

## Equality Impact Assessment Template (EqIA)

An Equalities Impact Assessment (EqIA) is a tool to understand the effects a decision will or is likely to have on people, specifically those people who have one or more protected characteristics under the Equality Act 2010.

It is an evidence-based approach and aims to ensure that decision-making processes are fair and do not present barriers to participation or create disadvantage for protected groups.

The EqIA should be started early on in a project before any decision is made. It can also be used:

- As a service improvement tool, and
- To assess the implications of strategic and operational decisions.

In this way, we can help ensure we do not discriminate, and promote equality.

### What is the Public Sector Equality Duty (PSED)?

The PSED under the [Equality Act 2010](#) requires that in the exercise of its functions, Waltham Forest Council must have due regard whilst seeking and evidencing ways that we:

- eliminate unlawful discrimination – including victimisation or harassment
- advance equality of opportunity between people who share a protected characteristic and those who don't
- foster or encourage good relations between people who share a protected characteristic and those who don't

The PSED helps the council meet its legal duties and to become more accountable, inclusive, credible and community orientated.

### Protected characteristics under the Equality Act 2010

It is against the law to discriminate against someone because of a protected characteristic. These are:

- Age
- Sex
- Ethnicity and race
- Religion or belief
- Disability
- Sexual orientation
- Pregnancy and maternity
- Gender reassignment
- Marriage and civil partnership

An EqIA enables officers to assess the impact of proposed decisions on people with these characteristics.

### Protected characteristics as determined by Waltham Forest Council

In addition to our statutory obligations under the Equality Act 2010, Waltham Forest Council include Care Leavers as having a protected characteristic and to this extent passed a motion in April 2023 to recognise this action. Therefore, Waltham Forest Council's EqIA process also includes a requirement to explore the impact of a proposal on that group.

## **Additional groups that face structural inequalities**

As a Council, we are committed to tackling structural disadvantages faced by our residents. We encourage staff to think about how a decision, proposal or policy might affect wider groups who are not covered by the Equality Act, but still experience relative material or social disadvantage in accessing opportunity.

The [State of the Borough report](#) identifies a number of additional groups that should be taken into account:

- Those who face socio-economic inequality (e.g. unemployment, low income, low academic qualifications) or live in areas of high deprivation
- Care Leavers
- People with caring responsibilities
- Survivors of domestic violence
- Migrants, including refugees and asylum seekers
- Homeless people and people at risk of homelessness
- People who are experiencing long-term unemployment

There might be other disadvantaged groups that you know from your service data who might be adversely affected by your proposal or policy. You need to consider these groups as well as the protected characteristics above as part of your EqIA.

## **Carrying out an EqIA**

When doing an assessment, you must answer these questions:

- Is the proposal, policy, or project likely to exclude or have a detrimental (harmful) effect on a specific group or community?
- Does it affect some groups or communities differently and can this be justified?
- How might it affect wider determinants (factors) such as income, housing, education, employment, neighborhoods, and communities that impact on health and well-being?
- Is the proposal, policy, or project likely to be equally accessed by all groups and communities? If not, can this be justified?
- Are there any barriers that might make it hard or stop different groups or communities accessing the proposal or policy to be delivered?
- Could the proposal or policy promote equality and good relations between different groups?

Service areas are responsible for ensuring EqIAs are started early on and should consult widely within their service to ensure they have considered all potential impacts. This should also include considering the impact on people who have identities that overlap e.g., intersectionality of gender, race, and disability for instance.

When completing a EqIA use data to help collate demographic evidence including:

- Census 2021 in Waltham Forest
- Statistics about the borough
- Other service specific data insights and sources, including data requests via Hornbill.

## **Guidance on compliance with the Public Sector Equality Duty for officers and decision makers**

1. The duty is mandatory and must be met by the decision-maker and not delegated. It is for the decision-maker to consider with help from the report and officer analysis.
2. EqIAs must be evidence-based and accurate – negative impacts must be fully and frankly identified so the decision-maker can fully consider their impact.
3. There must be compliance with the duty when decisions, proposal or policies are being formulated by officers and then by members or officers when taking the decision. The Council cannot rely on an EqIAs produced after the

decision is made but sometimes a “provisional” EqIA is appropriate eg. before consultation on a decision, proposal, or policy.

