



Equality Impact Assessment (EqIA)

The Public Sector Equality Duty (PSED) was introduced as part of the Equality Act 2010, which protects people from discrimination in the workplace, in the provision of services and in wider society.

The duty requires all public bodies to have due regard to the need to:

- Eliminate discrimination
- Advance equality of opportunity
- Foster good relations between different people

Public bodies demonstrate this due regard in different ways, including producing robust equality impact assessments when considering changes to policies and services.

An EqIA enables us to check the potential impacts on residents and employees of our policies, services and projects. It's an opportunity to challenge how we currently do things.

Carrying out an EqIA should not create extra work; it should be part of your normal service planning process. Most of the information required should already be available to you through other work already undertaken e.g. service user monitoring, analysis of complaints and national research.

The purpose of an EqIA is to *take account* of equality as plans develop, to promote and assist the consideration of equalities issues arising in plans and proposals and to ensure that where possible adverse or disproportionate impacts are minimised and positive impacts are maximised. As such where possible an EqIA should be started at the outset of a project/proposal and continually be developed and reviewed until a final proposal is adopted. An EqIA should be used to ensure decision makers have all the information they need regarding potential impacts to ensure they have due regard to the Public Sector Equality Duty when making judgements.

Carrying out EqIAs should be an integral part of policy or service development/change and larger projects may need more than one EqIA if different areas are impacted by the change.

Any project that requires consultation will automatically require an EqIA.

All approved and signed EqIAs are recorded in a central register. Please email your completed draft EqIA to equalities@buckinghamshire.gov.uk. Previous EqIAs can be made available for information upon request. For any questions or if you require support in completing your EqIA please contact Maria Damigos and Natalie Donhou Morley directly.



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Part A (Initial assessment) - Section 1 - Background

Proposal/Brief Title: Buckinghamshire Council Housing Strategy 2023-2028

OneDrive link to report/policy: [Buckinghamshire Council Housing Strategy 2024-2029](#)

Related policies:

- Buckinghamshire Corporate Plan 2020-2025
- The forthcoming Buckinghamshire Local Plan
- Buckinghamshire Joint Local Health and Wellbeing Strategy 2022-2025
- Opportunity Bucks
- Buckinghamshire Climate Change and Air Quality Strategy 2021
- Buckinghamshire Homelessness and Rough Sleeping Review and Strategy 2022-2025
- Buckinghamshire First Homes Interim Position Statement
- Buckinghamshire Council Housing Allocations Policy
- Buckinghamshire Tenancy Strategy.

Date: 6 July 2023

Type of strategy, policy, project or service: A new Buckinghamshire-wide strategy

Please tick one of the following:

- Existing
- New or proposed
- Changing, update or revision
- Other (please explain)

This assessment was created by:

Name: [Helen George](#)

Job Title: [Housing Strategy Officer](#)

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Briefly describe the aims and objectives of the proposal below:

The aims of the Buckinghamshire Housing Strategy 2024-2029 are:

- i) [maximise its opportunities and resources to meet housing needs and aspirations, involving the use of council resources and partnership opportunities.](#)



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- ii) ensure a co-ordinated approach to housing activity in Buckinghamshire, linking a suite of policies and strategies to deliver the council's ambitions
- iii) promote the role of housing in delivering corporate priorities and wider objectives including health and wellbeing and sustainable economic growth.
- iv) ensure that Buckinghamshire Council meets its obligations under the Equality Act 2010 and meets a diverse range of housing needs.

What outcomes do we want to achieve?

Priority one – a Home for Everyone: meeting the needs of our diverse population

Buckinghamshire Council will:

- Work with its partners to provide housing options for households with particular needs, including young people, persons leaving the Armed Forces, older people, people with physical disabilities, people with learning disabilities and/or autism, people with mental health issues, people with special educational needs, and key workers.
- Improve the accessibility of new and existing homes.
- Continue to monitor housing needs throughout Buckinghamshire, and produce response to meet housing needs.

