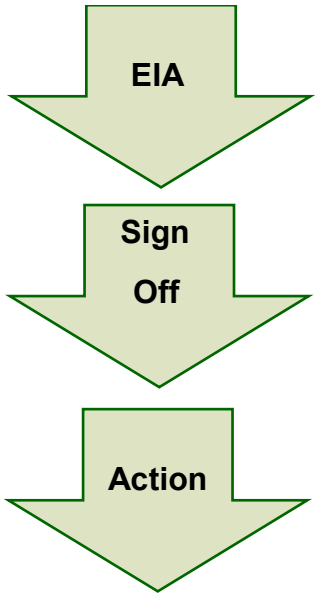
Spelthorne Borough Council (SBC) Equality Impact Assessment (EIA) Form

The purpose of an EIA is to ensure SBC is as inclusive as possible, both as a service deliverer and as an employer. It also demonstrates our compliance with Public Sector Equality Duty (PSED).

This document is a planning tool, designed to help you improve programmes of work by considering the implications for different groups of people. A guidance document is available here.

Please note that, once approved, this document will be made public, unless you have indicated that it contains sensitive information. Please ensure that the form is clear and easy to understand. If you would like any support or advice on completing this document, please contact the Equality, Diversity and Inclusion (EDI) team via ProjectsTeam@Spelthorne.gov.uk, or if it's relating to health inequalities, please contact Public Health via public.health@surreycc.gov.uk.



- Having identified an EIA is required, ensure that the EIA form is completed before any work is started. This includes gathering evidence and / or engaging the relevant stakeholders to inform your assessment.

- Brief the relevant Group Head for sign off and upload the completed form here: Upload Completed Equality Impact Assessments. Please name it "EIA [project] [service area] [year]"
- Undertake further research / engagement to further understand impacts (if identified).
- Undertake engagement and / or consultation to understand if EIA has identified and considered impacts.
- Amend accordingly to engagement / consultation feedback and brief decision makers of any changes.

- Implement proposed activity.
- Monitor impacts and mitigations as evidence of duty of care.

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Section One: Essential Information

Service / policy / strategy / practice / plan being assessed	Nightly-Paid Accommodation Procurement Framework
Business Unit / Service Area	Housing Strategy & Policy
Is this a new or existing service / policy / strategy / practice / plan? If existing, please state date of last assessment.	New Strategy
EIA Authors **N.B.** It is best practice to have more than one person complete the EIA to bring different perspectives to the table.	Gareth Richards, Emily Corfield
Do any other Business Units / Service Areas need to be included?	Procurement, Legal
Does this EIA contain personal and / or sensitive information?	No

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Are any of the outcomes from this assessment likely to result in complaints from existing services users, members of the public and / or employees?	None

1. Please explain the background to your proposed activity and the reasons for it.

The project aims to establish a procurement framework for the spot purchasing of nightly-paid accommodation for homeless households.

This work has been initiated in response to concerns raised by Peterborough City Council regarding unlawful expenditure and the absence of compliant procurement arrangements for similar accommodation services. Spelthorne Borough Council currently purchases nightly-paid accommodation on an *ad hoc* basis without formal contracts in place with most providers, raising potential risks in relation to procurement law compliance and governance.
The project will explore the feasibility and benefits of adopting a dynamic payment system that enables approved accommodation providers to join or leave a structured procurement framework. Such a framework would allow the Council to advertise accommodation needs and receive offers from compliant providers in real time. It will provide improved oversight of provider quality, compliance, and suitability, while ensuring that procurement practices align with the Procurement Act 2023.

The project will analyse impacts on existing providers, operational processes, budget requirements, and statutory duties under the Housing Act 1996 and Homelessness Reduction Act 2017.

Ultimately, the project seeks to strengthen governance, consistency, and value for money in how emergency accommodation is sourced. This will support better outcomes for households in crisis and reduce legal and financial exposure for the Council.

2. Please outline your proposed activity including a summary of the main actions.

The aims and objectives of the nightly-paid accommodation procurement framework are to:

- Ensure that the Council is compliant with the procurement rules under The Procurement Act 2023 to provide transparency and best value
- Ensure that properties provided by landlords to the Council for nightly-paid accommodation are safe, suitable, and fully compliant with all relevant legislation and other requirements

The main actions are to:

- Develop specification for compliant, suitable, safe properties and the management of those properties by accommodation providers
- Design dynamic open procurement framework to use for spot purchasing of nightly-paid accommodation for homeless households
- Implement nightly-paid accommodation procurement framework for accommodation providers to tender

3. Who is this going to impact and how?

Customers	Members of the Public	Employees	Job Applicants
Yes, the framework will ensure that their accommodation is safe, suitable, and fully compliant with all relevant legislation and other requirements	No	No	No
Other, please specify:	Providers (i.e., landlords) will need to participate in the procurement framework to be able to provide nightly-paid accommodation for Spelthorne BC		

Section Two: Evidence

Please include any evidence or relevant information that has influenced the decisions contained in this EIA. This could include demographic profiles; audits; research; health needs assessments; national guidance or legislative requirements and how this relates to the protected characteristic groups and additional groups outlined in Section Four.

