

Winchester City Council

Equality Impact Assessment (EqIA)



Section 1 - Data Checklist

When undertaking an EqIA for your policy or project, it is important that you take into consideration everything which is associated with the policy or project that is being assessed.

The checklist below is to help you sense check your policy or project before you move to Section 2.

		Yes/No	Please provide details
1	Have there been any complaints data related to the policy or project you are looking to implement?	Yes	Given the sensitive nature of the work undertaken in relation to ASB incidents, complaints are received about this service.
2	Have all officers who will be responsible for implementing the policy or project been consulted, and given the opportunity to raise concerns about the way the policy or function has or will be implemented?	Yes	Staff Team Corporate Legal Tenant Panels Housing Policy & Projects Manager Service Managers TACT Tenants
3	Have previous consultations highlighted any concerns about the policy or project from an equality impact perspective?	No	No equality-related issues highlighted in prior engagement.
4	Do you have any concerns regarding the implementation of this policy or project?	?	At this stage, no significant concerns have been identified. Implementation planning is underway, and no major barriers are currently anticipated. However, there are some areas that will require focused attention to ensure effective roll-out:

		Yes/No	Please provide details
	<i>(i.e. Have you completed a self-assessment and action plan for the implementation of your policy or project?)</i>		<p>Confusion between ASB and neighbour nuisance:</p> <ul style="list-style-type: none"> - There is an ongoing challenge in clearly distinguishing between Anti-social Behaviour (ASB) and lower-level neighbour nuisance. Residents often perceive any unwanted or irritating behaviour as ASB, leading to misreporting, increased service demand, and frustration when issues do not meet the ASB threshold. <p>Expectations around reporting and outcomes:</p> <ul style="list-style-type: none"> - Due to this definitional confusion, residents frequently expect rapid enforcement or formal action in scenarios that are more appropriately managed through tenancy management, mediation, or informal neighbour resolutions. This can cause dissatisfaction and place pressure on frontline staff. <p>Frontline consistency and confidence:</p> <ul style="list-style-type: none"> - Staff will need clear guidance, training, and tools to triage reports accurately, explain decisions confidently, manage expectations, and signpost appropriately. Without this, inconsistencies in advice or responses may arise. <p>Communication and public understanding:</p> <ul style="list-style-type: none"> - Policy implementation will rely heavily on clear, accessible communication that explains what ASB is (and is not), what residents can expect when they

		Yes/No	Please provide details
			<p>report an issue, and which routes are appropriate for different types of concerns.</p> <p>Self-assessment and action plan implications: These issues highlight the need for the self-assessment to include actions on:</p> <ul style="list-style-type: none"> - Staff training in ASB definitions, thresholds, and case categorisation. - Resident-facing guidance and improved online reporting pathways. - A strengthened triage framework to ensure proportionate and consistent responses - Alignment with the Housing Ombudsman's expectations on clarity, fairness, and communication. <p>Overall, while implementation risks are manageable, they will require proactive planning, strong internal communication, and targeted engagement with residents to ensure the policy is applied consistently and understood by all stakeholders.</p>
5	Does any accessible data regarding the area which your work will address identify any areas of concern or potential problems which may impact on your policy or project?	No	No equality-specific trends identified from local housing or casework data.
6	Do you have any past experience delivering similar policies or projects which may inform the implementation of your scheme from an equality impact point of view?	Yes	ASB case management shows that vulnerable residents (older tenants, disabled people, those experiencing mental ill-health) may face barriers in reporting, understanding processes, or engaging with case actions. The policy strengthens support and communication.
7	Are there any other issues that you think will be relevant?	No	<ul style="list-style-type: none"> - Victims may experience multiple ASB incidents.

		Yes/No	Please provide details
			<ul style="list-style-type: none"> - ASB incidents can lead to mental health deterioration, tenancy breakdown, or isolation - Staff handling ASB cases may experience vicarious trauma. - Ongoing need for staff wellbeing and resilience support.

