

## Equality Impact Assessment (EQIA)



The characteristics protected by the Equality Act 2010 are:

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|---|---|--|
| <p><b>Disability</b><br/><b>Gender reassignment</b><br/><b>Race</b></p> | <p><b>Age</b><br/><b>Marriage/civil partnership</b><br/><b>Sexual orientation</b></p> | <p><b>Sex (gender)</b><br/><b>Pregnancy/maternity</b><br/><b>Religion/belief</b></p> |
|---|---|--|

*By law we must have due regard to the need to:*

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act*
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it*
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.*

In effect, this means that we need to ensure that our policies and services are fair, equitable and proportionate and where possible mitigate against any adverse impacts on people from the different protected characteristics.

In addition to the above protected characteristics you should consider the impact of living in a **rural area** as part of this assessment. Where people live is not a characteristic protected by law, but for an organisation such as Babergh and Mid Suffolk District Councils it is good practice to consider carefully how location may affect people's experience of a policy or service.

The Rural-Urban definition, defines the rurality of very small census based geographies. Census Output Areas forming settlements with populations of over 10,000 (which are urban), while the remainder are defined as one of three rural types: *town and fringe, village or hamlet and dispersed*.

<b>Details</b>	
<b>Service or policy title</b>	Affordable Housing Commuted Sums Spending Policy
<b>Lead officer</b> <i>(responsible for the policy or service/function)</i>	Amma Antwi-Yeboah
<b>Officers carrying out the EQIA</b> <i>(at least one must have done EQIA training and it is recommended that an officer responsible for the policy or service/function is involved in completion)</i>	Robert Feakes – Housing Enabling Officer
<b>Is this new or a revision?</b> <i>(If revision state when previous EQIA undertaken)</i>	New
<b>Is this the first time this policy or function has been assessed?</b>	Yes
<b>Date of completing this EQIA</b>	07/06/23

<b>Description</b>
<p><b>What exactly is proposed?</b> <i>(Describe the service/policy and the changes that are being planned)</i></p> <p>The policy proposes a means of making decisions on the spend of affordable housing commuted sums.</p> <p>The policy would allow for spend of monies by the council on new affordable housing, or grant funding to external bodies for the delivery of affordable homes.</p>
<p><b>Why?</b> <i>(Give reasons why these changes are being introduced)</i></p> <p>In order to give clarity on decision making, so that decisions are logical, consistent and legally compliant, and so that external bodies know how to access funding.</p>
<p><b>What will the effect of the changes be?</b> <i>(Describe which people, communities, localities etc. will be affected by the changes)</i></p> <p>The specific communities and localities cannot be identified at this time; it will depend on the applications made. Any locality in Babergh or Mid Suffolk could be affected.</p> <p>The eventual occupants of the housing would be affected to a significant extent. With reference to the protected characteristics, any of those groups could occupy the housing. Other people in the community will be affected during the construction phase and beyond, but to a lesser extent.</p>
<p><b>How will it be implemented?</b> <i>(Describe the decision making process, timescales, process for implementation)</i></p> <p>External organisations developing affordable housing in the districts (Registered Providers, Parish Councils or Community Land Trusts) will be made aware of the criteria by which they can seek funding.</p> <p>External organisations will then be able to apply for funding by way of a form.</p> <p>The policy sets out what information needs to be demonstrated in order for an application to be considered eligible, and the means by which the scheme funding can be justified. The Councils will also abide by the policy in allocating funding to our own schemes.</p> <p>The Decisions will be made in accordance with the policy by the Director for Housing, in consultation with the Cabinet Member for Housing.</p> <p>Timescales will be determined by the varying availability of funding and individual project deadlines.</p>
<p><b>When is it due to start?</b> <i>(Planned start of new/revised policy/service)</i></p>

