

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

1. 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.
  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 **Corporate Management Team (CMT) reports and all projects must attach an EqIA.**

## A good EqIA has the following attributes:

1. **Comprehensively considers the 9 protected characteristics.**


|                                 |  |
|---------------------------------|--|
| 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        | <b>NEW-</b> Socio-economic inequalities (voluntary adoption) |

2. It has **considered equality of treatment** towards service users, residents, employees, partners, council suppliers & contractors, and Council Members
3. Sufficiently considered **potential and real impact** of proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members.
4. **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
5. **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.  | <b>Name of activity being assessed.</b>   | Temporary Accommodation Placement Policy   | 2.  | <b>The implementation date of the activity under consideration:</b>  | Implementation date to match the Cabinet sign-off date for the Temporary Accommodation Placement Policy |
| 3.  | <b>Directorate/Department(s):</b>   | Housing Services   | 4.  | <b>Service Area(s):</b>  | Housing Needs   |
| 5.  | <b>Who is (are) the assessment lead(s):</b><br><b>Please provide:</b><br>-Name<br>-Email address                                      | Kieran Edmunds<br><a href="mailto:kedmunds@oxford.gov.uk">kedmunds@oxford.gov.uk</a> | 6.  | <b>Contact details, in case there are queries:</b><br><b>Please provide:</b><br>-Name<br>-Email address                                    | Kieran Edmunds<br><a href="mailto:kedmunds@oxford.gov.uk">kedmunds@oxford.gov.uk</a>                    |
| 7.  | <b>Is this a new or ongoing EqlA?</b>   | New  | 8.  | <b>If this is an extension of a previous EqlA, please indicate where the previous EqlA is located and share the link to the said EqlA.</b> | N/A   |
| 9.  | <b>Date this EqlA started:</b>  | May 2025   |     |  |   |
| 10. | <b>Will this EqlA be attached to <a href="#">Corporate Management Team (CMT)</a> reports/updates, which will be published online?</b> | Yes  | 11. | <b>Give a date (tentative or otherwise) when this assessment will be taken to the CMT.</b>   | July 2025   |


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

|     |   |   |  |   |   |
|-----|---|---|--|---|---|
| 12. | <b>Type of activity being considered:</b><br><br>Check the most appropriate.  |   |  |   |   |
|     |   |   | Others. Please specify: Policy implementation  |   |   |
| 13. | <b>Which priority area(s) <u>within Oxford City Council's Corporate strategy (2024-2028)</u> does this activity fulfil?</b><br><br>Please check as needed.                      | Good, affordable homes  |  | Thriving Communities                    | Well run council                                |
| 14. | <b>Which priority area(s) within <u>Oxford City Council's Equality, Diversity &amp; Inclusion Strategy (2022)</u> does this activity fulfil?</b><br><br>Please check as needed. | Responsive services and customer care.  |  | Leadership & organisational commitment. | Understanding and working with our communities. |
| 15. | <b>Outline the aims, objectives, &amp; priorities of the activity being considered.</b>   | To ensure fair, transparent, and legally compliant placement of homeless applicants into temporary accommodation, prioritising suitability, safeguarding, and minimising disruption to vulnerable households. |  |   |   |
| 16. | <b>Please outline the consequences of not implementing this activity.</b><br>For example,   | <ul style="list-style-type: none"> <li>• Risk of legal challenge and reputational damage</li> <li>• Inconsistent and potentially discriminatory placement decisions</li> </ul>                                |  |   |   |

-Existing activity does not fulfill Corporate Objectives,  
-existing activity is discriminatory and not fulfilling Council's PSED,  
... to name a few.

- Failure to meet statutory housing duties and PSED obligations

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

|  |  |
|--|--|
| <p><b>17. Have you undertaken any consultations in the form of surveys, interviews, and/or focus groups?</b></p> <p><b>Please provide details—</b><br/>-when,<br/>-how many, and<br/>-the approach taken.</p>  | <p>Internal consultation with Housing Needs officers and Legal Services.</p>   |
| <p><b>18. List information and data used to understand who your residents or staff are and how they will be impacted.</b></p> <p><b>These could be—</b><br/>-third-party research,<br/>-census data,<br/>-legislation,<br/>-articles,<br/>-reports,<br/>-briefs.</p> | <ul style="list-style-type: none"> <li>• Homelessness Code of Guidance 2018</li> <li>• Nzolameso v Westminster City Council [2015] UKSC 22</li> <li>• Oxford City Council homelessness data (2022–2025)</li> <li>• Risk Register and Equalities Impact Grid</li> </ul> |
| <p><b>19. If you have not done any consultations or collected data &amp; information, are you planning to do so in the future?</b></p>   | <p>Ongoing service user feedback and quarterly monitoring</p>  |

**Please list the details –**

-when,  
-with whom, and  
-how long will you collect the  
relevant data.