Priority two – Better Homes: good quality, sustainable and matched to need

Buckinghamshire Council will:

- Continue to work to ensure a high quality, well-managed accommodation in the private rented sector.
- Work to ensure that best use is made of existing housing include empty homes and under-occupied homes.
- Work with registered providers and other partners to improve the sustainability and energy efficiency of homes in Buckinghamshire.

Priority three – New Homes: affordable, accessible, and appropriate

Buckinghamshire Council will:

- Assist registered providers in delivering new affordable homes, helping to identify sites, and securing funding.
- Maximise the use of local authority assets, including land, property and financial assets, to contribute to the delivery of affordable housing, and assist registered provider partners in maximising their assets to deliver more affordable homes.
- Ensure that the delivery of affordable housing is a major part of all regeneration schemes in Buckinghamshire.

Does this proposal plan to withdraw a service, activity or presence? Yes/**No**



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Please explain your answer:

This strategy does not plan to withdraw a service, activity or presence.

Does this proposal plan to reduce a service, activity or presence? Yes/**No**

Please explain your answer:

This strategy does not plan to reduce a service, activity or presence.

Does this proposal plan to introduce, review or change a policy, strategy or procedure?
Yes/No

Please explain your answer:

The housing strategy is a new Buckinghamshire-wide strategy.

Does this proposal affect service users and/or customers, or the wider community? **Yes/No**

Please explain your answer:

Yes, the Housing Strategy is intended to have a positive impact for service users and customers.

Does this proposal affect employees? **Yes/No**

Please explain your answer:

The Housing Strategy contains proposals for devising housing options for Key Workers. Buckinghamshire Council has devised a definition of Key Workers in the county which includes occupations in which employees of the council are employed. The Housing Strategy should provide new affordable accommodation options for employees of Buckinghamshire Council. The definition of Key Workers in Buckinghamshire is as follows:

1. Clinical staff employed by the NHS to include ambulance drivers, paramedics, healthcare workers;
2. Persons providing care services (including those working in care homes);
3. Police officers, community support officers, and frontline police staff;
4. Uniformed staff in the Fire & Rescue Service;
5. Prison officers, and frontline prison staff;
6. Probation officers;
7. Public sector employed teachers, social workers, planning and building control officers, environmental health officers, occupational therapists, speech therapists and educational psychologists;
8. Or such other critical workers that the council acting reasonably shall approve.

Will employees require training to deliver this proposal? Yes/**No**

Please explain your answer:

No, employees will not require training to deliver this proposal.



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Has any engagement /consultation been carried out, or is planned in the future?

Yes/No

Please explain your answer:

Consultation with stakeholder organisations. Workshops took place throughout Autumn 2022 on key housing issues which need to be addressed in Buckinghamshire. Consultees included representatives of statutory organisations, voluntary organisations in Buckinghamshire.

Public and stakeholder consultation to be carried out summer 2023.

Section 2 - Impacts

Please highlight potential impacts (including unintended impacts or consequences) for each protected characteristic*/equality groups below. Where there are negative or positive impacts please give more details of the impact. Where the impacts are unclear please explain why.

Age*

| Positive | Negative | Unclear | None |
|----------|----------|---------|------|
| X | | | |

Details:

The Housing Strategy will contain the following actions related to older people:

- To achieve the targets for developing affordable housing options as set out in the Buckinghamshire Adult Social Care Accommodation Market Analysis November 2022.
- Work with registered provider partners to understand role played by sheltered housing in the area and whether some should be remodelled to better meet current needs.

The Housing Strategy will contain the following actions related to younger people:

- Explore ways of increasing the number of one bed properties available in the private and social rented sectors
- Co-produce a housing options guide for younger people with Special Educational Needs and Disabilities (SEND); ensure appropriate advice and sign-posting is available to make good choices.

