

Full Equality Impact Assessment (EIA)

Please refer to the guidance and resources available on Connect site to help you complete this Full EIA form

A full EIA is undertaken when the policy or service change will have a significant impact on one or more of the protected characteristics and/or have high political or public interest.

The full EIA should demonstrate how you have considered the impact of the changes on the different protected characteristics in more depth than the EIA screening.

The evidence you collect must inform your assessment. This will help demonstrate that you have met the general duty and have shown due regard to eliminating discrimination, advancing equality and fostering good relations.

The characteristics protected by the Equality Act 2010 are:

Disability	Age	Sex (gender)
Gender reassignment	Marriage/civil partnership	Pregnancy/maternity
Race	Sexual orientation	Religion/belief

In addition to the above protected characteristics, you should consider the impact of living in a **rural area** as part of this assessment. Where people live is not a characteristic protected by law, but for an organisation such as Babergh and Mid Suffolk District Councils it is good practice to consider carefully how location may affect people's experience of a policy or service.

Similarly, you should also consider the impact of policies/services on **veterans**. We signed the Suffolk Armed Forces Covenant which aims to encourage activities which help to integrate the armed forces community into local life. Together Local Government, statutory services (such as health, police and the Job Centre), and charities shared aims of providing fair opportunity and support to the Armed Forces community and their families.

Therefore, you should consider the challenges and disadvantages faced by veterans in accessing public services, employment opportunities, housing, healthcare etc. after transitioning to civilian life. Also recognising that veterans may have disabilities or mental health conditions like PTSD resulting from their military service that need to be accommodated. Therefore, identifying and mitigating potential negative impacts of policies/services on this particular group.

Please also give consideration to **neurodivergent individuals**. Neurodiversity refers to the different ways the brain can work and take in information. Therefore, you should consider the need to provide suitable adjustments, accommodations and assistive technologies for neurodivergent individuals and prevent policies/services from disproportionately disadvantaging or excluding those who think/learn differently. Neurodiversity could also, in some cases, be classed as a disability, and therefore a protected characteristic, under the Equality Act 2010.

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Details	
Service or policy title	BABERGH AND MIDSUFFOLK DISTRICT COUNCIL HOARDING POLICY 2026
Lead officer <i>(responsible for the policy or service/function)</i>	Doug Strother, Head of Housing
Officers carrying out the EQIA <i>(it is recommended that an officer responsible for the policy or service/function is involved in completion)</i>	Beth Newton, Housing Services Manager
Is this new or a revision? <i>(If revision state when previous EQIA undertaken)</i>	New
Is this the first time this policy or function has been assessed?	Yes
Date of completing this EQIA	15th May 2026

Description
<p>What exactly is proposed? <i>(Describe the service/policy and the changes that are being planned)</i></p> <p>The purpose of the policy is to make all staff, tenants and members aware of our responsibilities and processes when dealing with tenants wishing to purchase their home through the Right to Buy.</p>
<p>Why? <i>(Give reasons why these changes are being introduced)</i></p> <p>It is important for a social landlord to have a documented policy detailing how they will support and assist residents who wish to purchase their home via the Right to Buy scheme, to ensure the council remains compliant and meets legislative government guidance and time frames.</p>
<p>What will the effect of the changes be? <i>(Describe which people, communities, localities etc. will be affected by the changes)</i></p> <p>All tenants of Babergh and Mid Suffolk District Councils will be affected by this policy, however it specifically relates to residents who wish to purchase their home via Right to Buy.</p> <p>This policy will not have any negative impact to residents, but should provide clear guidance for those wishing to purchase their home. Detailing clearly the responsibilities of both the resident and the Council, to ensure BMSDC's are meeting their statutory duties to tenants.</p>

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How will it be implemented? *(Describe the decision making process, timescales, process for implementation)*

The policy has been developed with input from the Home Ownership Team and with specific information drawn from the governments' Right to Buy Guidance. The policy has been checked by the Council's legal team.
The policy has been reviewed and checked for clarity by our Resident Readers group.

When is it due to start? *(Planned start of new/revised policy/service)*

Version 1.1 is due to go live June 2026

Any other relevant details

Data about the population

What is the demographic profile or make up of the community you are serving? *(A brief overview of quantitative data used and qualitative research undertaken, including customer surveys and focus groups, plus links to reports, local or national data that you have used, suggested sources of information can be found at the end of this document)*

See Below

What is the profile or make up of your service users by protected characteristics? *(Where this data is available. If it is not currently available state any plans to collect this in future)*

We are continually using various operational journeys with our tenants to increase and update the information we have about them to ensure that we continue to consider their specific needs and vulnerabilities when delivering landlord services to them so we can ensure that we are providing equitable services. In 2025 we carried out a 'getting to know you' campaign which focused on getting up to date information for all our tenants. This has been uploaded into our internal system and allowed us to break down and analyze the number of tenants who have told us they have a vulnerability of disability.

