

# Equality Impact Assessment



## Introduction

An Equality Impact Assessment (EqIA) is a tool to help local authorities ensure their policies, and the ways they carry out their functions, do what they are intended to do and for everybody.

The Equality Act 2010 includes a Public Sector Equality Duty (PSED) which requires public authorities to try and eliminate discrimination; advance equality of opportunity between persons who share a relevant protected characteristic and those who do not share it and promote equality and good relations across a range of protected characteristics.

The protected characteristics are:

Age	Disability	Gender Reassignment
Marriage and civil partnership	Pregnancy and maternity	Race
Religion or belief (including lack of belief)	Sex	Sexual orientation

The council also considers specific protected groups to ensure they are reflected in strategic decision-making. These include:

Armed forces personnel and Veterans	Carers	Care leavers
Socio-economically disadvantaged	Rural communities	

An EqIA should be completed with the full range of protected characteristics considered during the initial stages of developing new strategies, policies, functions or services, prior to starting a procurement exercise and before decisions are made, e.g. at committee or council meetings.

Examples of when an EqIA should be completed are:

<ul style="list-style-type: none"><li>Any proposals to introduce or add to a service</li></ul>	<ul style="list-style-type: none"><li>Any proposals to adopt policy priorities, legislation, strategies and plans</li></ul>
<ul style="list-style-type: none"><li>Any proposals to remove, reduce or alter a service</li></ul>	<ul style="list-style-type: none"><li>Changes to staffing structure where groups of employees are likely to be negatively affected</li></ul>
<ul style="list-style-type: none"><li>Any new policies or changes to policies</li></ul>	<ul style="list-style-type: none"><li>Any proposals in relation to procured or commissioned services</li></ul>

The EqIA consists of two key stages. Stage one is an initial equality screening, which must be reviewed by the Corporate Policy & Governance Team. This review determines whether the second stage, a full equality impact assessment, is required.

## Stage 1 - Equality Screening

Whenever a policy/service/function is reviewed, changed, developed or removed, an initial equality screening will need to be undertaken. This will help establish whether a full assessment is needed. This should be done at an early stage of the process so that it is part of policy, strategy, and project development. You must circulate a copy of the equality screening to [policy@stroud.gov.uk](mailto:policy@stroud.gov.uk) where they will determine whether a stage two assessment will need to be completed.

If it is determined that a stage two does not need to be completed, you must circulate the screening to your head of service where they will sign if off and you can then forward the signed-off copy to [policy@stroud.gov.uk](mailto:policy@stroud.gov.uk) for their records.

## Stage 2 – Equality Impact Assessment

If it is determined that a stage two is required, the full EqIA seeks to identify the impact on people with protected characteristics or protected groups that have been considered, including any mitigating actions proposed, and ensures decisions are based on evidence.

The EqIA should then be circulated to [policy@stroud.gov.uk](mailto:policy@stroud.gov.uk) for feedback and then agreed and signed off with the appropriate Head of Service or Director and should be included as an appendix to your covering report for committee or Council, along with commentary on the assessment in the main body of the committee or Council report.

## STAGE 1 – Equality Screening

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### 1. Identify the policy, project, function or service change

#### a. Person(s) responsible for this EqIA

Officer responsible: Connor Ward	Service area: Contract Services
Job title: Carbon Reduction and Sustainability Officer	Date of assessment: 28/05/2026
Signature: <i>cward</i>	

#### b. Is this a policy, function, strategy, service change or project?

Project

If other, please specify:

#### c. Name of the policy, function, strategy, service change or project

Warm Homes: Social Housing Fund Wave 3 Additional Funding

Is this new or existing?

**Already exists and is being reviewed**

**Please specify reason for change or development of policy, function, strategy, service change or project**

**Additional funding for the existing wave 3 project has been made available**

#### d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?

Aims: Social housing landlords to improve the energy performance of social homes in England.

Objectives: SDC propose to deliver an additional 50 properties, all receiving fabric insulation measures, to reach an EPC C.

Outcomes:	An additional 50 properties, all receiving fabric insulation measures, to reach an EPC C, in addition to the 507 properties included in our original Wave 3 application bid.
Benefits:	A further 50 of our properties receiving grant funding towards fabric insulation measures, to improve their energy efficiency and subsequent EPC rating, meaning these homes will be more energy efficient, leading to lower running costs.

**e. What are the expected impacts?**

Are there any aspects, including how this piece of work is delivered or accessed, that could have an impact on the lives of people, including employees and customers.

**Yes**

Do you expect the impacts to be positive or negative?