Disability*

| Positive | Negative | Unclear | None |
|----------|----------|---------|------|
| X | | | |

Details:

The Housing Strategy will contain the following actions related to physical disability:

- Achieve the targets for developing affordable housing options as set out in the *Buckinghamshire Adult Social Care Accommodation Market Analysis November 2022*



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- Carry out a monitoring and evaluation exercise to ensure the adaptations process is efficient and effective, including work delivered through Disabled Facilities Grant

The Housing Strategy will contain actions related to mental health:

- To achieve the targets for developing affordable housing options as set out in the *Buckinghamshire Adult Social Care Accommodation Market Analysis November 2022*.

The Housing Strategy will contain actions related to learning disabilities/autism:

- To achieve the targets for developing affordable housing options as set out in the *Buckinghamshire Adult Social Care Accommodation Market Analysis November 2022*.

Pregnancy & maternity*

| | | | |
|----------|----------|---------|------|
| Positive | Negative | Unclear | None |
| | | X | |

Details: - The Housing Strategy aims to increase the availability of good quality affordable homes in Buckinghamshire. A disproportionately high number of households with children headed by a lone parent approach Buckinghamshire Council for assistance under homelessness legislation.

Race & Ethnicity*

| | | | |
|----------|----------|---------|------|
| Positive | Negative | Unclear | None |
| | | X | |

Details: The Housing Strategy will contain actions related to Race and Ethnicity:

- Buckinghamshire has become substantially more ethnically diverse between 2011 and 2021. A research exercise will be carried out to assess whether this change generates any particular housing needs.

Marriage & Civil Partnership*

| | | | |
|----------|----------|---------|------|
| Positive | Negative | Unclear | None |
| | | | X |

Details: No particular impacts related to Marriage and Civil Partnership have been identified in the Buckinghamshire Housing Strategy 2023-2028.

Religion & Belief*

| | | | |
|----------|----------|---------|------|
| Positive | Negative | Unclear | None |
| | | | X |

Details: No particular impacts related to Religion and Belief have been identified in the Buckinghamshire Housing Strategy 2024-2029.

Sex*

| | | | |
|----------|----------|---------|------|
| Positive | Negative | Unclear | None |
|----------|----------|---------|------|



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X

Details: The Housing Strategy aims to increase the availability of good quality affordable homes in Buckinghamshire.

- A disproportionately high number households with children headed by a lone parent approach Buckinghamshire Council for assistance under homelessness legislation. Lone parents are mostly female.
- A disproportionately high number of single males require assistance with finding suitable and affordable homes.

Sexual Orientation*

| | | | |
|----------|----------|---------|------|
| Positive | Negative | Unclear | None |
| | | | X |

Details: No particular impacts related to Sexual Orientation have been identified in the Buckinghamshire Housing Strategy 2024-2029.

Gender Reassignment*

| | | | |
|----------|----------|---------|------|
| Positive | Negative | Unclear | None |
| | | | X |

Details: No particular impacts related to Gender Reassignment have been identified in the Buckinghamshire Housing Strategy 2024-2029.

Do you anticipate any impacts on military families/veterans in relation to the Armed Forces Act 2021 requirements on local authorities to have due regard to the Armed forces Covenant? Yes

Please explain your answer: The Housing Strategy aims to increase the availability of good quality affordable homes in Buckinghamshire. This will include homes for low cost home ownership. Under government guidelines, military families and veterans must be given priority for low cost home ownership homes.

Are there any other additional groups/impacts that the EqIA should evaluate in relation to the proposal? Yes

Details: The Housing Strategy includes actions to improve the housing options for older people and people with a range of disabilities. It also includes an action to improve housing options for key workers. These could have an indirect beneficial impact upon Carers.

The Housing Strategy contains also actions which aim to improve the supply of affordable housing throughout the county e.g. targeted use of council resources to improve supply which may have a positive impact on those facing rural isolation.

The Housing Strategy aims to increase the availability of good quality affordable homes in Buckinghamshire. The provision of more affordable homes, especially those at the lower Social Rent levels, will benefit households in receipt of lower incomes. The provision of



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more homes for special needs groups is intended to benefit those who experience social deprivation.

