

# 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:	27.02.2024	
Completed by:	Ruby Shekhawat	
Service:	Economy and Housing	
Project or policy EqIA relates to:	Consultation on Changes to Conduct and Competence for Social Housing Mangers	
Date EqIA discussed at service team meeting:	22.02.2024	

Conclusion (is a full assessment needed?):	No	
Signed off by (AD):	Rhian Hayes	
Sign off date:		

## 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 code and competence for social housing managers. These proposals have been extracted below:

1. Proposal 1 introduces a Standard to ensure social housing staff's competence and conduct. Registered providers must maintain written policies for staff development, performance appraisal, and addressing poor performance. They must also adopt a code of conduct tailored to individual roles, with a focus on relevant knowledge and skills.
2. Proposal 2 focuses on defining "Relevant Persons" and "Relevant SP Managers" as those with substantive roles in managing housing management services for social housing tenants, clarifying that only staff with significant responsibilities in this area require relevant qualifications.
3. Proposal 3 clarifies the roles and responsibilities of senior housing managers and executives in delivering housing management services. It outlines specific functions they oversee, such as customer services, complaints management, and strategic direction, providing guidance for qualification requirements based on job functions rather than titles.
4. Proposal 4 outlines exemptions for certain managerial roles not directly involved in delivering services to tenants, such as finance teams. However, roles combining back-office tasks with housing management responsibilities remain within scope for qualification requirements.
5. Proposal 5 Individuals become Relevant Persons or Relevant SP Managers once they have been in their current role for more than 6 months (except where there is a probation period applicable to the role in which case different rules apply)
6. Proposal 6 Where there is a probation period applicable to a person's role, they will need to have, or be working towards, a relevant qualification within 9 months from the point at which they take up their role.
7. Proposal 7 To avoid undue burden on small housing providers governed by volunteers, unpaid volunteer officers will not need to obtain relevant qualifications.

8. Proposal 8 suggests qualifications for senior housing managers and executives: Level 4 for managers and Level 5 or a foundation degree for executives. Higher qualifications meeting specific criteria exempt individuals from additional qualifications.
9. Proposal 9 is not relevant to WBC.
10. Proposal 10 outlines criteria for relevant qualifications in housing management. For senior housing managers, courses should cover professional practice, tenant needs, customer service, housing law, policy, and organizational policies. Senior housing executives' courses should include ethics, professional practice, customer service, strategic planning, leadership, and stakeholder management. Soft skills like tenant engagement and respectful customer service are emphasized.
11. Proposal 11 defines when senior housing managers and executives are working towards a qualification. Enrolment and progression timelines for qualification completion start within 6 months of enrolment but may extend to 12 months in cases where no course start date is available. Completion should align with the time limit or estimate set by the qualification's provider, typically within two years.
12. Proposal 12 outlines a transition period of 24 months for social housing sector staff to obtain or work towards relevant qualifications, ensuring improved service quality while mitigating disruptions. At least half of affected individuals must be progressing within the first 12 months.
13. Proposal 12 During the transition period, partially compliant qualifications require additional accredited training to cover remaining criteria. Staff with technical qualifications can supplement learning with accredited modules. After the transition, qualifications must fully meet criteria. Providers are encouraged to update courses accordingly.
14. Proposal 13 During the transition period, senior housing managers without a qualification from an apprenticeship program will be compliant if they pass the end point assessment, meet level 4 standards, and fulfil course content requirements. Apprenticeship's meeting criteria are considered progress towards qualification.
15. The Competence and Conduct Standard holds services providers accountable for staff qualifications. Registered providers must ensure Relevant SP Managers of services providers have or work towards relevant qualifications. Implied terms in agreements enforce this requirement. Registered providers must inform services providers of their obligations and ensure subcontractors comply. The criteria and transition periods for qualifications apply similarly to Relevant SP Managers as to Relevant Persons.

**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.

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### 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.

#### 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.**

<b>Equality group</b>	<b>Impact score</b>	<b>Impact and supporting data</b>
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	Impact on Staff: Qualitative data from WBC officers indicates that mandating additional qualifications could exacerbate the already substantial workload and stress levels experienced by housing managers, potentially leading to long-term health conditions. It's crucial to consider the well-being aspect for individuals, as this added stress could have a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. Moreover, these additional demands could contribute to burnout and decreased job satisfaction among staff
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	Neutral/no impact	There is no suggestion that these proposed policy changes would have any impact on this protected characteristic.
Race	Neutral/no impact	There is no suggestion that these proposed policy changes would have any impact on this protected characteristic.
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	Impact on Residents: Firstly, the proposed legislation aims to elevate the standard of service delivery within social housing, aiming to create a more positive and supportive environment for tenants, ultimately enhancing their overall quality of life. However, funding these qualifications from the Housing Revenue Stock Account could divert resources away from critical housing initiatives, potentially impairing the

		council's ability to address housing needs within the community. Ultimately, this could delay or hinder support for residents in need, exacerbating housing challenges for the most vulnerable individuals in the borough
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	Neutral/no impact	There is no suggestion that these proposed policy changes would have any impact on this protected characteristic.

## 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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