**Positive**

Please provide an explanation for your answer:

*Ensure that you include any significant positive or negative impacts to any protected characteristics or protected groups where relevant. This will help us identify whether you need to complete a stage two assessment.*

If successful in securing the additional grant funding, the delivery of further fabric insulation works will have a direct and positive impact on our tenants. By improving the thermal performance of their homes, these measures will help to maintain more consistent indoor temperatures, making homes warmer in winter and more comfortable during warmer periods.

This will reduce the amount of energy required to heat the property, helping to lower energy bills and improve affordability for tenants. In turn, this can help to alleviate fuel poverty and improve overall wellbeing.

In addition, improved insulation can contribute to better indoor environmental conditions, supporting healthier living environments and enhancing tenants' comfort and quality of life over the long term.

The selection of properties included within the project is determined by the criteria of the grant funding set by the Department for Energy Security and Net Zero (DESNZ), where we then look to improve those properties within our stock that are performing worst, in terms of their energy efficiency.

**a. Head of Service/Director sign off for stage one assessment**

Name: Andy Kefford

Job title: Strategic Head of Housing

Date: 28/05/2026

Signature:



Please forward this completed form to the Policy and Governance team via [policy@stroud.gov.uk](mailto:policy@stroud.gov.uk) and they will assess whether a stage two is required.

## Policy and Governance Review

b. Identify next steps as appropriate	
Stage two required	Yes
Reasoning	By accepting the funding this will have a direct impact on tenants quality of life in council properties.
Name	Emma Smith
Job title	Projects and Consultation Officer
Date of review	3 June 2026.

Officers do **not need** to complete this section if the Policy and Governance Team have determined that a stage two is not required. If you have been instructed to complete a stage two, please continue to do so in the following section.

## STAGE 2 – Full Equality Impact Assessment

### 1. Engagement and consultation

The best approach to find out if a policy, project or other piece of work, is likely to impact positively or negatively on people with protected characteristics and protected groups is to look at existing research, previous consultation findings and recommendations, or to consult with representatives of those people with protected characteristics and protected groups.

#### 1. Research and evidence

List below any data, consultations (previous, relevant, or future planned), complaints or feedback findings, or any relevant research, studies or analysis that you have considered to assess the policy, function, strategy, service change or project for its relevance to equality.

*Please visit the Stroud District Data webpage on the Hub for support and guidance in accessing data and insights.*

The selection of properties included within this project is determined primarily by eligibility criteria set by the Department for Energy Security and Net Zero (DESNZ) under the Warm Homes: Social Housing Fund. These criteria focus on improving the worst-performing properties in terms of energy efficiency (EPC ratings), rather than the characteristics of individual tenants.

Internal housing stock condition and energy performance data has been used to identify properties with the poorest thermal efficiency, ensuring that investment is targeted where it will have the greatest impact on reducing heat loss and energy demand.

No specific equality or demographic data has been used to select properties, as the scheme is asset-led rather than tenant-led. However, it is recognised that households living in low energy efficiency homes are more likely to experience fuel poverty, which can disproportionately affect vulnerable groups including older people, disabled people, and those on low incomes. “Energy efficiency is a key driver of fuel poverty, as higher energy efficiency reduces a household’s fuel costs for a particular size of property”<sup>1</sup> “Certain households are also more likely to be in fuel poverty, including low-income households, households with dependent children, households home to people living with disabilities, households where the age of the oldest member is between 16 and 24, and minority ethnic households, with single parent households the household most likely to be fuel poor.”<sup>2</sup> 11.4% of households in Stroud District were in fuel poverty in 2021.<sup>3</sup>

The assessment has been informed by:

- Government guidance on the Warm Homes Plan and Social Housing Fund
- Previous EqlAs undertaken for similar retrofit and housing improvement programmes
- Internal knowledge of tenant needs and typical impacts associated with retrofit works (e.g. temporary disruption, access requirements, and communication needs)

## 2. Consultation

Please visit the [Consultation and Engagement Hub](#) for support and guidance on delivering consultations and engagement activities to support the development of work at the council.

Will any consultation be conducted?

No

- Describe the consultation or engagement you have conducted or are intending to conduct.
- Describe who was consulted, what the outcome of the activity was and how these results have influenced the development of the strategy, policy, project, service change or budget option.

If no consultation or engagement is planned, please explain why.

No consultation is required with tenants as the selection of properties included within the project is determined by the criteria of the grant funding set by the Department for Energy Security and Net Zero (DESNZ), where we then look to improve those properties within our stock that are performing worst, in terms of their energy efficiency. The property and it’s energy efficiency determines its inclusion within the project, rather than individual tenants.

