

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.

Full Equality Impact Assessment (EIA)

Details	
Service or policy title	BABERGH AND MIDSUFFOLK DISTRICT COUNCIL HOARDING POLICY 2026
Lead officer <i>(responsible for the policy or service/function)</i>	Beth Newton/ Doug Stother
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	29.5.2026

Description
What exactly is proposed? <i>(Describe the service/policy and the changes that are being planned)</i> The purpose of the policy is to make all staff, tenants and members aware of our responsibilities and processes when dealing with tenants living in hoarded or self-neglected property
Why? <i>(Give reasons why these changes are being introduced)</i> It is important for a social landlord to have a documented policy detailing how they will support residents living in hoarded properties and for safeguarding measures to be put in place promptly, to both assist the resident and neighbouring properties, and to ensure the council remains compliant, addressing health and safety issues.
What will the effect of the changes be? <i>(Describe which people, communities, localities etc. will be affected by the changes)</i> All tenants of Babergh and Mid Suffolk District Councils will be affected by this policy, however it specifically relates to residents living in a hoarded or neglected property, or neighbours living the vicinity of such.
How will it be implemented? <i>(Describe the decision making process, timescales, process for implementation)</i>

Full Equality Impact Assessment (EIA)

The policy has been developed with input from various service areas mainly within the Housing and Neighbourhoods department
The policy has been reviewed by our Tenant Board and checked for clarity by our Resident Readers group. As this is a new policy which impacts all wards and all tenants within those wards, this is classed as a key decision to be taken by cabinet to approve the policy.

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

XXXXXX – after approval from Cabinet.

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

Full Equality Impact Assessment (EIA)

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)

Statistics show that hoarding and neglect often affects people of different sexes on a fairly even split, however in cases of in cases of severe self-neglect and animal hoarding, women make up the majority of identified or prosecuted cases of identified or prosecuted cases. In our districts the gender ratio is over 60% women, which could mean there are higher numbers of cases.

In addition, data shows that around 92% of people dealing with hoarding or neglect have a mental health condition. In Babergh and Mid-Suffolk, 64% of our residents are listed as having a disability or vulnerability, and nearly 9% of those have a mental health condition (909 residents).

Implications for communities and workforce

Disability

What is the impact on people with a disability (including

Our Hoarding and Neglect Policy, principles and support, will apply to all our tenants experiencing

Full Equality Impact Assessment (EIA)

children with additional needs) and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	hoarding regardless of any disability or vulnerability, as we have a duty of care as their landlord and local council to support and assist residents to live safely and compliantly in their home. People in this group may be more vulnerable because of their disability as they may struggle to either physically assist in clearing items, or deal with the magnitude mentally of having to address their hoarding. Some mental health conditions are particularly prevalent in experiencing issues with hoarding and neglect such as Hoarding Disorder, Anxiety and Depression, Dementia, ADHD, Autism, Psychosis, Schizophrenia and OCD
How does it have a positive or negative impact?	Negative- but with mitigations this should lessen the impact
What could be done to mitigate any adverse impact or further promote positive impact?	Where required, we will consider any disability-related vulnerabilities in relation to how we communicate and deal with hoarding and neglect cases. We will also make reasonable adjustments where this would further promote a positive impact on our tenants. This may include offering assistance from cleaning contractors, social services or counselling/GP or by ensuring clear routes to referrals to other agencies.
Age	
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>	Our Hoarding and Neglect Policy, principles and support, will apply to all our tenants experiencing hoarding regardless of their age, as we have a duty of care as their landlord and local council to support and assist residents to live safely and compliantly in their home. People in this group may be more vulnerable because of their age. Those that are older may find it more difficult to move around a cluttered home and could be more prone to falling. Studies suggest Hoarding is often chronic and worsens with age, with higher rates observed in individuals over 60 years old.
How does it have a positive or negative impact?	Neutral
What could be done to mitigate any adverse impact or further promote positive impact?	Where required, we will consider any age-related vulnerabilities in relation to how we communicate and deal with notifications hoarding and neglect. We will also make reasonable adjustments where this would further promote a positive impact on our tenants, this may include involving a responsible, trusted adult/family member or friend when dealing with older or younger residents.
Sex (gender)	
What is the impact on people of different genders and what	Our Hoarding and Neglect Policy, principles and support, will apply to all our tenants experiencing

Full Equality Impact Assessment (EIA)

evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	hoarding regardless of their sex, as we have a duty of care as their landlord and local council to support and assist residents to live safely and compliantly in their home. Whilst some statistics show that more men are likely to experience hoarding and neglect than women, other studies suggest it is more of an even split. In addition, more serious cases of self-neglect and hoarding are linked to women. Research has expressed that women are more likely to accept and seek support than men. Studies show there is generally no distinction between age, gender, ethnic group, socio-economic status, educational, occupational tenure.
How does it have a positive or negative impact?	Neutral, as above, there is generally an even split between genders
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>	Our Hoarding and Neglect Policy, principles and support, will apply to all our tenants experiencing hoarding regardless of gender reassignment, as we have a duty of care as their landlord and local council to support and assist residents to live safely and compliantly in their home. There could be a potential impact on residents going through gender reassignment due to the potential for staff to have less knowledge in this area. This policy highlights the impact hoarding and neglect can have on any individual.
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 partnership and what evidence do you have? <i>(If you do not believe there is any impact describe why not)</i>	Our Hoarding and Neglect Policy, principles and support, will apply to all our tenants experiencing hoarding regardless of their marriage or civil partnership status, as we have a duty of care as their landlord and local council to support and assist residents to live safely and compliantly in their home
How does it have a positive or negative impact?	Neutral

