

EQUALITY IMPACT ASSESSMENT

What is an Equality Impact Assessment?

An Equality Impact Assessment (EIA) is a tool designed to assist you in ensuring that you have thought about the needs and impacts of a change to your service / policy / plan / strategy to ensure it is fair and does not present barriers to participation or disadvantage any groups in relation to protected characteristics as defined in the Equality Act 2010. It enables a systematic approach in identifying and recording impacts and actions.

Why do we need it?

As a local authority that provides services to the public, we have a legal responsibility to ensure that we can demonstrate that we have paid due regard to the need to:

- ✓ Eliminate discrimination, harassment and victimisation
- ✓ Advance Equality of Opportunity
- ✓ Foster good relations

The EIA will help to ensure that we understand the potential effects of any new or significantly changed services, policies, plans, or strategies by assessing:

- the impacts on different groups, both internal and external
- any adverse impacts are identified
- actions are identified to remove or mitigate any adverse impacts

The EIA ensures decisions are transparent and based on evidence with clear reasoning.

What are the protected characteristics?

- ✓ Age
- ✓ Disability
- ✓ Gender reassignment
- ✓ Marriage and civil partnership
- ✓ Pregnancy and maternity
- ✓ Race
- ✓ Religion and belief
- ✓ Sex
- ✓ Sexual orientation

1. INTRODUCTORY INFORMATION

| | |
|---|---|
| Name of service /policy / plan /strategy | Improved Tenant Engagement Framework – with incentives |
| Lead Officer and others undertaking this assessment? | Jane Diver, Robyn Henry, HD Tenant Champion |
| Date EIA completed | 10.02.2026 |

NSDC is moving towards a more consistent and defined model of engagement, shaped by a collaborative design team comprising tenants, Council staff, and Tenant Participation Advisory Service (TPAS) in a project executed in 2025. This evolution reflects growing expectations for transparency, inclusivity, and digital accessibility. By modernising engagement practices, NSDC will strengthen trust and accountability while delivering a more responsive and equitable housing service that meets the diverse needs of its tenant residents. We are adopting an improved Tenant Engagement Framework, with a structured recognition and incentives scheme.

2. SUMMARY OF THE POLICIES, PROCEDURES, FUNCTIONS, AND SERVICES BEING ASSESSED

What are the aims and objectives of the policies, procedures, functions, and services

We carried out this Equality Impact Assessment to make sure the Improved Tenant Engagement Framework is fair, inclusive and accessible to all tenants.

The framework introduces a clearer and more consistent approach to tenant involvement. It explains how tenants can get involved and what they can expect. It aims to strengthen tenant voice and apply the same standards across services. It offers different routes into engagement so tenants with different abilities, time and confidence levels can participate.

It helps us check that the framework does not create barriers for any group. It supports NSDC's legal duties to consider people with protected characteristics before making changes. It ensures that every tenant has opportunities to take part in ways that suit their needs.

Who is affected by this policies, procedures, functions, and services and what is the intended change or outcome for them?

(i.e. staff / service users or other stakeholders)

We assessed the impact on NSDC tenants and leaseholders based on these Protected Characteristics:

- Age
- Sex
- Disability
- Sexual orientation
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race and ethnicity

Religion or belief
 Carers and Care Leavers (NSDC-specific)
 Armed Forces Covenant (NSDC-specific)

Which groups have been consulted with as part of the creation or review of this policies, procedures, functions, and services

(Please include how they were consulted and their responses. If you haven't consulted yet and are intending to do so, please complete the consultation table below)

- Tenant feedback during the design phase informed the assessment.
- Officer experience during the design phase informed the assessment.
- Existing equality guidance supported our approach.
- We will continue working with the Equality Group if new impacts emerge during implementation.
- Ongoing tenant feedback will help keep the framework relevant and inclusive.

In light of the answers given above, do you need to consult with specific groups to identify needs/issues? If not please explain why

Completed during the design phase.

CONSULTATION

Negative impacts identified will require the responsible officer to consult with the affected group/s to determine all practicable and proportionate mitigations. Add more rows as required.

| Group/Organisation | Date | Response |
|-----------------------------|------|----------|
| Tenant Engagement Champions | | |
| Design Team | | |

3. WHAT WE ALREADY KNOW AND WHERE THERE ARE GAPS

List any existing information / data about different diverse groups in relation to this policy? i.e. in relation to age, disability, gender reassignment, marriage or civil partnership, pregnancy & maternity, race, religion or belief, sex, sexual orientation etc

Examples of information / data such as consultation, previous EIA's, demographic information, anecdotal or other evidence

Tenant feedback collected during engagement activities informed the assessment.
 Officer experience in day-to-day work with tenants contributed insights about barriers and needs.
 Plans to continue engaging through the Equality Group as new impacts emerge.
 Ongoing tenant feedback will remain part of monitoring and review.

