

Equality Impact Assessment

Report title	Housing Landlord Transformation and Improvement Programme Update 2026
Completed by	Adel Gardner
Approved by	Vikki Cherry
Date	

The following statements will help you decide whether an EIA is necessary:	Tick all that apply.
Does it affect customers, colleagues or the wider community, and therefore potentially have an effect in terms of equality (for example, removing a service, workforce restructure, employment practices)	<input checked="" type="checkbox"/>
Could it result in a decision being made that would significantly affect how functions and services are delivered (for example, reducing a service or introducing a charge for a service)	<input checked="" type="checkbox"/>
Does it relate to a service that previous engagement has identified as being important to people	<input checked="" type="checkbox"/>
Does it, or could it in the future, affect different groups of people differently	<input checked="" type="checkbox"/>
Does it relate to a policy or service where there is significant potential for reducing inequalities or improving outcomes	<input checked="" type="checkbox"/>
Have there been, or are there likely to be, any public concerns about the policy or proposal	
Does it have an effect on how other organisations operate in terms of equality (i.e. commissioned services)	<input checked="" type="checkbox"/>

Section 3 Equality impacts	
Briefly explain what the policy/service/project aims to achieve	When the Housing and Landlord Transformation and Improvement programme is completed, we will have established a Landlord service that delivers a proactive, bespoke offering whilst demonstrating best practice. Our tenants are informed and have the opportunity to regularly

	<p>scrutinise our services. We hold up to date and validated data about our properties of which underpins decision making. We deliver a safe and compliant landlord service meeting regulatory and legislative requirement, where performance is measured, and Councillors and Senior Officers have assurance and oversight of the service.</p> <p>This is an equality impact assessment (EIA) of the proposals to transform the Housing Landlord service at South Holland District Council (SHDC). The EIA assesses the Transformation Programme for its impact on age, race, disability, religion or belief, gender and sexual orientation.</p> <p>The delivery of the Housing Landlord Transformation and Improvement Programme is supported by a suite of new and updated policies that enhance inclusive service delivery and regulatory compliance. These include the Reasonable Adjustment Policy, Disabled Aids and Adaptations Policy, Updated DCM and Repairs Policies, ASB Framework, Updated Allocations Policy, HRA Governance Framework, and the Knowledge and Information Management Framework.</p> <p>This assessment is intended to help the Transformation team consider the potential impact of transformation on individual members of staff and tenants. It will prepare plans to support individuals through change and will ensure the plans and projects do not discriminate against individuals in the groups outlined above.</p>
<p>Have you undertaken consultation or involved people who are most likely to be affected or interested?</p> <p>Please include: data or community feedback, gaps in data, and how you intend to fill these gaps (where possible)</p>	<p>The Housing Transformation proposals will affect:</p> <ul style="list-style-type: none"> • Tenants • Housing managers and staff • Third party service providers (PSPSL, other SHDC departments, Support service providers) <p>The Housing Transformation proposals will interest:</p> <ul style="list-style-type: none"> • Members of the Council

	<ul style="list-style-type: none"> Residents of the district <p>These groups have been engaged with as part of defining the Housing Transformation and Improvement Programme Objectives.</p> <p>Tenant Satisfaction Measures were carried out in 2023 to feedback on areas that tenants were least satisfied with. This data has informed the Transformation programme.</p> <p>Data used</p> <ul style="list-style-type: none"> Tenant Satisfaction Measures Self-assessment health checks Survey results Tenant census data Stock data
<p>Is there any evidence or research that demonstrates why some individuals or groups are, or are not, affected</p>	<p>N/A</p>
<p>What impacts are there for each of the following characteristics?</p>	
<p>Characteristics</p>	<p>Positive and negative impact</p>
<p>Gender</p>	<p>64% of South Holland tenants are female. (Tenant census 2023)</p> <p>Positive:</p> <ul style="list-style-type: none"> Females make up two thirds of our tenants and are likely to be impacted positively by the Landlord Strategy and Housing Landlord Transformation and Improvement programme. Statistically, women are more likely to be a victim of Domestic Abuse than men. Women suffering domestic violence will benefit from the development of a domestic abuse policy and the Council becoming DAHA (domestic abuse housing alliance) accredited.

