

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	NEW- Socio-economic inequalities (voluntary adoption)
	NEW- Sanctuary seeking status leading to intersecting 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

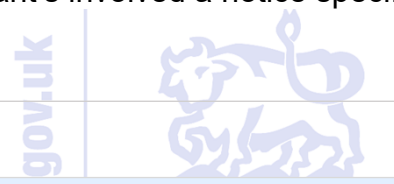
1.	Name of activity being assessed.	Mutual Exchange Policy	2.	The implementation date of the activity under consideration:	March 2026
3.	Directorate/Department(s):	Housing	4.	Service Area(s):	Housing
5.	Who is (are) the assessment lead(s): Please provide: -Name -Email address	James Watkins jwatkins@oxford.gov.uk	6.	Contact details, in case there are queries: Please provide: -Name -Email address	James Watkins jwatkins@oxford.gov.uk
7.	Is this a new or ongoing EqlA?	New <input type="checkbox"/>	8.	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.	No
9.	Date this EqlA started:	November 2025			
10.	Will this EqlA be attached to Corporate Management Team (CMT) reports/updates, which will be published online?	Yes	11.	Give a date (tentative or otherwise) when this assessment will be taken to the CMT.	April 2026

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

<p>12.</p>	<p>Type of activity being considered:</p> <p>Check the most appropriate.</p>	<input type="checkbox"/>	<input type="checkbox"/> Decommissioning	<input type="checkbox"/> Commissioning	<input type="checkbox"/>	
		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Others. Policy			
<p>13.</p>	<p>Which priority area(s) <u>within Oxford City Council's Corporate strategy (2024-2028)</u> does this activity fulfil?</p> <p>Please check as needed.</p>	<input checked="" type="checkbox"/> Good, affordable homes	<input type="checkbox"/> Strong, fair economy	<input type="checkbox"/> Thriving Communities	<input type="checkbox"/> Zero Carbon Oxford	<input type="checkbox"/> Well run council
<p>14.</p>	<p>Which priority area(s) within <u>Oxford City Council's Equality, Diversity & Inclusion Strategy (2022)</u> does this activity fulfil?</p> <p>Please check as needed.</p>	<input type="checkbox"/> Responsive services and customer care.	<input type="checkbox"/> Diverse and engaged workforce.	<input type="checkbox"/> Leadership & organisational commitment.	<input checked="" type="checkbox"/> Understanding and working with our communities.	
<p>15.</p>	<p>Outline the aims, objectives, & priorities of the activity being considered.</p>	<p>The policy sets out the Council's commitment to providing tenants with a good customer experience by giving good advice, managing, and supporting the Mutual Exchange process.</p> <p>The aim of the Policy is to deliver the Council's Mutual Exchange scheme in line with legislation and the relevant guidelines, and to apply the conditions for Mutual Exchanges fairly, consistently and within the statutory timeframe.</p>				

	<p>In addition, to ensure the effective use of the Council's housing stock by enabling tenants to move to accommodation suitable for their needs the following objectives would be achieved:</p> <ul style="list-style-type: none"> ○ Reducing over-crowding and under-occupation in the Council's existing stock. ○ Giving tenants a variety of choices for moving. ○ Addressing needs for adaptations and help release adapted homes. ○ Reducing pressure on the Council's Housing Register. ○ Reducing pressure on health and care services.
<p>16. Please outline the consequences of not implementing this activity. For example, -Existing activity does not fulfill Corporate Objectives, -existing activity is discriminatory and not fulfilling Council's PSED, ... to name a few.</p>	<p>Mutual exchanges need to be carried out within the statutory guidelines as set out in Section 92 of the Housing Act 1985 and in alignment with Section 91 of the Housing Act 1985 which generally prohibits the assignment of secure council tenancies, with limited exceptions.</p> <p>Assignments are only permitted via mutual exchange (s92), court orders for relationship breakdown, or to someone qualified to succeed to the tenancy, usually requiring a deed of assignment.</p> <p>Consequently, mutual exchanges should be carried out according to statute:</p> <ul style="list-style-type: none"> • Tenants with lifetime (secure and assured) tenancies have the right to exchange their social homes with other tenants. In order to carry out an exchange, tenants must transfer their tenancies by way of Assignment. • Landlords must provide a written decision within 42-days of receiving completed applications from all exchange partners. • Schedule 3 of the Housing Act 1985 sets out the grounds on which landlords can refuse applications for Mutual Exchange. • Council may providing conditional consent to a Mutual Exchange to proceed, for example subject to certain conditions being met such as, payment of rent arrears. <p>Localism Act 2011:</p> <p>This Act provides additional benefits for tenants which are:</p>

