

# Equality Impact Assessment (EqIA)

## Affordable Housing Service Policy

<p><b>Title of EqIA:</b></p>	<p><b>Affordable Housing Service Policy</b></p> <p>Eastleigh Borough Council (the Council) is committed to achieving diversity and equality of opportunity, both as an employer and as a provider of services. This means working to ensure that Eastleigh Borough is free from discrimination, but also doing what we can to positively promote equality and diversity across the delivery of services, and within our workforce.</p> <p>A key part of developing the Affordable Homes Service has been to undertake an Equality Impact Assessment (EqIA). The EqIA is an information gathering tool used to assess the potential impacts of policies on people with the characteristics that are protected by the Equality Act 2010.</p> <p>This Equality Impact Assessment shows the possible impact of policies on prospective housing applicants and tenants of Eastleigh Borough Council and demonstrates that the Council has considered the aims of the Equality Duty.</p>
<p><b>Brief description of the Proposal:</b></p>	<p>This assessment sets out how the Council will not only fulfil its legal duties under the Equality Act 2010 but will work towards embedding an inclusive mindset within all its services, processes, and culture in order to create an approach that values every individual regardless of their background and characteristics.</p> <p><a href="https://www.eastleigh.gov.uk/media/11344/equalities-strategy-and-action-plan-2022-25.pdf">https://www.eastleigh.gov.uk/media/11344/equalities-strategy-and-action-plan-2022-25.pdf</a></p> <p>The Council is committed to creating a fairer, more equal and more integrated borough where all people feel welcome and able to fulfil their potential. In line with the Public Sector Equality Duty councils have a duty to find housing for people who are deemed to have a priority need.</p> <p>Eastleigh Borough Council demonstrate compliance with the Public Sector Equality Duty (PSED) by:</p> <ul style="list-style-type: none"> <li>• Decision-makers being made aware of their duty to have ‘due regard’ and to the aims of the duty</li> </ul>

	<ul style="list-style-type: none"> <li>• Due regard is fulfilled before and at the time a particular policy or operational activity, that will or might affect people with protected characteristics is under consideration, as well as at the time a decision is taken. It is not a box ticking exercise.</li> <li>• Due regard involves a conscious approach and state of mind. The duty must be exercised with rigour and an open mind.</li> <li>• Advance equality of opportunity between persons who share a protected characteristic and persons who do not share it; and</li> <li>• Foster good relations between persons who share a protected characteristic and persons who do not share it.</li> <li>• The duty cannot be delegated to another body and will always remain on the body subject to it.</li> <li>• The duty is a continuing one.</li> <li>• It is good practice for the public body to keep an adequate record showing that they have considered their equality duties and considered relevant questions.</li> </ul>
<p><b>Summary of Impacts and Issues:</b></p>	<p>This assessment notes that the totality of policies within the Affordable Home Service represents a balance between meeting different forms of housing need and maximising the overall delivery of affordable homes, within the context of national policy requirements and available funding.</p> <p>It also identifies the mitigations that will be put in place through the programme to alleviate any potential negative impacts on those who share particular protected characteristics, and on relations between different groups who share characteristics and those groups who do not.</p> <p>The disproportionate extent to which those with some protected characteristics struggle to afford housing is one factor in their uneven distribution across housing tenures – and consequently the extent to which they experience the advantages and disadvantages associated with different tenures. Home ownership and social housing are the most secure tenures, but there are significant barriers to accessing each of them – high buying costs in the case of home ownership, and the rationing of scarce lettings to the households most in need in the case of social housing. The rapidly growing private rented sector is the least secure and the least affordable of tenures. These shifts in tenure have had particular impacts on certain groups. More</p>