Following the Cabinet meetings in July 2023.
<b>Any other relevant details</b>

<b>Data about the population</b>
<p><b>What is the demographic profile or make up of the community you are serving?</b> <i>(A brief overview of quantitative data used and qualitative research undertaken, including customer surveys and focus groups, plus links to reports, local or national data that you have used, suggested sources of information can be found at the end of this document)</i></p> <p>The Council's comprehensive assessment of demographics and affordable housing needs is set out in the Strategic Housing Market Assessment. See:</p> <p><a href="https://www.babergh.gov.uk/planning/planning-policy/evidence-base/current-evidence/shma/">https://www.babergh.gov.uk/planning/planning-policy/evidence-base/current-evidence/shma/</a></p> <p>In addition, further localised housing needs assessments are likely to be carried out in order to justify some projects.</p>
<p><b>What is the profile or make up of your service users by protected characteristics?</b> <i>(Where this data is available. If it is not currently available state any plans to collect this in future)</i></p> <p>The Council's Housing Register does not collect data on all the protected characteristics. This can be considered further in future. But it should also be noted that anyone aged over 16 can apply to join the Register, and anyone could need affordable housing at some point in their lifetime.</p>

<b>Implications for communities and workforce</b>	
<b>Disability</b>	
What is the impact on people with a disability (including children with additional needs) and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	Subject to projects coming forward the policy has a positive impact on the health, wellbeing and economic security of disabled people.
How does it have a positive or negative impact?	<p>A positive impact; the average new home is more accessible than the average existing dwelling.</p> <p>There is also the potential for the provision of specialist housing, should projects be worked up.</p> <p>The policy also encourages / prioritises the development of housing with higher accessibility standards.</p>
What could be done to	Subject to need, work up projects which could deliver

mitigate any adverse impact or further promote positive impact?	suitably accessible housing. Further work on needs would have to be undertaken.
<b>Age</b>	
What is the impact on people of different ages and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	<p>Anyone age 16 plus can legally make a Social Housing Application, although a tenancy cannot be taken up until age 18. This is not a matter which this policy can resolve, although the policy could allow for supporting the development of specialist housing in partnership with the County Council, as long as the development still represented affordable housing.</p> <p>General needs affordable housing is not aimed at specific age groups, but subject to schemes coming forward, specialist housing for older people could be developed.</p> <p>General needs affordable housing has benefits for families, children and young people.</p>
How does it have a positive or negative impact?	By providing housing which offers stability and economic security.
What could be done to mitigate any adverse impact or further promote positive impact?	Subject to need, work up projects which could deliver suitably accessible housing. Further work on needs would have to be undertaken. The Joint Homes and Housing Strategy calls for a project to better understand the housing needs of older people.
<b>Sex (gender)</b>	
What is the impact on people of different genders and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	<p>No impact / positive impact.</p> <p>If an individual's housing needs are affected by their gender, this is indirectly assessed through the assessment of housing need.</p> <p>The CBL Allocations Policy, does not take gender into consideration when allocating housing, but the effect of gender on housing need is indirectly assessed through the assessment of housing need, which then affects the allocation of the housing.</p> <p>Any person of any gender is able to make an application for Social Housing.</p>
How does it have a positive or negative impact?	Through the allocation of housing built under this policy
What could be done to mitigate any adverse impact or further promote positive impact?	
<b>Gender reassignment</b>	
What is the impact on people who have undergone gender	<p>No impact / positive impact.</p> <p>The CBL Allocations Policy, does not take this into</p>

reassignment (i.e. transgender people) and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	consideration when assessing or allocating housing. Any person of any gender is able to make an application for Social Housing. If gender reassignment effects the housing needs of the individual, then this would be taken into account through the assessment of housing need, which would effect the allocation of housing.
How does it have a positive or negative impact?	Through the allocation of housing built under this policy
What could be done to mitigate any adverse impact or further promote positive impact?	
<b>Marriage/civil partnership</b>	
What is the impact on people who are married or in a civil partnership and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	No impact / positive impact.  The CBL Allocations Policy, does not take this into consideration when assessing or allocating housing. Any person of any marital status is able to make an application for Social Housing. If marital status effects the housing needs of the individual, then this would be taken into account through the assessment of housing need, which would effect the allocation of housing.
How does it have a positive or negative impact?	Through the allocation of housing built under this policy
What could be done to mitigate any adverse impact or further promote positive impact?	
<b>Pregnancy/maternity</b>	
What is the impact on people who are pregnant women or those with a young child and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	No impact / positive impact.  The CBL Allocations Policy, does not take this into consideration when assessing or allocating housing. Any person is able to make an application for Social Housing. If pregnancy / maternity effects the housing needs of the individual, then this would be taken into account through the assessment of housing need, which would effect the allocation of housing.
How does it have a positive or negative impact?	Through the allocation of housing built under this policy.
What could be done to mitigate any adverse impact or further promote positive impact?	
<b>Race</b>	
What is the impact on people from different races or ethnic	No impact / Potentially positive impact.

