#### Why do an Equalities Impact Assessment (EqIA)?

 Equalities Impact Assessment (EqIA) is part of Oxford City Council's Public Sector Equality Duty (PSED) (Equality Act 2010).

The General PSED enables Oxford City Council to:

- a. identify and remove discrimination,
- b. identify ways to advance equality of opportunity,
- c. Foster good relations.
- 2. An EqIA must be done before making any decision(s) that may have an impact on people and/or services that people use and depend on.
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- 3. An EqIA form is one of many tools that can simplify and structure your equalities assessment.
- 4. We are passionate about equalities, and we highly recommend that <u>Corporate Management Team (CMT)</u> reports and all projects must attach an EqIA.

#### A good EqIA has the following attributes:

1. Comprehensively considers the <u>9 protected characteristics.</u>

1. Age	6. Race & Ethnicity
2. Disability	7. Religion or Belief
3. Gender Reassignment	8. Sex
4. Marriage & Civil Partnership	9. Sexual Orientation
5. Pregnancy & Maternity	

- It has considered equality of treatment towards service users, residents, employees, partners, council suppliers & contractors, and Council Members
- Sufficiently considered potential and real impact of proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members.
- Systematically recorded and reported any potential and real impact of your proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members
- Collected, recorded, & reported sufficient information and data on how your policy or proposal will have an impact.
- 6. Offers mitigations or adjustments if a PSED has been impacted.
- 7. Provides clear justifications for your decisions.
- 8. It is written in **plain English** with simple short sentence structures.

#### Section 1: General overview of the activity under consideration

1.	Name of activity being assessed.	<ul> <li>Council of Sanctuary Framework         <ul> <li>To assess the impact of adopting the Council of Sanctuary framework on different protected characteristics and ensure it promotes equality and inclusivity.</li> </ul> </li> <li>Objectives:         <ul> <li>Identify and remove potential discrimination.</li> <li>Advance equality of opportunity.</li> <li>Foster good relations between different community groups.</li> </ul> </li> </ul>	2.	The implementation date of the activity under consideration:	January 2025-December 2028 (3 years)
3.	Directorate/Department(s):	People and Communities Directorate	4.	Service Area(s):	Housing Services
5.	Who is (are) the assessment lead(s):	Stephen Cohen Refugee and Resettlement Manager Housing Services <u>scohen@oxford.gov.uk</u>	6.	Contact details, in case there are queries:	Stephen Cohen Refugee and Resettlement Manager Housing Services <u>scohen@oxford.gov.uk</u>
7.	Is this a new or ongoing EqIA?	New Extension to existing EqIA	8.	If this is an extension of a previous EqIA, please indicate where the previous EqIA is located and share the link to the said EqIA.	Not applicable
9.	Date this EqIA started:	18 October 2024			
10.	Will this EqIA be attached to <u>Corporate Management Team</u> ( <u>CMT</u> ) reports/updates, which will be published online?	Νο	11.	Give a date (tentative or otherwise) when this assessment will be taken to the CMT.	Not applicable

Section 2: About the activity, change, or policy that is being assessed.

12.	Type of activity being considered:	Budget  New Activity	Decommiss	Oth	Commissioning	activity	ange to an existing proval of the Council of
13.	Which priority area(s) does this activity fulfil? within Oxford City Council's Corporate strategy (2024-2028)	Strong, fair economy.	Good, affordable h	nomes.	Thriving communities	Zero Carbon Oxford.	U Well-run council.
14.	Which priority area(s) within does this activity fulfil? <u>Oxford City Council's</u> <u>Equality, Diversity &amp;</u> <u>Inclusion Strategy (2022)</u>	Responsive services and customer care.		verse an ed workf		tional	Understanding and working with our communities.
15.	Outline the aims, objectives, & priorities of the activity being considered.	Aims: The Council of Framework sets Council will support seeking sanctuary stakeholders and community in lither The Thriving Community The Thriving Strategy 2023-2 Oxford City Counce Equality, Diversity and engage with conversations att throughout the city make Oxford an	rt local people and work with d the local ne with the ties Strategy, Communities 7 committed il to champion and Inclusion and facilitate pout equality 7, and work to	Strategy work in residents asylum a Local A Action F Council become authority As part Council I to obtain	he Thriving Commun , the Council committ collaboration with s including refug seekers and the mig ity to inform and dev Authority City of Sanci Plan and ensure the meets its commitme	ed to local gees, grant /elop tuary City City City City local local by su , the iteria tuary	ities: orking in partnership with mmunities, organisations, d agencies to reduce equalities and create riving communities nampioning diversity and clusion in our own work and mmunity partnerships elping people live healthily providing services, pport, and facilities to