4. When an equality implication is identified, officers and members must give conscious and open-minded consideration to the equality duty when making a decision.
5. The duty is not, however, to achieve the three equality aims but to pay due regard when making the final decision – therefore, the duty can encourage officers to amend or change a decision, proposal, or policy where an equality implication is identified, but it does not stop difficult but justifiable decisions being made e.g to no longer continue a service for instance.
6. The decision maker may take into account things that may objectively justify taking a decision which has negative impact on equalities, e.g. financial targets, value for money or service needs.
7. The duty is ongoing: EqIAs should be reviewed over time and should say how impact will be monitored after the decision.

## Positive action

The Equality Act allows ‘positive action’ to tackle disadvantage faced by those sharing a protected characteristic, even if it has the consequence of disadvantaging those sharing a different protected characteristic. Positive action can be justified where it is proportionate. Positive action is different from positive discrimination, which is unlawful.

An example of unlawful positive discrimination would be where an employer recruits a person because they have a relevant protected characteristic rather than because they are the best candidate. For example, it would be unlawful to hire someone simply because their team was under-represented by woman and the candidate is hired because they are a woman.

However, if under-representation is an identified issue, then you could take steps to promote vacancies to this group or provide extra support for them to apply. This is positive action.

The difference between positive action and positive discrimination can be difficult to define and is determined by the particular situation. It is important to reflect upon whether any element of your service necessitates positive action. It is critical that you satisfy your duty under the Equality Act and therefore if you have any concerns, please seek further guidance/or legal advice before continuing.

# Equality Impact Assessment (EqIA)

## Section 1: About the proposal, policy or project

**Name of proposal, policy, or project:**

Residential Alterations and Retrofit Supplementary Planning Document (SPD)

**Name of lead officer and contact details:**

Conor Keappock [conor.keappock@walthamforest.gov.uk](mailto:conor.keappock@walthamforest.gov.uk)

**Name of service and directorate for this proposal, policy, or project:**

Place Directorate

**Strategic Director responsible for this proposal, policy, or project:**

Ian Rae

**Date the EqIA was started:**

11-5-2023

**What kind of proposal, policy or project is this assessment for?**

Tick all that apply.

- Change in service delivery or new service
- Change in policy or new policy
- Grants and commissioning
- Budget change or service cut
- Other  - if ticked, please give more detail: Click or tap here to enter text.

## Section 2: Proposal, policy, or project summary

**Please give a summary of this proposal, policy, or project**

Give brief details of:

- What the proposed decision or change is.
- The reasons for this decision or change.
- The outcomes you are hoping to achieve.

This Supplementary Planning Document (SPD) responds to the Climate Emergency and the borough's commitment to exemplar design at all scales. It provides practical, accessible guidance for residents wishing to alter or extend their homes, while also integrating retrofit measures to reduce bills, improve energy efficiency, and enhance comfort.

"Retrofit" is the addition or alteration of an existing building, to provide components or features that it did not have before. In addition to improving the appearance and function of a building, it is usually to improve the building's energy efficiency.

Not only will this SPD benefit individuals and families improving their homes, it also provides a benefit to the wider community through carbon savings, energy efficiency and encouraging urban greening to achieve Exemplar Design neighbourhoods.

The SPD supports the delivery of Mission Waltham Forest, particularly its goals around sustainability, inclusive growth, and neighbourhood quality. It complements the recently adopted Local Plan Part 1 and will be a material consideration in planning decisions.

The SPD is an update to the existing Residential Extensions and Alterations SPD, adopted in 2010. It has been updated to improve accessibility, reflect changing knowledge in this topic and to ensure guidance is aligned to the recently adopted Local Plan Part One.

The aim of the guidance is to ensure that people are encouraged to make sustainable improvements to their homes, so the borough's building stock is enhanced and that people's energy bills are potentially reduced. It is acknowledged that only some residents may be homeowners. Therefore, the guidance also provides 'light touch' guidance for renters or those unable to undertake large-scale renovations.

#### **Who will be affected by this proposal, policy, or project?**

For example: staff, service users, or the wider community

The SPD provides information for a range of people, including developers, architects, consultants working on residential development in the borough. This includes house alterations, extensions and retrofit measures to existing housing stock.

It will also be used by planning officers, councillors, and members of public in making decisions and understanding what to expect from the planning process for residential development.

### **Section 3: Equality analysis**

This section asks you to consider the potential impact (both positive and negative) of the proposed proposal, policy or project on the protected characteristics and the mitigations that will be taken to avoid or counteract any negative impact identified. If no negative impact(s) has been identified for that group, briefly explain why this is not applicable.

