

# Equality Impact Assessment

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|--|---|
| Assessment Of: Devon Home Choice Policy Change   |   |
| <input checked="" type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service<br><input type="checkbox"/> Other: | <input type="checkbox"/> New<br><input checked="" type="checkbox"/> Already exists / review <input type="checkbox"/> Changing |
| Directorate: Housing   | Assessment carried out by: Tammy Hayes  |
| Service Area: Housing  | Job Role: Housing Needs Lead  |
| Version / Date of Sign Off by Director:  | 4 <sup>th</sup> March 2026  |

## Step 1: What do we want to do?

*This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the Policy Officer early for advice.*

### 1.1 What are the aims and objectives/purpose of this proposal?

*Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.*

The purpose of this Equality Analysis is to assess the 12-month pilot to offer additional backdating of band start date to households living in 3 bed or larger social tenancies in Devon.

In April 2024, a 12-month pilot was signed off by full council and went into effect 1<sup>st</sup> October 2024.

43 existing applications were reassessed and offer an additional 5 year backdate to their applications for rehousing. This increased time in Band B, meant when shortlisting these applications would be increased in priority and would reduce the time on average households seeking downsize larger family homes would need to wait before being made an offer.

29 of the 357 adverts were offered to these households during 1<sup>st</sup> October 2024 and 19<sup>th</sup> December 2025. All 29 homes that were made available due to this policy change were advertised for relet through Devon Home Choice.

### 1.2 Who will the proposal have the potential to affect?

Service users    
  The wider community    
  Teignbridge workforce

### 1.3 Will the proposal have an equality impact?

*Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?*

*If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by your manager.*

If 'Yes' complete the rest of this assessment.

**Yes**       **No**      [please select]

By offering additional priority to existing social tenants seeking to downsize their family homes for smaller properties, we had initial concerns on the extent of pressure that would be placed on the 1 and 2 bed homes.

## Step 2: What information do we have?

### 2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics (listed in 2.2).

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data - from national research, local data or previous consultations and engagement activities.

Outline whether there are any over or under representation of equality groups within your service - don't forget to benchmark to local population where appropriate.

For workforce / management of change proposals you will need to look at the diversity of the affected team(s) using available evidence such as the employee profile data. Identify any under/over-representation for age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation. Please see: [Equality Act 2010 \(legislation.gov.uk\)](http://legislation.gov.uk).

| <b>Data / Evidence Source</b><br>[Include a reference where known] | <b>Summary of what this tells us</b>   |
|--|--|
| Devon Home Choice Data   | The proportion of homes let under this preference is 8% of TDC adverts.<br><br>25 three beds in TDC were made available for advert that would not have been without this increased priority. The remaining 4 were households downsizing social tenancies in South Hams/Exeter but with local connection to Teignbridge.<br><br>9 one beds were allocated to this cohort from 131 one bed adverts. 5 of which moved into over 55 provision and so only 4x 1 bed units of general purpose housing were utilised. |
| Homeless Data  | Has shown no significantly adverse impact on residents with homeless duty owed.  |
| <b>Additional comments:</b>  |  |

## 2.2 Do you currently monitor relevant activity by the following protected characteristics?

- |  |   |   |
|--|---|---|
| <input checked="" type="checkbox"/> Age                            | <input checked="" type="checkbox"/> Disability          | <input checked="" type="checkbox"/> Gender Reassignment |
| <input checked="" type="checkbox"/> Marriage and Civil Partnership | <input checked="" type="checkbox"/> Pregnancy/Maternity | <input checked="" type="checkbox"/> Race                |
| <input type="checkbox"/> Religion or Belief                        | <input checked="" type="checkbox"/> Sex                 | <input type="checkbox"/> Sexual Orientation             |

## 2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps please state this clearly with a justification.

For workforce related proposals all relevant information on characteristics may need to be sought from HR (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require action to address and identify the information needed.

The housing register no longer requests data on religion or sexual orientation.

## 2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this has been of Teignbridge's diverse communities.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to HR for advice on how to consult and engage with employees. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups, trades unions as well as affected staff.

Devon Home Choice did not seek additional consultation on this policy change pilot as the impact was less than 10% of the register and/adverts. In practice, the pilot has demonstrated only 4 properties over a 15 month period that potentially could have offered 1 bed need households on register to care leavers/other young people potentially with a disability have been offered to existing social tenants who also may have protected characteristics.

Devon Home Choice board will be creating an updated EIA for this specific change which will be available from late March 2026.

## 2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Consultation Officer for help in targeting particular groups.

This policy positively impacts households that are on low incomes, including disabled tenants and older persons who needing to downsize their social tenancies to smaller homes. It further supports families that are on low incomes needing 3 bed or larger homes access this provision.

We will continue to monitor the allocation and success of this policy change to ensure it remains proportionate to retain this additional priority.

### Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal.