	through the Council's Anti- Racism Charter. The Thriving Communities Strategy outlined the Council's approach to coordinating preventative services, reducing inequalities and improving residents quality of life. This activity is intrinsically linked to Oxford City Council's corporate strategy as laid out in the three key corporate priorities which fall within the <i>Thriving</i> <i>Communities</i> section.	<ul> <li>improve the outcomes for people seeking sanctuary from war and persecution through improving the institutional response to service delivery.</li> <li>This includes development of an action plan to be implemented over a 3 year period and also a plan that is publicised.</li> <li>The Council has therefore developed the Council of Sanctuary Framework which summarises the context, background what are the key challenges and progress, experiences and action plan.</li> <li>The framework is focused on supporting residents who are forcibly displaced due to war, conflict or other crisis and have sought safety and sanctuary, but its key objective is to support thriving communities and build an inclusive City for all residents. This equalities impact assessment is completed to understand the impact on the different stakeholders and ensure any mitigations are put in place.</li> </ul>	prevent and manage physical and mental health conditions <sup>1</sup>			
Please outline the consequences of not implementing this activity.	<ol> <li>If the Council of Sanctuary Framework is not implemented:         <ol> <li>There may be an adverse impact on some of the most vulnerable members in the city.</li> <li>The Council's commitment to meet certain criteria to obtain the Council of Sanctuary Award (accreditation) will be adversely affected.</li> <li>The Council's commitment within the Thriving Communities to support refugees and asylum seekers establish successful lives in Oxford would not be met.</li> </ol> </li> </ol>					

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<sup>&</sup>lt;sup>1</sup> <u>https://www.oxford.gov.uk/policies-plans-strategies/strategy/6</u>

### Section 3: Understanding service users, residents, staff and any other impacted parties.

17. 0	Have you undertaken any consultations in the form	A key objective was to engage key stakeholders (internal and external), as far as reasonably practical, in the development and implementation of a Council of Sanctuary framework.
	of surveys, interviews, and/or focus groups?	Officers set up an internal officer's project group in 2023, overseen by senior managers and an internal and external sanctuary group set up in 2024.
		An email address (COS@oxford.gov.uk) was also set up for feedback and communications to and from residents and stakeholders.
		In June 2023 the Council of Sanctuary Award, process and task and finish group arrangements were taken to the internal Policy Officers Group as a key agenda item.
		In October 2023, the Council commissioned a local refugee support charity with experience of policy and research, Asylum Welcome, to conduct a needs assessment for local residents in Oxford. The survey aimed to engage residents with lived experience and stakeholder groups who were working with local residents.
		Sixty-six interviews were conducted between October and December 2023 with research conducted face- to-face, either in English or using translation, either one-to-one or in pairs.
		The individuals interviewed were of different immigration status including:
		<ul> <li>27 asylum seekers who live in asylum accommodation</li> <li>10 people with refugee status</li> </ul>
		<ul> <li>7 people on resettlement schemes (ARAP, ACRS or UKRS).</li> <li>8 Ukrainians on specific Ukraine visas</li> </ul>
		<ul> <li>3 unaccompanied asylum seeking children</li> <li>4 EU migrants with indefinite leave to remain in the UK</li> <li>5 naturalised British citizens.</li> </ul>
		Eighteen different nationalities participated with two thirds of respondents identifying as male and one third female with the majority falling with the 25-34 age category. Asylum Welcome reported back in February 2024 and detailed their findings including the needs, barriers, and opinions of residents within a report.
		Alongside the above individuals, thirty service providers also contributed to the needs assessment research either through one-to-one interviews or by attending two group-based virtual interview sessions. The stakeholders work in a range of context in the city including faith-based, youth work, health and medical provision, education and employment support, hosting arrangements and other services.

