

Winchester City Council

Equality Impact Assessment (EqIA)



Section 1 - Data Checklist

When undertaking an EqIA for your policy or project, it is important that you take into consideration everything which is associated with the policy or project that is being assessed.

The checklist below is to help you sense check your policy or project before you move to Section 2.

		Yes/No	Please provide details
1	Have there been any complaints data related to the policy or project you are looking to implement?	No	There has been 1 Water Hygiene-related complaint in the past 12 months, but no trends identified since policy creation. This was related to rust coming through the tap.
2	Have all officers who will be responsible for implementing the policy or project been consulted, and given the opportunity to raise concerns about the way the policy or function has or will be implemented?	Yes	Service Managers, Health & Safety, Legal, Corporate H&S Lead, Councillors, TACT, and residents consulted during policy drafting.
3	Have previous consultations highlighted any concerns about the policy or project from an equality impact perspective?	No	No previous consultations evidenced.
4	Do you have any concerns regarding the implementation of this policy or project? <i>(i.e. Have you completed a self-assessment and action plan for the implementation of your policy or project?)</i>	Yes	Slight concerns about the technical nature of the policy and dissemination among staff and residents. Access to properties, particularly where residents are vulnerable or unwilling, has been a challenge.

		Yes/No	Please provide details
5	Does any accessible data regarding the area which your work will address identify any areas of concern or potential problems which may impact on your policy or project?	No	No equality-related data concerns identified but continued monitoring of access refusals and vulnerable resident data will inform reviews.
6	Do you have any past experience delivering similar policies or projects which may inform the implementation of your scheme from an equality impact point of view?	Yes	Lessons learned include improved record-keeping, clearer contractor roles, and integrated compliance monitoring.
7	Are there any other issues that you think will be relevant?	No	Potential access issues where residents are vulnerable or reluctant to allow entry; operational challenges maintaining consistent temperature checks in shared schemes.

Section 2 - Your EqIA form

Directorate: Housing	Your Service Area: Property Services	Team: Building Safety	Officer responsible for this assessment: Darren Smith	Date of assessment: 01/10/2025
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	Question	Please provide details
1	What is the name of the policy or project that is being assessed?	Water Hygiene Policy
2	Is this a new or existing policy?	New
3	Briefly describe the aim and purpose of this work.	To ensure Winchester City Council meets its legal obligations under the Health and Safety at Work Act 1974 and the Control of Substances Hazardous to Health (COSHH) Regulations 2002 by effectively managing the risk of Legionella and other waterborne bacteria within all housing assets. The policy sets out how water hygiene risk assessments, monitoring, and remedial actions are delivered to safeguard residents, visitors, and staff.
4	What are the associated objectives of this work?	<ul style="list-style-type: none"> - Ensure compliance with statutory and regulatory safety standards - Protect residents, staff, and contractors from injury - Promote inclusive communication and fair access during inspection works - Embed a proactive health and safety culture - Align with the Social Housing (Regulation) Act 2023 and the Safety and Quality Standard
5	Who is intended to benefit from this work and in what way?	<ul style="list-style-type: none"> - Tenants, leaseholders, and residents (especially those with disabilities or mobility impairments) - Staff and contractors operating or maintaining lifts - The wider Winchester community through improved safety and transparency
6	What are the outcomes sought from this work?	<ul style="list-style-type: none"> - Increased tenant and resident satisfaction - Reduction in complaints or maladministration

		<ul style="list-style-type: none"> - Enhanced compliance with the Equality Act 2010 and Regulator of Social Housing standards - Better identification and mitigation of discrimination risks - Data-driven continuous improvement - Timely remediation and re-inspection to maintain compliance - Improved recording, monitoring and reporting (TSMs / regulator)
7	What factors/forces could contribute or detract from the outcomes?	<ul style="list-style-type: none"> - Resource/funding availability - Data quality and resident access cooperation - Contractor capacity and competence Regulatory or insurance changes
8	Who are the key individuals and organisations responsible for the implementation of this work?	<ul style="list-style-type: none"> - Housing Policy & Projects Manager - Strategic Director (Housing) - Service Lead: Property Services - Building Safety Manager - Corporate Health and Safety Lead - Housing Systems & Data Team - Partner agencies and contractors Tenant & Leaseholder Panels
9	Who implements the policy or project and who or what is responsible for it?	Property Services Lead Property Services – Building Safety