## 3. Assessment

### Assessment of impacts

For each protected characteristic or protected group, please indicate the type of impact:

<sup>1</sup> [What is fuel poverty? - National Energy Action \(NEA\)](#)

<sup>2</sup> [Fuel Poverty \(2024\) - Nottinghamshire Insight](#)

<sup>3</sup> [Sub-regional fuel poverty data 2023 \(2021 data\) - GOV.UK](#)

- Positive – contributes to promoting equality or improving relations between people with protected characteristics and protected groups
- Neutral – no impact
- Negative – could disadvantage them.

Please use the 'Description of impact' box to explain how the impact is justified and include any data and evidence that you have collected from surveys, data, complaints or feedback to support your proposed changes

Protected characteristic or group	Specific characteristic (if applicable)	Impact	Description of impact	Mitigating action (if negatively impacted)
AGE	Older people (60+)	Positive and negative	<p>Positive - Older people can be more adversely affected from living in a cold environment and are more likely to be living in fuel poverty. “Fuel poverty is particularly dangerous for children and older people.</p> <p>Older people are more likely to live with health problems that can get worse in cold, damp living conditions”.<sup>4</sup> These works will allow tenants to adequately heat their homes for less, and reduce energy bills.</p> <p>Negative – Whilst the works are ongoing, older people may find the works more disruptive than the wider population.</p>	Before works commence on site, each tenant will be visited by the contractor’s Tenant Liaison Officer, who will discuss the works and be able to arrange for reasonable adjustments to be made as necessary for the tenants’ needs. The project will be constantly monitored while works are on site and adjustments will be able to be made.
	Younger people (16-25)	Positive	<p>Young families who may be more likely to be living in fuel poverty. “Single parent households were most likely to be fuel poor (24.7%)”<sup>5</sup> These works will allow tenants to adequately heat their homes for less, and reduce energy bills.</p>	
	Children (0-16)	Neutral	The impact for this group is considered to be no different to the wider population, as property	

<sup>4</sup> [The impacts of fuel poverty | Fuel Poverty Action](#)

<sup>5</sup> [Fuel poverty factsheet 2025](#)

			eligibility is determined by energy performance rather than tenant characteristics. However all group may benefit equally from improved thermal efficiency, and reduced energy bills.	
	Other	Neutral	The impact for this group is considered to be no different to the wider population, as property eligibility is determined by energy performance rather than tenant characteristics. However all group may benefit equally from improved thermal efficiency, and reduced energy bills.	
<b>DISABILITY</b> A definition of disability under the Equality Act 2010 is available <a href="#">here</a> .	Physical disability	Positive	Some disabled people are more adversely affected by living in a cold environment, especially for those with respiratory conditions. “Living in a cold home can worsen asthma and other respiratory illnesses and increase the risk of heart disease and cardiac events. It can also worsen musculoskeletal conditions such as arthritis.” <sup>6</sup> These works will allow tenants to adequately heat their homes for less.	
	Sensory impairment (sight, hearing)	Neutral	The impact for this group is considered to be no different to the wider population, as property eligibility is determined by energy performance rather than tenant characteristics. However all group	

<sup>6</sup> [Health inequalities: Cold or damp homes - House of Commons Library](#)

			may benefit equally from improved thermal efficiency, and reduced energy bills.	
	Mental health	Low negative	Members of this characteristic may be less able to deal with the small amount of disruption associated with these works.	Before works commence on site, each tenant will be visited by the contractor's Tenant Liaison Officer, who will discuss the works and be able to arrange for reasonable adjustments to be made as necessary for the tenants' needs. The project will be constantly monitored while works are on site and adjustments will be able to be made.
	Learning disability	Low negative	Members of this characteristic may be less able to deal with the small amount of disruption associated with these works.	Before works commence on site, each tenant will be visited by the contractor's Tenant Liaison Officer, who will discuss the works and be able to arrange for reasonable adjustments to be made as necessary for the tenants' needs. The project will be constantly monitored while works are on site and adjustments will be able to be made.
	All	Low negative	Whilst works are taking place within a home, this may create additional barriers depending on the individuals. Additionally, on the limited occasions that temporary relocation has to take place due to	Before works commence on site, each tenant will be visited by the contractor's Tenant Liaison Officer, who will discuss the works and be able to arrange for reasonable adjustments to be made as