	<p>broadly, a common theme is that low income households are more likely to find themselves in housing need. Housing need is, therefore, likely to be greater for those people who share protected characteristics who live in poverty.</p> <p>The housing affordability ratio shows how affordable housing is compared with median gross earnings - the higher the ratio the less affordable housing has become. Since 2002 the affordability ratio for Eastleigh has increased from 6.3 to 8.8 in 2020. This increase is slightly smaller than Hampshire as a whole (6.4 to 9.2) or England (5.1 to 7.8). Eastleigh is ranked in the middle of districts in Hampshire for affordability but less affordable than the national average. There are a larger proportion of properties owned outright in Eastleigh when compared with England, and a lower proportion of properties available for social or private renting than England. <a href="https://documents.hants.gov.uk/public-health/jsna-2022/eastleigh-district-report.pdf">https://documents.hants.gov.uk/public-health/jsna-2022/eastleigh-district-report.pdf</a></p> <p>The affordability pressures that result from a long-term undersupply of homes of all tenures in Eastleigh, and particularly affordable homes, are one important respect in which housing impacts those with particular protected characteristics and the relations between different groups.</p> <p>The policies have been developed by:</p> <ul style="list-style-type: none"> <li>• Engaging with key stakeholders and groups, representing people with protected characteristics to understand barriers to participation and access to EBC services.</li> <li>• Policies and communications are accessible, including how we will use translators and interpreters.</li> <li>• Staff will receive training to cover unconscious bias, equality impact assessments and public sector duty.</li> </ul> <p>The way in which the Council prioritises people for affordable housing has been considered in the interests of both ensuring that all target groups are represented and supported, whilst also actively seeking to contribute to mixed and sustainable communities. Whilst the demand for housing and support outstrips the available supply and local capacity, there may be disadvantages for some groups but on the basis of an overall quantum rather than by setting a particular protected group at a disadvantage.</p>
<p><b>Potential Positive Impacts:</b></p>	<ul style="list-style-type: none"> <li>• Policy proposals to promote inclusion of a more diverse group of people could help to reduce inequality.</li> <li>• Increased awareness of protected characteristics across all staff and services</li> </ul>

	<ul style="list-style-type: none"> <li>• These requirements will promote increased diversity in the built environment sector and create a more equal, diverse and inclusive Borough by meaningfully enhancing organisational practices, procurement methods and engagement with communities.</li> </ul>
<p><b>What engagement or consultation has been carried out?</b></p>	<p>Demographics and data have been collected from the ONS, Census and EBC strategies.</p> <p>Discussion groups and stakeholders have been extensively consulted on policy development and governance.</p> <p>Approval will be sought at Cabinet level of policies and strategies relating to the affordable housing service.</p>

## Assessment

For all of categories below please consider:

### 1. Does this proposal eliminate unlawful discrimination?

#### Check existing policies

Data has shown that there are some particular issues associated with certain elements of our local population, and there are actions specifically geared to ensure services are available to meet the needs of everyone, including marginalised groups. Both strategies are designed to support social inclusion and to help all residents to thrive. There is potential for vulnerable people and families (both with and without protected characteristics) to be adversely affected by public spending reductions – however, the actions contained in this policy/service are intended to minimise any negative effects.

### 2. Does this proposal advance equality of opportunity between people who share a protected characteristic and those who do not share it?

This approach will enable parity of service as it will be based on assessed need rather than service user group protected characteristics. There is no evidence I am aware of at this point to say that there will be a negative impact on any of these characteristics, so these remain unknown at this time. This will continue to be monitored and an assessment undertaken should it be determined that there is a negative impact on any additional protected characteristics.

### 3. Does this proposal foster good relations between people who share a protected characteristic and those who do not share it?

Their impacts will be far reaching, and with specific aims to ensure those on low incomes and/or who may be vulnerable in a range of ways are adequately supported to access

suitable secure homes. The identified priorities and detailed delivery plans seek to ensure appropriate local service provision for all groups, regardless of background or type, and include some specific actions to ensure anyone who may otherwise be disadvantaged are being actively considered and supported locally.

Ongoing service user engagement will seek views and regular forums for stakeholders will ensure any negative impacts are actively monitored and mitigated.