A – Quantitative Evidence

This is evidence which is numerical and should include the number people who use the service and the number of people from the protected characteristic groups who might be affected by changes to the service.

General Spelthorne Context

As of the 2021 census, Spelthorne has a population of 103,000 and is the 14th most densely populated of the South East's 64 Local Authority areas with 2,295 of residents per square kilometre.

According to the Indices of Deprivation 2025, the most deprived borough in Surrey. Spelthorne has the highest proportion and number of lone parent families and the highest overall levels of child poverty in Surrey; it also has the highest under-18 conception rate in the county. That said, residents are largely healthy, with life expectancy for both males and females slightly above the national average.

The Official Census and Labour Market Statistics 2021-2022 showed that Spelthorne has a relatively low rate of unemployment: 3.3% of those economically active aged 16 to 64, compared to the South East (3%) and UK as a whole (3.7%). Average wages for Spelthorne in 2025 were £877 per week for full-time employees, slightly above the South East average of £815 per week.

Whilst house prices remain well above the national average, most residents are owner-occupiers (68%), followed by private rented (18%) and social rented (13%).

Sources: English Indices of Deprivation 2025; Authority Monitoring Report for Spelthorne 2025; Nomis – Official Census and Labour Market Statistics 2021-2022; ONS Census, 2021 – Home Ownership and Renting; and https://commonslibrary.parliament.uk/constituency-data-wages/

Gender / Gender Identity

Census data from 2021 shows that 50.9% of residents in Spelthorne are female, with the remaining 49.1% being male.

A White Paper published in December 2018 (Help shape our future: the 2021 Census of population and housing in England and Wales) set out the ONS recommendation for what the census should contain and how it should operate. The White Paper recommended that the census in 2021 include a question about gender identity, asking respondents whether their gender is the same as the sex they were registered as at birth. As a result, 93.98% of people aged 16 years and over in Spelthorne have the same gender identity as their sex registered at birth.

The remaining population identify as follows:

People aged 16 years and over who have a gender identity different from their sex registered at birth but no specific identity given	0.19%
Identify as a trans woman	0.09%
Identify as a trans man	0.09%
Non-binary	0.02%
Another gender identity	0.02%
Prefer not to say	5.62%

Source: ONS Census, 2021 – Population and household estimates, England and Wales: Census 2021. Gender identity – ONS, 2021; and https://researchbriefings.parliament.uk/ResearchBriefing/Summary/CBP-8531

Age

Spelthorne has a slightly lower population of under-30s (33%) compared to the rest of the country (36%), and a slightly higher population of 30 – 69-year-olds (53%) compared with the national average of (51%), The number of 70+ is 14%, which is broadly in line with the rest of the nation.

Source: ONS – Population and household estimates, England and Wales: Census 2021.

Ethnicity

The ethnic make-up of Spelthorne is largely in line with the rest of England and Wales, predominantly residents are from a white ethnic background. However, there are slightly more Asian people and those with a mixed ethnic background but fewer people from a black ethnic group compared to the national average.

	Spelthorne		England and Wales
Ethnic Group	Number	%	%
Asian	13,146	12.8%	9.3%
Black	2,548	2.5%	4%
Mixed Ethnicities	3,763	3.7%	2.9%
White	81,000	78.6%	81.7%
Other	2,503	2.4%	2.1%

Source: ONS – Ethnic Group, England and Wales: Census 2021.

Disability

Spelthorne has a slightly lower percentage of residents with a disability compared to the rest of England and Wales.

	Spelthorne	England and Wales
Disability	%	%
Disabled under the Equality Act	14.4%	17.8%
Not disabled under the Equality Act	85.6%	82.2%

As of January 2026, there were around 4,726 PIP claimants in Spelthorne. Within Spelthorne, psychiatric disorders were the most common reason for claiming PIP and accounted for 42.6% of awards, compared 38.7% in England & Wales. Psychiatric disorders include anxiety and depression, learning disabilities and autism. The second most common reason for awards was musculoskeletal disease (general), which accounted for 14.2% of awards within Spelthorne and 18.9% in England & Wales. Musculoskeletal disease (general) includes osteoarthritis, inflammatory arthritis and chronic pain syndromes.

