

Equality Impact Assessment (EqIA) form: the initial impact assessment

1. Process and guidance

The purpose of an EqIA is to make sure that the council is meeting the needs of all our residents by ensuring we consider how different groups of people may be affected by or experience a proposal in different ways. EqIAs help us to meet our [Public Sector Equality Duty](#) and where applicable the [Armed Forces Duty](#)

The council has a two stage EqIA process:

- Stage 1 - the initial impact assessment
- Stage 2 - the full impact assessment.

This form is for use at Stage 1 of the process. This must be completed when undertaking a project, policy change, or service change. It can form part of a business case for change and must be completed and attached to a Project Initiation Document. The findings of the initial impact assessment will determine whether a full impact assessment is needed.

Guidance and tools for council officers can be accessed on the council's [Tackling Inequality Together](#) intranet pages.

Date started:	12.02.2024	
Completed by:	Samuel Watt	
Service:	Economy and Housing	
Project or policy EqIA relates to:	Consultation on Changes to Social Housing Allocations	
Date EqIA discussed at service team meeting:	13.02.2024	

Conclusion (is a full assessment needed?):	No	
Signed off by (AD):	Frances Haywood (deputising for Rhian Hayes)	<i>F.E. Haywood</i>
Sign off date:	29.02.2024	

2. Summary of the policy, project, or service

This section should be used to summarise the project, policy, or service change (the proposal).

What is the purpose of the proposal, what are the aims and expected outcomes, and how does it relate to service plans and the corporate plan?

To agree on Wokingham Borough Council's response to the Government's consultation on proposed changes to social housing allocations. These proposals have been extracted below:

1. UK connection test – a person must demonstrate their connection to the UK before they can be allocated social housing.
2. Local connection test – a person must demonstrate a connection to a local area for at least 2 years before they can be allocated social housing.
3. Income test – setting thresholds for applicants and those on a waiting list to qualify for social housing.
4. Anti-social behaviour test – people who have unspent convictions for certain criminal anti-social behaviour, as well as certain civil sanctions, will be disqualified from social housing for a defined period.
5. Terrorism test – terrorist offenders with unspent convictions will not qualify for social housing unless excluding them would increase the risk to public safety.
6. Grounds for eviction (anti-social behaviour and terrorist offences) – implementing a 'three strikes and you're out' policy for repeat offenders of anti-social behaviour, and creating a new ground for eviction for terrorist offences.
7. Fraudulent declaration test - mandating a period of disqualification for those who knowingly or recklessly make false statements when applying for social housing.
8. Applicants on a waiting list – applying the new eligibility and qualification tests not only to new applicants but also to those currently on a social housing waiting list.

The government would seek to bring these changes in Spring/Summer 2024 through secondary legislation.

How will the proposal be delivered, what governance arrangements are in place and who are the key internal stakeholders?

The proposal consists of a consultation response, so delivery of this will consist of submitting the response through the online consultation form, once the submission has been agreed through the Individual Executive Member Decision taken by the Executive Member for Housing and Partnerships.

Who will be affected by the proposal? Think about who it is aimed at and who will deliver it.

The decision to submit our consultation response will have no impact on those with protected characteristics as there is no guarantee that our consultation response will influence government policy. However, in Section 3 we have detailed how we expect protected groups to be affected if the proposed policy changes were to be implemented.

3. Data & Protected Characteristics

This section should be used to set out what data you have gathered to support the initial impact assessment.

The table below sets out the equality groups that need to be considered in the impact assessment. These comprise the nine protected characteristics set out in the Equality Act 2010 and other priority areas defined by the council.

Age	Armed Forces Communities	Care Experienced People	Disability
Gender Reassignment	Marriage and Civil Partnership	Pregnancy/Maternity	Religious belief
Race	Sex	Sexual Orientation	Socio-economic disadvantage

The Armed Forces Act 2021 requires consideration of the [impact on Armed Forces Communities](#) when exercising certain housing, education or healthcare functions (excluding social care). Further guidance can be found [here](#).

What data and information will be used to help assess the impact of the proposal on different groups of people? A list of useful resources is available for officers on the Council’s Tackling Inequality Together intranet pages.

The information used to understand the impact of the proposal on different groups is the data and experiences provided by WBC officers, in relation to providing social housing allocations in the Borough. This is the same intelligence which informed the proposal itself. Additionally, more general, widely publicised information relating to the impacts of implementing these proposed changes to social housing allocations, in terms of the groups which statistically it would affect the most, has also been used to help assess the proposal’s impact.