**Please consider how the proposed change will affect staff, service users or members of the wider community who share one or more of the following protected characteristics. Think about what action(s) you can take to address their specific needs. In addition, you may wish to consider the short-, medium- and longer-term implications, intersectionality between the different characteristics, as well as mitigations that may be required.**

#### **Age**

This can refer to people who have, for example, a specific age, or who are in a specific age range.

**Will the proposed change have a differential impact [negative] on people of a specific age or age group (e.g. older or younger people)? If so, explain why this group may be affected and what mitigating actions will be taken.**

No it is not anticipated that there will be negative impacts to specific groups.

**Highlight any positive benefits the proposed decision will have on people of a specific age or age group.**

The proposed guidance benefits older generations by supporting energy-efficient home improvements that can reduce energy bills. It also responds to growing intergenerational living, where more young people remain at home and households need to adapt spaces to changing needs. With high property costs limiting people's ability to move, the guidance helps residents of all ages improve and future-proof their existing homes.

#### **Sex (gender)**

Sex refers to whether you are a man or a woman.

**Will the proposed change to service/policy have a differential impact [negative] on people of a specific sex (e.g. women, men)? If so, explain why this group may be affected and what mitigating actions will be taken.**

**Highlight any positive benefits the proposal decision will have on people of a same or different sex (gender).**

The SPD will have positive impact on all the people regardless of their sex. The SPD should make it easier to make alterations to the home that suit different types of families and the differing ways they may wish to organise their home

## **Ethnicity and race**

This refers to a group of people defined by their race, colour, and nationality (including citizenship), ethnic or national origins.

**Will the proposed change to service/policy have a differential impact [negative] on people of a certain race? If so, explain why this group may be affected and what mitigating actions will be taken.**

No.

**Highlight any positive benefits the proposed change will have on people of a certain race.**

The SPD will have positive impact on all the people regardless of their race, colour, and nationality. It allows flexibility in how homes are arranged, recognising that different communities may prefer layouts such as separate kitchens or open-plan living. By enabling changes that suit diverse cultural practices and family types, the guidance helps ensure homes can be adapted to meet varying needs.

## **Religion or belief**

Religion refers to a person's faith (e.g. Buddhism, Islam, Christianity, Judaism, Sikhism, Hinduism) and includes lack of belief (e.g. Atheism). Belief includes any religious and philosophical belief including lack of belief (e.g. Atheism).

**Will the proposed change to service/policy have a differential impact [negative] on people who follow a religion or belief, including lack of belief? If so, explain why this group may be affected and what mitigating action will be taken.**

No.

**Highlight any positive benefits the proposed change will have on people with different religions or beliefs (including a lack of belief).**

The SPD will have positive impact on all people regardless of their faith, including no belief.

## **Disability**

A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on the person's ability to carry out normal day-day activities.

This could include physical impairment, hearing impairment, visual impairment, learning difficulties, long-term illness or health condition, mental illness, or other impairments.

**Will the proposed change to service/policy have a differential impact [negative] on people with disabilities? If so, explain why this group may be affected and what mitigating action will be taken.**

No.

**Highlight any positive benefits the proposed change will have on people with a disability.**

It will help people with disabilities as the proposed guidance helps to promote energy efficient improvements to homes, that can help to reduce energy bills. It also promotes accessible design.

## Sexual orientation

This refers to whether a person is attracted to people of the same sex or a different sex to themselves. Please consider the impact on people who identify as heterosexual, bisexual, gay, lesbian, or asexual.

**Will the proposed change to service/policy have a differential impact [negative] on people with a particular sexual orientation? If so, explain why this group may be affected and what mitigating action will be taken.**

No.

**Highlight any positive benefits the proposed change will have on people who identify as heterosexual, bisexual, lesbian or asexual.**

The SPD will have positive impact on all the people regardless of their sexual orientation.

## Pregnancy and maternity

Pregnancy refers to the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

**Will the proposed change to service/policy have a differential impact [negative] on pregnancy and maternity? If so, explain why this group may be affected and what mitigating action will be taken.**

No.

**Highlight any positive benefits the proposed change will have on people who are pregnant/expecting a baby.**

The SPD will have positive impact on pregnancy and maternity.

## Gender reassignment

This refers to people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex.

According to a [2020 landmark Employment Tribunal ruling](#), people who identify as gender fluid and non-binary or transitioning are protected under this section of the Equality Act and should therefore be considered as part of your assessment.