Source: ONS – Disability, England and Wales: Census 2021; and https://commonslibrary.parliament.uk/constituency-data-personal-independence-payment-2/

Religion

Residents of Spelthorne predominately identify themselves as either Christian or having no religion. There is a smaller Muslim population compared with the national average, but a larger Hindu and Sikh population.

	Spelthorne		England and Wales
	Number	%	%
Has religion	**64,959**	**63%**	**56.9%**
of which			
Christian	52,432	50.9%	46.2%
Muslim	4,146	4.0%	6.5%
Hindu	4,372	4.2%	1.7%
Buddhist	703	0.7%	0.5%
Jewish	174	0.2%	0.5%
Sikh	2,612	2.5%	0.9%
Other	520	0.5%	0.6%
No religion	**32,112**	**31.2%**	**37.2%**
Not stated	**5,884**	**5.7%**	**6.0%**

Source: ONS – Religion, England and Wales: Census 2021.

Sexual Orientation

The sexual orientation of Spelthorne residents is largely in line with the rest of England and Wales.

	Spelthorne		England and Wales
	Number	%	%
Sexual Orientation			
Straight or Heterosexual	75,505	90.57%	89.37%
Gay or Lesbian	1,088	1.31%	1.54%
Bisexual	704	0.84%	1.28%
Pansexual	123	0.15%	0.23%
Asexual	25	0.03%	0.06%
Queer	6	0.01%	0.03%
All Other Sexual Orientations	7	0.01%	0.02%
Not Answered	5,904	7.08%	7.47%

Source: ONS – Sexual Orientation, England and Wales: Census 2021.

Marriage / Civil Partnership

Slightly more people in Spelthorne are married compared to the rest of England and Wales, and fewer people identify as single.

	Spelthorne	UK
	%	%
Marital Status		
Never Married or Registered a Civil Partnership	35.1%	37.9%
Married or in a Registered Civil Partnership (including separated)	49.9%	46.9%
Divorced or Civil Partnership Dissolved	8.9%	9.1%
Widowed or Surviving Civil Partnership Partner	6.1%	6.1%

Source: ONS – Marriage and Civil Partnership Status in England and Wales: Census 2021.

Numbers in Emergency Accommodation

	Spelthorne			England		
	No. Households		Households (%)	No. Households		Households (%)
Emergency Accommodation Type	**Total Households**	**With Children < 18 yrs. old**	**Total Households**	**Total Households**	**With Children < 18 yrs. old**	**Total Households**
Nightly-Paid Accommodation	97	65	0.23	62,960	36,690	0.26
Temporary Accommodation	121	113	0.28	71,250	49,110	0.29
Total Owed Accommodation Duty	**218**	**178**	**0.51**	**134,210**	**85,800**	**0.55**

Source: GOV.UK – Households in temporary accommodation at end of quarter, 31st December 2025;
https://assets.publishing.service.gov.uk/media/69f08a8108ecdb5c6f34b065/Statutory_Homelessness_Detailed_Local_Authority_Data_202512.ods

B – Qualitative Evidence

This is data which describes the effect or impact of a change on a group of people, e.g. some information provided as part of performance reporting.

The procurement framework will ensure that the Council is compliant with The Procurement Act 2023 and that properties provided by landlords to the Council for nightly-paid accommodation are safe, suitable, and fully compliant with all relevant legislation and other requirements.
Improving the quality of nightly-paid accommodation will contribute to better health outcomes for occupiers.

Section Three: Engagement
Engagement with individuals or organisations affected by the proposed activity must take place. For further advice and support with engagement and consultations, click here.

Has the proposed activity been subject to engagement or consultation with those it's going to impact, taking into account their protected characteristics and socio-economic status?	No	
If YES, please state who with.	N/A	
If NO engagement has been conducted, please state why.	The Nightly-Paid Accommodation Procurement Framework is to ensure compliance with The Procurement Act 2023 and all other relevant standards and legislation, so there is no engagement prior to the commencement of the procurement framework. However, landlord engagement will be sought as part of the tender process.	
How was the engagement carried out?	**Yes / No**	**What were the results from the engagement? Please list…**
Focus Groups	No	N / A
Surveys	No	N / A
Public Event	No	N / A