The Council was able to use the first-hand experience alongside other stakeholder engagement work to help inform the development of the Council's action plan and framework document.				
The Council of Sanctuary project team has sought to consult internal staff from across the Council. Staff were therefore informed of the project objectives through internal communications including lunch and learn engagement meetings, Council newsletter, leadership briefings and in June 2024, through the Council's staff conference attended by over 200 staff.				
To add more detailed input into the project, the internal sanctuary partnership group which contained leads from different service areas was launched in August 2024 and has now met several times and internal staff have been able to feed into the development of the Council's action plan.				
There have also been extensive discussions with external stakeholders including group discussions with representatives from statutory and non-statutory agencies such as from the voluntary and community groups. The sanctuary project team have also engaged the general public and local businesses via spontaneous interviews and documented case studies of people seeking sanctuary and local residents.				
In September 2024, the external sanctuary partnership group was launched which contains representatives from local stakeholders and residents with lived experience. They have been able to feed into the development of the framework and action plan. The internal and external group will meet quarterly to review the action plan progress and routine updates will report into the Community Change Board which sits under the Thriving Communities section.				
The review and evidence base which informed this framework document has been conducted over a 12 month period.				
Data has been collected from a number of sources including commissioning and subsequent analysis of primary research and data between October and December 2023 which local residents with lived experience and external stakeholders were interviewed.				
Analysis has taken place of internal Council policies including key linked policies; the Thriving Communities Strategy, Equalities Diversity and Inclusion (EDI) Strategy, Housing, Homelessness and Rough Sleeping Strategy and the Council Strategy.				
Other data sources including internal Council data bases, data from the Office of National Statistics, Census data, published data from central government including Home Office migration statistics and other national policies to analysis the information.				
Other strategic/ equalities considerations				
<ul> <li>Safeguarding/ Welfare of Children and Vulnerable adults</li> <li>Mental Wellbeing/ Community Resilience</li> <li>The Council Strategy 2024 to 2028</li> <li>Thriving Communities Strategy 2023 to 2027</li> <li>Equality, Diversity and Inclusion Strategy</li> <li>Housing, Homelessness and Rough Sleeping Strategy</li> </ul>				

	The Council's voluntary adoption of the socio-economic duty.
19. If you have not done any consultations or collected data & information, are you planning to do so in the future?	Not applicable, please section 17.

## Section 4: Impact analysis.

20.	Who does the activity impact?	Service Users	Yes	No 🗆	Don't Know
		Members of staff	Yes	No 🗆	Don't Know
		General public	Yes	No	Don't Know
		Partner / Community Organisation	Yes	No	Don't Know
		City Councillors	Yes	No 🗌	Don't Know
		Council suppliers and contractors	Yes	No 🔀	Don't Know

	Does the activity impact positively or negatively on any protected characteristics as stated within Equality (Act 2010)?								
Protected Characteristic	Positive	Negative	Neutral	Don't know	Data/information/evidence supporting your assessment	Analysis & insight Mitigations			
Age 48		Dated.gov.uk		FOR	Refugees and asylum seekers often experience similar issues upon arrival in the UK but have come from many different cultures, backgrounds and countries of origin. Taking a person-centered approach will ensure that individuals are supported to achieve integration regardless of their background or circumstances.	The activity is about improving outcomes for refugees and asylum seekers through challenging discrimination, ensuring equality of opportunity (where possible within UK Immigration law) and promoting good relations between groups. No negative impacts of these proposals have been identified and seeks to have a positive impact.			
			COL	UTY JNCI	There is anecdotal evidence that a large proportion of local people seeking sanctuary are in the 25-34 age bracket. The Council of Sanctuary framework seeks to put in increased support for this group alongside the wider cohort.				
Disability (Visible and invisible)					Refugees and asylum seekers often experience similar issues upon arrival in the UK but have come from many different cultures, backgrounds and countries of origin. Taking a person-centered approach will ensure that individuals are supported to achieve integration	See above			

				regardless of their background or circumstances. There is anecdotal evidence that people seeking sanctuary have an increased risk of being diagnosed with a disability (visible and invisible) with higher reports of mental health conditions based on historic and current experiences. The Council of Sanctuary framework seeks to put in increased support for this group alongside the wider cohort	
Gender re-assignment 40	Dyterd.gov.uk		FOR	The activity is about improving outcomes for refugees and asylum seekers through challenging discrimination, ensuring equality of opportunity (where possible within UK Immigration law) and promoting good relations between groups. Some asylum seekers may have fled areas which were less tolerant of difference including gender re- assignment and will be better able to live as themselves in the UK.	See above
Marriage & Civil Partnership		Col	JNCI	The activity is about improving outcomes for refugees and asylum seekers through challenging discrimination, ensuring equality of opportunity (where possible within UK Immigration law) and promoting good relations between groups.	See above
Race, Ethnicity and/or Citizenship				The activity is about improving outcomes for refugees and asylum seekers through challenging discrimination, ensuring equality of opportunity (where possible within UK Immigration Iaw) and promoting good relations between groups. Some asylum seekers may have fled areas which were less tolerant of	See above

