and provide identification when requesting access or attending appointments. • Work only performed by appropriately qualified persons and Gas Safe registered engineers to carry out duties.
Other Significant Impacts Forcing entry	<p>Forcing entry without the tenants' consent would be a breach of article 8 Human Rights convention.</p> <p>Vulnerable tenants and occupiers could be more impacted especially people with a physical or mental disability.</p>	<p>This interference can be justified if it is a proportionate response to a legitimate aim. The process attached to the policy sets out a clear and transparent process to minimise distress and gives several opportunities to tenants to allow access to carry out essential inspections and servicing. Forced</p>

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		entry will only be authorised on a case by case basis which takes into account the persons vulnerability.

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