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Displays / Exhibitions	No	N / A
Other (please specify)	Tender process	Yet to happen
Has the proposed activity changed as a result of the engagement?	N / A	N / A
Have the results of the engagement been fed back to the consultees?	N / A	N / A
Is further engagement or consultation recommended or planned?	Yes – tender process	N / A
What process have you got in place to review and evaluate?	There is an annual review process built into the Nightly-Paid Accommodation Procurement Framework	

Section Four: Assessing the Impact

Protected Characteristics and other groups that experience greater inequalities

What will the impact of implementing this proposal be on people who share characteristics protected by the Equality Act 2010 or are likely to be affected by the proposed activity? This section also allows you to consider other impacts, e.g. health inequalities such as deprivation, socio-economic status, vulnerable groups such as individuals who suffer socio-economic disadvantage, armed forces, carers, homelessness, people leaving prison, young people leaving care etc.

On the basis of evidence, has the potential impact of the proposed activity been judged to be positive (+), neutral (=), negative (-), or positive and negative (+&-), for each of the protected characteristic groups below and in what way?

N.B In our Guidance to EIAs we have provided you with potential questions to ask yourself when considering the impact of your proposed activity. Think about what actions you might take to mitigate / remove the negative impacts and maximize on the positive ones. This will form part of your action plan at Section Six.

	Impact type (+) (=) (-) or (+&-)	**Nature of impact including health inequalities** Will your proposal have negative or positive implications for each group, including on health inequalities? Think about whether outcomes vary across groups and who benefits the most and least, for example, the outcome for a woman on a low income may be different to the outcome for a woman a high income.	**Mitigating Actions for Negative Impacts** What can you do to mitigate any identified negative impacts or health inequalities? Think about offering for example benefits advice, access to bus routes, community support, flexible opening times, creche facilities etc. Use this column to form the basis of Section 6.

Age	=	Young people aged 16-17 cannot hold tenancies and so housing options are severely limited. Elderly people may be less likely to access our services when needed. Those aged under 35 may have reduced access to emergency, temporary and settled accommodation due to welfare policies (e.g., they are subject to the lower Local Housing Allowance rate) as well as local landlord policies (i.e., age restrictions).	Young people aged 16-17 receive enhanced services via the Surrey Joint Protocol. They have access to specialist young people's homelessness accommodation. Older people have greater access to social housing via age restricted stock held by A2Dominion. Spelthorne Borough Council has a Discretionary Housing Payment pot which this group can access in case of hardship. Under the proposed Action Plan, there is a plan to review the demand for Sheltered, Extra Care and retirement schemes.

Disability Consider: • Physical disabilities • Sensory impairments • Neurodiverse conditions (e.g. dyslexia) • Mental health conditions (e.g. depression) • Medical conditions (e.g. diabetes)	=	Physically disabled people accessing homelessness services in Spelthorne have much more limited options available to them in relation to emergency, temporary and settled accommodation.	Accessible rooms for homeless families are provided at Harper House and White House. The Council's Housing, Homelessness and Rough Sleeping Strategy Action Plan also notes that the Council will explore joint ventures with developers and registered providers to deliver adapted accommodation where possible on site.
Gender Reassignment	=	Where individuals are transitioning, they may be impacted if they are placed into accommodation with shared facilities.	As part of standard assessments, we would consider this issue before offering accommodation with shared facilities.
Marriage and Civil Partnership	=	There is a lack of suitable family-sized properties available for emergency, temporary and settled accommodation compared to properties for single people.	The Council is procuring more larger-sized properties to use as emergency and temporary accommodation.
Pregnancy and Maternity	=	Under homelessness legislation, pregnant women are recognised as being in "priority need" and so arguably receive preferential treatment when compared with women who aren't pregnant, or men.	Those who are not in priority need receive a comprehensive housing needs assessment and support to access their own accommodation solutions.

Race Including: • Colour • Nationality • Citizenship • Ethnic or national origins	=	There is some evidence of racial prejudice for some groups when trying to secure accommodation. Individuals who do not have the right to reside in the UK are not entitled to homelessness assistance. Accommodation for people seeking asylum is the responsibility of the Home Office. Provision for pitches for gypsies and travelling showpeople are dealt with under Spelthorne BC's Local Plan.	To continue to support eligible individuals and households of all ethnic and racial backgrounds with nightly-paid accommodation placements in line with the Equality Act 2010.
Religion or Belief	=	No negative impacts have been identified.	N / A
Sex	=	No negative impacts have been identified.	N / A
Sexual Orientation	=	No negative impacts have been identified.	N / A
Groups who may require support: • Individuals who suffer socioeconomic disadvantage • Armed Forces (SBC signed the Armed Forces Covenant in April 2014) • Carers • Homelessness • People leaving Prison • People leaving Care	=	These groups are some of the more likely groups to be at risk of homelessness, so they are already being supported under the existing nightly-paid accommodation placement process, and so no negative impacts have been identified.	To continue to support these groups with nightly-paid accommodation placements in line with relevant legislation and The Council's own policies and procedures for groups who may require additional support.

