

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: Complaints Appeals Procedure	
Subsidiary/Directorate: PCHA	
Officer completing the assessment	
Name:	Job title: Policy Officer
Tel. no:	Email address:
Date of assessment: 12/12/08	
Is this an existing or proposed function/policy? Existing	
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) 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? All staff and contractors working for PCHA Resident representatives Board Members Residents	
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?	

This procedure aims to set out residents’ rights to appeal the decision made at Stage One of the complaints process. PCHA aims to hold appeals hearings in the spirit of mediation to attempt to resolve the complaint. The procedure is intended to ensure that appeals panels are accessible to all and the hearings are conducted consistently and fairly.

2.2 Who are the target groups that will benefit from this function/policy?
All residents and stakeholders.

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

- To resolve complaints
- To identify and service failures and learn from these
- To compensate residents where appropriate
- For residents to feel satisfied with the complaints process and that they have been given the opportunity for a fair hearing

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	X		
<p>PCHA staff will use language line services and translation services upon request. When attending appeals panels residents can be accompanied by an advocate, friend, or relative. If an interpreter was required this could be arranged. Information about the appeal process is available on the website, over the phone, in leaflet form and in the tenant’s handbook.</p> <p>The appeals panel is made up of a board member, resident representative and a PCHA manager not involved in the complaint; this reduces the risk of discrimination. The panel will ask all appellants whether they feel they are satisfied they have been</p>			

<p>given a fair hearing. If they feel they have not, the panel can decide whether any further action should be taken to address the issue.</p>			
<p>3.1.2 Gender (including transgender)</p>	X		
<p>We publicise the appeals procedure widely to all residents, for example through the website, resident newsletters, handbooks and leaflets. This ensures that all residents have access.</p> <p>The appeals panel is made up of a board member, resident representative and a PCHA manager not involved in the complaint; this reduces the risk of discrimination. The panel will ask all appellants whether they feel they are satisfied they have been given a fair hearing. If they feel they have not, the panel can decide whether any further action should be taken to address the issue.</p>			
<p>3.1.3 Disability</p>	X		
<p>The appeals procedure is intended to be as accessible as possible, and is advertised in a number of different formats, from the website to leaflets. Residents can also seek advice about the appeals process from officers face-to-face or over the phone.</p> <p>Residents have the right to bring a relative, friend or advocate with them to the appeal panel, and are entitled to have someone speak on their behalf.</p> <p>The appeals panel is made up of a board member, resident representative and a PCHA manager not involved in the complaint; this reduces the risk of discrimination. The panel will ask all appellants whether they feel they are satisfied they have been given a fair hearing. If they feel they have not, the panel can decide whether any further action should be taken to address the issue.</p>			
<p>3.1.4 Age</p>	X		
<p>The appeals procedure is intended to be as accessible as possible, and is advertised in a number of different formats, from the website to leaflets. These can be requested in large print or Braille. Residents can also seek advice about the appeals process from officers face-to-face or over the phone.</p> <p>The appeals panel is made up of a board member, resident representative and a PCHA manager not involved in the complaint; this reduces the risk of</p>			

<p>discrimination. The panel will ask all appellants whether they feel they are satisfied they have been given a fair hearing. If they feel they have not, the panel can decide whether any further action should be taken to address the issue.</p>		
<p>3.1.5 Sexual orientation</p>	X	
<p>The appeals procedure is intended to be as accessible as possible, and is advertised in a number of different formats, from the website to leaflets. Residents can also seek advice about the appeals process from officers face-to-face or over the phone.</p> <p>The appeals panel is made up of a board member, resident representative and a PCHA manager not involved in the complaint; this reduces the risk of discrimination. The panel will ask all appellants whether they feel they are satisfied they have been given a fair hearing. If they feel they have not, the panel can decide whether any further action should be taken to address the issue.</p>		
<p>3.1.6 Religion or belief</p>	X	
<p>The appeals panel is made up of a board member, resident representative and a PCHA manager not involved in the complaint; this reduces the risk of discrimination. The panel will ask all appellants whether they feel they are satisfied they have been given a fair hearing. If they feel they have not, the panel can decide whether any further action should be taken to address the issue.</p> <p>Where residents have particular communication needs, PCHA staff will use language line services and translation services. When attending appeals panels residents can be accompanied by an advocate, friend, or relative. If an interpreter was required this could be arranged. Information about the appeal process is available on the website, over the phone, in leaflet form and in the tenant's handbook.</p>		
<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?</p>		
	Yes/No	Not Sure
	No	
<p>Please specify: The appeals procedure is intended to be as independent from PCHA as possible, to ensure that residents feel they have received a fair hearing. If a resident felt they had been treated unfairly, this would be dealt with by the appeals panel, who would agree any appropriate remedial actions. This would all be minuted</p>		

during the hearing so that there is a record of the appellant's concerns.		
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 are not currently monitoring access to the appeals procedure by diversity strand, but this information is held by the organisation. We cannot be fully confident that there is no discrimination in this procedure.		
Benefits: Access and use of the complaints procedure as a whole, from stage one, is analysed by diversity, and this would always be the starting point for any complaint before it would be able to progress to the appeals stage. We do not need to duplicate this work when looking solely at the appeals stage. Once a complaint has reached the appeals stage we have tried to ensure fairness by asking the resident whether they have received a fair hearing. Any issues of discrimination could be brought up at this stage and the panel could decide on appropriate action. Residents can also bring someone with them to the hearing, either to accompany them or to speak on their behalf. Ultimately, if a resident was not happy with the outcome of the appeal they can go to the Housing Ombudsman. PCHA routinely provide contact details for this service when informing the resident of the outcome of their appeal.		
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
4.1.2 Is the differential treatment identified in 3.2 significant and justifiable in the wider policy objectives?		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"> • 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?

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
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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?

Action required: Need to complete data monitoring, but this only requires a minor amendment to the procedure in order to mitigate any potential (and unknown) negative impact.

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: N/A

5.8.2 Officer responsible for carrying out the Full Impact Assessment: N/A

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?

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Name of officer completed this assessment: Jenny Preece

Signature:

Date: 12/12/08

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