**Will the proposed change to service/policy have a differential impact [negative] on transgender people? If so, explain why this group may be affected and what mitigating action will be taken.**

No.

**Highlight any positive benefits the proposed change will have on people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex.**

The SPD will have positive impact on all people regardless of gender reassignment.

### **Marriage and civil partnership**

Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, where-as a marriage can be conducted through either religious or civil ceremonies. In the UK both marriages and civil partnerships can be same sex or mixed sex. Civil partners must be treated the same as married couples on a wide range of legal matters.

**Will the proposed change to service/policy have a differential impact [negative] on people in a marriage or civil partnership? If so, explain why this group may be affected and what mitigating action will be taken.**

No.

**Highlight any positive benefits the proposed change will have on people in a marriage or civil partnership.**

The SPD will have positive impact on all people regardless of their marital status.

### **Care Leavers**

**Will the proposed change to service/policy have a differential impact [negative] on people who are Care Leavers? If so, explain why this group may be affected and what mitigating action will be taken.**

No.

**Highlight any positive benefits the proposal will have on people who are Care Leavers.**

The SPD will have positive impact on care leavers.

### **Other structurally disadvantaged groups**

The [State of the Borough report](#) identifies a number of groups that might suffer from structural disadvantage in Waltham Forest. These groups should also be taken in account when assessing proposal or policies and include:

- People experiencing socio-economic inequality or geographic deprivation
- People with caring responsibilities
- Survivors of domestic violence
- Migrants, including refugees and asylum seekers
- Homeless people and people at risk of homelessness
- People who are experiencing long-term unemployment

There might be other structurally disadvantaged groups that you know from your service data might experience a differential impact based on your proposal or policy. This may include how your work impacts on the social, economic, and environmental conditions in which people live, work and age that influence health outcomes. Please consider these groups in this section as part of your equalities impact assessment.

**Will the proposed change to service/policy have a differential impact [negative] on other structurally disadvantaged groups?**

The SPD will not have a negative impact on structurally disadvantaged groups.

**Highlight any positive benefits the proposal will have on groups experiencing structural disadvantage.**

The SPD will have positive impact on all people and will support those that are socio-economically disadvantaged or in unstable housing through promoting of sustainable improvements to the boroughs housing stock, helping to lower bills. Efforts have been taken to ensure positive impacts to people in private rented accommodation through the inclusion of light touches and easy-win measures, to help improve energy efficiency and reduce bills in these homes.

## Section 4: Monitoring and reviewing

**Use this section to say:**

- How you intend to monitor and review the effects of this proposal or policy
- Who will be responsible for assessing its effects

After the adoption of SPD and before the end of 5 years the Council would expect to undertake a comprehensive review of all the Development Plan Documents. This review will consider how the SPDs have been delivered to ensure there is a positive impact on protected characteristic groups (PCGs).

## Section 5: Conclusion

**Set out your conclusions from the analysis of the proposal or policy.**

If there are negative equalities impacts, but you think that the proposal or policies should still proceed in the current or amended form, please provide evidence and an objective explanation as appropriate.

If it is helpful, refer to other documents e.g. a Cabinet report. You may find it helpful to identify one of the four outcomes below as being closest to your current proposal or policies. (Use your conclusions as a basis for the “Equalities Implications” in the Cabinet report.)

*This analysis has concluded that the proposals have a net benefit as the proposed guidance helps to promote energy efficient improvements to homes, that can help to reduce energy bills.*

**Outcome of Equality Impact Assessment** *check one that applies*

- **Outcome 1:** No major change required when the assessment has not identified any potential for discrimination or adverse impact and all opportunities to advance equality have been taken.
- **Outcome 2:** Adjustments to remove barriers identified by the assessment or to better advance equality. Are you satisfied that the proposed adjustments would remove the barriers identified?
- **Outcome 3:** Continue despite having identified some potential for adverse impacts or missed opportunities to advance equality. In this case, the justification should be included in the assessment and should be in line with the duty to have ‘due regard’. For the most important relevant policies, compelling reasons will be needed. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact.

- **Outcome 4:** Stop and rethink when an assessment shows actual or potential unlawful discrimination.

## Section 6: Signatures

Signed off by Corporate Director for the proposal or policy/project:



Name:

Ian Rae, Corporate Director of Regeneration, Planning and Strategic Property

Date:

23.01.2026

## Section 7: Version control

Status	Version	Author	Date	Changes made
Draft	1.0	Conor Keappock	08.12.2025	