## Section 4: Impact analysis.

|     |  |  |     |  |  |
|-----|--|--|-----|--|--|
| 20. | <b>Who does the activity impact?</b>             | <b>Service Users</b>                     | Yes |  |  |
|     | <b>Check as needed.</b>                          | <b>Members of staff</b>                  | Yes |  |  |
|     | The impact may be positive, negative or unknown. | <b>General public</b>                    | Yes |  |  |
|     |  | <b>Partner / Community Organisation</b>  | Yes |  |  |
|     |  | <b>City Councillors</b>                  | Yes |  |  |
|     |  | <b>Council suppliers and contractors</b> | Yes |  |  |



| 21.                      | 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<br>Mitigations   |
| Age<br><br>198           | Y  |          |         | www.oxford.gov.uk | <p>As of 23/07/2025, there were <b>69</b> homeless applicants <b>aged 16-24</b> in temporary (self-contained and bed and breakfast) accommodation. This does not include dependent children within the households of adult homeless applicants.</p> <p>As of 23/07/2025, there were <b>12 care leavers aged 18-20</b> and <b>3 care leavers aged 21-24</b> in temporary (self-contained and bed and breakfast) accommodation.</p> <p>As of 23/07/2025, there were <b>10</b> homeless applicants <b>aged 60 or over</b> in temporary (self-contained and bed and breakfast) accommodation.</p> | <p>The Temporary Accommodation Placement Policy prioritises families with children and older adults for suitable placements.</p> <p>As a general principle, applicants must be aged 18 or older to make an application for homelessness assistance. Homeless individuals aged 17 or less should be supported and, if necessary, accommodated by Statutory Children's Services.</p> <p>Young people aged 18–20 will be assessed in partnership with the Young People's</p> |



*Total number of households in temporary (self-contained and bed and breakfast) accommodation as of 23/07/2025: **305***

Pathway and Statutory Children's Services.

Where appropriate, referrals will be made to supported accommodation for young people or mediation services to prevent homelessness. Young adults who qualify as Care Leavers or Former Relevant Children under the Children Act 1989 will fall into the 'Priority 1' category for temporary accommodation and will therefore be prioritised for placements within the city.

While temporary accommodation is not age-restricted, applicants over 65 will be assessed for more suitable housing options, such as sheltered or extra care housing.

Where temporary accommodation is used, a clear move-on

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|---|---|--|--|---|---|
|   |   |  |  |   | plan will be developed in partnership with Adult Social Care and other relevant agencies.   |
| <p><b>Disability</b></p> <p><b>(Visible and invisible)</b></p> <p>200</p> | Y |  |  | <p>As of 23/07/2025, there were <b>61</b> homeless applicants with a <b>physical disability</b>, <b>115</b> applicants with disclosed <b>mental health problems</b>, and <b>13</b> applicants with a <b>learning disability</b>, in temporary (self-contained and bed and breakfast) accommodation.</p> <p><i>Total number of households in temporary (self-contained and bed and breakfast) accommodation as of 23/07/2025: <b>305</b></i></p> | <p>The Temporary Accommodation Placement Policy recognises adjustments must be made for physical and mental health needs. Oxford City Council will always endeavour to source hotel and bed and breakfast rooms that are accessible to applicants and households who require them, ensuring that individual needs related to mobility and disability are met wherever possible. The Council will move such applicants, as soon as reasonably possible, to more suitable accommodation to help provide for the disability.</p> |



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| <b>Gender re-assignment</b>               |   |  | Y |  | No specific impact identified; Oxford City Council has publicly committed to being a trans-inclusive council and is committed to ensuring that trans and non-binary people are not discriminated against while accessing homelessness services.            |
| <b>Marriage &amp; Civil Partnership</b>   |   |  | Y |  | No specific impact identified  |
| <b>Race, Ethnicity and/or Citizenship</b> | Y |  |   | As of 23/07/2025, 32.8% of homeless applicants in temporary (self-contained or bed and breakfast) accommodation identified themselves as White British. According to the 2021 census, White British people make up 74.4% of the population of England and Wales. This indicates people from ethnic minority backgrounds are disproportionately represented in the homeless population of Oxford. | The Temporary Accommodation Placement Policy ensures fair access to temporary accommodation irrespective of race, ethnicity or citizenship, while recognising that those from ethnic minority backgrounds are disproportionately impacted by homelessness. |