Section 2 - Your EqIA form

Directorate: Housing	Your Service Area: Housing Services	Team: Housing Services Team	Officer responsible for this assessment: Jo Elliott	Date of assessment: 01/12/2025
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	Question	Please provide details
1	What is the name of the policy or project that is being assessed?	Housing Services Anti-Social Behaviour Policy
2	Is this a new or existing policy?	New
3	Briefly describe the aim and purpose of this work.	To provide a consistent, fair, and effective framework for preventing, investigating, and resolving anti-social behaviour (ASB) within Winchester City Council's housing stock. The policy aims to ensure that tenants and residents feel safe, supported, and treated equitably.
4	What are the associated objectives of this work?	<ul style="list-style-type: none"> - Ensure compliance with statutory and regulatory housing duties - Deliver fair, consistent, accessible services - Support delivery of the Housing Strategy and HRA Asset Management Plan - Promote inclusion and eliminate discrimination in service delivery - Strengthen partnership working - Embed resident engagement and co-production - Improve data, performance monitoring and accountability

		<ul style="list-style-type: none"> - Align with the Council Plan and corporate priorities
5	Who is intended to benefit from this work and in what way?	<ul style="list-style-type: none"> - Council tenants and leaseholders - Vulnerable adults and older people - Children, young people and care leavers - People with disabilities or long-term health conditions - People experiencing mental ill-health - Families and low-income households - Ethnic minority communities - LGBTQ+ residents - Housing staff and partner agencies - Wider Winchester communities
6	What are the outcomes sought from this work?	<ul style="list-style-type: none"> - Fair, accessible ASB services for all residents - Increased tenant satisfaction and confidence in reporting - Reduced complaints, improved Ombudsman compliance - Earlier identification of vulnerabilities and discrimination risks - Transparent, accountable decision-making - Stronger partnership working and resident co-production - Evidence-informed continuous improvement
7	What factors/forces could contribute or detract from the outcomes?	<p>Support:</p> <ul style="list-style-type: none"> - Effective training and staffing - Strong partnership working - Robust data systems - Clear communication and tenant engagement <p>Risks:</p> <ul style="list-style-type: none"> - Limited resources - Legislative changes - Public perception and mistrust - Under-reporting by vulnerable groups - Inconsistent evidence or information sharing
8	Who are the key individuals and organisations responsible for the implementation of this work?	<ul style="list-style-type: none"> - Residents and tenants - Housing Policy & Projects Manager

		<ul style="list-style-type: none"> - Tenancy & Neighbourhood Services - Housing Systems & Data Team - Equality, Diversity and Inclusion Lead - Tenant and Leaseholder Panels - Hampshire County Council, Police, Health, Voluntary Sector - Contractors - ASB Officer and Housing Officers
9	Who implements the policy or project and who or what is responsible for it?	Housing Services Manager Housing Services Team Leader

		Please select your answer in bold . Please provide detail here.		
10a	Could the policy or project have the potential to affect individuals or communities on the basis of race differently in a negative way?	Y	N	
10b	What existing evidence (either presumed or otherwise) do you have for this?	Race Possible indirect discrimination if language barriers limit understanding of ASB processes.		
11a	Could the policy or project have the potential to affect individuals or communities on the basis of sex differently in a negative way?	Y	N	
11b	What existing evidence (either presumed or otherwise) do you have for this?	Sex Women may be disproportionately affected as victims in domestic abuse-related ASB. Men may under-report due to stigma.		
12a	<p>Could the policy or project have the potential to affect individuals or communities on the basis of disability differently in a negative way?</p> <p><i>you may wish to consider:</i></p> <ul style="list-style-type: none"> • <i>Physical access</i> • <i>Format of information</i> • <i>Time of interview or consultation event</i> 	Y	N	