**Statutory Considerations: Please highlight what impact could there be on people with protected characteristics.**

Impact Assessment	Details of Impact	Possible Solutions/ Mitigating Factors
<p><b>Age:</b></p>	<p>Children</p> <ul style="list-style-type: none"> <li>• Certain groups of children are at higher risk of living in poverty, including those from BAME backgrounds, deaf and disabled children and those from single parent families.</li> </ul> <p>Younger people</p> <ul style="list-style-type: none"> <li>• Younger people are more likely to be unemployed than adults aged between 25 and 64 and are more likely to face higher housing costs, relative to income. Proposals which increase the number of affordable homes being built and the affordability of those homes could benefit these households and help to reduce this inequality.</li> <li>• Younger people, and especially those from BAME backgrounds, are more likely to be excluded from education and professional opportunities and community</li> </ul> <p>Older people</p> <ul style="list-style-type: none"> <li>• Older people are more likely to have specialist needs, including the need for supported housing. Proposals to encourage the provision of supported and specialist housing, and to increase the provision of accessible and adaptable affordable</li> </ul>	<p>Proposals which increase the number of affordable homes being built and the affordability of those homes – especially Social Rent homes – could benefit these households and help to reduce this inequality.</p> <p>Design and sustainability standards are likely to benefit children by reducing the physical and mental health issues related to poor quality housing, such as cold and damp and poor air quality. In addition, increasing the provision of play space within housing developments will be of direct benefit to children and younger people.</p> <p>Improving the delivery, affordability and allocation of intermediate housing options is likely to benefit young adults.</p> <p>Policy proposals to promote inclusion of a more diverse group of people could help to reduce inequality.</p>

	<p>homes, will help to meet those needs and help to reduce housing costs for this group.</p> <ul style="list-style-type: none"> <li>• Older people, and especially those from BAME backgrounds, are more likely to be excluded from education and professional opportunities and community engagement processes.</li> <li>• Older people are less likely to benefit from investment in affordable housing aimed at encouraging home ownership, and Shared Ownership purchasers are less likely to include households headed by someone aged over 55, when compared to the target market</li> </ul>	<p>Design and sustainability standards are likely to benefit older people by reducing the physical and mental health issues related to poor quality housing, such as cold and damp and poor air quality. In addition, proposals to enhance building safety will be particularly of benefit to older people who are more vulnerable in a fire.</p> <p>Robust policies relating to these areas will minimise the impacts on this group.</p>
<b>Disability:</b>	<p>Households containing people with disabilities are more likely to experience poverty. Proposals which increase the number of affordable homes being built and the affordability of those homes – especially Social Rent homes – could benefit these households and help to reduce this inequality. With robust policies to support the proposals.</p> <p>Disabled people are more likely to have specialist needs, including the need for supported housing.</p> <ul style="list-style-type: none"> <li>• Quality of services are likely to benefit deaf and disabled people by reducing the physical and mental health issues related to poor quality housing</li> </ul>	<p>Proposals to encourage the provision of supported and specialist housing and increase the provision of accessible and adaptable affordable homes, will help to meet those needs and help to reduce housing costs for this group.</p> <p>Robust policies relating to these areas will minimise the impacts on this group.</p>
<b>Gender reassignment:</b>	<p>The very limited availability of data makes it difficult to reliably assess potential impacts of potential policy interventions on those who are</p>	