- Protection of security of tenure for lifetime tenancies after April 2012. This allows tenants to keep similar security of tenure when exchanging with tenants who are on flexible or fixed term tenancies. Tenancies can be transferred by way of Surrender and Re-grant.
- Grounds on which landlords may refuse an application for Mutual Exchange where Section 158 applies.
- Tenants' right to take legal action via County Court injunction if landlords fail to provide written decisions within 42-days of receiving applications for Mutual Exchange (S.159).
- Allows a flexible tenancy or an assured shorthold tenancy to be treated as a 'transfer of tenancy' not an exchange. A deed of surrender is to be completed and a new tenancy created.
- Notice of reason for refusal must be given within 42 days of receipt of request, giving each of the tenant's involved a notice specifying the grounds.



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

<p>17. Have you undertaken any consultations in the form of surveys, interviews, and/or focus groups?</p> <p>Please provide details— -when, -how many, and -the approach taken.</p>	<p>Yes – Residents Involvement Programme</p> <p>The Council recognises its equalities responsibilities as well as the critical need to listen and act on the lived in experiences of our residents.</p>
<p>18. List information and data used to understand who your residents or staff are and how they will be impacted.</p>	<ul style="list-style-type: none"> - Legislation - Risk assessment for vulnerable groups - Equalities assessment exercise - Engagement with residents


<p>These could be- -third-party research, -census data, -legislation, -articles, -reports, -briefs.</p>	
<p>19. If you have not done any consultations or collected data & information, are you planning to do so in the future?</p> <p>Please list the details – -when, -with whom, and -how long will you collect the relevant data.</p>	<p>N/A</p>

59

Section 4: Impact analysis.

<p>20. Who does the activity impact?</p> <p>Check as needed.</p> <p>The impact may be positive, negative or unknown.</p>	<p>Service Users</p>	<p>Yes <input checked="" type="checkbox"/></p>	<p>No <input type="checkbox"/></p>	<p>Don't Know <input type="checkbox"/></p>
	<p>Members of staff</p>	<p>Yes <input checked="" type="checkbox"/></p>	<p>No <input type="checkbox"/></p>	<p>Don't Know <input type="checkbox"/></p>
	<p>General public</p>	<p>Yes <input checked="" type="checkbox"/></p>	<p>No <input type="checkbox"/></p>	<p>Don't Know <input type="checkbox"/></p>
	<p>Partner / Community Organisation</p>	<p>Yes <input type="checkbox"/></p>	<p>No <input checked="" type="checkbox"/></p>	<p>Don't Know <input type="checkbox"/></p>

	City Councillors	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't Know <input type="checkbox"/>
	Council suppliers and contractors	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't Know <input type="checkbox"/>

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 Mitigations
Age		<input type="checkbox"/>	x	<input type="checkbox"/>		
Disability (Visible and invisible)	x	<input type="checkbox"/>		<input type="checkbox"/>		Aimed at tenants with tenants with disabilities to enable independent living

161

www.oxford.gov.uk



The Council will provide reasonable support to tenants who do not have access to the internet.

