

The **Public Sector Equality Duty** (Section 149 of the Equality Act) requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people carrying out their activities.

The Equality Duty supports good decision making – it encourages public bodies to be more efficient and effective by understanding how different people will be affected by their activities, so that their policies and services are appropriate and accessible to all and meet different people’s needs. The Council’s Equality and Safety Impact Assessment (ESIA) includes an assessment of the community safety impact assessment to comply with Section 17 of the Crime and Disorder Act and will enable the Council to better understand the potential impact of proposals and consider mitigating action.

<b>Name or Brief Description of Proposal</b>	The disposal of poorly performing HRA assets where the cost of repair and re-letting is significantly outweighed by the financial and strategic benefits of sale, alongside the disposal of freehold interests in leasehold-dominated blocks where the Council holds only a small number of tenancies.
<b>Brief Service Profile (including number of customers)</b>	
<p>This Equality and Safety Impact Assessment supports the business case for the disposal of void properties and selected freehold interests within the Housing Revenue Account (HRA).</p> <p>The first element relates to void properties that perform poorly in terms of financial viability, energy performance, and sustainability. These disposals help address the £75M Decent Homes funding gap by releasing underperforming assets where the cost of repair outweighs long-term benefit. Only empty properties are considered.</p> <p>The second element concerns blocks where the Council owns the freehold but only one or two dwellings, with all other units owned by long leaseholders. The Council currently carries disproportionate liabilities for repairs, fire safety works and major components in these blocks. Disposing of the freehold transfers these liabilities to a more appropriate freeholder and enables HRA resources to be redirected toward retained social homes.</p>	
<b>Summary of Impact and Issues</b>	
<p>There are no direct negative equality or safety impacts because:</p> <ul style="list-style-type: none"> <li>• Void disposals do not involve any existing tenants</li> <li>• Freehold disposals will not result in displacement, as existing Council tenants in affected blocks will remain secure tenants, with their rights protected in law.</li> </ul>	

**Indirect and positive impacts include:**

- Improved condition, safety, and energy efficiency of the retained stock through reinvestment of capital receipts.
- Reduced exposure to major works liabilities in blocks where the Council is no longer the most appropriate freeholder.
- More resources available for Decent Homes compliance, supporting the housing needs of all groups with protected characteristics.

The Housing Scrutiny Panel has recommended that an ESIA be undertaken for each individual disposal, which will further ensure that any localised or case-specific equality or safety issues are identified and mitigated.

**Mitigations & Safeguards:**

- Larger family homes (3+ bedrooms) and properties needed for care leavers are protected unless there is overwhelming financial evidence.
- Freehold sales will only be considered where Council tenants' rights, safety and access are fully protected.
- Capital receipts will remain within the HRA and reinvested into stock improvements, compliance programmes and sustainable housing delivery.
- Property-level ESIA's will be completed, ensuring transparency and compliance with the Public Sector Equality Duty.
- Oversight is provided by Housing Solutions Panel, Asset Management, Legal and Finance.
- Monitoring will continue through the HRA Asset Management Strategy and Decent Homes Programme governance.

**Potential Positive Impacts**

- Increased proportion of homes meeting the Decent Homes Standard (60% by end of 2025/26; trajectory to 100% by 2030).
- Improved safety, thermal comfort, and accessibility across retained stock.
- More efficient use of HRA resources, reducing exposure to cost pressures from mixed-tenure blocks.
- Improved living conditions for vulnerable and low-income residents.
- Reduction in long-term liabilities enables a strengthened HRA business plan.

<b>Responsible Service Manager</b>	Ola Onabajo – Service Manager, Asset Management
<b>Date</b>	27.11.25
<b>Approved by Senior Manager</b>	Jamie Brenchley – Director of Housing
<b>Date</b>	27.11.25

## Potential Impact

Impact Assessment	Details of Impact	Possible Solutions & Mitigating Actions
<b>Age</b>	Neutral / Indirect Positive. No tenant is displaced. Reinvestment in safety and accessibility benefits older tenants and households with age-related needs.	
<b>Disability</b>	Neutral / Indirect Positive. Accessible, safe and energy-efficient homes benefit disabled residents. Disposing of high-liability blocks frees resources for adaptations and compliance work.	
<b>Gender Reassignment</b>	Neutral. The proposal does not affect service access or treatment.	
<b>Marriage and Civil Partnership</b>	Neutral. No impact identified.	
<b>Pregnancy and Maternity</b>	Neutral. No direct impact. Indirect benefits arise from improved housing conditions.	
<b>Race</b>	Neutral. The proposal applies only to empty homes or freehold interests where tenant rights are unaffected. No disproportionate impact anticipated.	
<b>Religion or Belief</b>	Neutral. No identifiable impact.	
<b>Sex</b>	Neutral. No differential effects identified.	
<b>Sexual Orientation</b>	Neutral. No differential effects identified.	
<b>Community Safety</b>	Neutral / Positive. By reinvesting receipts in fire safety and compliance work, the proposal supports safer homes. Freehold disposals reduce block-level fire safety liabilities that may otherwise delay compliance.	
<b>Poverty</b>	Indirect Positive. Improved quality of retained homes reduces fuel poverty and maintenance-related costs.	

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	Freeing HRA resources supports prevention work and reduces reliance on expensive temporary accommodation.	
<b>Health &amp; Wellbeing</b>	Indirect Positive. Better thermal comfort, safer homes and accelerated Decent Homes compliance support physical and mental wellbeing. Removing high-cost, low-performing assets strengthens overall housing quality.	
<b>Other Significant Impacts</b>	None identified. All tenant protections remain in place for both void and freehold disposals.	