The assessment used existing equality guidance already held and used across NSDC.

The EQIA identifies known challenges for groups with protected characteristics, based on previous insight and officer knowledge:

Age: Some tenants may prefer or require non-digital formats or more support.

Disability: Awareness of accessibility needs such as large print, Easy Read, assisted digital support.

Sex / Sexual Orientation / Gender Reassignment / Religion or Belief / Race and Ethnicity: Listed and considered as part of the protected characteristics review, though no specific datasets were referenced.

Pregnancy & Maternity: Included as part of the protected characteristic assessment.

Marriage & Civil Partnership: Acknowledged as part of the assessment.

Armed Forces Covenant & Care Leavers: NSDC-specific groups recognised within existing organisational equality considerations.

The assessment reflects known patterns within NSDC services, such as:

Some tenants having limited digital access or relying on offline communication.

Tenants facing language barriers, indicating previous awareness of translation needs.

The risk that digital-only engagement could exclude disabled tenants or those with lower confidence.

Staff experience identifies some engagement activities attract tenants who are already confident or active, which may unintentionally disadvantage quieter or less confident tenants.

Officer knowledge identifies that some groups may be under-represented, existing awareness from previous data collection and engagement trends.

Socio-economic Information Considered

(While not protected characteristics, these are relevant contextual data the EQIA acknowledges):

Low confidence

Financial hardship

Caring responsibilities

Lack of transport

Irregular working hours

These were included due to existing understanding of tenant challenges.

Summary - existing evidence used includes:

Tenant feedback

Officer experience

Existing equality guidance

Understanding of barriers affecting disabled tenants, digitally excluded tenants and tenants with language needs

Awareness of under-represented groups

Socio-economic challenges known from previous service interactions

Planned use of demographic monitoring to track participation

4. ASSESSING THE IMPACT

| Protected Characteristic | Is there potential of positive or negative impact? | Please explain and give examples of evidence / data used | Action to address negative impact (<i>i.e. adjustment to the policy/plan – the action log below should be completed to provide further information</i>) |
|---------------------------------|---|---|--|
|---------------------------------|---|---|--|

| | | | |
|-------------------------------------|--|---|----------------|
| Age | Positive Potential Uneven/ Negative | The clearer structure makes it easier for more tenants to understand how to get involved. Offering multiple ways to participate supports different needs, abilities and confidence levels. A consistent approach helps build trust, especially for people who felt unheard or unsure how to take part. | See Action Log |
| Disability | Positive Potential Uneven/ Negative | The clearer structure makes it easier for more tenants to understand how to get involved. Offering multiple ways to participate supports different needs, abilities and confidence levels. A consistent approach helps build trust, especially for people who felt unheard or unsure how to take part. | See Action Log |
| Gender Reassignment | Positive | A consistent approach helps build trust, especially for people who felt unheard or unsure how to take part. | |
| Marriage / Civil Partnership | Positive | A consistent approach helps build trust, especially for people who felt unheard or unsure how to take part. | |
| Pregnancy / Maternity | Positive | Offering multiple ways to participate supports different needs, abilities and confidence levels. | |
| Race | Positive | A consistent approach helps build trust, especially for people who felt unheard or unsure how to take part. | |
| Religion / Belief | Positive | A consistent approach helps build trust, especially for people who felt unheard or unsure how to take part. | |
| Sex | Positive | A consistent approach helps build trust, especially for people who felt unheard or unsure how to take part. | |
| Sexual Orientation | Positive | A consistent approach helps build trust, especially for people who felt unheard or unsure how to take part. | |

| | | | |
|--|-------------------|---|----------------|
| Other groups which may be impacted? (carers, low literacy, priority neighbourhoods, health inequalities, rural isolation, veterans, care leavers) | Positive | A consistent approach helps build trust, especially for people who felt unheard or unsure how to take part. | See Action Log |
| | Potential Uneven/ | Offering multiple ways to participate supports different needs, abilities and confidence levels. | |
| | Negative | The clearer structure makes it easier for more tenants to understand how to get involved. | |

5. PROPOSED MITIGATION: ACTION LOG

To be completed when barriers, negative impact or discrimination are found as part of this process – to show actions taken to remove or mitigate. Any mitigations identified throughout the EIA process should be meaningful and timely. Add more rows as required.

