



## **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?	N	No complaints received by the landlord service relating to the reporting and management of hate crime.
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 significant equality concerns identified, but: <ul style="list-style-type: none"><li>• Tenants consistently reported confusion between ASB, hate incidents, and neighbour disputes.</li><li>• Residents from minority backgrounds highlighted discomfort approaching the Council due to fear of not being believed or taken seriously.</li></ul>

4	<p>Do you have any concerns regarding the implementation of this policy or project?</p> <p><i>(i.e. Have you completed a self-assessment and action plan for the implementation of your policy or project?)</i></p>	No	<p>Yes – manageable with mitigation</p> <p>Implementation planning is underway, and no major barriers are expected. However:</p> <ul style="list-style-type: none"> <li>Confusion between ASB, hate crime, and neighbour nuisance may continue to create unrealistic expectations about response times or enforcement powers.</li> <li>Some residents believe all unpleasant behaviour is “hate crime”, which can lead to misreporting and dissatisfaction.</li> <li>Staff will require training and strong case triage tools to distinguish between nuisance, ASB, and hate crime.</li> <li>Public-facing communication must clearly set out definitions, report routes, and expected outcomes.</li> <li>Self-assessment actions include stronger triage guidance, improved online reporting, and training aligned with the ASB Policy and Hate Crime Procedure.</li> </ul>
5	<p>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?</p>	No	<p>No direct concerns, but:</p> <ul style="list-style-type: none"> <li>National data indicates under-reporting of hate crime across disability, race, and LGBTQ+ groups.</li> <li>Trends show repeat victimisation among vulnerable tenants.</li> <li>Evidence shows disabled residents and neurodiverse people face difficulties with standard reporting routes.</li> </ul>
6	<p>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?</p>	Yes	<ul style="list-style-type: none"> <li>Tenant feedback and case reviews highlighted inconsistent recording of hate incidents under previous ASB processes.</li> </ul>

			<ul style="list-style-type: none"> <li>Learning from the Housing Ombudsman Spotlight on Noise &amp; ASB (2022) informed the need for clearer thresholds and communication.</li> <li>Alignment with Domestic Abuse and Safeguarding has strengthened the response to vulnerable tenants.</li> </ul>
7	Are there any other issues that you think will be relevant?	No	<ul style="list-style-type: none"> <li>Victims may experience intersectional disadvantage (e.g., race + disability).</li> <li>Hate crime can cause mental health deterioration, risk of tenancy breakdown, and social isolation.</li> <li>Staff dealing with persistent or traumatic cases may experience vicarious trauma; ongoing wellbeing support is required.</li> </ul>

## Section 2 - Your EqIA form

Directorate:	Your Service Area:	Team:	Officer responsible for this assessment:	Date of assessment:
Housing Services	Housing Services	Housing Services team	Jo Elliott	01/12/2025

	<b>Question</b>	<b>Please provide details</b>
1	What is the name of the policy or project that is being assessed?	Housing Services Hate Crime Policy
2	Is this a new or existing policy?	New
3	Briefly describe the aim and purpose of this work.	<p>To set out Winchester City Council's approach to preventing, identifying, and responding to hate crime and hate incidents within its housing stock and communities.</p> <p>The policy ensures that victims are supported, perpetrators are held accountable, and communities are safeguarded.</p> <p>It contributes to a safe, inclusive, and respectful housing environment by embedding zero tolerance for hate crime, aligning with the Council's duties under the Equality Act 2010, Human Rights Act 1998, and Anti-Social Behaviour, Crime and Policing Act 2014.</p>

4	What are the associated objectives of this work?	<p>Ensure compliance with statutory and regulatory housing standards</p> <p>Deliver customer-focused, equitable housing services</p> <p>Support delivery of the Housing Strategy and HRA Asset Management Plan</p> <p>Improve access to affordable and sustainable housing</p> <p>Promote inclusion and eliminate discrimination in service delivery</p> <p>Strengthen partnership working with internal and external stakeholders</p> <p>Embed resident engagement and co-production in decision-making</p> <p>Enhance data quality and performance monitoring</p> <p>Align policy and practice with corporate priorities and the Council Plan</p>
5	Who is intended to benefit from this work and in what way?	<p>Council tenants</p> <p>Vulnerable adults and older persons</p> <p>Young people and care leavers</p> <p>Families and households on low incomes</p> <p>People with disabilities or long-term health conditions</p> <p>Ethnic minority communities</p> <p>LGBTQ+ residents</p> <p>Housing staff and partner agencies</p> <p>The wider Winchester community</p>
6	What are the outcomes sought from this work?	<p>Improved equality of access to housing services</p> <p>Increased tenant and resident satisfaction</p> <p>Reduction in complaints or maladministration</p> <p>Better identification and mitigation of discrimination risks</p> <p>Enhanced compliance with the Equality Act 2010 and Regulator of Social Housing standards</p> <p>Greater transparency and accountability in decision-making</p> <p>Improved staff awareness and inclusive service design</p> <p>Data-driven continuous improvement</p> <p>Increased partnership and co-production with residents</p>
7	What factors/forces could contribute or detract from the outcomes?	<p>Availability of resources and funding</p> <p>Staffing levels and training</p>

