

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](#).**

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|---------------------------------|--|
| 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

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| 1. | Name of activity being assessed. | Private Sector Housing Enforcement Policy (new policy) | 2. | The implementation date of the activity under consideration: | 09/07/2026 |
| 3. | Directorate/Department(s): | Planning and Regulation | 4. | Service Area(s): | Regulatory Services, Regulation Residential Team |
| 5. | Who is (are) the assessment lead(s): Please provide: -Name -Email address | Courtney Bennett | 6. | Contact details, in case there are queries: Please provide: -Name -Email address | cbennett@oxford.gov.uk |
| 7. | Is this a new or ongoing EqIA? | New <input type="checkbox"/> | 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. | |
| 9. | Date this EqIA started: | 01/07/2026 | | | |
| 10. | Will this EqIA be attached to Corporate Management Team (CMT) reports/updates, which will be published online? | No | 11. | Give a date (tentative or otherwise) when this assessment will be taken to the CMT. | |

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

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| 12. | Type of activity being considered: Check the most appropriate. | <input type="checkbox"/> | <input type="checkbox"/> Decommissioning | <input type="checkbox"/> Commissioning | <input type="checkbox"/> | |
| | | <input checked="" type="checkbox"/> New Activity | | <input type="checkbox"/> Others. Please specify: | | |
| 13. | Which priority area(s) <u>within Oxford City Council's Corporate strategy (2024-2028)</u> does this activity fulfil? Please check as needed. | X <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 |
| 14. | Which priority area(s) within <u>Oxford City Council's Equality, Diversity & Inclusion Strategy (2022)</u> does this activity fulfil? Please check as needed. | <input type="checkbox"/> Responsive services and customer care. | <input type="checkbox"/> Diverse and engaged workforce. | <input type="checkbox"/> Leadership & organisational commitment. | X <input checked="" type="checkbox"/> Understanding and working with our communities. | |
| 15. | Outline the aims, objectives, & priorities of the activity being considered. | <p>Aims: To set out the Council's principles and approach to enforcing housing legislation in the private rented sector, including new duties introduced by the Renters' Rights Act 2025.</p> <p>Objectives: To ensure enforcement action is taken consistently, fairly and transparently, and that landlords, agents and tenants understand what to expect from the Council.</p> <p>Priorities: To tackle poor housing conditions and management in the private rented sector, protect tenants from unlawful practices, and meet the Council's statutory enforcement duties.</p> | | | | |

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| <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>The Council would lack a clear standalone enforcement policy reflecting current legislation, leaving enforcement decisions vulnerable to legal challenge. Officers would have less clear guidance on the application of new statutory duties under the Renters' Rights Act 2025, increasing the risk of inconsistent decision-making.</p> |
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Section 3: Understanding service users, residents, staff and any other impacted parties.

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| <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>No formal consultation was undertaken for this policy. The primary audience is landlords, letting agents and managing agents operating in Oxford's private rented sector. The policy is based on the ACEHO model policy for local housing authorities and has been reviewed by Legal Services. It replaces an approach that sat within the Corporate Enforcement Policy rather than a standalone document.</p> |
| <p>18. List information and data used to understand who your residents or staff are and how they will be impacted.</p> <p>These could be- -third-party research, -census data, -legislation, -articles, -reports,</p> | <p>Renter's Rights Act ACEHO model policy Selective licensing and hmo licensing data Census data</p> |

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| 19. | <p>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> | NA |
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Section 4: Impact analysis.


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| 20. | Who does the activity impact? | Service Users | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | Don't Know <input type="checkbox"/> |
| | Check as needed. | Members of staff | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | Don't Know <input type="checkbox"/> |
| | The impact may be positive, negative or unknown. | General public | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | Don't Know <input type="checkbox"/> |
| | | Partner / Community Organisation | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | Don't Know <input type="checkbox"/> |
| | | 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 121 | | <input type="checkbox"/> | X | <input type="checkbox"/> | As this policy is aimed to provide clarity and transparency to landlords and other property managers operating in the rental market there is a neutral impact in relation to age | The Council do not collect data in relation to age of landlords/property managers and is not considered to impact on the use of these policies. | |
| Disability (Visible and invisible) | | <input type="checkbox"/> | X | <input type="checkbox"/> | As this policy is aimed to provide clarity and transparency to landlords and other property managers operating in the rental market there is a neutral impact in relation to disability | The Council do not collect data in relation to disability of landlords/property managers and is not considered to impact on the use of these policies. | |
| Gender re-assignment | | <input type="checkbox"/> | X | <input type="checkbox"/> | As this policy is aimed to provide clarity and transparency to landlords and other property managers operating in the | The Council do not collect data in relation to gender re-assignment of landlords/property managers and is | |

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| | | | | | rental market there is a neutral impact in relation to gender re-assignment | not considered to impact on the use of these policies. |
| Marriage & Civil Partnership | <input type="checkbox"/> | <input type="checkbox"/> | X | <input type="checkbox"/> | As this policy is aimed to provide clarity and transparency to landlords and other property managers operating in the rental market there is a neutral impact in relation to marital status | The Council do not collect data in relation to marital status of landlords/property managers and is not considered to impact on the use of these policies. |
| Race, Ethnicity and/or Citizenship | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | As this policy is aimed to provide clarity and transparency to landlords and other property managers operating in the rental market there is a neutral impact in relation to Race, Ethnicity and/or citizenship | <p>The main groups affected are those who do not speak English as a first language (or at all) and those with limited or no ability to understand how the policy/law affects them day to day</p> <p>To mitigate for this, translation services are offered at formal interviews and where required in all interventions.</p> <p>Property reports will where necessary contain photographic evidence of defects for some areas of the enforcement work. Engagement with landlords of ethnic groups is encouraged through landlord forums, face to face meetings and newsletters where legal obligations of being a landlord/ property manager are highlighted and discussed</p> |
| Pregnancy & Maternity | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | As this policy is aimed to provide clarity and transparency to landlords and | The Council do not collect data in relation to pregnancy of landlords/property managers and is |