	<p>proposing to undergo, are undergoing, or have undergone a process (or part of a process) for the purpose of reassigning their sex.</p> <p>No direct impact</p>	
<b>Marriage and civil partnership:</b>	No direct impact	
<b>Pregnancy and maternity:</b>	<p>The limited availability of specific data on this group makes it hard to identify impacts, beyond those that affect households including children.</p> <ul style="list-style-type: none"> <li>• Design and sustainability standards are likely to benefit pregnant women.</li> </ul> <p>In addition, increasing the provision of green outdoor space within housing developments will benefit people spending longer periods at home, and this could include pregnant women and those with primary childcare responsibilities.</p>	<p>Appropriate accommodation choice</p> <p>Estate management policies to cover these areas</p>
<b>Race:</b>	<p>Black, Asian and minority ethnic (BAME) groups are more likely to experience poverty, are less likely to own their own home and are disproportionately affected by overcrowding.</p> <ul style="list-style-type: none"> <li>• Design and sustainability standards are likely to benefit people from a BAME background by reducing the physical and mental health issues related to poor quality housing including access to nature and open space.</li> <li>• New arrivals to the UK, such as Ukraine, are more likely to be excluded from education and</li> </ul>	<p>Proposals which increase the number of affordable homes being built and the affordability of those homes – especially Social Rent homes – could benefit these households and help to reduce this inequality.</p> <p>Proposals to make Shared Ownership more affordable will also improve access to home ownership for this group.</p>



	professional opportunities and community engagement processes. BAME employees in the built environment also report experiencing discrimination at work.	Policy proposals to promote inclusion of a more diverse group of people in the built environment could, therefore, help to reduce this inequality.
<b>Religion or belief:</b>	<p>The limited availability of data on the extent to which those who hold a particular religion or belief (including no religion or belief) are subject to particular housing problems, makes it difficult to reliably identify potential impacts. However, to the extent that households with some religious beliefs belong disproportionately to BAME groups, they are likely to experience similar impacts identified for those from BAME backgrounds above.</p> <p>No direct impact</p>	
<b>Sex:</b>	<p>Women are more likely to be economically inactive, low paid, and/or subject to the poverty that affects single parent families. Female-headed households are also more vulnerable to statutory homelessness.</p> <ul style="list-style-type: none"> <li>• Female employees in the built environment also report experiencing discrimination at work. EDI proposals to promote inclusion of a more diverse group of people could, therefore, help to reduce this inequality</li> </ul>	<p>Data also shows that no region in England is affordable for a woman on a median salary to rent a private home. (Big Issue)</p> <p>Policy proposals which increase the number of affordable homes being built and the affordability of those homes – especially Social Rent homes – could benefit these households and help to reduce this inequality</p>
<b>Sexual Orientation:</b>	There is an absence of data on the extent to which those who identify as LGBTQ+ experience	LGBTQ+ employees in the built environment also report experiencing discrimination at work. Policy proposals

	<p>difficulties covering housing costs or occupy particular types of housing.</p> <ul style="list-style-type: none"> <li>• There is evidence that those who are LGBTQ+ may experience discrimination when seeking to rent or buy a home. Younger LGBTQ+ people are also more vulnerable to homelessness. There is also evidence of demand from older LGBTQ+ people for specialist provision care and retirement housing.</li> </ul>	<p>to promote inclusion of a more diverse group of people in the built environment could, therefore, help to reduce this inequality.</p> <p>The provision of more affordable housing, and specialist housing in particular, may benefit this group.</p> <p>The use of tenancy agreements that recognise the rights of same-sex partner relationships.</p> <p>EBC will operate and monitor lettings practices that reduce the chance of discrimination.</p> <p>We will provide support to tenants to help them maintain their tenancies.</p> <p>Robust transparent policies with tenant voice will help this process</p>
<b>Social deprivation - please highlight what impact could there be on people experiencing social deprivation:</b>	Positive	
<b>Other significant Impacts:</b>	In designing the programme, a careful balance has been struck between promoting high standards of provision and maintaining the delivery of much-needed affordable homes. Where new	

	requirements have been introduced, these have been assessed on balance to be positive for equality, diversity and inclusion.	
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**Action Plan**

<b>Activity</b>	<b>Outcome</b>	<b>Timeframe</b>	<b>Person responsible</b>

<b>Lead Officer:</b>	
<b>Manager:</b>	
<b>Corporate Director:</b>	
<b>Date completed:</b>	