Section 3 – Is a full assessment required?

If you have answered yes to any of the initial assessment questions in section 1 of this EqIA, or have indicated a negative or unclear impact in section 2, it is likely you will need to complete part B of the EqIA form. Should you need guidance as to whether a full EqIA is needed at this time please contact Maria Damigos or Natalie Donhou Morley before continuing.

Following completion of part A, is part B completion required?

X Yes

- No
- Not required at this time

Explain your answer:

This is major strategy for Buckinghamshire Council so it requires completion of part B.

Have you completed an DPIA for this project/change? Yes/No

(As you are completing an EqIA, you may also require a DPIA - for more information please contact dataprotection@buckinghamshire.gov.uk)

This strategy does not involve any use of personal information.

Part B (Full assessment) - Section 5 – Further information

Will there be an impact on any other functions, services or policies? If so, please provide more detail:

Yes. The Housing Strategy relates to all of the following corporate policies, strategies and position statements:

- Buckinghamshire Corporate Plan 2020-2025
- The forthcoming Buckinghamshire Local Plan
- Buckinghamshire Joint Local Health and Wellbeing Strategy 2022-2025
- Opportunity Bucks
- Buckinghamshire Climate Change and Air Quality Strategy 2021
- Buckinghamshire Homelessness and Rough Sleeping Review and Strategy 2022-2025
- Buckinghamshire First Homes Interim Position Statement
- Buckinghamshire Council Housing Allocations Policy
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Are there any potential barriers to implementing changes to your service/strategy/policy/ project?

The strategy will be implemented by an action plan which will be updated on an annual basis. The methods for overcoming barriers to implementing individual actions will be included in the action plans, and if needed, Equality Impact Assessments will be completed for individual actions.

Section 6 – Information gathering – what do you need to know about your customers and making a judgement about potential impacts on them?

What data do you already have about your service users, or the people your policy or strategy will have an impact on, that is broken down by protected characteristics* and equality groups (non-statutory)?

Once all available data has been gathered, it will be examined to check whether there is evidence of any of the following among the projects in the action plan:

- lower take up/participation rates by disadvantaged groups generally;
- lower take up/participation by certain groups,
- eligibility criteria which disadvantages certain groups,
- access to services being reduced or denied to people,
- people facing increased difficulty as a result of a policy/practice,
- a policy/practice resulting in reduced benefits for equality groups.

The information sources which will be used for each Protected Characteristic Group are:

Age*: Census 2021, information on housing schemes for older people in Buckinghamshire, Buckinghamshire Adult Social Care Accommodation Market Analysis November 2022.

Disability*: Census 2021, Buckinghamshire Adult Social Care Accommodation Market Analysis November 2022.

Pregnancy and maternity*: Buckinghamshire Council records of applications for assistance under homelessness legislation.

Race*: Census 2021.

Marriage & Civil Partnership*: Census 2021

Religion or belief*: Census 2021

Sex*: Buckinghamshire Council records of applications for assistance under homelessness legislation, Census 2021, Indices of Multiple Deprivation 2019.

Sexual orientation*: Not applicable

Gender re-assignment*: Not applicable

Gender identity: Not applicable



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Carers: *Further research needs to be carried out into sources of information on housing need among key workers.*

Rural isolation: Census 2021, Indices of Multiple Deprivation 2019, Census 2021, Indices of Multiple Deprivation 2019.

Single parent families: Census 2021, Buckinghamshire Council records of applications for assistance under homelessness legislation.

Poverty (social & economic deprivation): Census 2021, Indices of Multiple Deprivation 2019.

Military families / veterans: Census 2021, Buckinghamshire Council Housing Register.

Do you need any further information broken down by protected characteristic or equality group to inform this EqIA?

Yes

No

If yes, list here to help you gather data for the action plan in Section 11

Section 7 – Negative effects, impacts or consequences

Is there any potential for or actual direct or indirect discrimination or a disproportionate effect on a protected group or equality group?