groups and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	The CBL Allocations Policy, does not take this into consideration when assessing or allocating housing. Any person is able to make an application for Social Housing. If race effects the housing needs of the individual, then this would be taken into account through the assessment of housing need, which would effect the allocation of housing.
How does it have a positive or negative impact?	Through the allocation of housing built under this policy.  The policy could be used to support provision for Gypsies and Travellers.
What could be done to mitigate any adverse impact or further promote positive impact?	Separate strategy for working up sites for Gypsies and Travellers, subject to need. Through work on the Joint Local Plan, a new Accommodation Needs Assessment is being commissioned.
<b>Sexual orientation</b>	
What is the impact on people according to their sexual orientation and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	No impact.  The CBL Allocations Policy, does not take this into consideration when assessing or allocating housing. Any person of any sexual orientation is able to make an application for Social Housing. If sexual orientation effects the housing needs of the individual, then this would be taken into account through the assessment of housing need, which would effect the allocation of housing.
How does it have a positive or negative impact?	Through the allocation of housing built under this policy
What could be done to mitigate any adverse impact or further promote positive impact?	
<b>Religion/belief</b>	
What is the impact on people according to their religion or belief and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	No impact.  The CBL Allocations Policy, does not take this into consideration when assessing or allocating housing. Any person aged 16 plus is able to make an application for social housing. As with other characteristics, if this had an impact on housing need it would be taken into account as part of the assessment of housing need.
How does it have a positive or negative impact?	Through the allocation of housing built under this policy.
What could be done to mitigate any adverse impact or further promote positive impact?	No impact.



<b>Rurality</b>	
Where people live is not a characteristic protected by law: but for Babergh and Mid Suffolk District Councils it is good practice to consider carefully how location may affect people's experience of a policy or service.	
What is the impact on people according to whether they live in an urban or rural environment and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	By virtue of the planning system, and the use of spatial strategies, affordable housing is more likely to be delivered in more urban areas.  However, the policy supports the development of Rural Exception Sites where there is an unmet need for affordable housing.
How does it have a positive or negative impact?	Through supporting Rural Exception Sites.
What could be done to mitigate any adverse impact or further promote positive impact?	

<b>Making Decisions</b>	
Having completed this equality impact assessment indicate which decision is recommended to be taken.	
Should the policy or service be implemented as the correct course of action?	Yes
Should the policy or service be amended as suggested by the report so that mitigating actions are taken to address an adverse or negative impact on any characteristic?	Yes – it is apparent that the allocation of the homes will be a key way in which the equality impacts of the policy will be managed. As such, the policy should be clarified to steer proposals to allocate housing units through the Gateway to Homechoice. Different approaches should only be by exception, and if different approaches are to be taken, they should be required to provide a standalone Equality Impact Assessment in order to demonstrate consistency with legislation.
Should the policy or service be reviewed and revised more significantly to take into account its impact on different groups?	No
Should the policy or service not be actioned as there are too many negative impacts?	No

<b>Monitoring Impact</b>
Assessing the impact on equality is an ongoing process that does not end once a policy or service had been agreed or implemented.

## Equality Impact Assessment (EQIA)



How frequently will the policy or service be reviewed?	Annually.
Who will be involved?	Senior Housing Officers and colleagues from other departments as necessary.
Will there need to be an action plan completed for any amendments?	Subject to nature of amendments required, if necessary.
What further evidence or consultation will be needed to check that the policy or service is working well?	Review of schemes delivered and spend of money, along with consideration of any other relevant national or local policy or legislative changes.

<b>Completion</b>	
Authors signature	R W Feakes
Date of completion	12 June 2023

Additional sources of data can be found on the following links:

<http://www.suffolkobservatory.info/Default.aspx>

<http://www.nomisweb.co.uk/>

<https://www.ons.gov.uk/>

<http://suffolkcf.org.uk/publications/hidden-needs-2016/>

<https://www.nao.org.uk/>