Full Equality Impact Assessment (EIA)

What could be done to mitigate any adverse impact or further promote positive impact?	N/A
Pregnancy/maternity	
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>	Our Hoarding and Neglect Policy, principles and support, will apply to all our tenants experiencing hoarding regardless of their pregnancy or maternity status, as we have a duty of care as their landlord and local council to support and assist residents to live safely and compliantly in their home People in this group may be more vulnerable because of their pregnancy or maternity and it is likely a referral to children services would need to be made when hoarding or neglect is discovered.
How does it have a positive or negative impact?	Neutral
What could be done to mitigate any adverse impact or further promote positive impact?	Where required, we will consider any pregnancy or maternity related vulnerabilities in relation to delivery of our service. This may include making referrals to the GP or Social Services.
Race	
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>	Our Hoarding and Neglect Policy, principles and support, will apply to all our tenants experiencing hoarding regardless of their race, as we have a duty of care as their landlord and local council to support and assist residents to live safely and compliantly in their home
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. We are not aware of any distinction between these groups based on current available data.
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 Hoarding and Neglect Policy, principles and support, will apply to all our tenants experiencing hoarding regardless of their sexual orientation, as we have a duty of care as their landlord and local council to support and assist residents to live safely and compliantly in their home.
How does it have a positive or negative impact?	Neutral
What could be done to mitigate any adverse impact	Staff receive training on equality and diversity and treating residents fairly. We are not aware of any

Full Equality Impact Assessment (EIA)

or further promote positive impact?	distinction between these groups based on current available data.
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 Hoarding and Neglect Policy, principles and support, will apply to all our tenants experiencing hoarding regardless of their religion or belief, as we have a duty of care as their landlord and local council to support and assist residents to live safely and compliantly in their home. Studies show there is generally no distinction between age, gender, ethnic group, socio-economic status, educational, occupational tenure.
How does it have a positive or negative impact?	Neutral
What could be done to mitigate any adverse impact or further promote positive impact?	Where we are aware of any religious factors that need to be considered in the delivery of our service, we will make reasonable adjustments where practicable. We are not aware of any distinction between these groups based on current available data.

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>	Our service will be delivered to all our tenants in line with the policy regardless of where they live in the district, as we have a duty of care as their landlord and local council to support and assist residents dealing with hoarding or neglect. Residents in rural areas could be more vulnerable as there is a risk of isolation and fewer local support services available.
Is the impact positive or negative? <i>(Explain)</i>	Neutral
What could be done to mitigate any adverse impact or further promote positive impact?	It is important that visits are conducted in rural areas whether through Officer visits or repairs, and any concerns reported back. We rely on our electrical and gas engineers who complete compliance checks to feedback signs of hoarding. We have a function now available on our customer account to 'flag' hoarded or neglected properties. This allows us to build a picture of those residents affected to ensure over time, these are not missed/forgotten.

Armed Forces Veterans

Full Equality Impact Assessment (EIA)

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, however, they may have a directly linked mental health condition from time spent in the forces, which could make them more likely to experience hoarding or neglect.
Is the impact positive or negative? <i>(Explain)</i>	Neutral
What could be done to mitigate any adverse impact or further promote positive impact?	As per the disability section.

Neurodiversity	
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>	There is potential for a disproportionate impact on neurodivergent residents, particularly those with ADHD, autism and executive functioning difficulties. Research indicates that hoarding behaviours are more prevalent amongst people with ADHD, with difficulties in attention, organisation, categorisation, decision-making and task completion contributing to the accumulation of possessions. Autistic people may also have strong emotional, sensory or functional attachments to possessions, which can make decluttering and disposal activities particularly distressing. There is a risk that behaviours associated with hoarding may be misunderstood as non-engagement, neglect or wilful non-compliance where underlying neurodivergent needs are not recognised. As a landlord and local authority, we have a duty to support residents whilst balancing our responsibilities for health, safety and safeguarding.
Is the impact positive or negative? <i>(Explain)</i>	Potentially negative , as neurodivergent residents may experience greater difficulty engaging with interventions, complying with timescales, processing information, or managing decluttering activities due to executive functioning, communication or sensory differences. There is also a risk of increased anxiety and distress if interventions are not tailored to individual needs.

Full Equality Impact Assessment (EIA)

	However, where appropriate support, reasonable adjustments and person-centred approaches are adopted, the policy can have a positive impact by enabling residents to access support, reduce risks within their homes and sustain their tenancy.
What could be done to mitigate any adverse impact or further promote positive impact?	• Consider whether hoarding behaviours may be linked to a neurodivergent condition when assessing cases. • Make reasonable adjustments in accordance with the Equality Act 2010 where appropriate. • Provide information in accessible formats and adapt communication methods to suit individual needs. • Allow flexibility in timescales where reasonable and appropriate. • Use clear, structured and achievable action plans, recognising that large decluttering tasks may be overwhelming for some neurodivergent residents. • Work collaboratively with advocates, family members, support workers, health professionals and partner agencies where consent and circumstances allow. • Ensure staff have an awareness of hoarding, neurodiversity and executive functioning difficulties to support informed decision-making. • Take a person-centred and trauma-informed approach to minimise distress and maximise engagement.

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

Full Equality Impact Assessment (EIA)

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.
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	29.05.2026