

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

General Information	
Name of function/policy: Section 20 Procedure	
Subsidiary/Directorate: PCHA	
Officer completing the assessment	
Name:	Job title: Policy Officer
Tel. no:	Email address:
Date of assessment: 26/09/08	
Is this an existing or proposed function/policy? Existing – this procedure was held in a number of old Sutherland documents; these have been adapted to apply across leaseholders and tenants.	
Initial Impact Assessment (Sections 1- 4)	
Section 1. Responsibility and Ownership (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) Deputy Director Housing	
1.2 Who is responsible for this function/policy on a day-to-day basis? (this could be a named individual or a group) Housing Services Manager	
1.3 Who else, both internally and externally, influences delivery of this function/policy? Housing Services Team Leasehold Services Team Asset Management Department Mechanical and Electrical Department Maintenance Department	
Section 2. Aims and Objectives of the Function or Policy (refer to 5.2 in page 12 in guidance notes)	

2.1 What are the aims and objectives of this function/policy?
 The aim of the procedure is to develop a consistent approach towards carrying out section 20 consultation where residents will be charged above a certain amount of money for works, or where PCHA are planning to enter into a long term contract. We aim to enable staff to decide whether section 20 consultation needs to be carried out before particular works is authorised, and to show each step of the consultation in detail. Ultimately, we aim to be able to recover the full costs of eligible works from residents through the variable service charge. In order for this to be realised we must have carried out the correct consultation.

2.2 Who are the target groups that will benefit from this function/policy?
 All residents should benefit from this procedure as they will have the opportunity to be consulted before certain rechargeable works are carried out, and before PCHA enter into long term contracts. This gives them an opportunity to object to the works, or propose an alternative contractor.

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

- To ensure that PCHA recoups the cost of works which are service chargeable
- To increase resident satisfaction by consulting them on works that are rechargeable through the service charge account
- To ensure compliance with the requirements of the Commonhold and Leasehold Reform Act 2002

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	Y	N	N
List the evidence: The consultation mechanism is the same for all works that fall under section 20, therefore everyone will have the opportunity to comment on the proposals. Documents are available in different languages and interpreters are available through services such as Language Line. The			

process for carrying out section 20 consultation is available in different places, for example through the website, in the residents' handbook, and through information sheets on service charges.			
3.1.2 Gender (including transgender)	Y	N	N
List the evidence: All residents are involved in section 20 consultation, regardless of gender. The consultation mechanism is the same for everyone, and residents are able to get involved in a number of ways, for example through writing, phoning, or through residents' meetings.			
3.1.3 Disability	Y	N	N
List the evidence: The consultation mechanism is the same for all works that fall under section 20, therefore everyone will have the opportunity to comment on the proposals. Although residents are asked to comment in writing, if help is needed with this officers will assist in writing a statement. Officers will also liaise with support services where they are involved with the resident. Information on the way consultations are carried out is available in a number of ways, for example through the website, residents' handbooks, and information sheets on service charges.			
3.1.4 Age	Y	N	N
List the evidence: The consultation mechanism is the same for all works that fall under section 20, therefore everyone will have the opportunity to comment on the proposals. Information on the way consultations are carried out is available in a number of ways, for example through the website, residents' handbooks, and information sheets on service charges.			
3.1.5 Sexual orientation	Y	N	N
List the evidence: All residents are involved in section 20 consultation, regardless of sexual orientation. The consultation mechanism is the same for everyone, and residents are able to get involved in a number of ways, for example through writing, phoning, or through residents' meetings.			
3.1.6 Religion or belief	Y	N	N
List the evidence: All residents are involved in section 20 consultation, regardless of religion or belief. The consultation mechanism is the same for			

everyone, and residents are able to get involved in a number of ways, for example through writing, phoning, or through residents' meetings.		
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
		X
Please specify: All residents have the same right to consultation, regardless of diversity strands. By law PCHA must consult with all residents, and we put in place measures to minimise barriers to getting involved in the consultation, for example highlighting consultation rights to residents, making information available in different formats and languages.		
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 analyse the diversity information we hold on residents in relation to section 20 consultation. This could be a potential risk as we cannot be sure that we are not discriminating against a particular group. However as we legally must consult all residents regardless of diversity areas, PCHA act to ensure that everyone is aware of their consultation rights. Adherence to this legal requirement outweighs any potential negative impact from not analysing diversity information.		
Benefits: Because PCHA has a legal requirement to consult with all residents, we must inform everyone about their consultation right, regardless of diversity issues. Residents also have the ultimate right of appeal to an independent tribunal if they feel that they have not been properly consulted.		
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?	X	
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"> • If any of the answers in 4.1.1 to 4.1.3 is 'no', then a partial assessment should be undertaken. • 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		
	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? <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:

Full Impact Assessment

**Section 6. Action Plan for Implementing Proposed Changes to the Function or Policy within the next 12 months
(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
Issues to be considered:						
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?	

**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?	

Name of officer completed this assessment: Jenny Preece

Signature:

Date: 26/09/08

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