

## **Equality Impact Assessment Template**

To complete the template, please refer to the Equality Impact Assessment Process & Guidance Notes. Section 5 (5.1 to 5.8) in pages 11 to 17 provides a step-by-step guide on how to carry out initial, partial and full impact assessments.

- (1) The General Information section must be completed in all assessments.
- (2) For an Initial Impact Assessment, complete Sections 1 - 4
- (3) For a Partial Impact Assessment, proceed to complete Section 5
- (4) For a Full Impact Assessment, proceed to complete Sections 6- 8

<b>General Information</b>	
Name of function/policy: Compensation Procedure	
Subsidiary/Directorate: PCHA	
Officer completing the assessment	
Name:	Job title: Policy Officer
Tel. no:	Email address:
Date of assessment: 15/09/08	
Is this an existing or proposed function/policy? Existing	
<b>Initial Impact Assessment (Sections 1- 4)</b>	
<b>Section 1. Responsibility and Ownership</b> (refer to 5.1 in pages 11 & 12 in guidance notes)	
1.1 Who is responsible for this function/policy at senior management level? (this could be a named individual or a group e.g. DEG) Head of Business Support	
1.2 Who is responsible for this function/policy on a day-to-day basis? (this could be a named individual or a group) Customer Relations Manager	
1.3 Who else, both internally and externally, influences delivery of this function/policy? Customer Relations Team Appeals Panel Senior Managers	
<b>Section 2. Aims and Objectives of the Function or Policy</b> (refer to 5.2 in page 12 in guidance notes)	
2.1 What are the aims and objectives of this function/policy? <ul style="list-style-type: none"> <li>• To ensure fair compensation is paid to residents where appropriate</li> <li>• To make consistent payments depending on the type of compensation award</li> </ul>	

<ul style="list-style-type: none"> <li>To apply consistent formulae where this is possible to ensure that payments are made equally based on the type of claim</li> <li>To minimise court action by taking quick action to apologise where mistakes have been made and give fair compensation to residents</li> <li>To apply best practice guidance from the Housing Corporation regarding the types and levels of compensation payments</li> </ul>			
2.2 Who are the target groups that will benefit from this function/policy? All residents			
2.3 What are the intended outcomes of this function/policy? <ul style="list-style-type: none"> <li>To reduce the level of complaints by acting quickly to compensate residents where this is appropriate</li> <li>To achieve consistency in the levels and types of compensation payment</li> <li>To identify any particular areas of service weakness</li> <li>To encourage contractors and staff to meet service commitments and reduce the amounts of compensation</li> <li>To prevent compensation payments being made inconsistently and in a haphazard manner in relation to the types and amounts of compensation granted</li> </ul>			
<b>Section 3. Relevance to the General Duty:</b> <ul style="list-style-type: none"> <li>Eliminating Unlawful Discrimination,</li> <li>Promoting Equality of Opportunity, and</li> <li>Promoting Good Community Relations</li> </ul> <b>(refer to 5.3 in pages 12 - 15 in guidance notes)</b>			
The following questions may help to guide relevance to the General Duty : <ul style="list-style-type: none"> <li>Is the policy/function directly or indirectly discriminatory? Refer to Guidance Notes Section 5.3.1 in page 13 for definition of discrimination.</li> <li>Is the policy/function intended to increase equality of opportunity by implementing positive action to redress disadvantages? Is this lawful?</li> <li>Is the policy/function likely to result in different outcomes for different groups? How the impacts affect relation between groups or between Genesis and different community groups?</li> </ul>			
3.1 Is there any evidence that this function/policy may have/has had positive, adverse or neutral impact upon the General Duty on the following groups of people: <p>examples of evidence - monitoring/performance data, surveys, evaluation reports, census, consultation findings, inspection reports, partner organisations data etc.</p> <p>examples of adverse impact – lower success rates in allocating/selecting process, eligibility criteria which disadvantage any groups, access denied/difficult compared to other groups, poorer quality of service/information etc</p>			
	Positive	Adverse	Neutral
	Yes/No	Yes/No	Yes/No
3.1.1 Ethnic Groups	<b>Yes</b>	<b>No</b>	<b>No</b>
List the evidence: PCHA does not collect diversity data on compensation payments, however there are strict criteria on the situations in which compensation payments would be made and the levels of payment applicable in a given situation. PCHA follow fixed formulae to guide the awarding of compensation. Also many compensation payments will come from a complaint, therefore diversity information will already have been captured.			