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| | | | | other property managers operating in the rental market there is a neutral impact in relation to pregnancy | not considered to impact on the use of these policies. |
| 123 Religion or Belief | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | As this policy is aimed to provide clarity and transparency to landlords and other property managers operating in the rental market there is a neutral impact in relation to religion or belief | The Council do not collect data in relation to religion or beliefs of landlords/property managers and is not considered to impact on the use of these policies. |
| Sex | | | <input type="checkbox"/> | As this policy is aimed to provide clarity and transparency to landlords and other property managers operating in the rental market there is a neutral impact in relation to sex | The Council do not collect data in relation to sex of landlords/property managers and is not considered to impact on the use of these policies. |
| Sexual Orientation | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | As this policy is aimed to provide clarity and transparency to landlords and other property managers operating in the rental market there is a neutral impact in relation to sexual orientation. | The Council do not collect data in relation to Sexual Orientation of landlords/property managers and is not considered to impact on the use of these policies. |

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| <p>Socio-economic inequalities such as:</p> <ul style="list-style-type: none"> - income and factors that impact income. -access to jobs <p>This was voluntarily adopted by Oxford City Council on the 13th of March 2024.</p> | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | <p>As this policy is aimed to provide clarity and transparency to landlords and other property managers operating in the rental market there is a neutral impact in relation to socio-economic inequalities.</p> | <p>Smaller and accidental landlords may have fewer resources to respond to enforcement action than larger portfolio landlords. The policy applies consistently regardless of portfolio size.</p> |
| <p>Other (voluntary consideration)</p> <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>Oxford City Council became a local</p> | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | <p>www.oxford.gov.uk</p>  | |

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| <p>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.</p> | | | | | | |
| <p>Other For example: - Unpaid carers - Prison population - Homeless population - Council suppliers & contractors - Cabinet Members</p> | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> |  | |

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

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| 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"/> | No major change(s) or adjustments and continue with activity but continue to monitor. | <input type="checkbox"/> | No major change(s) or adjustments and continue |

with the activity. No need to monitor in the future.

23. Please explain how you have reached your conclusions above.

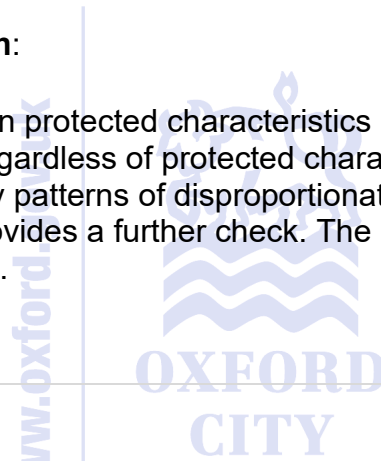
Benefits of Implementation:

Promotes Equity: Ensures everyone has equal opportunities.

Enhances Diversity:

Improves Representation:

The impact of this policy on protected characteristics is neutral. It applies consistently to all landlords and property managers regardless of protected characteristics. The service will monitor the application of the policy to identify any patterns of disproportionate impact, and senior manager sign-off on enforcement decisions provides a further check. The policy will be reviewed regularly to reflect changes in legislation and case law.



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.

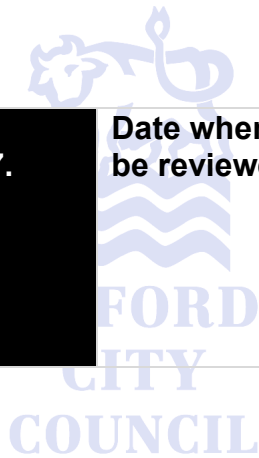
These arrangements must be built into the performance management framework such as KPIs or Risk Registers.

24. Who or which team or service area will be responsible for

Regulatory Services, Residential Regulation Team

| | | | | | |
|-------------------|---|------------------------------------|-------------------|--|------------------|
| | <p>monitoring equalities impact?</p> <p>For example- - team, -directorate, -service area, -Equalities Steering Group,etc.</p> | | | | |
| <p>25.</p> | <p>Who (individual, team, or service area) will be responsible for carrying out the EqlA review?</p> | <p>Regulatory Services Manager</p> | | | |
| <p>26.</p> | <p>How often will the equality impact be reviewed for this activity? For example- -quarterly, -yearly, etc.</p> | <p>Annually</p> | <p>27.</p> | <p>Date when the EqlA will be reviewed again.</p> | <p>1/07/2026</p> |

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Section 7: Sign-off

Name: Courtney Bennett

Job Title: Regulatory Services
Manager

Signature:

Name: David Butler

Job Title: Director, Planning and
Regulation

Signature:

Name: Full Name

Job Title: Type here

Signature:

Suggested list of people to include are:

- 1) Project lead/manager.
- 2) Head of service area or team.
- 3) Person who completed the EqlA.
- 4) EDI Lead.
- 5) EDI Specialist.
- 6) For joint projects, please consider the following:
 1. Other project leads
 2. Other service area and/or team lead/managers.

This is not an exhaustive list.

Name: Gail Malkin

Job Title: Head of People

Signature:
G Malkin

Name: Full Name

Job Title: Type here

Signature:

Name: Full Name

Job Title: Type here

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