Section 4 below has been completed on the basis that, with the information we have available currently, the policy changes will be implemented as described. As part of our consultation response, we have requested more information on a number of points which would change our expectation of how those with protected characteristics would be impacted. The proposals state that there would be exemptions for armed forces members and veterans, care leavers, domestic abuse victims and refugees arriving via resettlement schemes.

4. Assessing & Scoring Impact

This section should be used to assess the likely impact on each equality group, consider how significant any impacts could be and explain how the data gathered supports the conclusions made.

Scoring impact for equality groups

Positive impact	The proposal promotes equality of opportunity by meeting needs or addressing existing barriers to participation and/or promotes good community relations
Neutral or no impact	The proposal has no impact or no disproportionate impact.
Low negative	The proposal is likely to negatively impact a small number of people, be of short duration and can easily be resolved.
High negative	The proposal is likely to have a significant negative impact on many people or a severe impact on a smaller number of people.

Referring to the Scoring table above, please give an impact score for each group, explain what the likely impact will be, and briefly set out how the data supports this conclusion.

Equality group	Impact score	Impact and supporting data
Age	Neutral/no impact	There is no suggestion that these proposed policy changes would have any impact on this protected characteristic.
Disability	High negative impact	Qualitative data from WBC officers suggests that there are sometimes links between ASB and mental health. In turn, if the proposal for a '3 strikes and you're out' policy change was implemented we would expect this disproportionately impact those with mental health challenges and the Council's ability to accommodate them.
Gender reassignment	Neutral/no impact	There is no suggestion that these proposed policy changes would have any impact on this protected characteristic.
Marriage and Civil Partnership	Neutral/no impact	There is no suggestion that these proposed policy changes would have any impact on this protected characteristic.
Pregnancy/Maternity	Neutral/no impact	There is no suggestion that these proposed policy changes would have any impact on this protected characteristic.
Religious belief	High Negative impact	The proposal states that to qualify for social housing, applicants must pass a 10 year UK connection test and a 2 year local connection test. Wokingham's local connection

		<p>test is 5 years so this will have no impact. However, some applicants would qualify for the 5 year local connection test but not the 10 year national test.</p> <p>This protected group is more likely to be impacted, especially those who don't have a national connection to the UK. This means that those without a 10 year connection will be ineligible for social housing if the changes become law.</p>
Race	High Negative impact	<p>As of 2023, Wokingham's ethnic demographics were proportioned as: 87.1% born in Europe, 3.2% of people born in Africa, 8% born in the Middle East and Asia, 1.2% from the Americas and the Caribbean and 0.4% from Antarctica and Oceania. The 12.9% of people that weren't born in Europe, including a significant portion of those born in Europe but without a 10 year connection to the UK, would be ineligible for social housing if these changes were brought into effect.</p> <p>The proposal states that to qualify for social housing, applicants must pass a 10 year UK connection test and a 2 year local connection test. Wokingham's local connection test is 5 years so this will have no impact. However, some applicants would qualify for the 5 year local connection test but not the 10 year national test.</p> <p>This protected group is more likely to be impacted, especially those who don't have a national connection to the UK. This means that those without a 10 year connection will be ineligible for social housing if the changes become law.</p>
Sex	Neutral/no impact	There is no suggestion that these proposed policy changes would have any impact on this protected characteristic.
Sexual Orientation	Neutral/no impact	There is no suggestion that these proposed policy changes would have any impact on this protected characteristic.
Socio-economic disadvantage	High Negative impact	Qualitative data from our housing officers suggest that people with a socio-economic disadvantage have a greater likelihood of having been involved with Anti-Social behaviour. If implemented, this proposal would mean that residents with unspent convictions for certain criminal Anti-Social behaviour and other civil sanctions will be disqualified from social housing for a defined period.

Armed Forces Communities	Neutral/no impact	There is no suggestion that these proposed policy changes would have any impact on this protected characteristic.
Care Experienced People	High Negative impact	Qualitative data from our young people’s housing officers suggest that Care Experienced People have a greater likelihood of having been involved with Anti-Social behaviour. If implemented, this proposal would mean that residents with unspent convictions for certain criminal Anti-Social behaviour and other civil sanctions will be disqualified from social housing for a defined period.

5. Conclusion and next steps.

Based on your findings from your initial impact assessment, you must complete a full impact assessment if you have identified any groups as having a low or high negative impact.

If no impact, or a positive impact has been identified, you do not need to complete a full assessment. However, you must include reference to the initial assessment in any associated reports, and it must receive formal approval from the Assistant Director responsible for the project, policy, or service change.

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