	<ul style="list-style-type: none"> • <i>Personal assistance</i> • <i>Interpreter</i> • <i>Induction loop system</i> • <i>Independent living equipment</i> • <i>Content of interview)</i> 			
12b	What existing evidence (either presumed or otherwise) do you have for this?	<p>Disabled tenants may face barriers in communication, comprehension, or participating in investigations. Neurodivergent and mentally ill residents may require adaptations.</p> <p>13. Sexual orientation</p>		
13a	Could the policy or project have the potential to affect individuals or communities on the basis of sexual orientation differently in a negative way?	Y	N	
13b	What existing evidence (either presumed or otherwise) do you have for this?	Under-reporting linked to fear of homophobia, stigma, or concerns about being taken seriously.		
14a	Could the policy or project have the potential to affect individuals on the basis of age differently in a negative way?	Y	N	
14b	What existing evidence (either presumed or otherwise) do you have for this?	<p>Older tenants may feel isolated or vulnerable to intimidation. Younger tenants may be perceived as perpetrators.</p>		
15a	Could the policy or project have the potential to affect individuals or communities on the basis of religious belief differently in a negative way?	Y	N	
15b	What existing evidence (either presumed or otherwise) do you have for this?	Neighbour disputes involving cultural or religious differences may be misinterpreted as nuisance rather than hate-related ASB.		

16a	Could this policy or project have the potential to affect individuals on the basis of gender reassignment differently in a negative way?	Y	N	
16b	What existing evidence (either presumed or otherwise) do you have for this?	Trans residents may under-report ASB due to stigma, fear, or lack of trust in agencies.		
17a	Could this policy or project have the potential to affect individuals on the basis of marriage and civil partnership differently in a negative way?	Y	N	
17b	What existing evidence (either presumed or otherwise) do you have for this?	No identified disproportionate impact.		
18a	Could this policy or project have the potential to affect individuals on the basis of pregnancy and maternity differently in a negative way?	Y	N	
18b	What existing evidence (either presumed or otherwise) do you have for this?	No evidence of systemic disadvantage, although stress or vulnerability during pregnancy may need consideration.		
19	Could any negative impacts that you identified in questions 10a to 15b create the potential for the policy to discriminate against certain groups on the basis of protected characteristics?	Y	N	Yes – Without mitigations, there is risk of indirect discrimination for several protected groups.

20	Can this negative impact be justified on the grounds of promoting equality of opportunity for certain groups on the basis of protected characteristics? Please provide your answer opposite against the relevant protected characteristic.	Y	N	<p>Where legal or enforcement action is taken, it is lawful, proportionate, and necessary to protect residents and communities.</p> <p>Differential treatment is justified as it promotes equality by safeguarding victims and ensuring compliance with tenancy conditions.</p> <p>Actions such as injunctions, possession proceedings, or closure orders are applied consistently following case review and safeguarding checks.</p>
21	How will you mitigate any potential discrimination that may be brought about by your policy or project that you have identified above?	<ul style="list-style-type: none"> - Mandatory consideration of vulnerabilities in all ASB cases - Safeguarding check for all enforcement action - Accessible formats, translations, easy-read information - Multiple reporting routes (online, phone, in-person) - Quarterly equality monitoring of ASB case trends - Staff training on equality, safeguarding, unconscious bias, and trauma-informed practice - Strengthened communication and support for vulnerable residents 		
22	Do any negative impacts that you have identified above impact on your service plan?	Y	N	<p>Ensure hate crime awareness and equality refresher training for all housing staff</p> <p>Develop accessible reporting formats (translations, easy read, online and phone)</p> <p>Establish regular data review and partnership learning sessions</p>

				<p>Publish summary of hate crime response outcomes for transparency</p> <p>Ensure continuous consultation with tenants through engagement plan</p>
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Signed by completing officer	Paul Salter
Area Housing Manager	Joanna Elliott
Signed by Service Lead or Corporate Head of Service	Gillian Knight