The Council will also provide additional and reasonable support to tenants who are unable to manage independently with using any Mutual Exchange service the Council provides. Support will be based on individual need and on a case-by-case basis. This may include:

- Access to a computer
- Explaining how the mutual exchange service works
- Assistance to navigate the online mutual exchange service.
- Registering and searching for matches on behalf of a tenant.

Gender

x

re-assignment						
Marriage & Civil Partnership	<input type="checkbox"/>	<input type="checkbox"/>	x	<input type="checkbox"/>		
Race, Ethnicity and/or Citizenship		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Pregnancy & Maternity	<input type="checkbox"/>	<input type="checkbox"/>	x	<input type="checkbox"/>		
Religion or Belief	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>		

www.oxford.gov.uk



62

Sex			x	<input type="checkbox"/>		
Sexual Orientation	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>		
Socio-economic inequalities such as: - income and factors that impact income. -access to jobs This was voluntarily adopted by Oxford City Council on the 13th of March 2024.	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>		
Other (voluntary consideration)	<input type="checkbox"/>	<input type="checkbox"/>	x	<input type="checkbox"/>		

163

www.oxford.gov.uk



<p>Sanctuary seeking status leading to intersecting inequalities experienced by</p> <p>For example:</p> <p>asylum seeker, refugee, person with insecure immigration status</p> <p><u>Oxford City Council became a local authority of sanctuary in December 2024, thereby committing to learn from our experiences, embed inclusive practices and share efforts to create a culture of welcome and safety for all.</u></p>					<p>www.oxford.gov.uk</p> 	
<p>Other</p> <p>For example:</p> <ul style="list-style-type: none"> - Unpaid carers - Prison population - Homeless population -Council suppliers & contractors -Cabinet Members 	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	

--	--	--	--	--	--	--

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

22.	Conclusions.							
	<input type="checkbox"/>	Stop and reconsider the activity.	<input type="checkbox"/>	Adjust activity before beginning the activity and continue to monitor.	<input checked="" type="checkbox"/>	Enhanced service delivery to be delivered by the implementation of this policy	<input checked="" type="checkbox"/>	Monitoring of performance in respect of the implementation of the policy is required.
23.	Please explain how you have reached your conclusions above.		<p>Benefits of Implementation: Enables healthy living for all tenants</p> <p>Promotes Equity: Ensures everyone has equal opportunities.</p> <p>Enhances Diversity:</p> <p>Improves Representation:</p>					

Section 6: Monitoring and review plan.

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

24.	<p>Who or which team or service area will be responsible for monitoring equalities impact?</p> <p>For example- - team, -directorate, -service area, -Equalities Steering Group,etc.</p>	Landlord Services		
25.	<p>Who (individual, team, or service area) will be responsible for carrying out the EqIA review?</p>	Landlord Services		
26.	<p>How often will the equality impact be reviewed for this activity?</p> <p>For example- -quarterly, -yearly, etc.</p>	Yearly	<p>27. Date when the EqIA will be reviewed again.</p>	April 2027

Section 7: Sign-off

Suggested list of people to include are:

- 1) Project lead/manager.

Name: James Watkins

Job Title: Housing Projects and Policies Manager

Signature:



Name: Bill Graves

Job Title: Landlord Services Lead

Signature:



Name: Full Name

Job Title: Type here

Signature:

167

Name:

Job Title:

Signature:

Name: Full Name

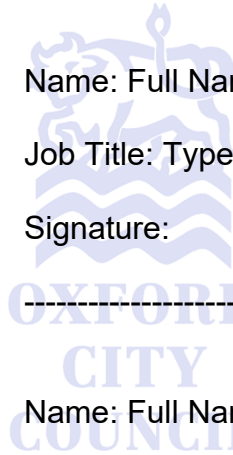
Job Title: Type here

Signature:

Name: Full Name

Job Title: Type here

Signature:



Name: Full Name

Job Title: Type here

Signature:

Name: Full Name

Job Title: Type here

Signature:

Name: Full Name

Job Title: Type here

Signature:

You have now reached the end of the assessment.

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

168

www.oxford.gov.uk

