

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: Lettings Procedure	
Subsidiary/Directorate: PCHA	
Officer completing the assessment	
Name:	Job title: Policy Officer
Tel. no:	Email address:
Date of assessment: 29/09/08	
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) Jackie Thomas, 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) Damola Awosika, Lettings and Allocations Manager	
1.3 Who else, both internally and externally, influences delivery of this function/policy? Lettings and Allocations Team Supported Housing Team Housing Services Team Contracts and Compliance Manager Service Charge Manager Rent Assessment Manager Voids Team	
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?
 To ensure the fair allocation of PCHA’s properties to new residents, and to ensure as far as possible that properties match the needs of the household. PCHA aims to participate in choice based lettings to maximise applicants’ control of the allocations process.

2.2 Who are the target groups that will benefit from this function/policy?
 All applicants who bid for PCHA’s properties
 Local Authority partners

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

- To let properties in accordance with choice based lettings
- To ensure that properties match household needs
- To identify vulnerabilities and support new residents to sustain their tenancies
- Increased customer satisfaction and reduced stock turnover

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: PCHA currently advertises its properties through choice-based lettings schemes, such as Locata. There are a range of ways to bid for properties, e.g. online; by phone, and the properties are advertised in a range of ways, e.g. through a newsletter, online, by phone. Priority banding is decided by set criteria, which reduces the potential for discrimination. Applicants also control the bidding process by bidding for the properties that they want.

Translations for the Locata magazine are available, and PCHA also have interpreters and translation services.

<p>PCHA collect information on ethnic group for new residents and analyse this in its Lettings Plan. This analysis will highlight any areas in which PCHA's lettings procedures could be having a discriminatory impact.</p>			
<p>3.1.2 Gender (including transgender)</p>	<p>Y</p>	<p>N</p>	<p>N</p>
<p>List the evidence: PCHA currently advertises its properties through choice-based lettings schemes, such as Locata. There are a range of ways to bid for properties, e.g. online; by phone, and the properties are advertised in a range of ways, e.g. through a newsletter, online, by phone. Priority banding is decided by set criteria, which reduces the potential for discrimination. Applicants also control the bidding process by bidding for the properties that they want.</p> <p>PCHA report information through the CORE system on the gender of the household head.</p>			
<p>3.1.3 Disability</p>	<p>Y</p>	<p>N</p>	<p>N</p>
<p>List the evidence: PCHA currently advertises its properties through choice-based lettings schemes, such as Locata. There are a range of ways to bid for properties, e.g. online; by phone, and the properties are advertised in a range of ways, e.g. through a newsletter, online, by phone. Priority banding is decided by set criteria, which reduces the potential for discrimination. Applicants also control the bidding process by bidding for the properties that they want.</p> <p>Information from Locata can be translated into an easier to use format for applicants with learning difficulties. PCHA also collect information on whether there are people with disabilities or wheelchair-users in the household. This is analysed in PCHA's Lettings Plan and benchmarked against other RSLs. The analysis should highlight any areas in which PCHA's lettings procedures could be having a discriminatory impact.</p> <p>All new single applicants have a vulnerability assessment with the Tenant Support Team in order to identify any support needs. Other households can have a vulnerability assessment if requested by a member of staff.</p>			
<p>3.1.4 Age</p>	<p>Y</p>	<p>N</p>	<p>N</p>
<p>List the evidence: PCHA currently advertises its</p>			

<p>properties through choice-based lettings schemes, such as Locata. There are a range of ways to bid for properties, e.g. online; by phone, and the properties are advertised in a range of ways, e.g. through a newsletter, online, by phone. Priority banding is decided by set criteria, which reduces the potential for discrimination. Applicants also control the bidding process by bidding for the properties that they want.</p> <p>PCHA collects information on the age of the lead household member, and benchmarks the average age against other RSLs. This will form part of PCHA's Lettings Plan and highlight any areas in which the Lettings Procedure could be having a discriminatory impact.</p>			
<p>3.1.5 Sexual orientation</p>	<p>Y</p>	<p>N</p>	<p>N</p>
<p>List the evidence: PCHA currently advertises its properties through choice-based lettings schemes, such as Locata. There are a range of ways to bid for properties, e.g. online; by phone, and the properties are advertised in a range of ways, e.g. through a newsletter, online, by phone. Priority banding is decided by set criteria, which reduces the potential for discrimination. Applicants also control the bidding process by bidding for the properties that they want.</p>			
<p>3.1.6 Religion or belief</p>	<p>Y</p>	<p>N</p>	<p>N</p>
<p>List the evidence: PCHA currently advertises its properties through choice-based lettings schemes, such as Locata. There are a range of ways to bid for properties, e.g. online; by phone, and the properties are advertised in a range of ways, e.g. through a newsletter, online, by phone. Priority banding is decided by set criteria, which reduces the potential for discrimination. Applicants also control the bidding process by bidding for the properties that they want.</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>			
		<p>Yes</p>	<p>No</p>
			<p>X</p>
<p>Please specify: PCHA operates within choice based lettings schemes. This means that the applicant decides what sort of properties to bid for. Local Authority partners usually decide the shortlist of applicants, depending on their priority. PCHA therefore has no say in who bids for the properties. PCHA also collect monitoring data on all new applicants through CORE returns. This information is used to identify any disparities in lettings to particular groups.</p>			
<p>3.3 What are the risks and/or benefits to the Genesis Housing Group of the positive or adverse impacts identified above? Please specify.</p>			

Risks: Although properties are let through choice based lettings, PCHA are able to refuse nominees under certain circumstances. This could lead to the possibility of discrimination by refusing to house certain people. However, the procedure sets out clear criteria for refusing a nominee, and officers must document the reasons for any refusal and feed this back to the nominating Local Authority.

Benefits: PCHA collect information on diversity for CORE reports, and this data is made available for analysis. The Lettings Plan analyses this data and identifies any areas of concern and any changes that may need to be made to the Lettings Procedure as a result. The choice based lettings system itself allows residents to choose which properties to bid on, and their priority banding is allocated in accordance with strict criteria for each band. This reduces the potential for discrimination. Applicants who feel that they have been unfairly treated can also appeal through the Complaints Procedure.

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
		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)

- 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
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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:						
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/	- Will the action have the same impact on all target	- Is the intended outcome clear? - Will the	- Can the action be monitored within existing systems? - Are changes to existing monitoring	Who will be responsible for : - implementing action - monitoring action	When the action will be carried out & monitoring completed?	

function - business objectives/priorities	groups - will another group be adversely affected?	intended outcome address all the concerns? - Any potential unintended impacts?	systems required?	-overall policy development at senior management level?		

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

7.1 Groups that have been consulted:

Groups Consultation	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: 29/09/08

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