| Negative/Uneven Impact | Action | Responsible Officer | Target Date |
|---|--|---------------------|-------------------------------------|
| Some tenants may find certain engagement routes harder to use, including: People with disabilities, People with limited digital access, People facing language barriers. They may be excluded if engagement relies too much on digital or written methods. | Offer a range of engagement options, including in-person, telephone, hybrid and online methods. | JND/RH | April 2026 |
| | Provide accessible formats such as large print, Easy Read, translated materials or assisted digital support. | JND/RH | April 2026 |
| | Ensure digital tools supplement—rather than replace—face-to-face and accessible routes | JND/RH | April 2026 |
| It ensures no tenant is excluded because of disability, digital access or language needs. | | | |
| Without monitoring, some groups may continue to be under-represented. We could miss important voices and experiences. | Monitor participation trends by demographic group (where data is available). | JND/RH | Monitoring will commence April 2026 |
| | Identify patterns that show gaps or barriers. | JND/RH | April 2026 |
| | Carry out targeted outreach where groups are missing. | JND/RH | Will commence April 2026 |
| It helps balance opportunities so that quieter or less confident tenants can still take part. | | | |
| Incentive-based opportunities may work better for tenants who already have more confidence, free time or stability. | Make sure incentives do not favour only confident or highly active participants. | JND/RH | Monitoring will commence April 2026 |
| | Offer low-pressure, informal and flexible engagement options. | JND/RH | Will commence April 2026 |

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|--|--|------------------------------------|--------------------------|
| It might lead to the same people participating more often. | Support participation through staff outreach and confidence-building approaches. | JND/RH | Will commence April 2026 |
| It helps balance opportunities so that quieter or less confident tenants can still take part. | | | |
| Socio-economic Factors Tenants may face challenges such as: Low confidence Financial hardship Caring responsibilities Lack of transport Irregular working hours | Flexible engagement methods and accessible options will help reduce these barriers. | JND/RH | Will commence April 2026 |
| Human Rights | The framework supports fair treatment and increases tenants' ability to influence decisions affecting their homes and communities. | JND/RH | Will commence April 2026 |
| Impact on Staff and the Organisation | Staff may need training in accessible communication and inclusive engagement methods. | Housing Services Business Managers | Ongoing |
| | A skills audit will help identify development needs. | Housing Services Business Managers | Ongoing |
| | Consistent practice across teams will support fairness and build tenant trust. | SLT | Ongoing |
| | | | |

What are the arrangements for monitoring and reviewing the actual impact of the policies, procedures, functions, and services?

We will monitor who is taking part to identify under-represented groups. Equality considerations will be reviewed regularly as the framework rolls out. This will help ensure the framework remains fair and accessible, especially as NSDC prepares for Local Government Reorganisation.

Overall, the Improved Tenant Engagement Framework is designed to be fair, inclusive and accessible. With the planned mitigations and regular monitoring, the framework will support equal participation and help ensure that all tenants—regardless of background or circumstances—have a meaningful voice.

6. EVALUATION DECISION

Once consultation and practicable and proportionate mitigation have been put in place, the officer responsible should evaluate whether any negative impact remains and, if so, provide justification for any decision to proceed.

| Question | Explanation / justification |
|----------|-----------------------------|
|----------|-----------------------------|

| | | |
|--|---|---|
| Is it possible the proposed new service / policy / plan or strategy or the proposed change could discriminate or unfairly disadvantage people? | Potentially if the mitigations are not implemented. | |
| Final Decision | Tick | Include any explanation/justification required |
| 1. No barriers identified; therefore, activity will proceed | | |
| 2. Stop the policy or practice because the data shows bias towards one or more groups | | |
| 3. Adapt or change the policy in a way that will eliminate the bias | | |
| 4. Barriers and impact identified , however having considered all available options carefully, there appear to be no other proportionate ways to achieve the aim of the policy or practice (e.g. in extreme cases or where positive action is taken). Therefore, you are going to proceed with caution with this policy or practice knowing that it may favour some people less than others, providing justification for this decision | X | See above mitigations |

Did you consult with an Equality and Diversity Ally prior to completing this assessment?

Yes/~~No~~

7. SIGN OFF

| | |
|--|---|
| Name and job title of person completing this EIA | Jane Diver Tenant Engagement Officer |
| Officer Responsible for implementing the change to policies, procedures, functions, and services etc. | Jane Diver Robyn Henry |
| Business Manager | Julie Davidson |
| Date Agreed (by Business Manager) | 10/02/2026 |
| Date of Review (if required) | 01/04/2027 |