			the works taking place, this may have an impact on routines.	necessary for the tenants' needs. The project will be constantly monitored while works are on site and adjustments will be able to be made. Additionally, advanced notice of when works are planned to take place should occur to give time for tenants to plan and prepare accordingly.
<b>GENDER REASSIGNMENT</b>	How would this affect people whose gender is different from that assigned at birth?	Neutral	The impact for this group is considered to be no different to the wider population, as property eligibility is determined by energy performance rather than tenant characteristics. However all groups may benefit equally from improved thermal efficiency, and reduced energy bills. There is a potential that there could be some discomfort in interacting with contractors if this is not handled sensitively.	
<b>MARRIAGE &amp; CIVIL PARTNERSHIP</b>		Neutral	The impact for this group is considered to be no different to the wider population, as property eligibility is determined by energy performance rather than tenant characteristics. However all group may benefit equally from improved thermal efficiency, and reduced energy bills.	
<b>PREGNANCY &amp; MATERNITY</b>		Positive and negative	Positive - As a result of the completed works in the property, this will mean a warmer home with	Before works commence on site, each tenant will be visited by the contractor's Tenant

			<p>higher air quality, which benefits maternal and infant health. Cavity wall and loft insulation significantly reduce heat loss through the building envelope, cutting losses from walls (around 33%) and roofs (around 25%), which increases internal temperatures and improves thermal comfort. When installed alongside adequate ventilation, these measures also enhance indoor air quality by reducing moisture, preventing condensation and mould, and lowering exposure to indoor pollutants. Evidence from UK studies shows that combined fabric and ventilation upgrades deliver both warmer homes and measurable public health benefits.<sup>78</sup></p> <p>Negative – Whilst the works are ongoing, there could be exposure to noise and dust, as well as disruption to routines.</p>	<p>Liaison Officer, who will discuss the works and be able to arrange for reasonable adjustments to be made as necessary for the tenants' needs. The project will be constantly monitored while works are on site and adjustments will be able to be made.</p> <p>Additionally, advanced notice of when works are planned to take place should occur to give time for tenants to plan and prepare accordingly, such as work appointments taking place around pregnancy/postnatal needs.</p>
<p><b>RACE*</b> Further information on the breakdown below each of these headings, is available here. For example, Asian, includes Chinese, Pakistani and Indian etc.</p>	White	Neutral	<p>The impact for this group is considered to be no different to the wider population, as property eligibility is determined by energy performance rather than tenant characteristics. However all groups may benefit equally from improved</p>	
	Mixed or multiple ethnicities	Neutral		
	Asian or Asian British	Neutral		
	Black, Black British, Caribbean or African	Neutral		

<sup>7</sup> [English Housing Survey 2024 to 2025: home insulation - fact sheet - GOV.UK](#)

<sup>8</sup> [Health effects of home energy efficiency interventions in England: a modelling study | BMJ Open](#)

	Other ethnicities (please specify)	Neutral	thermal efficiency, and reduced energy bills.	
<b>RELIGION &amp; BELIEF**</b> A list of religions used in the Census is available <a href="#">here</a>	See note	Neutral	The impact for this group is considered to be no different to the wider population, as property eligibility is determined by energy performance rather than tenant characteristics. However all groups may benefit equally from improved thermal efficiency, and reduced energy bills.	
<b>SEX</b>	Men	Positive and negative	The impact for this group is considered to be no different to the wider population, as property eligibility is determined by energy performance rather than tenant characteristics. However all groups may benefit equally from improved thermal efficiency, and reduced energy bills. Single Parents will benefit from reduced energy costs within their home.	Before works commence on site, each tenant will be visited by the contractor's Tenant Liaison Officer, who will discuss the works and be able to arrange for reasonable adjustments to be made as necessary for the tenants' needs. The project will be constantly monitored while works are on site and adjustments will be able to be made. Additionally, advanced notice of when works are planned to take place should occur to give time for tenants to plan and prepare accordingly, such as work appointments taking place around childcare responsibilities.
	Women	Positive and negative		
<b>SEXUAL ORIENTATION</b>	Straight/Heterosexual	Neutral	The impact for this group is considered to be no different to the wider population, as property	
	Lesbian	Neutral		

	Gay	Neutral	eligibility is determined by energy performance rather than tenant characteristics. However all group may benefit equally from improved thermal efficiency, and reduced energy bills.
	Bisexual	Neutral	
	Other sexual orientation (please specify)	Neutral	

