

Equality Impact Assessment

Purpose of the Equality Impact Assessment (EIA) process:

The Equality Act 2010 (the Act) introduced the [Public Sector Equality Duty](#) (PSED) requiring public bodies to give due regard to the need to:

- Eliminate unlawful discrimination
- Advance equality of opportunity
- Foster good relations

Consideration must be given to the 'protected characteristics' under the Act. Assessments should consider relevant evidence relating to persons with protected characteristics in relation to assessments of potential impact.

The purpose of an EIA is to ensure that policies, functions, plans or decisions (hereafter referred to as 'policy/ decision') do not create unnecessary barriers for people protected under the Act. Where negative impacts are identified these should be eliminated or minimised, and opportunities for positive impact should be maximised. An EIA is not required for a decision in relation to an individual.

Screening is a short exercise to determine whether a policy/ decision is relevant to equalities, and if so, whether a full EIA should be conducted.

Section 1: Equality Impact Assessment Screening

Title and description of the policy/ decision:	MDH Vulnerable Residents and Reasonable Adjustments Policy
Job title of the person(s) undertaking the assessment:	MDH Policy Officer
Council service:	Mid Devon Housing
Date of assessment:	24 th February 2026
What are the aims, purposes, objectives and proposed outcomes of the policy/ decision?	
The Vulnerable Residents and Reasonable Adjustments Policy: • Defines vulnerability in the context of housing and service access. • Sets out processes for identifying and supporting vulnerable residents. • Establishes how MDH will record and use data about a resident's vulnerabilities. • Details MDH's approach to making reasonable and proportionate adjustments. • Ensures equity, legal compliance, and safe service delivery. The policy is intended to improve access, support tenancy sustainment, and remove barriers for residents needing additional assistance. The policy is likely to have positive impacts for all groups with protected characteristics, particularly: • Disabled residents • Older residents • Residents experiencing domestic abuse • Residents with language or communication barriers A core aim of the policy is that by seeking to remove disadvantages and deliver equal access to services for all tenants and leaseholders, this will impact positively on all groups with protected characteristics. The revised policy introduces several changes that will have a positive impact on vulnerable tenants and leaseholders by: • Providing a clearer definition of vulnerability, identifying a vulnerable person as someone who is experiencing difficulties with everyday living and, to avoid being disadvantaged, who requires either additional support or an adaptation to the way we deliver services or extra help to sustain their tenancy. • Focusing on individual needs rather than labels, by assessing what support a person requires within each specific service area instead of categorising them according to a general definition of vulnerability. • Ensuring needs are identified and responded to appropriately by setting out common indicators of vulnerability and clearly recording when an individual is currently vulnerable. The policy avoids assuming that whole groups of people with particular characteristics are vulnerable. Instead, every resident is assessed on a case-by-case basis to determine the level of support they need. Overall, the policy is expected to have a positive impact on tenants with protected characteristics. However, some potential risks of indirect adverse impact have been	

identified, including digital exclusion, communication barriers, and inconsistencies in data recording. Mitigating actions have been identified to minimise these risks.

The policy actively advances equality by embedding reasonable adjustments, proactive support, and a standardised recording process.

Who may be affected by the policy/ decision?	The policy: • Directly affects all MDH tenants and applicants for tenancies. • Relates to services where vulnerability intersects with protected characteristics. • Involves data collection, decision-making, and potential adjustments. • Could affect different groups in different ways (positively or negatively).		
How have stakeholders been involved in the development of the policy/ decision? E.g. a consultation exercise	Tenants and Members were consulted between 1 st July 2026 and 31 st July 2026.		
Will there be scope for prompt, independent reviews and appeals against decisions arising from the policy/ decision?	MDH will review this Policy every 5 years and as required to address legislative, regulatory, best practice or operational issues. However, the Head of Housing and Health is given delegated authority to make minor amendments to the Policy as required by legislative changes, formal guidance or local operational considerations.		
To which part(s) of the Public Sector Equality Duties is the policy/ decision relevant:			
	Yes	No	Details
1. Eliminate unlawful discrimination	☒	☐	The policy promotes a consistent and fair approach to decision-making, reducing the risk of indirect discrimination and ensuring that individual needs are considered.
2. Advance equality of opportunity	☒	☐	The policy also aims to reduce disadvantage, improve access, and support tenancy sustainment outcomes for vulnerable residents.
3. Foster good relations between different groups	☒	☐	By promoting understanding of individual needs, improving communication accessibility, and ensuring fair and respectful treatment, the policy supports positive relationships between tenants and services.

