

Appendix 3**Equality Impact Assessment**

The Equality Act 2010 replaces the previous anti-discrimination laws with a single Act. It simplifies the law, removing inconsistencies and making it easier for people to understand and comply with it. It also strengthens the law in important ways, to help tackle discrimination and equality. The majority of the Act came into force on 1 October 2010.

Public bodies are required in it to have due regard to the need to:

- eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited under the Act
- advance equality of opportunity between people who share a protected characteristic and people who do not share it, and
- foster good relations between people who share a protected characteristic and people who do not share it.

The public sector Equality Duty came into force on 5 April 2011. The duty ensures that all public bodies play their part in making society fairer by tackling discrimination and providing equality of opportunity for all. It ensures that public bodies consider the needs of all individuals in their day to day work – in shaping policy, delivering services and in relation to their own employees.

The Equality Duty encourages public bodies to understand how different people will be affected by their activities so that policies and services are appropriate and accessible to all and meet different people's needs. By understanding the effect of their activities on different people, and how inclusive public services can support and open up people's opportunities, public bodies are better placed to deliver policies and services that are efficient and effective.

The new equality duty replaces the three previous public sector equality duties, for race, disability and gender. The new equality duty covers the following protected characteristics:

- age
- disability
- gender reassignment
- pregnancy and maternity
- race – this includes ethnic or national origins, colour or nationality
- religion or belief – including lack of belief
- sex
- sexual orientation.

It also applies to marriage and civil partnership, but only in respect of the requirement to have due regard to the need to eliminate discrimination.

The Council has also decided to treat people who have care experience as if they had a protected characteristic under the law.

Having due regard means consciously thinking about the three aims of the equality duty as part of the process of decision-making. This means that consideration of equality issues must influence the decisions reached by public bodies, including how they act as employers, how they develop, evaluate and review policies, how they design, deliver and evaluate services, and how they commission and procure from others.

Having due regard to the need to advance equality of opportunity involves considering the need to:

- remove or minimise disadvantages suffered by people due to their protected characteristics
- meet the needs of people with protected characteristics, and
- encourage people with protected characteristics to participate in public life or in other activities where their participation is low.

Fostering good relations involves tackling prejudice and promoting understanding between people who share a protected characteristic and others.

Complying with the equality duty may involve treating some people better than others, as far as this is allowed by discrimination law. For example, it may involve making use of an exception or the positive action provisions in order to provide a service in a way which is appropriate for people who share a protected characteristic.

The Equality Duty also explicitly recognises that disabled people's needs may be different from those of non-disabled people. Public bodies should therefore take account of disabled people's impairments when making decisions about policies or services. This might mean making reasonable adjustments or treating disabled people better than non-disabled people in order to meet their needs.

There is no explicit requirement to refer to the Equality Duty in recording the process of consideration but it is good practice to do so. Keeping a record of how decisions were reached will help public bodies demonstrate that they considered the aims of the Equality Duty. Keeping a record of how decisions were reached will help public bodies show how they considered the Equality Duty. Producing an Equality Impact Assessment after a decision has been reached will not achieve compliance with the Equality Duty.

It is recommended that assessments are carried out in respect of new or revised policies and that a copy of the assessment is included as an appendix to the report provided to the decision makers at the relevant Cabinet, Committee or Scrutiny meeting.

Where it is clear from initial consideration that a policy will not have any effect on equality for any of the protected characteristics, no further analysis or action is necessary.

Public bodies should take a proportionate approach when complying with the Equality Duty. In practice, this means giving greater consideration to the Equality Duty where a policy or function has the potential to have a discriminatory effect or impact on equality of opportunity, and less consideration where the potential effect on equality is slight. The Equality Duty requires public bodies to think about people's different needs and how these can be met.

EQUALITY IMPACT ASSESSMENT (EIA)

Directorate:	Deputy Chief Executive	Title of the Lead Officer responsible for EIA	Assistant Director of Asset Management and Development
Name of the policy or function to be assessed:		Asset Management Strategy	
Title of the Officer undertaking the assessment:		Change Delivery Manager	
Is this a new or an existing policy or function?		Existing	
1. What are the aims and objectives of the policy or function? The Strategy, aligning with our Corporate Plan, Housing Delivery Plan, and Climate Change Strategy, aims to deliver imaginative, effective housing solutions that meet community needs and support sustainable development.			
2. What outcomes do you want to achieve from the policy or function? • 4,380 homes under strategic management • 250 new affordable homes delivery target (2025-2030) • £ 47 million capital investment programme			
3. Who is intended to benefit from the policy or function? Tenants will benefit from the strategy as it is designed to improve the standards of our housing stock and increase the number of new-builds and acquisitions.			
4. Who are the main stakeholders in relation to the policy or function? The two main stakeholders will be tenants and teams / colleagues within the Council, including; * Asset Management (e.g. Capital Works Manager / Modernisation officers / Development Team)			

- * Colleagues within Housing (e.g. Housing Operations)
- * Colleagues within Environmental Services (e.g. Climate Change team)

5. What baseline quantitative data do you have about the policy or function relating to the different equality strands?

The Council's housing management system, Capita Open Housing, is utilised to capture and contain quantitative data relating to the different equality strands. This information (for example, identifying tenants that require additional support needs) will support colleagues when considering each tenant's situation according to that person's individual circumstances.