<p>Only one manager is authorised to make compensation payments in order to maximise consistency and ensure parity between payments, however if a resident was not happy with their decision, they can apply to the appeals panel who can also award compensation.</p> <p>PCHA aim to ensure that the compensation procedure is accessible to all residents, for example by providing written and verbal translation services through language line and interpreters. Residents will be given help to make a compensation claim if requested, and the contact details for the Customer Relations Team are published in a number of places.</p>			
<p>3.1.2 Gender (including transgender)</p>	<p><b>Yes</b></p>	<p><b>No</b></p>	<p><b>No</b></p>
<p>List the evidence: PCHA does not collect diversity data on compensation payments, however there are strict criteria on the situations in which compensation payments would be made and the levels of payment applicable in a given situation. PCHA follow fixed formulae to guide the awarding of compensation. Also many compensation payments will come from a complaint, therefore diversity information will already have been captured.</p> <p>Only one manager is authorised to make compensation payments in order to maximise consistency and ensure parity between payments, however if a resident was not happy with their decision, they can apply to the appeals panel who can also award compensation.</p> <p>PCHA advertise the complaints procedure and our service standards to all residents, regardless of gender. They also receive information about their rights through their tenancy agreement and information given to them from the Housing Corporation.</p>			
<p>3.1.3 Disability</p>	<p><b>Yes</b></p>	<p><b>No</b></p>	<p><b>No</b></p>
<p>List the evidence: PCHA does not collect diversity data on compensation payments, however there are strict criteria on the situations in which compensation payments would be made and the levels of payment applicable in a given situation. PCHA follow fixed formulae to guide the awarding of compensation. Also many compensation payments will come from a</p>			

<p>complaint, therefore diversity information will already have been captured.</p> <p>Only one manager is authorised to make compensation payments in order to maximise consistency and ensure parity between payments, however if a resident was not happy with their decision, they can apply to the appeals panel who can also award compensation.</p> <p>PCHA will assist residents with their complaint, for example by helping them to complete a complaints form or application for compensation. We will also speak with advocates acting on behalf of a resident. The complaints procedure and our service standards are published in a range of formats and places, and if residents require assistance staff will endeavour to meet this request.</p>			
<p><b>3.1.4 Age</b></p>	<p><b>Yes</b></p>	<p><b>No</b></p>	<p><b>No</b></p>
<p>List the evidence: List the evidence: PCHA does not collect diversity data on compensation payments, however there are strict criteria on the situations in which compensation payments would be made and the levels of payment applicable in a given situation. PCHA follow fixed formulae to guide the awarding of compensation. Also many compensation payments will come from a complaint, therefore diversity information will already have been captured.</p> <p>Only one manager is authorised to make compensation payments in order to maximise consistency and ensure parity between payments, however if a resident was not happy with their decision, they can apply to the appeals panel who can also award compensation.</p> <p>Information on the complaints and compensation process is available in a range of formats, for example large print, and officers will give assistance to residents where required.</p>			
<p><b>3.1.5 Sexual orientation</b></p>	<p><b>Yes</b></p>	<p><b>No</b></p>	<p><b>No</b></p>
<p>List the evidence: List the evidence: List the evidence: PCHA does not collect diversity data on compensation payments, however there are strict criteria on the situations in which compensation payments would be made and the levels of payment applicable in a given situation. PCHA follow fixed formulae to guide the awarding of compensation.</p>			

<p>Also many compensation payments will come from a complaint, therefore diversity information will already have been captured.</p> <p>Only one manager is authorised to make compensation payments in order to maximise consistency and ensure parity between payments, however if a resident was not happy with their decision, they can apply to the appeals panel who can also award compensation.</p>			
3.1.6 Religion or belief	<b>Yes</b>	<b>No</b>	<b>No</b>
<p>List the evidence: List the evidence: List the evidence: PCHA does not collect diversity data on compensation payments, however there are strict criteria on the situations in which compensation payments would be made and the levels of payment applicable in a given situation. PCHA follow fixed formulae to guide the awarding of compensation. Also many compensation payments will come from a complaint, therefore diversity information will already have been captured.</p> <p>Only one manager is authorised to make compensation payments in order to maximise consistency and ensure parity between payments, however if a resident was not happy with their decision, they can apply to the appeals panel who can also award compensation.</p> <p>PCHA make publicise the complaints process in a variety of formats and translations are available upon request.</p>			
3.2 Is there any evidence to believe that some or all of the groups in 3.1.1 – 3.1.6 could be differently affected by the function/policy?			
		Yes	No
			<b>X</b>
Please specify: The strict criteria set out in the compensation procedure and guidance from our regulators means that compensation payments will be assessed without reference to diversity strands.			
3.3 What are the risks and/or benefits to the Genesis Housing Group of the positive or adverse impacts identified above? Please specify.			
Risks: PCHA do not collect diversity information about compensation payments, therefore we potentially cannot be sure that there is no adverse impact on a particular group.			
Benefits: Most compensation payments come from complaints, and PCHA are collecting diversity reports on complainants and will be producing diversity reports. Although one manager is responsible for awarding compensation payments, the potential for discrimination is tempered by the strict criteria for awarding compensation by type and amount of award. If the resident is not happy with the			

decision of this manager they can apply to the appeals panel. This is an independent panel made up of senior managers, resident representatives and board members. Their decision is binding on PCHA. Residents can also appeal this decision by going to the Independent Housing Ombudsman.