|     |                                  |   |   |  |   |   |
|-----|----------------------------------|---|---|--|---|---|
|     |                                  |   |   |  | <i>Total number of households in temporary (self-contained and bed and breakfast) accommodation as of 23/07/2025: <b>305</b></i>  |   |
| 202 | <b>Pregnancy &amp; Maternity</b> | Y |   |  | <p>As of 23/07/2025, there were <b>7 pregnant women</b> in temporary (self-contained or bed and breakfast) accommodation.</p> <p><i>Total number of households in temporary (self-contained and bed and breakfast) accommodation as of 23/07/2025: <b>305</b></i></p> | The Temporary Accommodation Placement Policy ensures safeguarding measures are in place for pregnant women. Households containing pregnant women will fall into the 'Priority 1' category for temporary accommodation and will therefore be prioritised for placements within the city. |
|     | <b>Religion or Belief</b>        |   | Y |  |   | No specific impact identified   |
|     | <b>Sex</b>                       | Y |   |  | As of 23/07/2025, <b>166</b> homeless applicants identified as <b>female</b> in temporary (self-contained or bed and breakfast)   | Oxford City Council recognises that women experiencing homelessness may face distinct risks and   |

accommodation. **45** applicants had been made homeless as a result of **domestic abuse**: although it is not possible to disaggregate this figure by gender, it is recognised that domestic abuse disproportionately impacts women and girls.

*Total number of households in temporary (self-contained and bed and breakfast) accommodation as of 23/07/2025: **305***



vulnerabilities, including domestic abuse, sexual exploitation, and trauma.

When assessing allocations of temporary accommodation for vulnerable women, consideration will be given to:

- Women fleeing domestic abuse or coercive control.
- Women with a history of sexual violence or exploitation.
- Pregnant women or women with dependent children.
- Women with complex needs, including mental health, substance misuse, or trauma.

Where possible, women will be placed in women-only or

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women-preferred accommodation.

Shared accommodation will be risk-assessed to ensure safety and suitability.

Oxford City Council has publicly committed to being a trans-inclusive council and is committed to ensuring that trans and non-binary people are not discriminated against while accessing homelessness services.

In April 2025, the UK Supreme Court ruled that for the purposes of the Equality Act 2010, the term “woman” refers to biological sex. The practical implications of this ruling are that services designated as women-only or men-only must now apply those categories by biological sex. However, the Equality Act 2010 and the Public Sector

|                    |  |  |   |  |  |  |
|--------------------|--|--|---|--|--|--|
| 205                |  |  |   | <a href="http://www.oxford.gov.uk">www.oxford.gov.uk</a> |  | <p>Equality Duty continue to provide protection against discrimination to those who identify as transgender or non-binary. Oxford City Council will work closely and compassionately with all homeless applicants who identify as transgender or non-binary, taking personal risk and safeguarding considerations into account, to ensure they are offered accommodation which is non-discriminatory, safe, and suitable to their needs.</p> |
| Sexual Orientation |  |  | Y |  |  | <p>No specific impact identified</p>   |

|   |   |  |  |                   |  |   |
|---|---|--|--|-------------------|--|---|
| <p><b>Socio-economic inequalities such as:</b></p> <ul style="list-style-type: none"> <li>- income and factors that impact income.</li> <li>-access to jobs</li> </ul> <p>This was voluntarily adopted by <a href="#">Oxford City Council on the 13<sup>th</sup> of March 2024.</a></p> | Y |  |  | www.oxford.gov.uk | <p>As of 23/07/2025, <b>209</b> homeless applicants in temporary (self-contained or bed and breakfast) accommodation were in receipt of <b>Universal Credit. 71 applicants were in work</b> (full time, part time, or on paid parental leave). The majority of homeless applicants have a sufficiently low income as to qualify for welfare benefits, indicating socio-economic inequalities within the homeless population in Oxford.</p> <p><i>Total number of households in temporary (self-contained and bed and breakfast) accommodation as of 23/07/2025: <b>305</b></i></p> | <p>The Temporary Accommodation Placement Policy supports low-income households without the means to resolve their own housing situation by offering access to emergency accommodation for those groups who qualify for it. Employment status will be taken into consideration when determining priority for in-district placements, ensuring users can maintain existing employment where appropriate. Homeless applicants will be supported to make claims for Housing Benefit, if they are eligible to do so, to ensure the costs of temporary accommodation are covered.</p> |
| <p><b>Other (voluntary consideration)</b></p> <p><b>For example:</b></p>  | Y |  |  |                   | <p>As of 23/07/2025, <b>13 former asylum seekers</b> (i.e., those with refugee status) were in temporary (self-contained or bed and breakfast) accommodation.</p>  | <p>The Temporary Accommodation Placement Policy directly supports vulnerable groups experiencing homelessness,</p>  |