Which of the protected characteristics is the policy/ decision relevant to?

Tick and briefly describe any likely equalities impact (positive, negative, or neutral)

Characteristic	Positive	Negative	Neutral	Comments
Sex	☒	☐	☐	Positive Impacts: • People experiencing domestic abuse are specifically recognised as a group who may be vulnerable. • Clear referral routes and sign posting and support available.
Age	☒	☒	☐	Positive Impacts: • Older residents may be more likely to need support, aids/adaptations, or communication adjustments. • Clear identification processes and reasonable adjustments support ageing residents to maintain tenancies. Potential Risks: • Digital exclusion may occur for older residents if services rely heavily on online communication.
Disability	☒	☒	☐	Positive Impacts: • The policy explicitly recognises physical, sensory, learning, and mental health issues. • Reasonable adjustments are built into the service model, aligned with duties under the Act. • Clear processes for identifying, recording and responding to disability-related needs. Potential Risks: • If data is not consistently

Characteristic	Positive	Negative	Neutral	Comments
				recorded, some needs may be overlooked.
Religion or Belief	☒	☐	☐	Positive Impacts: Policy is flexible about communication methods, appointment scheduling, and privacy needs.
Race	☒	☒	☐	Positive Impacts: - Policy recognises residents who do not speak English as a first language. - Interpreting and translation services available. Potential Risks: - Miscommunication without appropriate language support. - Cultural barriers to declaring vulnerabilities.
Sexual Orientation	☒	☐	☐	Positive Impacts: - Commitment to fair treatment and adjustments for all tenants regardless of sexual orientation. - Policy emphasises treating all tenants with respect.
Gender reassignment	☒	☒	☐	Positive Impacts: - Commitment to personalised communication and sensitive handling of personal information. - Policy emphasises respect and fair treatment. Potential Risks: - Risk of misgendering or insensitive language in communication.
Pregnancy/ maternity	☒	☐	☐	Positive Impacts: Residents experiencing

Characteristic	Positive	Negative	Neutral	Comments
				pregnancy-related health issues may be assessed as temporarily vulnerable. Additional support and reasonable adjustments may reduce risk of tenancy stress.
Marriage and Civil partnership*	☐	☐	☒	No specific impacts

*Applies only to Employment and the duty to give regard to the elimination of discrimination.

Decision by Corporate Manager to recommend this policy/ decision for an Equality Impact Assessment?

Yes

If the answer is “Yes”, please continue to the Section 2 and complete the Equality Impact Assessment. If the answer is “No”, please give a brief reason here.

The policy is expected to have an overall positive impact in terms of equalities. Some potential risks of indirect impact have been identified, and appropriate mitigations have been incorporated. The policy sets out how the MDH will meet its legal duties and also apply best practice.

EIA Screening Complete

Section 2: Equality Impact Assessment (EIA)

Evidence and Consultation

What existing sources of information have you gathered to help identify how people covered by the protected characteristics may be affected by this policy/ decision? E.g. consultations, national or local data and/or research, complaints or customer feedback. Please identify any gaps in the available information that might make it difficult to form an opinion about the effect of the policy on different groups.

The following data sources have been used:

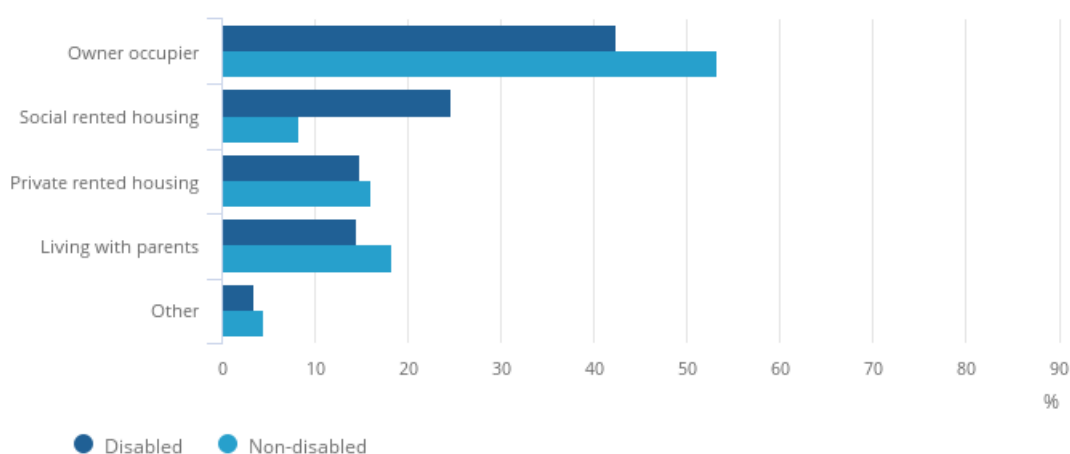
- MDH housing management data.
- Devon Home Choice application information.
- Local demographic profiles.
- Relevant legislation including the Equality Act 2010 and Social Housing (Regulation) Act 2023.
- Models and comparable EQIAs from other councils

