

Equality Impact Assessment / Equality Analysis

(Version 4)

Item name	Details
Title of service or policy	Empty Residential Property Policy 2022 (ERP Policy 2022)
Name of directorate and service	Housing Services
Name and role of officers completing the EqIA	Debbie Freeman – Empty Property Officer Nick Plumley - Affordable & Specialist Housing Team Manager
Date of assessment	12/01/2026

Equality Impact Assessment (or 'Equality Analysis') is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on people and different groups within our community. The main aim is to identify any adverse impacts (i.e. discriminatory or negative consequences for a particular group or sector of the community, and to identify areas where equality can be better promoted). Equality impact Assessments (EqIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EqIA) or Equality Analysis. **Not all sections will be relevant – so mark N/A any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council's website following relevant service lead approval.

1.1 Identify the aims of the policy or service and how it is implemented

Key questions	Answers / notes
<p>1.1 Briefly describe purpose of the service/policy e.g.</p> <ul style="list-style-type: none"> ● How the service/policy is delivered and by whom ● If responsibility for its implementation is shared with other departments or organisations ● Intended outcomes 	<ul style="list-style-type: none"> ● The ERP Policy 2022 details Housing Services approach to bringing empty properties back into use. The policy is delivered by the Empty Property Officer. The service users are owners of empty properties and members of the public who may make a complaint about empty properties. ● The outcome is to bring empty residential properties back into use using a targeted approach based on a prioritisation system. ● The use of prioritisation also ensures all empty property owners are treated equally and resources are used effectively. ● The policy now focuses on strengthening cross service working processes, this will ensure the Council is using all available functions and powers to bring properties

	<p>back into use, and customers are receiving the most effective service possible.</p> <ul style="list-style-type: none"> ● Enforcement action may be initiated or coordinated when an empty property meets the required thresholds. ● High level enforcement action such as Compulsory Purchase Orders or Enforced Sale may be used be justified as a last resort in situations where there appears to be no other prospect of an empty property being brought into residential use.
<p>1.2 Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> ● Is it a new service/policy or review of an existing one? ● Is it a national requirement?). ● How much room for review is there? 	<p>The ERP Policy 2022 is a review of the Empty Property Policy 2018 version; it is not a national requirement and will be reviewed periodically. This EQAI is an updated version of the one completed for the ERP Policy 2018.</p>
<p>1.3 Do the aims of this policy link to or conflict with any other policies of the Council?</p>	<ul style="list-style-type: none"> ● The policy's delivery contributes towards the action plans and targets of The Local Plan, superseded by the Housing Plan 2025 to 2030 (HP), is outlined in the Corporate Strategy and responds to the 2023 Economic Strategy, specifically in relation to ensuring that B&NES residents have access to affordable and high-quality housing. The HP states that the Acquiring Authority will continue to bring empty properties back into use to expand the housing offer. To enhance the ERPP, the council will now be concentrating on developing and embedding procedures for high-level enforcement action on empty homes, including Enforced Sale and Compulsory Purchase Orders. The properties that come forward through these enforcement measures will be fed into the forthcoming asset review process for consideration as social housing. The aspiration is to compound the benefits of the council's empty property work by viewing them as potential contributors to the B&NES Homes

pipeline. Empty properties are diverse in nature and may present a solution to specific areas of market failure.

2. Consideration of available data, research and information

Key questions	Data, research and information that you can refer to
<p>2.1 What equality focussed training have staff received to enable them to understand the needs of our diverse community?</p>	<p>It is mandatory for all B&NES council officers to undertake Equality Training.</p>
<p>2.2 What is the equality profile of service users?</p>	<p>The range of service users that the policy covers is vast, including:</p> <ul style="list-style-type: none"> • The owners of empty residential properties • The neighbours of empty residential properties being adversely effected by them and wishing to log a complaint • All residents of the Bath and North East Somerset area are invited to report empty residential properties they are aware of <p>Due to this, the equalities profile of people using the service is the same as the overarching, accepted demographics of Bath and North East Somerset.</p>
<p>2.3 Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?</p>	<p>There has been no customer consultation as this is an updated policy following national/government guidance.</p>
<p>2.4 What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?</p>	<p>No consultation has taken place. Policy was updated in 2022 and this updated EQIA was carried to ensure adherence with the Public Sector Equality Duty and ensure empty property owners with protected characteristics are considered</p>