		Please select your answer in bold . Please provide detail here.		
10a	Could the policy or project have the potential to affect individuals or communities on the basis of race differently in a negative way?	Y	N	
10b	What existing evidence (either presumed or otherwise) do you have for this?	Some residents have limited English proficiency or prefer communications in another language. Failure to provide accessible translated information or culturally appropriate engagement could reduce informed consent for access and		

		increase risk. Complaints/engagement logs indicate occasional difficulty reaching non-English-speaking households.		
11a	Could the policy or project have the potential to affect individuals or communities on the basis of sex differently in a negative way?	Y	N	
11b	What existing evidence (either presumed or otherwise) do you have for this?	No differential impact identified. Works and engagement apply equally to all genders. Contractor training and DBS checks ensure fair treatment.		
12a	<p>Could the policy or project have the potential to affect individuals or communities on the basis of disability differently in a negative way?</p> <p><i>you may wish to consider:</i></p> <ul style="list-style-type: none"> • <i>Physical access</i> • <i>Format of information</i> • <i>Time of interview or consultation event</i> • <i>Personal assistance</i> • <i>Interpreter</i> • <i>Induction loop system</i> • <i>Independent living equipment</i> • <i>Content of interview</i> 	Y	N	
12b	What existing evidence (either presumed or otherwise) do you have for this?	Residents with mobility or sensory impairments may face access issues or need tailored communication (e.g., large print, easy read). Evidence: case reports during property visits; existing vulnerability flagging system.		
13a	Could the policy or project have the potential to affect individuals or communities on the basis of sexual orientation differently in a negative way?	Y	N	
13b	What existing evidence (either presumed or otherwise) do you have for this?	No evidence or indication of differential impact. All service users treated equally; no data suggesting specific barriers.		
14a	Could the policy or project have the potential to affect individuals on the basis of age differently in a negative way?	Y	N	

14b	What existing evidence (either presumed or otherwise) do you have for this?	Older residents (especially in sheltered schemes) are more likely to experience difficulties due to health, mobility, or cognitive issues. Engagement evidence: higher rate of delayed access or assistance needs among residents aged 70+.		
15a	Could the policy or project have the potential to affect individuals or communities on the basis of religious belief differently in a negative way?	Y	N	
15b	What existing evidence (either presumed or otherwise) do you have for this?	No direct link identified. Access and communication arrangements are neutral to faith or belief.		
16a	Could this policy or project have the potential to affect individuals on the basis of gender reassignment differently in a negative way?	Y	N	
16b	What existing evidence (either presumed or otherwise) do you have for this?	No evidence of disproportionate impact. Contractor codes of conduct and training reinforce respect and confidentiality.		
17a	Could this policy or project have the potential to affect individuals on the basis of marriage and civil partnership differently in a negative way?	Y	N	
17b	What existing evidence (either presumed or otherwise) do you have for this?	No identifiable difference in impact. Service provided on an individual basis, not household type.		
18a	Could this policy or project have the potential to affect individuals on the basis of pregnancy and maternity differently in a negative way?	Y	N	
18b	What existing evidence (either presumed or otherwise) do you have for this?	Pregnant or postnatal residents may be more vulnerable to airborne bacteria or require relocation during intrusive works. Evidence: health and safety guidance; safeguarding cases.		
19	Could any negative impacts that you identified in questions 10a to 15b create the potential for the policy to discriminate against certain groups on the basis of protected characteristics?	Y	N	for Race, Disability, Age, and Pregnancy & Maternity, if mitigations are not applied
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	Can this negative impact be justified on the grounds of promoting equality of opportunity for certain groups on the basis of protected characteristics? Please provide your answer opposite against the relevant protected characteristic.	Y	N	none can be justified; all require mitigation.
21	How will you mitigate any potential discrimination that may be brought about by your policy or project that you have identified above?	<p>Accessible Communication</p> <ul style="list-style-type: none"> - Translate key documents into the top resident languages. - Provide interpreter or telephone translation service. - Ensure website and print content meet accessibility standards. <p>Vulnerable Resident Protocol</p> <ul style="list-style-type: none"> - Record vulnerability indicators and preferred communication needs (with consent). - Coordinate with Housing Neighbourhoods and Social Care to support access and welfare. <p>Reasonable Adjustments</p> <ul style="list-style-type: none"> - Offer flexible appointment times and relocation support. - Provide support officers from Tenancy Sustainment for vulnerable or disabled residents. <p>Contractor and Staff Training</p> <ul style="list-style-type: none"> - Ensure contractors receive Equality Diversity and Inclusion, safeguarding, and vulnerable resident awareness training. - Require competency accreditation. <p>Resident Engagement and Feedback</p> <ul style="list-style-type: none"> - Develop and maintain a resident engagement strategy. - Use TACT and tenant panels to co-design accessible communications, where practicable. <p>Monitoring and Reporting</p> <ul style="list-style-type: none"> - Track equality-related KPIs around EDI delivery. <p>Review equality data quarterly.</p>		

22	Do any negative impacts that you have identified above impact on your service plan?	Y	N	Resource allocation for translation services, vulnerability monitoring, and staff training to ensure equitable access.
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Signed by completing officer	Paul Salter
Signed by Service Manager	Darren Smith
Corporate Head of Service	Gilly Knight