PCHA have followed best practice guidance when formulating the amounts of compensation to be awarded for a given situation, and also meet Housing Corporation requirements and statutory requirements such as the Right to Repair.

**Section 4. Assessment of Equality Impact**  
(refer to 5.4 in pages 15 - 16 in guidance notes)

4.1 It is possible to determine the equality impact of the function/policy by answering the following questions:

	Yes	No
4.1.1 Is any of the adverse impacts identified in 3.1.1 – 3.1.6 justified?	N/A	N/A
4.1.2 Is the differential treatment identified in 3.2 significant and justifiable in the wider policy objectives?	N/A	N/A
4.1.3 Is the risk identified in 3.3 justified?	X	
4.2 If any of the answers in 4.1.1 to 4.1.3 is 'no', is there a better opportunity to meet the General duty by amending the function/policy?		
	Yes	No
	N/A	N/A
4.3 This next stage of assessment for this function/policy is: (please choose either 4.3.1, 4.3.2 or 4.3.3)		
<ul style="list-style-type: none"> <li>If any of the answers in 4.1.1 to 4.1.3 is 'no', then a partial assessment should be undertaken.</li> <li>If additional evidence will be needed in order to support the amendments in Section 5, and an action plan is also needed in order to implement the amendments, then proceed to a full assessment</li> </ul>		
	Yes	No
4.3.1 It will not be assessed further but will continue to be monitored	X	
4.3.2 It will proceed to a partial assessment (Section 5)		X
4.3.3 It will proceed to a full assessment (Sections 5 to 8)		X

**Partial Impact Assessment**

**Section 5. Consideration of Alternatives**  
(refer to 5.5 in page 16 in guidance notes)

5.1 What amendments are proposed for this function/policy in order to mitigate the adverse impacts or for positive impacts?

Amendments	Who By	When by

5.2 Will more evidence be needed for supporting the amendments?

	Yes	No

5.3 If 'yes', what the additional evidence will be? e.g. Who has expert knowledge of the issues? Which groups have a direct interest?							
5.4 How will the additional evidence be acquired? ( e.g. through consultation, commission new research etc)							
5.5 Will experts or partners be involved in the assessment at this stage?							
						Yes	No
5.6 If 'yes', who are they? What are their roles?							
5.7 The next stage is to decide whether a full assessment will be necessary. This decision can be based on the answers to the following questions:							
						Yes	No
5.7.1 Has significant adverse impact on some groups of people been identified in 3.1.1 – 3.1.6?							
5.7.2 Will significant amendments (refer to 5.1) be needed to mitigate the adverse impacts, without affecting the policy's overall aims?							
5.7.3 Could the adverse impact result in unlawful discrimination?							
5.7.4 Could the adverse impact hinders equality of opportunity?							
5.7.5 Could the adverse impact lead to tension between different groups?							
5.8 Based on the evidence gathered in 5.71 to 5.75, will this function/policy be subject to a full assessment?							
						Yes	No
5.8.1 Date by which the Full Impact Assessment will be completed:							
5.8.2 Officer responsible for carrying out the Full Impact Assessment:							
<b>Full Impact Assessment</b>							
<b>Section 6. Action Plan for Implementing Proposed Changes to the Function or Policy within the next 12 months</b> <b>(refer to 5.6 in page 16 in guidance notes)</b>							
Action	Target Group	Intended Outcome	Monitoring Arrangement	Responsible Officer	Completion Date	Action Completed Yes/No	
<b>Issues to be considered:</b>							
Is the action relevant to the: - policy/ function - business objectives/ priorities	- Will the action have the same impact on all target groups - will another group be adversely affected?	- Is the intended outcome clear? - Will the intended outcome address all the concerns? - Any potential unintended impacts?	- Can the action be monitored within existing systems? - Are changes to existing monitoring systems required?	Who will be responsible for : - implementing action - monitoring action - overall policy development at senior management level?	When the action will be carried out & monitoring completed?		

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**Section 7. Consultation on Action Plan**  
**(refer to 5.7 in page 16 in guidance notes)**

7.1 Groups that have been consulted:

<u>Groups Consultation</u>	Ethnicity	Gender	Disability	Age	Sexual Orientation	Religion/ Belief
How consultation is carried out?						
When consultation is done?						
How many people are consulted?						
Which organisations are consulted?						
Consultation findings						

7.2 Amendments or changes, if any, proposed as a result of consultation.

7.3 When the amendments will be carried out? By who?

**Section 8. Publication of Results of Assessment, Consultation and Monitoring**  
**(refer to 5.8 in page 17 in guidance notes)**

8.1 How the results will be published?

Method (e.g. Genie, customer newsletters)	Date

8.2 Will access and language issues be considered? If yes, how?

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Name of officer completed this assessment: Jenny Preece

Signature:

Date: 15/09/08

(Instruction : On completion of this assessment, please attach it to the function/policy and submit to the Senior Manager for approval).