

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

Question	Response
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1.1	Name of policy/decision/service/project/programme being assessed	Rough Sleeper Policy Homelessness and Housing Equalities
1.2	Summary of aims and objectives of the policy/decision/service/project/programme	<p>This policy is intended to support the Council in its function to provide the statutory duty to prevent homelessness and aid people who are threatened with homelessness or are homeless and are at risk of, or currently rough sleeping.</p> <p>This policy outlines the Council’s approach to individuals found rough sleeping in Swindon and those that may be at risk of rough sleeping in Swindon. Preventing and responding quickly to those rough sleeping is a priority for Swindon Borough Council.</p> <p>The aim of this policy is to reduce rough sleeping in Swindon. We aim to do this by:</p> <ul style="list-style-type: none"> • Responding quickly to reports of rough sleeping. • Employing effective up-stream prevention work. • Taking a multi-agency approach to support those rough sleeping/ at risk of rough sleeping. • Helping residents to sustain their tenancies. • Providing training to any person who may work with someone with the potential to rough sleep. <p>When rough sleeping occurs, the Council will take prompt action to help resolve the situation; the response will focus on prevention, assessment, and advice.</p> <p>Swindon Borough Council is committed to developing trauma informed ways of working. Trauma-informed organisations assume that people have had traumatic experiences, and as a result may find it difficult to feel safe within services and to develop trusting relationships with service providers. Consequently, services are structured, organised and delivered in ways that promote safety and trust, and aim to prevent re-traumatisation.</p> <p>The Council recognises that effective delivery of this policy relies on collaborative working with key partners and stakeholders.</p>
1.3	Who is affected by the policy/decision/service/	It affects all individuals rough sleeping or at risk of rough sleeping in the boundary of Swindon.

	project/programme? (e.g. employees/service users/supplier/contractor)	It will affect all residents living within the Borough regardless of their background, as well as businesses and other organisations operating in the Borough. Within the Council, this policy relates to the work of the Rough Sleeper Team, The Wider Homelessness team and Community Safety Partnership (incorporating the anti-social behaviour team) and, to a lesser extent, legal services.
1.4	What involvement and consultation has been done in relation to this proposal? (e.g. with relevant groups and stakeholders)	A draft version of the policy, has been subject to public, staff, partner and stakeholder engagement.
1.5	What are the arrangements for monitoring and reviewing the actual impact of the policy/funding activity/event?	Swindon Borough Council will regularly review the EqIA, in line with legislative changes or good practice, or if the policy 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	Neutral	Different approaches and mechanisms may be required for engaging with and representing, people with a range of disabilities depending on their individual needs. Consider: <ul style="list-style-type: none"> • Communication methods. • Accessibility – venue, location, transport. • Range of support needed to participate. • Hearing Loops and Interpreters. • Disability awareness training for employees. 	<ul style="list-style-type: none"> • Offer a range of appointments, e.g. at home, at the office, at a library. • Consider different support needs, e.g. liaise with support workers, make referrals to support agencies. • Include interpretation services where needed. • Use text type telephones. • All staff to receive disability awareness training.
Gender Reassignment	Neutral	Trans people should be able to disclose their gender	Swindon Borough Council does not have a trans policy.

		<p>identity without fear of prejudice.</p> <ul style="list-style-type: none"> • Making it clear you have a Trans policy and process. • Awareness training for employees. 	
Marriage or Civil Partnership	Neutral	All couples or partners, regardless of gender, should be able to access services.	
Pregnancy and Maternity	Neutral	<p>Consider:</p> <ul style="list-style-type: none"> • Flexible hours of the service/project. • Is there access to private area for breastfeeding mothers? 	<p>Be flexible with timings and appointments.</p> <ul style="list-style-type: none"> • Introduce private area for breastfeeding, if requested.
Race	Neutral	<p>Consider:</p> <ul style="list-style-type: none"> • The size of the BME communities that your service/project affects. • Language(s) spoken/understood. • Culture, such as hygiene, clothing, physical activities, mixed gender activities. • What access support can you offer? 	Regular review of approach and activities undertaken in respect of the policy to ensure that this group is not being disadvantaged.
Religion or Belief	Neutral	<p>Consider:</p> <ul style="list-style-type: none"> • The diversity within the communities that your service/project affect. • Prayer times, meal times, food (some religions do not eat meat), cultural habit or belief, religious holidays such as Ramadan. • Awareness training for employees. 	Be flexible with appointments, e.g., home visits, familiar place offered to suit the individual.
Sexual Orientation	Neutral	<p>Consider:</p> <ul style="list-style-type: none"> • LGB people should feel safe to disclose their sexual orientation without fear of prejudice. • Make it clear you recognised civil marriage and partnerships. • Awareness training for employees. 	<p>Provide ongoing awareness training for employees.</p> <p>Swindon Borough Council Equality policy.</p>

Sex (gender)	Neutral	<p>Consider:</p> <ul style="list-style-type: none"> • The impact on men and women. • Child care/care of other dependants. • Mixed/single gender groups/activities. • Timing of services/projects. 	<p>Be flexible with appointments.</p>
Age	Neutral	<p>Consider:</p> <ul style="list-style-type: none"> • The way younger and older people access services may be different. • Use of technology. • Child care/care of another dependant. • Timings/flexibility, such as work patterns. • Transport arrangements. • Venue location. 	<p>Accept correspondence in different formats, e.g. email, written, WhatsApp messages, telephone call.</p> <p>Offer a range of appointments, this may mean working flexibly with hours and locations.</p>
Children in Care and Care Leavers	Neutral	<p>Consider:</p> <ul style="list-style-type: none"> • The way younger and older people access services may be different. • Use of technology. • Child care/care of another dependant. • Timings/flexibility, such as work patterns. • Transport arrangements. • Venue location. 	<p>Accept correspondence in different formats, e.g. email, written, WhatsApp messages, telephone call.</p> <p>Offer a range of appointments, this may mean working flexibly with hours and locations.</p> <p>Involve Pathway Advisors and other support services where required.</p>

Section Three- Evaluation

3.1	Is it possible the proposed policy or activity or change in policy or activity could discriminate or unfairly disadvantage people?	No. The policy provides a transparent framework that SBC will follow to ensure decisions on rough sleeping and procedures that follow are carried out in line with the policy.
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Final Decision:	Tick the relevant box	Include any explanation / justification required
1. No barriers identified, therefore activity will proceed.	✓	The policy provides a transparent framework that SBC will follow to ensure decisions on rough sleepers and

		procedures that follow are carried out in line with the policy.
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 policy 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 Four – Record Keeping

Will this EqIA be published* (*EqIA's should be published alongside relevant event paperwork including cabinet papers:	Yes/Not required
Date Completed	07/08/2024
Review date (if applicable)	

Change Log:

Name	Date	Version	Change Made

Responsibilities			
Name of person leading this EqIA	Chelsie Eddolls	Date Completed	07/08/2024
Names and roles of people involved in the consideration of impact	Chelsie Eddolls (Rough Sleeper Team Manager)		
Name of Director signing EqIA	Andrew McDonald	Date Signed	31/12/2024