#### 3.1 Does the proposal have any potentially adverse impacts on people on the basis of their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

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|---|---|
| <b>GENERAL COMMENTS</b> (highlight any potential issues that might impact <b>all or many groups</b> ) |   |
|   |   |
| <b>PROTECTED CHARACTERISTICS</b>  |   |
| <b>Age: Young People</b>  | Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Neutral <input type="checkbox"/>                                 |
| Potential impacts:  |   |
| Mitigations:  |   |
| <b>Age: Older People</b>  | Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Neutral <input type="checkbox"/>                                 |
| Potential impacts:  | Older persons are more likely to be in homes larger than their housing needs. So this policy change positively impacts their ability to move to a smaller home more suited to their needs   |
| Mitigations:  | We will continue to monitor annually the impact to ensure the change remains proportionate.   |
| <b>Disability</b>   | Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/>                                 |
| Potential impacts:  |   |
| Mitigations:  |   |
| <b>Sex</b>  | Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/>                      |
| Potential impacts:  | For households requiring three bed or larger, predominately these are single female parents with dependent children. Therefore this policy change positively impacts females with children. |
| Mitigations:  | We will continue to monitor annually the impact to ensure the change remains proportionate.   |
| <b>Sexual orientation</b>   | Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/>                                 |
| Potential impacts:  |   |
| Mitigations:  |   |

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|---|---|
| <b>Pregnancy / Maternity</b>            | Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> |
| Potential impacts:                      |   |
| Mitigations:                            |   |
| <b>Gender reassignment</b>              | Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> |
| Potential impacts:                      |   |
| Mitigations:                            |   |
| <b>Race</b>                             | Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> |
| Potential impacts:                      |   |
| Mitigations:                            |   |
| <b>Religion or Belief</b>               | Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> |
| Potential impacts:                      |   |
| Mitigations:                            |   |
| <b>Marriage &amp; civil partnership</b> | Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> |
| Potential impacts:                      |   |
| Mitigations:                            |   |

#### OTHER RELEVANT CHARACTERISTICS

|   |  |
|---|--|
| <b>Socio-Economic (deprivation)</b>   | Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Neutral <input type="checkbox"/>  |
| Potential impacts:  | It positively supports households who are existing social tenants who are likely to be on low incomes, older persons or disabled tenants to downsize 3bed or larger homes more quickly. This outcome improves their financial position as it reduces their rental liability and running costs, including utility costs of running homes larger than their household needs. |
| Mitigations:  | Ongoing annual monitoring of impact on register  |
| <b>Other group(s)</b><br><i>Please add additional rows below to detail the impact for other relevant groups as appropriate e.g. Asylums and Refugees; Rural/Urban Communities, Homelessness, Digital Exclusion, Access To Transport</i> | Refugees   |
| Potential impacts:  | Refugees are less likely to be existing social tenants based on current TDC data.  |
| Mitigations:  | The release of larger social housing homes will not disadvantage those requiring this size of accommodation  |

### 3.2 Does the proposal create any benefits for people on the basis of their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our Public Sector Equality Duty to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

Indirectly supporting those to move to suitably sized accommodation supports households on low incomes financial security. The majority of downsizers are older persons where family members have naturally moved on from the family home or households that may have disabilities that impact their ability to manage larger homes and are proactively seeking to move to more suitable accommodation.

## Step 4: Impact

### 4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This content should be used as a summary in reports, where this full assessment is included as an appendix.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary and appropriate despite this.

**Summary of significant negative impacts and how they can be mitigated or justified:**

Continued annual monitoring of lets to this cohort

**Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:**

The policy change supports low income households move to smaller homes, alleviating some of the financial pressures of rent liabilities, running costs and allows increase of adverts for larger homes to be advertised.

### 4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

| Improvement / action required  | Responsible Officer | Timescale |
|--|---------------------|-----------|
| Under Occupiers/Downsizers Uptake – efforts to increase numbers of households willing to downsize social tenancies | Tammy Hayes         | 12 months |
|  |                     |           |
|  |                     |           |

### 4.3 How will the impact of your proposal and actions be measured?

How will you know if have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective and your approach is still appropriate. Include the timescale for review in your action plan above.

Annual assessment of downsizers moves and uptake of applying to move to appropriate size of accommodation.

**4.4 Is there an opportunity to promote positive attitudes and good relations between different groups and communities?**

By engaging social housing tenants we can support the empowerment of tenants to move to the right size of home for their household needs and in turn, release larger homes for let for the housing register.

**Step 5: Review & Sign-Off**

*EIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek review and feedback from management before requesting it to be signed off. All working drafts of EIAs and final signed-off EIAs should be saved in G:\GLOBAL\EIA. Once signed-off please add the details to the 'EIA Register' of all council EIAs saved in the same directory.*

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|--|---|
| <b>Reviewed by Service Manager:</b><br>Yes <input type="checkbox"/><br>No <input type="checkbox"/> Instead was reviewed by: Director of Customer Experience and Transformation | <b>Strategic Leadership Team Sign-Off:</b><br> |
| Date:  | Date: 4/3/26  |