	<p>Negative:</p> <ul style="list-style-type: none"> • 2019 report by ONS indicated that there was a higher proportion of women who had never used the internet 8.7%, compared with men at 6.3% potentially putting them of experiencing a negative impact of participating via online surveys or accessing online services. <p>Any mitigation required: The Landlord Strategy and the Housing Landlord Transformation and Improvement programme are high level documents. Policies and plans that have a direct impact on this protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect gender discrimination. Face to face consultation sessions in addition to online.</p>
Age	<p>The median age of South Holland tenants is 63, however it should also be noted that there are more 76 year old tenants than any other single tenant age (modal average), eight of the top ten biggest single ages are in the mid sixties to mid seventies. There are around 100 residents aged 90 or above (Tenant census 2023)</p> <p>Positive:</p> <ul style="list-style-type: none"> • Offering more age-appropriate services, including age-appropriate property settings. • Making it easier for individuals to complain by providing different channels to complain which minimises the risk of over 65 from being restricted from making a complaint as a digital exclusion. • Produce reasonable adjustments for individuals who may need to access our complaints process. <p>Negative:</p> <ul style="list-style-type: none"> • Some staff with protected characteristics may struggle to adapt to the pace and scale of change e.g. changing processes and procedures, introduction of new policies and supporting tenants through change. • The Landlord Strategy may not be representative of older residents and staff – as younger residents and staff are more likely to complete the online survey.

	<p>Any mitigation required: The Landlord Strategy and the Housing Landlord Transformation and Improvement programme are high level documents. Policies and plans that have a direct impact on this protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect age discrimination. Face to face consultation sessions in addition to online.</p>
<p>Disability</p>	<p>40% of all council housing residents have a such a limiting disability. This compares to just 19% of the South Holland district population as whole that has a limiting disability. When restricting analysis to just tenants, the proportion with a limiting disability increases to 51%. This proportion is higher than average, as only 41% of tenants in social housing in England and Wales in the UK 2021 census have a limiting disability (household reference person). Almost two thirds of households had at least one member with a disability (60%). (Tenant census 2023)</p> <p>The Disabled Aids and Adaptations Policy and Reasonable Adjustment Policy adopted in 2025 directly support tenants with disabilities by ensuring tailored support.</p> <p>Positive:</p> <ul style="list-style-type: none"> • Data will enable proactive approaches to managing and supporting tenants in properties. For example, blind tenants would proactively have their properties inspected for damp and mould. • Provision of more housing that is accessible and adaptable will increase choice and help mitigate any shortfall or barriers in access. • Better understanding of our property types with adaptations will disproportionately positively impact disabled, vulnerable, and older people who are the primary end users of such accommodation. • Produce and document reasonable adjustments for individuals who may need to access our services. • It will encourage officers to listen to the individuals voice in designing services.

	<p>Negative:</p> <ul style="list-style-type: none"> Using online methodology for consultation may lead to lower participation by those that are disabled who account for 51% of tenants <p>Any mitigation required: The Landlord Strategy and the Housing Landlord Transformation and Improvement programme are high level documents. Policies and plans that have a direct impact on this protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect disability discrimination. Face to face consultation sessions in addition to online.</p>
Race	<p>8% of tenants are from a Black or minority ethnic group. (Tenant census 2023)</p> <p>Positive: Tenant and staff engagement will seek out the voices for under-represented groups</p> <p>Negative: no significant impact.</p> <p>Any mitigation required: The Landlord Strategy and the Housing Landlord Transformation and Improvement programme are high level documents. Policies and plans that have a direct impact on this protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect race discrimination. Resident groups will form a true representation of the make-up of our tenants.</p>
Religion or belief	<p>Positive: Tenant and staff engagement will seek out the voices for under-represented groups</p> <p>Negative: no significant impact.</p> <p>Any mitigation required: The Landlord Strategy and the Housing Landlord Transformation and Improvement programme are high level documents. Policies and plans that have a direct impact on this protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect religion or belief discrimination.</p>

<p>Sexual orientation</p>	<p>A little over one in ten of those tenants that completed the census declined to give their sexual orientation, but amongst those that did, 1.7% are LGBTQ including 0.7% gay or lesbian, 0.6% bisexual and 0.4% other. (Tenant census 2023)</p> <p>Positive:</p> <ul style="list-style-type: none"> • Tenant and staff engagement will seek out the voices for under-represented groups • ASB policy to support victims from all communities including LGBTQ <p>Negative: no impact identified.</p> <p>Any mitigation required: The Landlord Strategy and the Housing Landlord Transformation and Improvement programme are high level documents. Policies and plans that have a direct impact on this protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect sexual orientation discrimination.</p> <p>The ASB Framework adopted in 2025 ensures that anti-social behaviour is addressed inclusively, supporting victims from all communities including LGBTQ+.</p>
<p>Gender reassignment</p>	<p>Positive: no impact identified</p> <p>Negative: no impact identified</p> <p>Any mitigation required: The Landlord Strategy and the Housing Landlord Transformation and Improvement programme are high level documents. Policies and plans that have a direct impact on this protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect gender reassignment discrimination.</p>
<p>Pregnancy, maternity and paternity</p>	<p>Positive: no impact identified</p> <p>Negative: no impact identified</p>

