

## **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: Mutual Exchange Procedure	
Subsidiary/Directorate: PCHA	
Officer completing the assessment	
Name:	Job title: Policy Officer
Tel. no:	Email address:
Date of assessment: 01/12/08	
Is this an existing or proposed function/policy? Existing	
<b>Initial Impact Assessment (Sections 1- 4)</b>	
<b>Section 1. Responsibility and Ownership (refer to 5.1 in pages 11 &amp; 12 in guidance notes)</b>	
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) Deputy Director Housing Services	
1.2 Who is responsible for this function/policy on a day-to-day basis? (this could be a named individual or a group) Lettings and Allocations Manager	
1.3 Who else, both internally and externally, influences delivery of this function/policy?  Lettings and Allocations Team Income Services Team Housing Services Team Maintenance Department Other registered social landlords of exchange partners Energy Efficiency Manager	
<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?

- To increase the mobility of residents who want to move home
- To participate in a choice-based scheme for mutual exchanges to allow residents the opportunity to move between different areas
- To increase resident satisfaction by giving people greater choice about where they can live
- To operate within the legal framework when deciding whether an exchange can go ahead
- To process applications for mutual exchanges in a consistent manner
- To ensure that mutual exchanges are carried out within 42 days
- To assess the condition of the property before a mutual exchange is approved and identify any works necessary, either to be carried out by PCHA or the outgoing resident

2.2 Who are the target groups that will benefit from this function/policy?

All Assured and Secure tenants who have the right to mutual exchange  
 Tenants of other registered social landlords who have the right to mutual exchange

2.3 What are the intended outcomes of this function/policy?

- Increased resident satisfaction
- Processing all claims for mutual exchanges within 42 days
- Reduced repair requests from new residents who have mutually exchanged into properties
- Reduced complaints from new residents who have mutually exchanged into properties
- Reduced pressure on the transfer list

**Section 3. Relevance to the General Duty:**

- **Eliminating Unlawful Discrimination,**
  - **Promoting Equality of Opportunity, and**
  - **Promoting Good Community Relations**
- (refer to 5.3 in pages 12 - 15 in guidance notes)**

The following questions may help to guide relevance to the General Duty :

- Is the policy/function directly or indirectly discriminatory? Refer to Guidance Notes Section 5.3.1 in page 13 for definition of discrimination.
- Is the policy/function intended to increase equality of opportunity by implementing positive action to redress disadvantages? Is this lawful?
- 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?

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:

examples of evidence - monitoring/performance data, surveys, evaluation reports, census, consultation findings, inspection reports, partner organisations data etc.

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

	Positive	Adverse	Neutral
	Yes/No	Yes/No	Yes/No
3.1.1 Ethnic Groups	<b>Yes</b>	<b>No</b>	<b>No</b>

<p>List the evidence: We aim to provide equal access to the mutual exchange process to all residents, regardless of ethnicity. Residents have access to translation services and interpreters where these are required. PCHA participates in the Homeswapper and House Exchange schemes which are choice-based systems through which people can find exchange partners. Once registered, key information about properties is available in a number of languages, and the House Exchange website can be translated. These are web-based systems and to widen accessibility PCHA residents can use computer facilities at the office to search for properties. For Homeswapper, residents can also be notified of matches by text message; for House Exchange residents can register using a paper application form, and the details of matches are posted to them.</p> <p>As PCHA can only refuse permission for a mutual exchange based on the criteria set out in Schedule 3 of the Housing Act 1985, therefore there is little scope for discrimination in approvals for exchanges.</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: Mutual exchanges can only be refused on the grounds set out in Schedule 3 of the Housing Act 1985; this reduces the potential for discrimination when giving permission for mutual exchanges to take place.</p> <p>PCHA participate in two choice based lettings systems for mutual exchanges, and the process is resident-led. We aim to make the service as accessible as possible to all resident, including having information on the website and rights to carry out an exchange outlined in the tenancy agreement.</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: New exchange partners who are moving into single person accommodation, or where vulnerabilities have been identified, will be interviewed by a member of the Tenant Support Team. This will identify any issues around vulnerability and any support needs, so that we can help the person to sustain their new tenancy.</p> <p>As PCHA can only refuse consent to a mutual exchange under the grounds set out in Schedule 3 of the Housing Act 1985, there is little scope for discrimination against people with a disability. We</p>			