6. What baseline qualitative data do you have about the policy or function relating to the different equality strands?

Tenants receive a transactional survey after a repair is completed and the opportunity to complete an annual tenant satisfaction survey.

Tenants that move into a new-build home also receive a survey to gain an understanding of experience.

Information from these surveys will enable the Council to baseline qualitative data, which will be monitored going forward.

7. What has stakeholder consultation, if carried out, revealed about the nature of the impact?

This strategy has been developed through extensive consultation with internal stakeholders (including the Housing Influence Panel reviewing the Asset Management Compass), drawing on expertise across housing, development, finance, and strategy functions. The development process incorporated lessons learned from previous housing delivery programmes, best practice research, and detailed analysis of local housing needs and market conditions.

Our evidence base includes comprehensive analysis of housing stock condition, demographic trends, and strategic alignment with the Corporate Plan 2025-2030, Housing Delivery Plan 2025-30, and Climate Change and Green Futures Strategy. This multi-source approach ensures that strategic decisions are grounded in robust evidence while maintaining alignment with broader council objectives.

The consultation process revealed consistent themes around the need for systematic delivery mechanisms, enhanced governance structures, and improved performance monitoring. Stakeholders emphasised the importance of sustainable capacity building, strategic partnerships, and evidence-based decision making. These insights have been incorporated throughout the strategy, ensuring that operational approaches reflect organisational learning and stakeholder priorities.

8. From the evidence available does the policy or function affect or have the potential to affect different equality groups in different ways?

In assessing whether the policy or function adversely affects any particular group or presents an opportunity for promoting equality, consider the questions below in relation to each equality group:

- ☐ **Does the policy or function target or exclude a specific equality group or community? Does it affect some equality groups or communities differently? If yes, can this be justified?**

The Council recognises that some tenants and leaseholders have additional support needs. The Council will consider each person's situation according to that person's individual circumstances when related to this strategy.

- ☐ **Is the policy or function likely to be equally accessed by all equality groups or communities? If no, can this be justified?**

The strategy applies to all Council housing properties (existing and new), both General Needs and Independent Living.

Leaseholders have different obligations with regards to maintaining their homes. However, we will always provide relevant support and advice. Reports received about properties not owned by the Council will be investigated by the Council's Private Sector Housing team.

This is justified.

- ☐ **Are there barriers that might make access difficult or stop different equality groups or communities accessing the policy or function?**

It is the responsibility of the Council as a landlord to ensure that we maximise access for all groups. This would include the following actions:

- Arrange to translate the strategy for residents whose first language is not English
- Arrange appropriate additional support for residents who may not understand the strategy (e.g. support worker invited to discuss the strategy).

- ☐ **Could the policy or function promote or contribute to equality and good relations between different groups? If so, how?**

The strategy ensures that a consistent approach will be taken and that the Council will exercise its duties within the current legal and policy framework.

□ What further evidence is needed to understand the impact on equality?

Using data that will be captured (see section 6), the Council will be able to establish whether there has been any negative or positive impact on residents and their ability to adhere to the strategy.

9. On the basis of the analysis above what actions, if any, will you need to take in respect of each of the equality strands?

Age:

It is not anticipated that the Council will need to take any further action in order to enable access for this group. Regular monitoring and analysis may identify reasons that have not been anticipated. Action will be taken to mitigate any barriers identified.

Disability:

It is not anticipated that the Council will need to take any further action in order to enable access for this group. Regular monitoring and analysis may identify reasons that have not been anticipated. Action will be taken to mitigate any barriers identified.

Gender:

It is not anticipated that the Council will need to take any further action in order to enable access for this group. Regular monitoring and analysis may identify reasons that have not been anticipated. Action will be taken to mitigate any barriers identified.

Gender Reassignment:

It is not anticipated that the Council will need to take any further action in order to enable access for this group. Regular monitoring and analysis may identify reasons that have not been anticipated. Action will be taken to mitigate any barriers identified.

Marriage and Civil Partnership:

It is not anticipated that the Council will need to take any further action in order to enable access for this group. Regular monitoring and analysis may identify reasons that have not been anticipated. Action will be taken to mitigate any barriers identified.

Pregnancy and Maternity:

It is not anticipated that the Council will need to take any further action in order to enable access for this group. Regular monitoring and analysis may identify reasons that have not been anticipated. Action will be taken to mitigate any barriers identified.

Race:

It is not anticipated that the Council will need to take any further action in order to enable access for this group. Regular monitoring and analysis may identify reasons that have not been anticipated. Action will be taken to mitigate any barriers identified.

Religion and Belief:

It is not anticipated that the Council will need to take any further action in order to enable access for this group. Regular monitoring and analysis may identify reasons that have not been anticipated. Action will be taken to mitigate any barriers identified.

Sexual Orientation:

It is not anticipated that the Council will need to take any further action in order to enable access for this group. Regular monitoring and analysis may identify reasons that have not been anticipated. Action will be taken to mitigate any barriers identified.

Care Experience:

It is not anticipated that the Council will need to take any further action in order to enable access for this group. Regular monitoring and analysis may identify reasons that have not been anticipated. Action will be taken to mitigate any barriers identified.

I am satisfied with the results of this EIA. I undertake to review and monitor progress against the actions proposed in response to this impact assessment.

Signature: Assistant Director – Assistant Director Asset Management and Development

A solid black rectangular box used to redact the signature of the Assistant Director.