Guidance note: Direct discrimination is when someone is treated unfairly because of a protected characteristic, such as sex or race or an equalities group, such as being a carer. For example, someone is not offered a promotion because they're a woman and the job goes to a less qualified man. Indirect discrimination can happen when there are rules or arrangements that apply to a group of employees or job applicants, but in practice are less fair to a certain protected characteristic.

Yes

No

Not sure at this time

What are the potential negative effects, impacts or consequences and how have, or may, they arise:

Guidance note (delete after completion)

Please state what the potential negative impact (s) are – Section 8 allows you to set out any minimising/mitigating actions.

State what the negative impact(s) are for each group, identified in Section 2. In addition, you should also consider and state potential risks associated with your proposal.



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Section 8 – Proposals to remove or minimise negative effects, impacts or consequences

How is it proposed to mitigate or minimise the negative effects, impacts or consequences identified in Section 7?

Guidance Note (delete after completion)

No negative impacts are anticipated.

Section 9 - Other factors to take into consideration:

Guidance note (delete after completion)

This should include balancing or other factors for decision makers to take into consideration such as positive impacts (financial or otherwise), costs and resources

Section 10 - Conclusion:

This policy is overarching and is based on improving housing options for those groups identified as being of most need of housing.

Delivery of related documents such as the Housing Strategy Action Plan and Housing allocations policy will be instrumental in ensuring that impacts continue to be monitored

Public consultation will be delivered, with questions to consider equality/agreement with the policy aims and objectives, and data collection will be completed to ensure that a broad spectrum of residents have had an opportunity to engage.

Section 11 - Action Planning

Guidance note (delete after completion)

Where the policy or practice would result in unavoidable or potentially unlawful impacts changes should clearly be made where possible and specific actions should be identified and noted in the action plan. The objectives of the policy or practice should be re-examined to find out if there is an alternative way of meeting the desired objectives without the adverse impact, and potentially creating a positive one.

Where impacts are unavoidable the objective of completing the EqIA and the action plan is to demonstrate that impacts have been considered as part of the decision making process to ensure compliance with the PSED. An example to show how this works - where a council decides to close a care home, if they do so without considering the equalities implications (via an EqIA or otherwise) the decision is extremely likely to be quashed by the Courts on a challenge, as per previous case law. This would happen even if it is almost certain that examination of the equalities implications will have little or no impact on the final decision (e.g. due to a lack of resources to pay for the care home) - because the PSED was not part of the decision making process.



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A properly completed EqIA should be a full and complete record to show that all equalities implications and the PSED were appropriately considered by the decision maker.

If the adverse impact is potentially unlawful and alternatives cannot be found, the policy or practice may need to be completely redesigned.

| Actions to be taken to address negative effects, impacts or consequences and maximise positive impacts | Potential Outcomes | Lead | Timescales |
|--|--------------------|------|------------|
| Equality Impact Assessments will be completed for projects within the action plan | | | |

Section 12 - Monitoring Arrangements

What are the plans to monitor the actual and/or final impact? (The EqIA will help anticipate likely effect but final impact may only be known after implementation)

The Buckinghamshire Housing Strategy 2024-2029 and its associated action plans will be monitored and revised on an annual basis.

What are the proposals for reviewing and reporting actual impact

Governance of the strategy will be delegated by Buckinghamshire Council's Cabinet.

Section 13 - Part A and B Sign off – (If Part B has not been completed please complete Section 4)

Officer completing Part A and B assessment: [Helen George](#)

Date: [18 May 2023](#), updated [6 July 2023](#)

Equality advice sought from: [Natalie Donhou Morley & Maria Damigos](#) Date: [05/07/2023](#)
[2023](#)

Service Director sign off: [Lisa Michelson](#) Date: [6 July 2023](#)

CMT sign off (if deemed necessary by Service Director) sign off: (Please insert name) Date:
(Please insert Date)

Next review date: [To be confirmed](#)