Other Identified Health Inequalities (HI) Many issues can have an impact on health: is it an area of deprivation, does every population group have equal access, unemployment, work conditions, education, skills, our living situation, rural, urban, rates of crime etc.	=	Homelessness has a significant negative impact on health.	We are relieving homelessness by placing affected households and individuals into safe, suitable, compliant nightly-paid accommodation.
Other Groups If there are any other groups	=	N / A	N / A

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Public Sector Equality Duty (PSED)

Public Authorities must have 'due regard' to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations. Please evidence how your proposed activity meets our obligations under the PSED.

	Evidence of Due Regard
Eliminate unlawful discrimination (harassment, victimisation and other prohibited conduct):	The project will ensure that the Council complies with the requirements of The Equality Act 2010 and with The Council's own policies and procedures for other groups who may require additional support when placing homeless households and homeless individuals into nightly-paid accommodation. The specifications require providers to be able to evidence experience in managing complex and vulnerable customers, and include sections relating to safeguarding and harassment.
Advance equality of opportunity: This involves • removing or minimising disadvantages suffered by people due to their protected characteristics; • taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people, for example, taking steps to take account of people with disabilities; • encouraging people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low.	Please see the answers previously provided in the above table for Protected Characteristics and other groups that experience greater inequalities.

Foster good relations: This means tackling prejudice and promoting understanding between people from different groups and communities.	The project will tackle prejudice and promote understanding between people from different groups and communities by ensuring fairness, inclusion and respect in the placement of homeless households and homeless individuals into nightly-paid accommodation.

Section Five: Partners / Stakeholders

	Yes / No	Describe the interest / effect
Which sectors are likely to have an interest in or be affected by the proposed activity?		
Businesses	Yes (providers)	Providing accommodation
Councils	Yes	Meeting statutory requirements
Education Sector	N / A	N / A
Fire and Rescue	Yes	Meeting fire safety standards
Governance Structures	N / A	N / A
NHS	N / A	N / A
Police	N / A	N / A
Voluntary and Community Sector	Yes	Providing housing and legal advice
Other(s): please list and describe the nature of the relationship / impact		N / A

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Section Six: Action Planning

If you have identified impacts on protected characteristic groups in Section Four, please summarise these in the table below detailing the actions you are taking to mitigate or support this impact. It is also important to consider how often this E.I.A. will be reviewed, and who is responsible for doing this. If you are not taking any action to support or mitigate the impact, you should complete the No Mitigating Actions section below instead.

Mitigating Actions

Consider:

- Who else do you need to talk to? Do you need to engage or consult?
- How you will ensure your activity is clearly communicated
- Whether you could mitigate any negative impacts or build on positive impacts for protected groups or health inequalities
- Whether you could do more to fulfil the aims of the PSED
- How you will monitor and evaluate the effect of this work
- Anything else you can think of!

Identified Impact	Action(s)	Timescale incl. evaluation and review date	Name of person(s) responsible
Please see the answers previously provided in the above table for Protected Characteristics and other groups that experience greater inequalities	There is an annual review process built into the Nightly-Paid Accommodation Procurement Framework	Ongoing	Gareth Richards Ken Emerson Karen Sinclair

No Mitigating Actions

Please explain why you do not need to take any action to mitigate or support the impact of your proposed activity.
N / A

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Section Seven: Assessment Outcome

Only one of following statements best matches your assessment of this proposed activity. Please select one and provide your reasons.		
No major change required	✓	The proposal is in line with equality legislation and consideration has been given to the impact on other vulnerable groups.
The proposal has to be adjusted to reduce impact on protected characteristic groups and / or health inequalities		
Continue with the proposal but it is not possible to remove all the risk to protected characteristic groups and / or health inequalities		
Stop the proposal as it is potentially in breach of equality legislation		

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Section Eight: Sign Off
N.B To be completed after the EIA is completed but before the area of work commences.

Name of person(s) completing EIA	Gareth Richards
Name and signature of Group Head	Karen Sinclair
Date	
Date of next review and name of person(s) responsible	Ongoing, Gareth Richards, Ken Emerson, Karen Sinclair