				difference and will be better able to live as themselves in the UK.	
Pregnancy & Maternity				The activity is about improving outcomes for refugees and asylum seekers through challenging discrimination, ensuring equality of opportunity (where possible within UK Immigration law) and promoting good relations between groups.	See above
Religion or Belief		-		The activity is about improving outcomes for refugees and asylum seekers through challenging discrimination, ensuring equality of opportunity (where possible within UK Immigration law) and promoting good relations between groups.	See above
	1006-			Some asylum seekers may have fled regimes which did not tolerate religious freedoms.	
Сл Сбех			FORI	The activity is about improving outcomes for refugees and asylum seekers through challenging discrimination, ensuring equality of opportunity (where possible within UK Immigration law) and promoting good relations between groups.	See above
		COL	UNCI	A higher proportion of asylum seekers are males. Women are likely to experience greater equality in the UK than some of the regimes they have fled from.	
Sexual Orientation				The proposal is about improving outcomes for refugees and asylum seekers through challenging discrimination, ensuring equality of opportunity (where possible within UK Immigration law) and promoting good relations between groups.	See above

Other (voluntary consideration)For example:Migrant, refugee, or asylum seekers51	C Stranger		<ul> <li>Some asylum seekers may have fled regimes which did not afford rights to people in same sex relationships and they will benefit from different social attitudes living in the UK.</li> <li>The data on this group is confounding mostly because this is a highly mobile group.</li> <li>However, it is estimated that 1 in 3 people in Oxford are some form of migrants.</li> <li>Refugees and asylum seekers are particularly vulnerable groups who often face significant barriers to accessing services and opportunities. These barriers can include language difficulties, lack of recognition of qualifications, and trauma from past experiences.</li> <li>Ensuring their inclusion in the City of Sanctuary framework involves: <ul> <li>Providing tailored support services to address specific needs.</li> <li>Promoting access to education, healthcare, and employment.</li> <li>Ensuring that policies do not inadvertently discriminate against these groups.</li> </ul> </li> </ul>	<ul> <li>This framework seeks to positively improve the service offer to residents who are affected by war and conflict and it aims to improve integration of local communities and therefore will have a positive impact on groups from backgrounds which contain a protected characteristic.</li> <li>The Council through the internal and external partnership groups will seek to mitigate any concerns raised by stakeholder groups.</li> <li>Adopting a City of Sanctuary framework in Oxford involves creating a welcoming environment for all, particularly those seeking refuge. This includes:</li> <li>Building community awareness and understanding of the challenges faced by refugees and asylum seekers.</li> <li>Encouraging local businesses and services to become more inclusive.</li> <li>Developing partnerships with organisations that support refugees and asylum seekers to enhance service provision.</li> <li>The ongoing work will have a positive impact on this group if the actions take on a targeted, strategic, informed and joined-up approach.</li> </ul>
Other			Census 2021	Adopting a City of Sanctuary framework in Oxford involves

(voluntary consideration)		Inward migration is likely to place increased pressure on an already limited housing supply.	creating a welcoming environment for all, particularly those seeking refuge.
For example: Socio-economic status (income, wealth, etc.)		The socio-economic duty under Section 1 of the Equality Act 2010 requires public bodies to consider how their decisions can reduce the inequalities of outcome caused by socio-economic disadvantage.	<ul> <li>This includes:</li> <li>Building community awareness and understanding of the challenges faced by refugees and asylum seekers.</li> <li>Encouraging local businesses and services to become more</li> </ul>
		This is particularly relevant for refugees and asylum seekers, who often experience higher levels of poverty and social exclusion. Research shows that Migrant workers make important contributions to the labour market in both high- and low-skilled	<ul> <li>inclusive.</li> <li>Developing partnerships with organisations that support refugees and asylum seekers to enhance service provision.</li> <li>The ongoing work will have a positive impact on this group if the actions take on a targeted,</li> </ul>
52		occupations. However, those seeking asylum have limited rights, do not have access to full benefits and will be surviving on low incomes.	strategic, informed and joined-up approach.
	CITY COUNCI	The Council of Sanctuary framework can help overcome some of the disadvantage experienced by increasing access to networks and advocacy as well as support from things like foodbanks.	

## Section 5: Conclusion(s) of your Full Impact Assessment

22.

Conclusions.