<p>2.5 If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equality considerations within this?</p>	<p>Any consultation carried out in the future would be inclusive of individual needs and be subject to EQIA</p>
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3. Assessment of impact: ‘Equality analysis’

Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:

- Meets any particular needs of equalities groups or could help promote equality in some way.
- Could have a negative or adverse impact for any of the equality groups

Key questions	Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
<p>3.1 Issues relating to all groups and protected characteristics</p>	<p>The ERP Policy 2022 offers tailored support from the Empty Property Officer which aims to recognise and respond to challenges facing individuals due to their protected characteristics. Residents and empty property owners will be invited to inform the service of their accessible needs.</p>	<p>Being subject to enforcement action resulting in an empty property being removed from ownership may cause emotional distress.</p>
<p>3.2 Sex – identify the impact/potential impact of the policy on women and men.</p>	<p>Both men and women will benefit from improved housing stock. Increased housing supply and resolution of environmental nuisance.</p>	<p>No adverse impact identified</p>

<p>3.3 Pregnancy and maternity</p>	<p>Pregnant people and new parents will benefit from improved housing stock. Increased housing supply and resolution of environmental nuisance.</p>	<p>The council holds no responsibility for ensuring that refurbishment plans for empty homes are suitable for pregnant women and new parents</p>
<p>3.4 Gender reassignment – identify the impact/potential impact of the policy on transgender people</p>	<p>Trans people will benefit from improved housing stock. Increased housing supply and resolution of environmental nuisance.</p>	<p>No adverse impact identified</p>
<p>3.5 Disability – identify the impact/potential impact of the policy on disabled people (ensure consideration of physical, sensory and mental health needs/differences)</p>	<ul style="list-style-type: none"> • Disabled people will be offered tailored support to bring their property back into use, if their disability prevents them from taking the appropriate actions required. • Reasonable adjustments will be considered for individuals when an accessible need has been shared with the service. • Officers will work with disabled empty property owners to ensure that they receive communication in a style best suited to them. This could be in-person, via phone or in writing. • The Empty Property Officer can act as a single point of contact and co-ordinate across council services on their behalf as well as liaising with approved third parties (Lasting Power of Attorney etc) and/or family members supporting the individual. 	<ul style="list-style-type: none"> • Some disabled empty property owners may be less able to organise bringing their empty property back into use or manage its ongoing upkeep. This makes them potentially at higher risk of enforcement action than non-disabled empty property owners. To mitigate against this, tailored, practical support is available. • Although a diagnosis is not necessarily required, in some cases disabled people may be asked to provide evidence of their disability relevant to bringing their empty property back into use.

	<ul style="list-style-type: none"> • Interpretation services are available where necessary, for Deaf customers 	
<p>3.6 Age – identify the impact/potential impact of the policy on different age groups</p>	<ul style="list-style-type: none"> • Written information, phone and face to face meetings with the Empty Property Officer are available as options for accessing the support offered and will be used to contact owners of empty properties, acknowledging that many older people do not use or have access to internet services. • The Empty Property Officer can act as a single point of contact and co 'ordinate across council services on their behalf, as well as liaising with approved third parties and/or family members supporting the individual. 	<ul style="list-style-type: none"> • Older empty property owners may be less able to organise bringing their empty property back into use or manage its ongoing upkeep. This makes them potentially at higher risk of enforcement action than younger empty property owners. To mitigate against this, tailored, practical support is available.
<p>3.7 Race – identify the impact/potential impact on across different ethnic groups</p>	<p>People from all ethnicities will benefit from improved housing stock. Increased housing supply and resolution of environmental nuisance.</p>	<ul style="list-style-type: none"> • Language barriers could prevent empty property owners whose first language is not English from understanding their responsibilities as the owner of an empty property so may be more vulnerable to enforcement action. • Translation services are available where necessary, for customers whose first language is not English.