	<p>Any mitigation required: The Landlord Strategy and the Housing Landlord Transformation and Improvement programme are high level documents. Policies and plans that have a direct impact on this protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect pregnancy maternity or paternity discrimination.</p>
Marriage and civil partnership	<p>Positive: no impact identified</p> <p>Negative: no impact identified</p> <p>Any mitigation required: The Landlord Strategy and the Housing Landlord Transformation and Improvement programme are high level documents. Policies and plans that have a direct impact on this protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect marriage and civil partnership discrimination.</p>
Rural isolation	<p>Positive: no impact identified</p> <p>Negative: no impact identified</p> <p>Any mitigation required: The Landlord Strategy and the Housing Landlord Transformation and Improvement programme are high level documents. Policies and plans that have a direct impact on this protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect rural isolation discrimination.</p>
Socio-economic factors	<p>Positive:</p> <ul style="list-style-type: none"> • Individuals will be able to raise complaints in any way with any member of staff. This promotes awareness and access for individuals who are less confident in expressing themselves in writing. • Review and improvement of our complaint procedure to use appropriate language when responding in writing to adjust to meet the needs of the complainant.

	<ul style="list-style-type: none"> • Cost of living response officers to provide welfare, benefit, housing and debt advice to tenants at risk of falling into arrears or losing tenancies. • Improvement in neighbourhoods and estates and investment in our community centres and green and open spaces within our estates. <p>Negative: no impact identified</p> <p>Any mitigation required: The Landlord Strategy and the Housing Landlord Transformation and Improvement programme are high level documents. Policies and plans that have a direct impact on this protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect socio-economic discrimination.</p>
<p>Other <i>(for example, those with dependents/caring responsibilities, asylum seeker and refugee communities, children in the care system, etc)</i></p>	<p>Positive: No impact identified</p> <p>Negative: No impact identified</p> <p>Any mitigation required: The Landlord Strategy and the Housing Landlord Transformation and Improvement programme are high level documents. Policies and plans that have a direct impact on this protected group will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect other discrimination.</p>
<p>Carers are not a protected characteristic under the Public Sector Equality Duty, however we need to consider the potential impact on this group to ensure that there is no associative discrimination (i.e. discrimination against them because they are associated with people with protected characteristics). The definition of carers developed by Carers UK is that ‘carers look after family, partners or friends in need of help because they are ill, frail or have a disability. The care they provide is unpaid. This includes adults looking after other adults, parent carers looking after disabled children and young carers under 18 years of age.’</p>	

<p>Overall, if there is a potential adverse impact after the mitigation, please state why and whether this is justifiable.</p>	<p>n/a</p>
<p>How will you monitor this to ensure there is no adverse effect in the future?</p>	<p>The Landlord Strategy and the Housing Landlord Transformation and Improvement programme are high level documents. Policies and plans that have a direct impact on protected groups will be subject to consultation and EIA assessment to identify and mitigate any identified direct or indirect discrimination.</p>
<p>Outcome of EIA:</p>	<p>Adjustments:</p> <ul style="list-style-type: none"> • Steps have already been taken to address barriers around digital exclusion. These include the introduction of printed materials, sending documents in alternative formats, and promotion of events and activities through a variety of channels. Additional tools such as text relay for hearing-impaired tenants has been introduced and the development of an online repairs portal are underway. • Change management support has been initiated, with staff briefings and training aligned to new policies and service standards such as reasonable adjustments policy and Awaabs Law. • A suite of new and updated policies has been developed to support inclusive service delivery and regulatory compliance. These include: <ul style="list-style-type: none"> ○ Reasonable Adjustment Policy ○ Disabled Aids and Adaptations Policy ○ Updated DCM and Repairs Policies ○ ASB Framework ○ Updated Allocations Policy ○ HRA Governance Framework ○ Knowledge and Information Management Framework ○ Tenant Engagement and Influence Strategy <p>Further work is ongoing to interrogate potential impacts on groups where data gaps exist, particularly in under-represented communities and intersectional characteristics.</p>

	<p>The Landlord Strategy and the Housing Landlord Transformation and Improvement Programme will continue to be reviewed periodically. Equality impacts will be reassessed at each review point, and formal Equality Impact Assessments will be carried out for each new policy introduced under the programme.</p>
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