### Other protected groups for consideration

<p><b>Socio-economically disadvantaged</b></p> <p>The term socio-economic refers to the differences between groups of people caused mainly by their financial situation. These include factors like employment, education, health, income, living environment, crime, and access to housing.</p>		Positive	<p>Members of this group are more likely to be living in fuel poverty. Evidence shows that fuel poverty is strongly associated with socio-economic disadvantage, with research indicating that “fuel poverty [is] concentrated in the lower-income deciles”, and that its impacts are “disproportionately felt by some of the most vulnerable people in society.”<sup>9</sup></p> <p>In 2021, 11.4% of households in the Stroud District were found to be fuel poor.<sup>10</sup> These works will allow tenants to adequately heat their homes for less, and reduce energy bills, resulting in a reduction in fuel poverty and improved financial resilience.</p>
<p><b>Rural communities</b></p> <p>Considerations include how people who live in rural parts of the district can access council services, transport, education, employment, and internet and broadband.</p>		Positive	<p>The Stroud District is generally considered a rural area, which can mean that some properties in the District do not have access to the gas grid, meaning they may currently be reliant on an inefficient heating system. The benefits of</p>

<sup>9</sup> [Who are the fuel poor? - Cost of Living Research Group, University of York](#)

<sup>10</sup> [Sub-regional fuel poverty data 2023 \(2021 data\) - GOV.UK](#)

			these works will allow tenants to adequately heat their homes for less, and reduce energy bills, as the properties will become more energy efficient.	
<b>Carers</b> A carer is anyone, including children and adults, who looks after a family member, partner or friend who needs help because of their illness, frailty, disability, a mental health problem or an addiction and cannot cope without their support. The care they give is unpaid. <sup>11</sup> Please see guidance for considering care experience in EqlAs <a href="#">here</a> .		Neutral	The impact for this group is considered to be no different to the wider population, as property eligibility is determined by energy performance rather than tenant characteristics. However all group may benefit equally from improved thermal efficiency, and reduced energy bills.	
<b>Care Leavers</b> A care leaver is defined in law as someone over the age of 16 who has been in the care of the local authority and/or Health and Social Care Trust for a period of at least 13 weeks or more. Please see guidance for considering care experience in EqlAs <a href="#">here</a> .		Neutral	The impact for this group is considered to be no different to the wider population, as property eligibility is determined by energy performance rather than tenant characteristics. However all group may benefit equally from improved thermal efficiency, and reduced energy bills.	
<b>Other protected groups if applicable (e.g. refugees or asylum seekers, homeless people)</b>		Choose an item.		

\* To keep the form concise, race has not been included as an exhaustive list, please augment the list above where appropriate to reflect the complexity of other racial identities.

\*\* There are too many faith groups to provide a list, therefore, please input the faith group e.g. Muslims, Buddhists, Jews, Christians, Hindus, etc. Consider the different faith groups individually if relevant and required when considering positive or negative impacts. A list of religions in the Census is available [here](#)


## Policy and Governance Review

<sup>11</sup> [NHS commissioning » Who is considered a carer?](#)

**a. Stage two sign-off**

Stage two review completed	Yes
Any further changes of feedback	No
Name	Emma Smith
Job title	Projects and Consultation Officer
Date of stage two review	3 June 2026

**a. Head of Service/Director sign off for stage two assessment**

Name: Andy Kefford	
Job title: Strategic Head of Housing	Date: 04.06.2026
Signature: 	

## 2. Outcomes, action and public reporting

a. Please list the actions that have been identified through the above impact assessment:

Action	Target completion date	Lead Officer
Pre-work visits from contractor's Tenant Liaison Officer	Throughout project	Kirsty Hussain, Asset & Sustainability Manager
Constant Monitoring of works on site	Throughout project	Kirsty Hussain, Asset & Sustainability Manager
Advance notice and flexibility in scheduling of work	Throughout project	Kirsty Hussain, Asset & Sustainability Manager

### b. Public reporting

All completed EqlAs are required to be publicly available on the Council's [website](#) once they have been signed off. EqlAs are also published with the papers for committee and full Council decisions.

## 3. Monitoring outcomes, evaluation and review

An Equalities Impact Assessment is not an end in itself but the start of a continuous monitoring and review process. The relevant Service or Lead Officer responsible for the delivery of the policy, function or service change is also responsible for monitoring and reviewing the EqlA and any actions that may be taken to mitigate impacts.

Individual services are responsible for conducting the EqlA for their area, however the Policy and Governance team are available to provide support and guidance. Please email [policy@stroud.gov.uk](mailto:policy@stroud.gov.uk) if you have any questions.

**Once you have sign-off from the relevant Head of Service or Director, please send completed EqlAs to [policy@stroud.gov.uk](mailto:policy@stroud.gov.uk).**

## 4. Document control information (if applicable)

Name	Date	Version	Change