

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:	22 nd May 2026	
Completed by:	Neil Hutchinson, Interim Strategic Asset Manager	
Service:	Housing Landlord Services	
Project or policy EqIA relates to:	Legionella Safety Policy	
Date EqIA discussed at service team meeting:	4 th June 2026 at Housing Leadership Team	

	9 th June 2026 at Corporate Leadership Team – Gold 29 th June 2026 at Housing Innovation Panel	
Conclusion (is a full assessment needed?):	Full assessment not required	
Signed off by Head of Housing:	Neil Hutchison, Interim Strategic Asset Manager	
Sign off date:	29 th June 2026	

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 Legionella Safety policy is to ensure that all water systems within the homes and buildings owned and managed by Wokingham Borough Council are monitored, well maintained and in a safe and compliant condition.

This policy is designed to protect the health and safety of tenants, residents, staff, contractors and visitors by minimising the risk of exposure to legionella bacteria, scalding, and other waterborne hazards..

This policy outlines the statutory and regulatory obligations applicable to WBC and states the governance arrangements in place to meet these.

The Council's existing Policy and Procedure for Legionella Management was last updated in 2021 and is overdue a review and update. Also, this document was shared with Pennington Choices in 2023 as part of their Compliance Health Check on the Council's compliance functions in housing services, and it recommended the segregation of policy, procedure and process, as well as other recommendations.

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

The front page of the policy confirms that it has been consulted with the following colleagues and forums in advance of the Individual Executive Member Decision meeting scheduled for Thursday 9 July 2026:

- Asset Management and Compliance Team.
- Repairs and Maintenance Consultative Panel.
- Local Housing Companies (Loddon Homes Ltd and Berry Brook Homes Ltd).
- Legal Services.
- Housing Leadership Team.
- Housing Innovation Partnership.

The policy will be hosted on the appropriate system/repository for colleagues to access and reference, and awareness regarding the availability of the new policy will be communicated to Housing Services colleagues by the Housing Leadership Team.

The policy confirms the roles and responsibilities of key stakeholders, inclusive of Wokingham Borough Council employees, third party contractors and tenants within Section 6.

The policy confirms the governance arrangements within Section 7, including performance reporting to internal stakeholders and external bodies, internal and external auditing arrangements, access to training and development, as well as reporting water hygiene and legionella related accidents, incidents and near misses.

Section 8 of the policy confirms the policy will be reviewed every three years, or sooner, if and whenever there are any relevant changes to legislation, regulatory requirements, case law or good practice that would impact this policy, as well as any required service improvements identified through internal audits, service reviews, learning from complaints or regulatory judgements.

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

There are statutory duties the Council must undertake as a social housing provider regarding water hygiene in homes and buildings owned and managed by the Council. The policy is aimed at protecting the health and safety of tenants, residents, staff, contractors and visitors by minimising the risk of exposure to legionella bacteria, scalding, and other waterborne hazards.

The policy will be primarily used by Building Compliance colleagues within the Asset Management team within Housing Services.

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

The Armed Forces Act 2021 also 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 opening page of the policy provides accessibility and translation information for tenants and residents to request alternative versions.

Section 9 of the policy provides an overview regarding equality and diversity. As referenced above, there are statutory duties the Council must undertake as a social housing provider regarding water hygiene, and tenant data will be used, where required, to protect the health and safety of tenants, residents, staff, contractors and visitors by minimising the risk of exposure to legionella bacteria, scalding, and other waterborne hazards..

Resident Volunteers, who are participants of the Repairs and Maintenance Consultative Panel and Housing Innovation Panel, have had the opportunity to review and feedback on the suitability and impact of this policy on different groups of people.

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	
Disability	Neutral or no impact	
Gender reassignment	Neutral or no impact	
Marriage and Civil Partnership	Neutral or no impact	
Pregnancy/Maternity	Neutral or no impact	
Religious belief	Neutral or no impact	
Race	Neutral or no impact	
Sex	Neutral or no impact	
Sexual Orientation	Neutral or no impact	
Socio-economic disadvantage	Neutral or no impact	

Armed Forces Communities	Neutral or no impact	
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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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