|   |          |  |  |                          |   |  |
|---|----------|--|--|--------------------------|---|--|
| <p>Migrant, refugee, or asylum seekers.</p> <p>207</p>                                  |          |  |  | <p>www.oxford.gov.uk</p> | <p>There were <b>12 care leavers aged 18-20</b> and <b>3 care leavers aged 21-24</b> in temporary (self-contained and bed and breakfast) accommodation.</p> <p><b>30</b> homeless applicants in temporary (self-contained or bed and breakfast) accommodation had a <b>history of criminal offending.</b></p> <p><i>Total number of households in temporary (self-contained and bed and breakfast) accommodation as of 23/07/2025: <b>305</b></i></p> | <p>including refugees, care leavers, prison leavers and those with unpaid caring responsibilities.</p> |
| <p><b>Other</b><br/><b>For example:</b><br/>- Unpaid carers<br/>- Prison population</p> | <p>Y</p> |  |  |                          | <p><i>Total number of households in temporary (self-contained and bed and breakfast) accommodation as of 23/07/2025: <b>305</b></i></p>   | <p>The Temporary Accommodation Placement Policy directly supports vulnerable groups experiencing</p>   |

|   |  |  |  |  |  |   |
|---|--|--|--|--|--|---|
| - Homeless population<br>-Council suppliers & contractors<br>-Cabinet Members |  |  |  |  |  | homelessness, including refugees, care leavers, prison leavers and those with unpaid caring responsibilities. |
|---|--|--|--|--|--|---|

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

| 22. | Conclusions. |  |  |                                     |  |  |
|-----|--------------|--|--|-------------------------------------|--|--|
|     |              |  | <p>Having considered equality of treatment towards service users, residents, employees, partners, council suppliers and contractors, and Council Members, and considered any potential and real impact of the introduction of a Temporary Accommodation Placement Policy upon these stakeholders, it is concluded that no protected characteristic or PSED will be impacted negatively by the introduction of the Policy.</p> <p>It is anticipated that the protected characteristics of Age, Disability, Race, Ethnicity and/or Citizenship, Pregnancy and Maternity, and Sex will be</p> | <input checked="" type="checkbox"/> | <p>No major change(s) or adjustments and continue with activity but continue to monitor.</p> |  |



|  |  |  |   |  |  |  |
|--|--|--|---|--|--|--|
|  |  |  | <p>positively impacted by the introduction of the Policy. Individuals experiencing socio-economic inequalities will also be positively impacted and the Policy directly supports vulnerable groups experiencing homelessness, including refugees, care leavers, prison leavers and those with unpaid caring responsibilities.</p> |  |  |  |
|--|--|--|---|--|--|--|

|     |   |   |
|-----|---|---|
| 23. | <p><b>Please explain how you have reached your conclusions above.</b></p> | <p>Having considered the protected characteristics as defined in the Equality Act (2010), it is concluded that the Temporary Accommodation Placement Policy will have a net positive impact because it promotes equity, improves access to housing for vulnerable groups, and ensures legal compliance. It enhances diversity and representation in service delivery. Vulnerable groups, including those with protected characteristics, will be prioritised for in-district placements according to the placement prioritisation matrix, taking into account multiple disadvantage and specific needs. No protected characteristic will be directly negatively impacted by the introduction of the Policy and so mitigations in this respect are not required, but monitoring will be ongoing to ensure that negative impacts do not arise during the Policy's implementation.</p> |
|-----|---|---|

## 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. | <p><b>Who or which team or service area will be responsible for monitoring equalities impact?</b></p> <p><b>For example-</b></p> <ul style="list-style-type: none"> <li>- team,</li> <li>-directorate,</li> <li>-service area,</li> <li>-Equalities Steering Group,etc.</li> </ul> | Housing Needs Team, Housing Services   |     |   |
| 25. | <p><b>Who (individual, team, or service area) will be responsible for carrying out the EqlA review?</b></p>  | Housing Needs and Strategy Manager   |     |   |
| 26. | <p><b>How often will the equality impact be reviewed for this activity?</b></p> <p><b>For example-</b></p> <ul style="list-style-type: none"> <li>-quarterly,</li> <li>-yearly, etc.</li> </ul>  | <p>The EqlA will be reviewed in line with the Temporary Accommodation Placement Policy review cycle—whenever the policy is formally reviewed or amended.</p> | 27. | <p><b>Date when the EqlA will be reviewed again.</b></p> <p><b>Aligned with the next scheduled policy review or earlier if amendments are made.</b></p> |

## Section 7: Sign-off

**Suggested list of people to include are:**

1) Project lead/manager.

Name: **Kieran Edmunds**

Job Title: **Rapid Rehousing Manager**

Signature:

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Name: Richard Wood

Job Title: Housing Needs and Strategy  
Manager

Signature:

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Name:

Job Title:

Signature:

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Name: **Sobia Afridi**

Job Title: Diversity and Inclusion  
specialist

Signature:  
G Malkin

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Name: Full Name

Job Title: Type here

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**You have now reached the end of the assessment.**

**⚠ Please appended this to any reports and project files for reference.**

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