Disability

As of the date of this assessment, we are aware of 64.05% of tenants listed within our system as having a disability or vulnerability. This makes up approximately 3590 residents out of a total of 5608.

Age – The percentage of tenants with a vulnerability or disability by Age

- 31.47% are over 70 years old
- 18.06% are between 60 and 69 years old
- 16.42% are between 50 to 59 years old
- 15.46% are between 40 to 49 years old
- 13.64% are between 30 to 39 years old
- 4.49% are between 22 to 29 years old

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Gender- The percentage of tenants with a vulnerability or disability by Gender

- Male 36.43%
- Female 63.53%
- Other 0.04%

Ethnicity/Race- The percentage of tenants with a vulnerability or disability by Ethnicity/Race

- 92.74% are White British
- 2.1% are White other
- 0.18% are White and Black African
- 0.46% are listed as ‘Other’
- 0.45% White Irish
- 2.34% refused to tell us

Language- The percentage of tenants with a vulnerability or disability by Language

- 98.72% - English
- 0.39%- Polish
- 0.07% – Portuguese
- 0.12% - Romanian
- 0.09% – Turkish
- 0.14% - Ukrainian
- 0.09% – Lithuanian
- We have small numbers (1) for Africans, Bengali, Dari, French, German (2), Irish (2), Italian(2), Pashto(2), Spanish(2), Swedish(1), Thai (2), Urdu(1)

The data collected shows that most of our residents speak English, which will assist in understanding the right to buy policy and following the procedure. For residents who do not speak English, further mitigation has been detailed below.

This is also the case for our older residents who in turn make up nearly 50% of our resident profile.

The data also shows that over half our residents have a disability and therefore this assessment addresses ways we can support those tenants.

Implications for communities and workforce	
Disability	
What is the impact on people with a disability (including children with additional needs) and what evidence do	Our Right to Buy Policy, principles and guidance, will apply to all our tenants regardless of any disability or vulnerability, as we have a statutory duty to fulfil our

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<p>you have? <i>(If you do not believe there is any impact describe why not)</i></p>	<p>obligation to allow residents to purchase their home if it meets the RTB criteria. People in this group may need additional support when completing their application for RTB depending on their disability.</p>
<p>How does it have a positive or negative impact?</p>	<p>Negative due to the complex nature of Right to Buy, this could pose more challenging to understand if someone has a learning or mental health condition</p>
<p>What could be done to mitigate any adverse impact or further promote positive impact?</p>	<p>We will ensure we communicate with residents using their preferred method of communication, including changing the fonts to large print. A member of the Home Ownership Team will offer to visit tenants wishing to make an application and explain the process in more detail We will ensure residents are fully aware of what the risks and responsibilities are when dealing with a house purchase. When any concerns are raised regarding capacity, these will be flagged to the relevant officer/ agency (e.g. Community Housing Officer, support agency/social care). All applicants will be treated fairly and with respect regardless of disability.</p>
<p>Age</p>	
<p>What is the impact on people of different ages and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i></p>	<p>Our Right to Buy Policy, principles and guidance, will apply to all our tenants regardless of age, as we have a statutory duty to fulfil our obligation to allow residents to purchase their home if it meets the RTB criteria. People in this group may need additional support when completing their application if they are not familiar with the process of purchasing a home or are not digitally confident. As stated above, nearly half of our tenants are over the age of 60. Residents who live in some older persons or adapted properties, may be exempt from the Right to Buy and this will need to be explained clearly. All applicants will be treated fairly and with respect regardless of their age.</p>
<p>How does it have a positive or negative impact?</p>	<p>Negative- due to the complex nature of RTB and the fact a lot of the work is done online.</p>
<p>What could be done to mitigate any adverse impact or further promote positive impact?</p>	<p>We will ensure we communicate with residents using their preferred method of communication, including changing the fonts to large print or sending letters rather than emails. Where possible, we will print documents and send them for signature if this is deemed most suitable for the resident. A member of the Home Ownership Team will offer to visit tenants wishing to make an application and explain the process in more detail</p>

