

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.

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:	10/01/2022
Completed by:	Francesca Rowson
Service:	Place Commissioning
Project or policy EqIA relates to:	IMD on First Homes Interim Policy Statement
Date EqIA discussed at service team meeting:	17/01/2022
Conclusion (is a full assessment needed?):	No full EqIA needed
Signed off by (AD):	Rhian Hayes
Sign off date:	28/01/2022

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?

The purpose of the IMD is to obtain approval to publish a First Homes interim policy statement on the Wokingham Borough Council's website. The aim of this statement is to outline the Council's position on First Homes and introduce local eligibility criteria for the Wokingham Borough area, in line with Government recommendations. This First Homes policy change is nationwide and guidance was published by the Government on 24th May 2021. This guidance includes the recommendation that local planning authorities should introduce local requirements so that First Homes operates effectively in their local area, and that authorities should make their position on First Homes clear e.g. through publishing an interim statement. Therefore, the proposed publication of the interim statement is directly in line with Government policy and the outcome would be to make First Homes requirements clear in Wokingham for developers, housing associations etc. It would also ensure that First Homes works as well as possible for the local population by introducing a key worker and local connection criteria as local eligibility requirements.

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

If the IMD results in agreement of the interim statement, it will then be published on the Wokingham Borough Council website. It will provide guidance regarding First Homes in Wokingham Borough to anyone who is interested/to whom it is relevant. The policy itself being implemented is not an internal Wokingham Borough Council policy but rather a national policy change which all local planning authorities will need to take into consideration going forwards, and which Wokingham Borough Council itself is reacting to in accordance with Government guidance. When First Homes application forms start to come in from developers, the Council will check that the buyers being put forward are eligible to purchase a First Home in line with both national and local eligibility requirements, as outlined in the proposed interim statement.

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

Publication of the proposed interim statement would benefit developers, housing associations and other bodies concerned with housing and developments in the Wokingham Borough area, because it would make clear the implications of the new national First Homes policy for the local area and new development sites within it. Developers and housing associations etc. will all be impacted by the national policy change, and so this clarification of the impact for Wokingham Borough through the interim statement is both important and recommended by the government guidance.

Within the statement itself, the stipulation of key worker and local connection criteria as local eligibility requirements would enable the initial prioritisation for First Homes of those in key worker professions who provide an essential service to the local area and economy and who live or work in the borough. The interim statement proposes to use the same definitions of local connection and key worker for First Homes administration as used elsewhere by Wokingham Borough Council, which would enable greater efficiency of processing applications by the Council and ensure consistency with other S106 agreements used.

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	Disability	Gender reassignment	Marriage and Civil Partnership	Pregnancy/Maternity
Religious belief	Race	Sex	Sexual Orientation	Socio-economic disadvantage

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.

This IMD concerns the publication of a statement clarifying implications for Wokingham Borough of a national policy change. The change itself is required by the Government and applies to all local planning authorities. Therefore, the decision does not concern whether or not the policy change takes place – this has already been decided by the Government, and MHCLG (now DLUHC) published an Equality Impact Assessment on the equality implications of the introduction of the new First Homes policy in September 2020.

Therefore, the only decision which Wokingham Borough Council would be introducing with the publication of this interim policy statement would be the stipulation of local eligibility requirements for First Homes, as mentioned in the question above. The introduction of local connection and key worker criteria locally is directly in line with Government recommendations.

In terms of the potential impact on different groups of people, it is not thought that Wokingham Borough Council’s specific local eligibility criteria would result in a disproportionate impact on any particular group of people with protected characteristics, as far as this is possible to pre-empt. This is because the group of people who qualify as key workers (and who will therefore be prioritised for the first 3 months) is likely to be broadly representative of the wider population of the borough. Any more detailed analysis of this fact would be very difficult to establish due to the fact that there is no precise data available on the numbers of people with protected characteristics among key workers compared with everyone else. This is due to the nature and breadth of this eligibility criterion. However, it is very unlikely that Wokingham’s local criteria would disproportionately impact any one particular group. Furthermore, the local connection criterion being “someone who lives or works in Wokingham Borough” ensures that there will be no discrimination on the grounds of nationality or national origins, as it entails no stipulation of residence in Wokingham for a specific number of years prior to the time of interest in purchasing a First Home.

Additionally, the initial prioritisation of key workers for purchasing First Homes would have benefits in other regards, due to their providing an essential service to the local area and economy.

Lastly, due regard has been given to ensuring accessibility in the communication of the new First Homes requirements and locally set eligibility criteria. The interim statement which is proposed for publication on the Council’s website has been checked and updated to ensure that it is in an accessible format for readers with disabilities, including using clear and accessible headings throughout the document and adding alternative text under the image on the first page.

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 or no impact	As explained above.
Disability	Neutral or no impact	As explained above.
Gender reassignment	Neutral or no impact	As explained above.
Marriage and Civil Partnership	Neutral or no impact	As explained above.
Pregnancy/Maternity	Neutral or no impact	As explained above.
Religious belief	Neutral or no impact	As explained above.

Race	Neutral or no impact	As explained above.
Sex	Neutral or no impact	As explained above.
Sexual Orientation	Neutral or no impact	As explained above.
Socio-economic disadvantage	Neutral or no impact	As explained above.

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.