

Equality Impact Assessment (EqIA)

Deciding what needs to be assessed

In theory all policies, decisions, services, projects and programmes should be impact assessed. The most practical approach is to assess as the proposal is being developed or as processes, services and policies come up for review making the EQIA part of the development process. Do not be put off by the list below, it does not mean that long and detailed assessments are required every time you are engaged in one of the activities. However, it does mean that you should always consider the equalities implications of your proposals.

Policy

- New policy development
- Substantial revision of an existing policy or process
- Any change which may have a disproportionate impact on a particular group

Decision

- Key decision
- Decision for management board/cabinet
- Budget change decision

Service

- New service
- Service review, including the decommissioning of services
- Any service change which may have a disproportionate impact on a particular group

Projects and programmes

- All, at planning stage

Further information: [Equality Impact Assessments - a user's guide](#)

Section One

No.	Question	Response
1.1	Name of strategy/decision/service/	Damp & Mould Strategy and Action Plan for Council Homes 2025-28

	project/programme being assessed	
1.2	Summary of aims and objectives of the strategy/decision/service/project/programme	The Damp & Mould Strategy sets out Swindon Borough Council's approach to identifying, preventing, and remediating damp and mould in its housing stock. It aims to improve housing conditions, protect tenant health, and ensure compliance with statutory duties including Awaab's Law, the Housing Act 2004, and the Decent Homes Standard.
1.3	Who is affected by the strategy/decision/service/project/programme? (e.g. employees/service users/supplier/contractor)	<ul style="list-style-type: none"> • Council tenants (including vulnerable groups such as older people, children, disabled people, and those with long-term health conditions) • Housing staff and contractors • Community partners and stakeholders • Residents in temporary accommodation
1.4	What evidence and data has been used in relation to the strategy?	<ul style="list-style-type: none"> • Stock condition surveys (5,500 properties surveyed to date) • Environmental sensor data from 200+ homes • Complaints and disrepair records • Tenant demographic data (e.g. age, disability, language needs) • National legislation and guidance (e.g. Awaab's Law, HHSRS) • Feedback from tenant engagement events and campaigns
1.5	What involvement and consultation has been done in relation to this proposal? (e.g. with relevant groups and stakeholders)	A draft version of the strategy has been written in line with national legislation. It has been subject to public, colleagues, partner and stakeholder engagement. The Tenant Scrutiny Panel were consulted.
1.6	What are the arrangements for monitoring and reviewing the actual impact of the strategy/funding activity/event?	Swindon Borough Council will regularly review the EqIA, in line with legislative changes or good practice, or if the strategy impacts any group directly.

Section Two - Protected Characteristics

Protected Characteristic Group	Is there a potential for positive or negative impact? Is the impact neutral?	Please explain and give examples of any evidence/data used	Action to address negative impact (e.g. adjustment to the proposal)
Disability	Positive	Tenants with respiratory conditions or mobility impairments may be disproportionately affected.	Targeted visits to older tenants; proactive inspections; 'Behind Every Door' campaign.
Gender Reassignment	Neutral	No specific impact identified.	Ensure inclusive communication and reporting processes.
Marriage or Civil Partnership	Neutral	No specific impact identified.	Neutral.
Pregnancy and Maternity	Positive	Pregnant women and infants are more vulnerable to poor housing conditions.	Prioritisation of cases involving pregnant tenants or young children.
Race	Positive	Language barriers may prevent some tenants from reporting issues.	Multilingual materials; QR codes linking to online resources; community engagement.
Religion or Belief	Neutral	No specific impact identified.	Neutral.
Sexual Orientation	Neutral	No specific impact identified.	Neutral.
Sex (gender)	Neutral	Women may be more likely to report issues or manage household health.	Ensure gender-sensitive communication and support.
Age	Positive	Older people may be more vulnerable to health impacts of damp and mould and less likely to report issues.	Targeted visits to older tenants; proactive inspections; 'Behind Every Door' campaign.
Children in Care and Care Leavers	Neutral	No specific impact identified.	Neutral.

Section Three – Engagement and Consultation

Swindon Borough Council recognises that meaningful tenant engagement is essential to the success of the Damp & Mould Strategy. The strategy outlines a multi-layered approach to engaging tenants, ensuring that their voices are heard, their needs are met, and their homes are safe and healthy.

Key Engagement Activities	
1. Let's Talk Housing events	The Property Condition team will attend regular tenant engagement events such as "Let's Talk Housing" to provide updates, gather feedback, and offer direct support to tenants experiencing damp and mould issues.
2. Community Impact days	Officers will participate in community events to raise awareness of damp and mould, distribute educational materials, and promote reporting mechanisms.
3. Behind Every Door campaign	This proactive initiative involves visiting every tenant to identify issues early, including damp and mould, and signpost to other services such as Social Care where needed. It is particularly valuable for reaching tenants who may not otherwise report problems.
4. Tenant Scrutiny arrangements	New scrutiny mechanisms will allow tenants to monitor the Council's performance in addressing damp and mould. This includes opportunities to co-design improvements to the responsive repairs service and ensure value for money.
5. Accessible Information	<ul style="list-style-type: none"> • Revised leaflets with QR codes linking to the Council's damp and mould webpage. • Materials tailored to different languages and literacy levels. • Advice that considers tenants' financial and practical constraints (e.g. heating costs, drying clothes indoors).
6. Online Reporting tool	A new digital platform is being developed to make reporting damp and mould easier and more accessible, especially for tenants who prefer online communication or face barriers to calling.
7. Training for Frontline Staff and Contractors	Housing officers, surveyors, and contractors are being trained to identify signs of damp and mould during routine visits and report concerns to the Property Condition team. This ensures tenants are supported even if they don't raise issues themselves.
8. Feedback and Complaints Mechanisms	Tenants can report issues via phone or email, and the Council is committed to improving its complaints process to ensure concerns are addressed promptly and transparently.

Inclusive Engagement

The strategy acknowledges that some groups—such as older people, disabled tenants, and those with language barriers—may be less likely to report issues. Targeted engagement efforts, including data-driven outreach and tailored communication, aim to ensure these groups are not left behind.

3.1	Is it possible the proposed strategy or activity or change in strategy or activity could discriminate or unfairly disadvantage people?	No. The strategy provides a transparent framework that SBC will follow to ensure decisions on damp and mould and procedures that follow are carried out in line with the strategy.
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Final Decision:	Tick the relevant box	Include any explanation / justification required
1. No barriers identified, therefore activity will proceed.	✓	The strategy provides a transparent framework that SBC will follow to ensure decisions on damp and mould and procedures that follow are carried out in line with the strategy.
2. Stop at some point because the data shows bias towards one or more groups		
3. Adapt or change the event in a way which you think will eliminate the bias		
4. Barriers and impact have been identified, however having considered all available options carefully, there appear to be no other proportionate ways to achieve the aim of the strategy or practice (e.g. in extreme cases or where positive action is taken). Therefore, proceed with caution with this knowing that it may favour some people less than others, providing justification for this decision.		

Section Five – Record Keeping

Will this EqIA be published* (*EqIA's should be published alongside relevant event paperwork including cabinet papers:	Yes/Not required
Date Completed	
Review date (if applicable)	

Change Log

Name	Date	Version	Change Made

Responsibilities			
Name of person leading this EqlA	Nick Kemmett	Date Completed	26/08/2025
Names and roles of people involved in the consideration of impact	Nick Kemmett	Andrew McDonald	Sally Nelson
Name of Director signing EqlA	Andrew McDonald	Date Signed	28/08/2025