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	We will arrange for contact to be made via a trusted third party if required or deemed appropriate.
Sex (gender)	
What is the impact on people of different genders and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	<p>Our Right to Buy Policy, principles and guidance, will apply to all our tenants regardless of sex, as we have a statutory duty to fulfil our obligation to allow residents to purchase their home if it meets the RTB criteria.</p> <p>There should be no impact on residents regardless of gender as there is strict guidance for the council to follow and none of which is related to gender. There should be no assumption that one gender is more likely to be able to complete the application than another. All applicants will be treated fairly and with respect regardless of sex (gender).</p>
How does it have a positive or negative impact?	Neutral
What could be done to mitigate any adverse impact or further promote positive impact?	If the resident requests to speak to an officer of a specific gender for any reason, such as religion or to make them feel more comfortable, we will look to accommodate this request.
Gender reassignment	
What is the impact on people who have undergone gender reassignment (i.e. transgender people) and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	<p>Our Right to Buy Policy, principles and guidance, will apply to all our tenants regardless of gender reassignment, as we have a statutory duty to fulfil our obligation to allow residents to purchase their home if it meets the RTB criteria.</p> <p>There should be no impact on residents regardless of gender reassignment as there is strict guidance for the council to follow and none of which is related to gender reassignment. There should be no assumption that one gender is more likely to be able to complete the application than another, or that someone going through gender reassignment would be any more affected.</p> <p>All applicants will be treated fairly and with respect regardless of gender reassignment.</p>
How does it have a positive or negative impact?	Neutral
What could be done to mitigate any adverse impact or further promote positive impact?	If the resident requests to speak to an officer of a specific gender for any reason, to make them feel more comfortable, we will look to accommodate this request. Additional training can be provided for Officers where required.
Marriage/civil partnership	
What is the impact on people who are married or in a civil	Our Right to Buy Policy, principles and guidance, will apply to all our tenants regardless of marriage or civil

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<p>partnership and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i></p>	<p>partnership, as we have a statutory duty to fulfil our obligation to allow residents to purchase their home if it meets the RTB criteria. There should be no impact on residents regardless of marriage or civil partnership, as there is strict guidance for the council to follow and none of which is related to an applicant's relationship status. All applicants will be treated fairly and with respect regardless of their marital status</p>
<p>How does it have a positive or negative impact?</p>	<p>Neutral</p>
<p>What could be done to mitigate any adverse impact or further promote positive impact?</p>	<p>N/A</p>
<p>Pregnancy/maternity</p>	
<p>What is the impact on people who are pregnant women or those with a young child and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i></p>	<p>Our Right to Buy Policy, principles and guidance, will apply to all our tenants regardless of pregnancy or maternity, as we have a statutory duty to fulfil our obligation to allow residents to purchase their home if it meets the RTB criteria. There should be no impact on residents regardless of pregnancy or maternity, as there is strict guidance for the council to follow and none of which is related to an applicant's pregnancy or maternity. All applicants will be treated fairly and with respect regardless of pregnancy status.</p>
<p>How does it have a positive or negative impact?</p>	<p>Neutral</p>
<p>What could be done to mitigate any adverse impact or further promote positive impact?</p>	<p>N/A</p>
<p>Race</p>	
<p>What is the impact on people from different races or ethnic groups and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i></p>	<p>Our Right to Buy Policy, principles and guidance, will apply to all our tenants regardless of race, as we have a statutory duty to fulfil our obligation to allow residents to purchase their home if it meets the RTB criteria. There could be a negative impact for residents who are not native English citizens, due to the complex nature of right to buy and the differing terminology and processes for house purchases in the UK, compared to some other countries. All applicants will be treated fairly and with respect regardless of their race or heritage.</p>