		<ul style="list-style-type: none"> The empty property page on the council's website can be translated via Google translate into other languages.
3.8 Sexual orientation – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual, questioning people	People of any sexual orientation will benefit from improved housing stock. Increased housing supply and resolution of environmental nuisance.	No issues identified
3.9 Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?	Both married, civil partnered and single people will benefit from improved housing stock. Increased housing supply and resolution of environmental nuisance.	No issues identified
3.10 Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	People of any religious or faith group will benefit from improved housing stock. Increased housing supply and resolution of environmental nuisance.	No issues identified
3.11 Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances (this is not a legal requirement but is a local priority).	<ul style="list-style-type: none"> Financial assistance in the form of loans and grants are available to empty property owners that meet the criteria detailed in the ERP Policy 2022 The ERP Policy 2022 aims to increase the number of affordable and social housing available in BANES which would directly benefit this group. Where literacy is an issue, the content of letters sent from the Empty Property Officer can be explained in person or over the phone on request. 	<ul style="list-style-type: none"> Empty property owners who can't afford to maintain them to an acceptable standard (not having a detrimental impact on the neighbouring houses) are, as a result, more likely to be subject to enforcement action by the Council than those who can. The EPR Policy 2022 contains measures to help with meeting the costs through small works grants of up to £500 and loans of up to £30,000 administered by Lendology CIC

	This ensures customers fully understand the content.	
3.12 Rural communities* identify the impact / potential impact on people living in rural communities	There is often a shortage of housing for local people in rural areas so increasing the housing stock may benefit this group. The incentives offered by the ERPP 2022 are not available to owners bringing the property back into use as a holiday let or 2nd home, both of which can effect housing availability in rural areas.	No issues identified
3.13 Armed Forces Community ** serving members; reservists; veterans and their families, including the bereaved. Public services are required by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).	People in or leaving the armed forces often face disadvantage with housing and action to improve available housing may benefit this group	No issues identified
3.14 Care Experienced *** This working definition is currently under review and therefore subject to change: In B&NES, you are 'care-experienced' if you spent any time in your childhood in Local Authority care, living away from your parent(s) for example, you were adopted, lived in residential, foster care, kinship care, or a special guardianship arrangement.	People leaving care often face disadvantage with housing and action to improve available housing may benefit this group	No issues identified

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*There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

** The Equality Act does not cover armed forces community. However, the Armed Forces Bill (which came in on 22 Nov 2022) introduces a requirement to pay 'due regard' to make sure the Armed Forces Community are not disadvantaged when accessing public services.

***The Equality Act does not cover care experienced people. B&NES adopted this group as a protected characteristic in March 2024 alongside over 80 other Local Authorities. Although we have data for care leavers and children/young people who are currently in the care of B&NES we do not have wider data on disadvantage experienced through being in care.

4. Bath and North East Somerset Council Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
The council do not obtain data explaining what proportion of the empty property owners in B&NES have protected characteristics. This data could be necessary for ensuring the support and incentives offered via the ERP Policy 2022 are	Individuals receiving support through the ERP Policy 2022 that have a protected characteristic that could be impacting their ability to bring their empty property back into use, have the option to disclose this to the empty Property Officer so the			

as appropriate and beneficial to this group as possible.	support offered can be tailored to help mitigate these barriers.			

5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equality Team (equality@bathnes.gov.uk), who will publish it on the Council's website. Keep a copy for your own records.

Signed off by:
senior officer)

Graham Sabourn

(Divisional Director or nominated

Date: 12/02/26