		Political or strategic priorities Legislative or regulatory changes (e.g., Social Housing Regulation Act 2023) Tenant and resident engagement capacity Partnership and inter-departmental working Public perception and communications Under-reporting due to fear or mistrust Quality of evidence available. Resident cooperation and willingness to engage.
8	Who are the key individuals and organisations responsible for the implementation of this work?	Residents Housing Policy & Projects Manager Tenancy & Neighbourhood Services Team Housing Systems & Data Team Equality, Diversity and Inclusion (EDI) Lead Tenant and Leaseholder Panels Partner Agencies (e.g., Hampshire County Council, voluntary sector, registered providers) Contractors ASB Officer 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 <b>bold</b> . 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?	<input type="checkbox"/> Y	<input type="checkbox"/> N	

10b	What existing evidence (either presumed or otherwise) do you have for this?	Race-related hate crime remains one of the most reported types.		
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?	Women may experience gender-based hate or harassment.		
12a	Could the policy or project have the potential to affect individuals or communities on the basis of disability differently in a negative way?  <i>you may wish to consider:</i> <ul style="list-style-type: none"><li>• <i>Physical access</i></li><li>• <i>Format of information</i></li><li>• <i>Time of interview or consultation event</i></li><li>• <i>Personal assistance</i></li><li>• <i>Interpreter</i></li><li>• <i>Induction loop system</i></li><li>• <i>Independent living equipment</i></li><li>• <i>Content of interview</i>)</li></ul>	Y	N	
12b	What existing evidence (either presumed or otherwise) do you have for this?	Disabled tenants may face barriers in communication or case engagement. Disabled people are disproportionately targeted by hate crime.		
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?	Risk of underreporting due to stigma or fear of not being believed. LGBTQ+ tenants may face verbal abuse or discrimination.		
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?	Older tenants may feel isolated or vulnerable to intimidation. Younger tenants may be perceived as perpetrators. Older residents and young people may experience or witness hate crime and may be less likely to report.		
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?	Risk of community tensions being misinterpreted as nuisance rather than hate-based ASB. Faith-based hate incidents may increase during community tensions.		
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?	Risk of underreporting due to stigma or fear of not being believed. Trans and non-binary residents face high levels of hostility and under-reporting.		
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?			
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?			
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 – if not mitigated Without robust triage, some reports could be misclassified as nuisance instead of hate crime. Disabled residents, older tenants, or minority

				groups may face barriers using standard reporting routes.
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><b>Yes – where proportionate and necessary</b></p> <p>Enforcement actions (injunctions, possession, closures) are lawful, proportionate, and taken only after individual assessment. Differential treatment ensures protection of victims and upholds the Council's statutory duties under the Equality Act, Housing Acts, and ASB legislation.</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"> <li>• Improve accessible reporting routes (phone, email, in-person, online).</li> <li>• Apply Category A classification for all hate-related incidents.</li> <li>• Provide reasonable adjustments and personalised action plans.</li> <li>• Strengthen partnership working with Police, CSP, LGBTQ+ groups, and disability organisations.</li> <li>• Provide culturally sensitive communication and translation.</li> <li>• Implement mandatory hate crime and equality refresher training.</li> <li>• Ensure robust risk assessments, early safeguarding referral, and trauma-informed practice.</li> </ul>
22	Do any negative impacts that you have identified above impact on your service plan?	Y	N	Ensure hate crime awareness and equality refresher training for all housing staff

				<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
Signed by Area Housing Manager	Joanna Elliott
Signed by Service Lead or Corporate Head of Service	Gillian Knight