Office for National Statistics - Annual Population Survey 2019 states:

Disabled people were more likely to rent social housing, with 24.7% of disabled people aged 16 to 64 years occupying property in this way. This compares with just 8.2% of non-disabled people aged 16 to 64 years, a difference of 16.5 percentage points.

Figure 1: One-quarter of disabled people in 2019 rented social housing

Housing situation of disabled and non-disabled people aged 16 to 64 years, UK, 2019



Source: Office for National Statistics - Annual Population Survey

This EIA examines whether the policy:

- Removes or reduces disadvantage.

- Improves access to services.
- Ensures fair treatment and equitable outcomes for all groups.
- Avoids discrimination, whether direct or indirect.
- It includes tenants, applicants, leaseholders (where applicable), carers and authorised representatives.

New processes will need to be introduced so that MDH can monitor outcomes for tenants receiving reasonable adjustments.

Please complete this table for all the Protected Characteristics. If you have identified any negative impacts you will need to consider how these can be justified or where possible mitigated either to reduce or remove them. (Please add rows where needed)

Potential Impacts/ Issues Identified/ Opportunities identified	Mitigation required (action) or Justification	Lead Officer and target completion date	What is the expected outcome from the action?
Sex			
No significant Impacts			
Age			
Digital exclusion may occur for older residents if services rely heavily on online communication.	- Policy includes flexible communication routes (phone, letters, home visits). - Housing officers will offer tailored reasonable adjustments.	All Managers – within 6 months Customer Manager - Annually	Staff Training on tailored reasonable adjustments to be developed and rolled out across the service Review of communication accessibility (translation/BSL/large print)
Disability			
If data is not consistently recorded, some needs may be overlooked.	- Policy mandates a standardised data-recording system. - Annual vulnerability review survey.	Customer Manager - Annually	Annual audit of vulnerability data consistency. Introduce regular monitoring of reasonable adjustment requests, including type, frequency and outcomes, to ensure equitable service.
Religion or Belief			

Potential Impacts/ Issues Identified/ Opportunities identified	Mitigation required (action) or Justification	Lead Officer and target completion date	What is the expected outcome from the action?
No significant Impacts			
Race			
- Miscommunication without appropriate language support. - Cultural barriers to declaring vulnerabilities.	- Offering interpreters and translated materials. - Staff trained to identify needs sensitively.	Customer Manager - within 6 months	Process for providing interpreters and translated material for use by all officers defined. Introduce staff training on vulnerability identification and EIA principles
Sexual Orientation			
No significant Impacts			
Gender Reassignment			
Risk of misgendering or insensitive language in communication.	- Staff training on communication preferences. - Recording preferred name, title and pronouns where provided.	Customer Manager - within 6 months	Introducing staff training on vulnerability identification and EIA principles
Pregnancy/ maternity			

Potential Impacts/ Issues Identified/ Opportunities identified	Mitigation required (action) or Justification	Lead Officer and target completion date	What is the expected outcome from the action?
No significant Impacts			
Marriage and Civil partnership (Applies only to Employment and the duty to give regard to the elimination of discrimination)			
No significant Impacts			

Please provide details of arrangements to monitor and review the policy/ decision and any mitigating actions or actions to promote equality:

MDH will review this Policy every 5 years and as required to address legislative, regulatory, best practice or operational issues. However, the Head of Housing and Health is given delegated authority to make minor amendments to the Policy as required by legislative changes, formal guidance or local operational considerations.

Please state where the EIA will be published (e.g. on the MDDC website):

MDH Website

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Equality Impact Assessment Sign off

For completion by Corporate Manager

Are you prepared to agree and sign off the EIA?

☒ **Yes** ☐ **No**

If “No”, provide details of why and next steps:

Name: Simon Newcombe

Job Title: Head of Housing and Health

Date: