

Equality Impact Assessment

Report title	Anti-Social Behaviour (ASB) and Hate Crime Policy for the Housing Landlord Service
Completed by	Adel Gardner
Approved by	Vikki Cherry
Date	24 th March 2026

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)	☒
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)	☐
Does it relate to a service that previous engagement has identified as being important to people	☒
Does it, or could it in the future, affect different groups of people differently	☒
Does it relate to a policy or service where there is significant potential for reducing inequalities or improving Outcomes	☒
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)	☐

Section 3 Equality impacts

Appendix 3

Briefly explain what the policy/service/project aims to achieve	The policy aims to ensure that all tenants live in safe, secure and welcoming neighbourhoods by: • preventing and addressing anti-social behaviour and hate crime • ensuring victims receive a fair, consistent and timely response • taking a victim-centred approach that identifies and responds to risk and vulnerability • delivering accessible reporting options for all residents • ensuring that responses are proportionate, evidence-based and compliant with equality duties
Have you undertaken consultation or involved people who are most likely to be affected or interested? Please include: data or community feedback, gaps in data, and how you intend to fill these gaps (where possible)	Consultation was carried out during policy development, including: • consultation with SHDC tenants • engagement with elected members • consultation with agencies involved in tackling ASB (Police, environmental health, safer communities)
Is there any evidence or research that demonstrates why some individuals or groups are, or are not, affected	Evidence used: • Tenant Census 2023 (demographic and vulnerability data) • National Census 2021 (comparators for protected characteristics) • Crime Survey for England & Wales (domestic abuse prevalence) • Housing Ombudsman reports • Internal ASB case data

Characteristics	Positive and negative impact
Sex	The tenant census (2023) reported that 56% of residents in our properties are female (compared with 51% in South Holland (national census 2021). Positive:

	• Victim-centred, risk based approach particularly benefits women, who are statistically more likely to experience harassment, domestic abuse and targeted hate behaviours. • Multiple reporting channels increase accessibility for people who may feel unsafe reporting in person. Negative: • Women (56% of tenants) may be disproportionately affected by ASB relating to harassment or coercive control. • Women experiencing domestic abuse may fear repercussions from perpetrators if reporting ASB. Any mitigation required: Ability to avoid contacting alleged perpetrators where this increases risk.
Age	The tenant census (2023) reported that the median age for tenants is 63 (52 in the national census for South Holland, 2021). The average age profile of residents in our properties is 48 (46 in the national census for South Holland, 2021). Positive: • Older tenants (median age 63) benefit from risk-based triage, faster contact times and tailored communication. • Sheltered Housing “meet and greet” sessions improve access for older or socially isolated tenants. Negative: Older residents may face barriers using online reporting. Any mitigation required: • Multiple non-digital reporting routes (phone, Housing Officer, home visits). • Tailored communication and support following risk assessments.

Disability

The tenant census (2023) reported that 51% of tenants have a limiting disability and 40% of residents have a limiting disability, compared with 41% and 19% for South Holland respectively (national census 2021). Further to this, the tenant census recorded the type of disability:

Type of disability	Tenant census (%)	Number of tenants
Mobility issues	42	558
Mental health issues (incl anxiety & depression)	30	398
Stamina or breathing or fatigue conditions	29	385
Other significant medical condition	23	305
Dexterity (e.g. lifting or carrying objects or using a keyboard)	19	252
Hearing impairment	15	199
Memory issues	14	186
Visual impairment	9	119
Social or behavioural condition (e.g. ADHD or ASD)	8	106
Mobility issues (temporary)	7	93
Learning impairment	6	80
Speech impairment	3	40

In the Housing Ombudsman report on Attitudes, Rights and Respect, 58% of respondents considered themselves to have a disability, and 68% of those said their landlord had not made reasonable adjustments for them, despite being asked. Many respondents referred specifically to the lack of aids and adaptations in their home, reflecting the EHS findings that over half of housing association tenants lack the adaptations they need.

Independent living officers have become aware of issues whereby tenants with disabilities such as visual impairment or hearing impairment are facing barriers when trying to access our services.

Positive:

	• Policy explicitly recognises that behaviour may arise from disability-related conditions; response is proportionate, support-led and not automatically enforcement-led. • Adjusted communication methods (translation, support worker, alternative formats) improve access. • Risk assessments embed identification of vulnerability. Negative: • High proportion of disabled tenants (51% tenants, 40% residents) means disabled people disproportionately experience ASB and difficulty reporting it. Any mitigation required: • Recording of additional needs on case files. • Use of advocates/support workers. • Flexibility in evidence-gathering where memory or stamina issues are present. • Ensuring reasonable adjustments and accessible formats (Braille, large print, audio).
Race	The tenant census (2023) reported that 8% of tenants are from ethnic minority groups consisting of 6.4% Other White (2.5% Polish, 1.4% Lithuanian, 1% Portuguese and Latvian). The 2021 census reported 9% ethnic minority groups for South Holland, with 6.7% (4% Poland, 2.6% Lithuania and 1.5% Romania). In 2021, 0.6% of South Holland residents identified their ethnic group within the "Other" category ("Arab" or "Any other ethnic group"), up from 0.1% in 2011. Positive: • Clear recognition of racially motivated incidents as hate crime. • Access to translation services supports reporting and understanding of case processes. Negative: • Some tenants may fear reprisal or mistrust authorities based on previous experiences.

	Any mitigation required: Anonymous and multiple reporting routes.
Religion or belief	We do not record data around religion or belief, however the National census reported 33% of South Holland residents reporting to have 'no religion; followed by 58.9% as Christian. Positive: Hate crime definition covers faith-related harassment. Negative: none Any mitigation required: Optional collection of protected characteristic information at point of report.
Sexual orientation	The tenant census (2023) reported that 1.7% of tenants who identify as LGBTQ+ sexual orientation, compared with 2.8% in South Holland (National Census 2021). Positive: • Explicit protection under hate crime provisions (homophobic harassment). • Multiple confidential reporting options. Negative: LGBTQ+ tenants (1.7%) may under-report due to fear of discrimination. Any mitigation required: Strict confidentiality processes
Gender reassignment	We do not collate data regarding gender reassignment. Positive: Explicit inclusion under hate crime protections. Negative: No implications.

	Any mitigation required: ensure respectful communication practices
Pregnancy, maternity and paternity	We do not collate data regarding pregnancy, maternity and paternity. Positive: Safeguarding procedures offer protection where vulnerability is present. Negative: No implications. Any mitigation required: No.
Marriage and civil partnership	The South Holland census recorded 49.2% of residents married or in a civil partnership. <i>Note this is a protected characteristic in employment only.</i> Positive: No implications. Negative: No implications. Any mitigation required: No.
Rural isolation	South Holland is a rural area spanning 74,238 hectares, with limited access to public transport. Positive: • Multiple access routes reduce barriers for tenants in remote areas. • Officers conduct home visits and estate walkabouts. Negative: No implications Any mitigation required: Remote engagement options (phone/email).

Socio-economic factors	The overall income deprivation score for South Holland is 10.3%. Exploring local income deprivation (ons.gov.uk) Of the 316 local authorities in England (excluding the Isles of Scilly), South Holland is ranked 174th most income-deprived. Sutton Bridge is among the 20% of most income-deprived neighbourhoods in England. Positive: Support first approach helps sustain tenancies and reduces escalation. Negative: Income deprivation may limit ability to comply with environmental adjustments (e.g., carpets to reduce noise) Any mitigation required: Signposting to financial and wellbeing support.
Additional category: Carers	We do not hold data around tenants with caring responsibilities. The national census reported that 4.25% of South Holland residents (aged 5 years and older) provided up to 19 hours unpaid care each week (2021). In 2021, just under 1 in 50 people (1.9%) reported providing between 20 and 49 hours of unpaid care each week. Census 2021 was undertaken during the coronavirus (COVID-19) pandemic. This may have influenced how people perceived and managed their provision of unpaid care, and therefore may have affected how people chose to respond. Positive: flexible communication methods and home visits support those with caring responsibilities. Negative: None Any mitigation required: None

Additional category: Domestic abuse and ASB victims	117 for period 1 April - 31 March 2026. This excludes cases reported but found not to constitute ASB 52.1% of residents surveyed in the TSMs reported being satisfied with our approach to handling complaints of ASB. The Crime Survey for England and Wales estimated that 3.8 million people aged 16 years and over experienced domestic abuse in the year ending March 2025. During 2024/25, 15 households were housed in social housing following fleeing domestic abuse. Positive: • strong multi-agency working. • Safety based decisions (not contacting alleged perpetrator if required). • Risk led timescales for urgent cases. Negative: None Any mitigation required: Regular checks for safety and welfare.
Overall, if there is a potential adverse impact after the mitigation, please state why and whether this is justifiable.	Some groups, particularly disabled residents, older tenants, women, and ethnic minorities experience higher exposure to ASB and barriers to reporting. However, the policy includes robust mitigation, including flexible communication, safeguarding, risk-based triage and tailored support. Residual risk is low, proportionate and justified given the support framework in place.
How will you monitor this to ensure there is no adverse effect in the future?	The following mechanisms will ensure no new adverse impact occurs: • Monthly performance clinic and quarterly scrutiny monitoring • Tracking of hate incidents and protected characteristic linked cases • Tenant Satisfaction Measures (TSMs) for ASB case handling • Annual reporting to the Regulator of Social Housing • Ongoing review through the Tenant Influence Pane

Appendix 3

Outcome of EIA:	Mitigations in place and no unlawful discrimination identified.
-----------------	---

ends