EqIA 2023- Ver 1.1

		Stop and reconsider the activity.				Adjust activ activity and					No major change(s adjustme and conti with activ but conti monitor.	) or ents inue /ity		No major change(s) or adjustmen and continue with the activity. No need to monitor in the future.
23.	you ha	e explain hov ave reached	/	to improve	integration of		nities and th	erefore will	have a pos	sitive imp	act on group	os from b	ackgrounds	onflict, and it ain s which contain aracteristics.
your conclusions above.				em and builds									experience and <i>v</i> ith local resider	
			groups, bus	siness and ed		isations and	other key st	takeholders	to harne	ess the skills	and know		sector, inter-fai w leadership a	
				Overall, this incorporates		a comprehens	sive framewo	ork and actio	on plan to I	be imple	mented over	the next	t 3 years (2	2025-2028) whi
			The Council's plan to work with colleagues and external stakeholders across the life of the framework implementation period to deliv In the Council's commitments as set out in the Equalities, Diversity and Inclusion Strategy <sup>2</sup> :											
				con	nmunity enga	gement		-	•		-			unity assets a
			add	dress issues a	nd celebrate s	strengths; thi	s approach i	s embedde	d in our i	new Commur	nity Impac	ct Fund	that we can join	
				prac wha	ctice, this me at's wrong- th	ans doing "wit is approach is	th" rather than s often terme	an "to" and, ed <u>asset-ba</u>	where poss sed comm	ible, foci <u>unity de</u>	using on what velopment (	t is stron ABCD). A	g in commu ABCD appro	r communities. Inities rather the oaches show th ce on each othe

<sup>&</sup>lt;sup>2</sup> <u>https://www.oxford.gov.uk/equality-diversity-inclusion/oxford-equality-diversity-inclusion-edi-</u> strategy/6#:~:text=The%20Council's%20Strategy%20for%202020,the%20opportunities%20for%20disadvantaged%20groups.

Connecting people to their shared interests, and enabling them to exchange skills and resources, helps communities identiand take action on the issues that are most important to them.

The Council plan to ensure information and communication is accessible, using a range of mediums both written and verbal and utilisit translation services where required.

There are plans within the framework document to improve data collection so the Council can better understand some cohorts issu where there is limited public data and use this data to inform service development.

There are plans to address gaps in understanding regarding marginalised groups such as individuals with no recourse to public fun (NRPF), who face acute barriers to accessing housing, money and other basic provisions. This can be especially problematic for wome who are dependent on their spouses for their immigration status e.g. spousal's visa's or where they are sponsored by a family member This will involve working with key partners to leverage support, especially for cases where the Council does not have a statutory du Overall, this framework seeks to positively improve the Council's service offer in this regard.

The framework outlines plans to ensure all staff are upskilled to deliver services and improve accessibility to services in a traun informed and culturally sensitive way and to work with HR partners to have a workforce that as a whole reflects Oxford's diver population. The Council through the internal and external partnership groups will seek to mitigate any concerns raised by stakehold groups.

## Section 6: Monitoring and review plan.

The responsibility for maintaining a monitoring arrangement of the EqIA action plan lies with the service/team completing the EqIA. These arrangements must be built into the performance management framework such as KPIs or Risk Registers.

24.	Who or which team or service area will be responsible for monitoring equalities impact?	It is proposed that as part of the Council of Sanctuary cabinet report, which will go to cabinet on 22 January 2025, there are annual reviews which need to be reported back to Council members regarding the progress of the framework and this will include a review of equalities considerations.
		Two sanctuary partnership forums with internal staff and external partners and residents with lived experience have been set up to provide accountability to the action plan and meet quarterly from 2025-2028. Individual action owner will be reporting back on progress via automated reporting functions set up by the Council of sanctuary project tear
		The framework action plan will be updated regularly and informed by what data tells us and if there any changing circumstances. Routine updates will report into the Community Change Board which sits under the Thriving Communities section.

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25.	Who (individual, team, or service area) will be responsible for carrying out the EqIA review?	we don't have access to	the data to see trends a mework is adversely affe	nave access to it and seek to we and put in place mitigations if we ecting certain groups in Oxford'	
26.	How often will the equality impact be reviewed for this activity?	Annually	27.	Date when the EqIA will be reviewed again.	January 2026
			B .		

# Section 7: Sign-off

Name: Stephen Cohen	Name: Lucy Cherry	Name:		
Job Title: Refugee & Resettlement Manager	Job Title: Policy & Partnerships Officer	Job Title:		
Signature:	Signature:	Signature:		
Name:	Name:	Name:		
Job Title:	Job Title:	Job Title:		
Signature:	Signature:	Signature:		

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