

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:	26.09.2022
Completed by:	Francesca Rowson
Service:	Economic Development and Growth
Project or policy EqIA relates to:	A Decent Homes Standard in the Private Rented Sector: proposed consultation response
Date EqIA discussed at service team meeting:	21.09.2022
Conclusion (is a full assessment needed?):	No
Signed off by (AD):	Rhian Hayes
Sign off date:	29/09/2022

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 proposal is to submit a response to the Government's 'A Decent Homes Standard in the Private Rented Sector' consultation, to express the views of Wokingham Borough Council and to try to shape the Government's approach to introducing this new proposed Standard. This Government consultation concerns the proposed introduction of a Decent Homes Standard into the private rental sector, to match the Decent Homes Standard in the social rented sector since 2001. As detailed in the 'A Fairer private rented sector' White Paper, the Government plans to introduce this new Standard into the private rented sector too, and this consultation constitutes part of its engagement with key stakeholders to decide on the best way of doing so.

The aim of the proposal, therefore, is to guide the Government on how WBC sees the Standard best being implemented. In summary, the main recommendations of the proposed response are twofold; it guides the Government on how WBC sees the new Standard working best (such as providing suggestions on clarity needed to expand the scope of its application to different accommodation types) – whilst simultaneously encouraging the Government to mitigate carefully against the risk of shrinking the private rented sector due to added burdens on landlords through the Standard, such as through ensuring non-duplication of landlord duties compared to existing legislation.

This proposal relates to the wider Council plans by taking into account the growth of the private rented sector as one of the Council's strategic objectives. It highlights the importance of mitigating risks carefully, such as providing further funding for any additional Council work due to the Standard (such as enforcement duties) and non-duplication of burdens on landlords so that they are not discouraged from having properties in the sector. In this way, it seeks to enable continuation of this strategic objective of the Council's (private rented sector expansion) by guiding the Government on appropriate risk mitigation in relation to the implementation of this new Standard.

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.

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

If the suggestions made by WBC are taken forwards by the Government, then there will be a positive impact on people in the private rented sector compared to if WBC did not submit a consultation response. This is because the comments and recommendations of WBC focus both on the importance of improving conditions for private rented tenants, whilst also on the importance of the Government implementing the new Standard in such a way that extra burdens on private landlords aren't too significant (which could cause them to leave the sector as a result). This would have a negative impact on private renters through shrinking the sector, less availability of private rentals and higher prices consequently. In its proposed response, WBC highlights this issue and requests that implementation takes care of this delicate aspect – therefore, the proposal would have a positive impact on private rented tenants if the Government took up its suggestions, or otherwise a neutral impact if not.

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.

The main group of people who will be impacted by the Government’s proposal to introduce a Decent Homes Standard into the Private Rented Sector will be people who are private renters or people who are looking to become private renters. Landlords will also be impacted through the new measures, as the Standard would increase the amount of scrutiny and administrative work that private landlords will need to undergo for their properties to be suitable for private renters. That said these new measures, as long as they are non-duplicative from existing legislation, should help improve standards for renters and so should have a positive effect overall.

Data relating to the private rented sector and those who rent privately can be found on page 13 of the DLUHC’s English Housing Survey: Headline Report, 2020-21. This is currently the most recent report available. Information can be gleaned from this report about the group of private renters in England in the year 2020-21 in terms of their income levels and the proportion of private renters with a disability or long term illness, compared to home owners and those who rent socially. This data is as follows:

- Section 1.34: In terms of the spread of private renters across five income quintiles (highest income to lowest income), private renters and outright occupiers (owners with no mortgage) were evenly spread across the five quintiles. This is in comparison to social renters, who were concentrated in the lower income quintiles (50% in the lowest; 26% in the second lowest), and to those with a mortgage, who were concentrated in the highest income quintiles (36% in the highest; 28% in the second highest).
- Therefore, although no specific figures were provided in this report relating to private renters, it is clear that they are represented evenly across those with both higher and lower incomes. Therefore, this proposal, which impacts on private renters specifically, would have no disproportionate impact on any group with protected characteristics as far as this data can show.
- Section 1.35: Additionally, there is data in the report on percentages of people with a disability or long term illness among those who rent socially, privately and owner occupiers. The data counts where at least one household member has a disability or long term illness.

These statistics show that whereas 55% of households who social rent had at least one household member in this category, only 29% of households who privately rented did so, compared to only 28% where the property was owner occupied.

- Therefore, this echoes the above conclusion, specifically showing that the group of people with a disability or long term illness is not disproportionately represented in the group of people who will be affected by this proposal – i.e. private renters.

Additionally, WBC’s proposed consultation response, for which the Council is seeking agreement through this IEMD, highlights issues and recommends mitigating actions in such a way that the new Decent Homes Standard for the Private Rented Sector is introduced with the best overall outcomes for both private tenants and (reputable) landlords. Therefore, regardless of the fact that groups with protected characteristics are not disproportionately represented in the group of those who privately rent (as show by the statistics), the proposal should result in a positive impact on private renters if the Government went ahead with WBC’s recommendations.

Finally, one further point of note is that WBC specifically recommends, within the proposed consultation response, that the Decent Homes Standard extends to caravans and houseboats (as non-traditional private rented accommodation). Therefore, if the scope of the new Decent Homes Standard encompasses these private rented accommodation types as recommended by WBC, then this would mean a positive impact on these tenants through improved standards of their accommodation as a result.

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 far as the available data can show, no groups with a protected characteristic are disproportionately represented in the overall group consisting of private rented sector tenants. Therefore, this proposal should have no disproportionate impact on any such group. Furthermore, WBC's proposed consultation response should have either a positive impact on private renters (if the Government implements WBC's suggestions, as explained above) or a neutral impact if not.
Disability	Neutral or no impact	As above.
Gender reassignment	Neutral or no impact	As above.
Marriage and Civil Partnership	Neutral or no impact	As above.
Pregnancy/Maternity	Neutral or no impact	As above.
Religious belief	Neutral or no impact	As above.
Race	Neutral or positive impact	WBC specifically recommends that the Decent Homes Standard extends to caravans and houseboats as non-traditional private rented accommodation – if implemented, this would improve private rented standards for people living in these non-traditional types of private rented accommodation.
Sex	Neutral or no impact	As per 'Age' category above.
Sexual Orientation	Neutral or no impact	As per 'Age' category above.

Socio-economic disadvantage	Neutral or no impact	As per 'Age' category above.
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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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