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How does it have a positive or negative impact?	Negative- There could be more challenges for someone who is not a UK native due to the differing terminology and process for purchasing housing.
What could be done to mitigate any adverse impact or further promote positive impact?	If a resident is non-English speaking, we will take steps to support them and translate documents where possible. We can use a translation service or speak to a trusted friend on their behalf to ensure they understand and can communicate easily with us. Similarly, if England is not their native Country, we will ensure the process of house purchase in the UK is explained in more simplified terms and in greater detail as deemed necessary.
Sexual orientation	
What is the impact on people according to their sexual orientation and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	Our Right to Buy Policy, principles and guidance, will apply to all our tenants regardless of sexual orientation, as we have a statutory duty to fulfil our obligation to allow residents to purchase their home if it meets the RTB criteria. There should be no impact on residents regardless of sexual orientation, as there is strict guidance for the council to follow and none of which is related to an applicant's sexual preference. All applicants will be treated fairly and with respect regardless of their sexual orientation.
How does it have a positive or negative impact?	Neutral
What could be done to mitigate any adverse impact or further promote positive impact?	Staff receive training on equality and diversity and treating residents fairly.
Religion/belief	
What is the impact on people according to their religion or belief and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	Our Right to Buy Policy, principles and guidance, will apply to all our tenants regardless of religion or belief, as we have a statutory duty to fulfil our obligation to allow residents to purchase their home if it meets the RTB criteria. There should be no impact on residents regardless of religion or belief, as there is strict guidance for the council to follow and none of which is related to an applicant's religion or beliefs. All applicants will be treated fairly and with respect regardless of their religion or beliefs

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How does it have a positive or negative impact?	Neutral
What could be done to mitigate any adverse impact or further promote positive impact?	N/A

Rurality	
Where people live is not a characteristic protected by law: but for Babergh and Mid Suffolk District Councils it is good practice to consider carefully how location may affect people's experience of a policy or service.	
What is the impact on people according to whether they live in an urban or rural environment and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	<p>Our service will be delivered to all our tenants in line with the policy.</p> <p>Much of the work in relation to the Right to Buy process is done online, over the phone or via letter, but the Home Ownership Officers will visit any council tenant on request.</p> <p>Where residents need to post documents, or use the internet, there could be a slight disadvantage depending on the services available in the area and the level of internet connection.</p>
Is the impact positive or negative? <i>(Explain)</i>	Neutral- Whilst there could be some potential barriers there are steps in place to overcome these.
What could be done to mitigate any adverse impact or further promote positive impact?	Visits are available to all residents and where internet access is poor we can arrange to send postal documents or suggest alternative locations where they can use a computer (such as a library)

Armed Forces Veterans	
We signed the Suffolk Armed Forces Covenant which aims to encourage activities which help to integrate the armed forces community into local life. Together, Local Government, statutory services (such as Health, police and the Job Centre), and charities shared aims of providing fair opportunity and support to Armed Forces people and their families.	
What is the impact on veterans? <i>(If you do not believe there is any impact describe why not)</i>	There should be no impact on armed forces veterans because of implementing this policy.
Is the impact positive or negative? <i>(Explain)</i>	Neutral
What could be done to mitigate any adverse impact or further promote positive impact?	N/A

Neurodiversity	
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Neurodiversity refers to the different ways the brain can work and take in information. It includes conditions like ADHD, autism, dyslexia and dyspraxia.

What is the impact on neurodivergent people? <i>(If you do not believe there is any impact describe why not)</i>	Our service will be delivered to all our tenants in line with the policy regardless of any neurodiversity condition. As the process is quite complex and time-bound this could cause potential confusion or stress for residents who have a neurodiversity condition.
Is the impact positive or negative? <i>(Explain)</i>	Negative- The policy is in depth and has a lot of stages to the process. This could prove challenging and off-putting to some neurodiverse residents.
What could be done to mitigate any adverse impact or further promote positive impact?	If we are made aware of any specific requirements for the tenant via themselves or their representative, we will look to make any reasonable adjustments to mitigate any adverse impact, such as adjusting our communication method or processes to further promote a positive impact. We can also visit residents to go through the process step by step.

Making Decisions

Having completed this equality impact assessment indicate which decision is recommended to be taken.

Should the policy or service be implemented as the correct course of action?	Yes
Should the policy or service be amended as suggested by the report so that mitigating actions are taken to address an adverse or negative impact on any characteristic?	No
Should the policy or service be reviewed and revised more significantly to take into account its impact on different groups?	No
Should the policy or service not be actioned as there are too many negative impacts?	No


Monitoring Impact

Assessing the impact on equality is an ongoing process that does not end once a policy or service had been agreed or implemented.

How frequently will the policy or service be reviewed?	Every 3 years or as legislation changes require.
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Who will be involved?	TBC
Will there need to be an action plan completed for any amendments?	No
What further evidence or consultation will be needed to check that the policy or service is working well?	As stated above, we are continually looking at improving and keeping up to date the data we hold on our tenants in relation to their protected characteristics and vulnerability status. We will also use data from complaints and satisfaction surveys, as well as any relevant tenant engagement activities when reviewing the policy and service.

Completion	
Authors signature	
Date of completion	15.5.2026