<p>aim to advertise the mutual exchange process on the website, and Letting Support Officers are available to give advice on how to carry out exchanges. They will also make sure that the outgoing tenant understands the implications of exchanging their home.</p> <p>PCHA has the right to refuse grounds for consent to a mutual exchange where the property was substantially adapted for a physically disabled person but if the exchange went ahead a physically disabled person would not be living there. Overall, the impact of this is positive for disabled people as it ensures that specially adapted housing is retained for those who need these adaptations.</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: PCHA participate in choice-based schemes for mutual exchanges to enable residents to have a large choice of exchange partners across the country. These services are largely web-based and not all residents will have access to the internet, however PCHA provide free access to computers in their main reception area. House Exchange will also allow people to receive matched properties by post, and Homeswapper can notify people of matches by text message. This ensures that there is a range of ways in which people can access the service.</p> <p>PCHA will not refuse a consent based on age, and can only use the ground specified in Schedule 3 of the Housing Act 1985 to prevent an exchange from taking place; this reduces the potential for discrimination when deciding whether an exchange can go ahead.</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: Mutual exchanges can only be refused on the grounds set out in Schedule 3 of the Housing Act 1985; this reduces the potential for discrimination when giving permission for mutual exchanges to take place. We will treat same sex-partners in the same way as those in heterosexual relationships, for example they would be entitled to a joint tenancy if they were joint tenants in their previous property.</p> <p>PCHA participate in two choice based lettings systems for mutual exchanges, and the process is resident-led. We aim to make the service as accessible as possible to all resident, including having information on the website and rights to carry</p>			

out an exchange outlined in the tenancy agreement.			
3.1.6 Religion or belief	<b>Yes</b>	<b>No</b>	<b>No</b>
<p>List the evidence: Mutual exchanges can only be refused on the grounds set out in Schedule 3 of the Housing Act 1985; this reduces the potential for discrimination when giving permission for mutual exchanges to take place.</p> <p>PCHA participate in two choice based lettings systems for mutual exchanges, and the process is resident-led. We aim to make the service as accessible as possible to all resident, including having information on the website and rights to carry out an exchange outlined in the tenancy agreement.</p> <p>PCHA have translation services that can be accessed by residents as required, and information on the mutual exchange websites can be translated for residents to make sure that the exchange process is as accessible as possible.</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 mutual exchange process is widely accessible to residents and they can obtain information from PCHA’s website, the Homeswapper and House Exchange websites, or in written, face-to-face and telephone contact from Lettings Support Officers. It is also a resident-led, choice-based process, which is designed to maximise choice for residents and enable them to access properties that are available for exchange.			
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: We do not currently analyse trends in access for mutual exchanges, therefore if discrimination was occurring we would not necessarily be aware of this.			
Benefits: The rules for refusal of mutual exchanges are very stringent, and PCHA can only refuse consent to an exchange based on the grounds set out in Schedule 3 of the Housing Act 1985. This means that we cannot discriminate on any other grounds. PCHA have also sought to make the mutual exchange process as accessible as possible by participating with the Homeswapper and Home Exchange service. These are choice-based systems that allow residents’ maximum access to a range of properties available for exchange.			
<b>Section 4. Assessment of Equality Impact (refer to 5.4 in pages 15 - 16 in guidance notes)</b>			
4.1 It is possible to determine the equality impact of the function/policy by answering the following questions:			
	Yes	No	
4.1.1 Are any of the adverse impacts identified in 3.1.1 –	N/A	N/A	

3.1.6 justified?		
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
		X
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
<b>Partial Impact Assessment</b>		
<b>Section 5. Consideration of Alternatives</b> (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? <i>e.g. Who has expert knowledge of the issues? Which groups have a direct interest?</i>		
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> (refer to 5.6 in page 16 in guidance notes)						
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?	
<b>Section 7. Consultation on Action Plan</b> (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?						
<b>Section 8. Publication of Results of Assessment, Consultation and Monitoring (refer to 5.8 in page 17 in guidance notes)</b>						
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?						

Name of officer completed this assessment: Jenny Preece

Signature:

Date: 01/12/08

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