

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: Sheltered Housing Manual	
Subsidiary/Directorate: PCHA	
Officer completing the assessment	
Name:	Job title: Policy Officer
Tel. no:	Email address:
Date of assessment: April 2009	
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)	
Charlie MacDonald, Head of Supported 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)	
Older Persons' Services Manager Sheltered Scheme Managers Sheltered Housing Officer Neighbourhood Liaison Officers Lettings and Allocations Officers	
1.3 Who else, both internally and externally, influences delivery of this function/policy?	
Local Authority support services Supporting People teams Sheltered Housing residents Charities and voluntary agencies such as Age Concern, Open Age and Elders' Voice NHS services	

**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 Sheltered Housing Manual aims to:

- Provide guidance on how to manage sheltered housing schemes
- Be accessible to sheltered housing residents who want to find out how we will deliver services and manage sheltered accommodation
- To provide clear procedures covering:
 - How prospective residents can access sheltered housing
 - Eligibility criteria for sheltered housing, and how this will be assessed
 - Refusal of a prospective residents, and a clear appeals process
 - Assessment and review of support needs, and how we will seek to meet these needs
 - Carrying out risk assessments
 - Actions to be taken if a resident does not want to participate in support needs' and risk assessments
 - Our commitment to managing diversity, promoting equality in our schemes, and attempting to meet residents' cultural needs
 - Our approach to collecting rent, preventing rent arrears, and taking action against those with rent arrears in sheltered housing
 - Our approach to managing low level anti-social behaviour in sheltered housing schemes
 - Our obligations under health and safety legislation, for example fire safety, accident reporting, scheme risk assessments, and gas safety
 - Safeguarding adults in sheltered housing.

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

Sheltered housing residents
Prospective applicants to sheltered housing schemes

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

- High resident satisfaction with the management of sheltered housing
- A transparent and consistent approach to allocating and managing sheltered housing
- Resident participation in the process of risk assessments, health and safety assessments, and support planning
- Positive assessments from Supporting People

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

<p>disadvantages? Is this lawful?</p> <ul style="list-style-type: none"> 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? 			
<p>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> <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	Yes	No	No
<p>List the evidence:</p> <p>Available units in sheltered housing are advertised through Locata, which is a choice-based lettings system. People on the waiting list for a specific scheme are advised when properties become available so they can bid. The process is therefore led by residents who choose where to bid for accommodation. Prospective residents can access information in a number of different languages though the website, or through the Locata magazine or by phone. We participate in the CORE system through which we collect and report on ethnicity.</p> <p>The Scheme Manager will pick up on any language needs before they move in during the housing application interview. If there are translation needs we will provide interpreters where requested, for example to make sure that support needs' assessments are carried out accurately. Residents may also have a friend, family member or advocate with them when the support plan is being completed.</p> <p>We are committed to providing a responsive and culturally sensitive service, and Scheme Managers will help to meet residents' cultural needs as much as possible and promote community cohesion. This includes asking residents about any social and cultural activities they want to do as part of the support planning process. All schemes have communal notice boards which will display information on cultural events and activities in the local area.</p> <p>Rent letters that are sent to residents will include translation statements in order to identify any language needs. We are able to run reports on rent arrears by ethnicity in order to determine any adverse impact, but we are not currently doing this on a regular basis.</p> <p>In line with our anti-social behaviour procedure, we will record categories of anti-social behaviour, vulnerability issues, and the alleged perpetrator and complainant details. From this we will be able to produce reports on anti-social behaviour against diversity strands, but we are not currently doing this on a regular basis.</p>			
3.1.2 Gender (including transgender)	No	No	Yes

<p>List the evidence:</p> <p>We advertise our sheltered housing to all residents, regardless of gender, through a variety of media such as website, in brochures and over the phone. All residents will receive a full assessment of their support needs and any risk factors. We are committed to providing a responsive and culturally sensitive service that is tailored to the individual resident.</p> <p>In line with our anti-social behaviour procedure, we will record categories of anti-social behaviour, vulnerability issues, and the alleged perpetrator and complainant details. From this we will be able to produce reports on anti-social behaviour against diversity strands, but we are not currently doing this on a regular basis.</p>			
<p>3.1.3 Disability</p>	<p>Yes</p>	<p>No</p>	<p>No</p>
<p>List the evidence:</p> <p>Prospective residents to sheltered housing must demonstrate low to medium support needs in order to be eligible for the accommodation under Supporting People. All applicants will be assessed by a Scheme Manager in order to determine whether support needs – which may include a disability – can be met. If the prospective resident has a disability which cannot be catered for within the accommodation, for example the support requirement is too high, they will be referred back to the Local Authority. Prospective residents can appeal any decision to refuse to offer them a sheltered housing unit.</p> <p>Where existing residents wish to transfer to sheltered housing, they will be informed when a unit is available so that they can participate in choice based lettings through the Locata system. We are committed to encouraging diversity and ensuring access to our services. Information about PCHA and its procedures is available in a range of formats, for example Braille, upon request</p> <p>If a prospective resident is unable to travel, we will make efforts to meet with them in person in order to assess their suitability for sheltered housing. They may bring an advocate or support worker to this meeting, the viewing of a sheltered housing unit, and the support needs' assessment. We will also seek to provide a signer where requested.</p> <p>The Sheltered Housing Officer will consult residents' support plans in order to identify any vulnerabilities when dealing with rent arrears. Where there are concerns, the Sheltered Housing Officer will contact the Tenant Support Team. The SHO will visit the resident at home; this will enable them to identify and communication needs. During this meeting, residents will be offered a financial assessment to make sure that the tenancy can be sustained. Residents will be offered appropriate support with this.</p> <p>Any court action will be authorised by the Older Persons' Services</p>			

<p>Manager and the Head of Supported Housing. This safeguard reduces the potential for discrimination.</p> <p>In line with our anti-social behaviour procedure, we will record categories of anti-social behaviour, vulnerability issues, and the alleged perpetrator and complainant details. From this we will be able to produce reports on anti-social behaviour against diversity strands, but we are not currently doing this on a regular basis.</p> <p>We will carry out a case review for any tenant who is or may be disabled within the meaning of the Disability Discrimination Act and against whom legal action is being considered. The review will be carried out by the Scheme Manager, SHO or Neighbourhood Liaison Officer, Older Persons' Services Manager, with assistance from the Tenant Support Team where appropriate.</p>			
<p>3.1.4 Age</p>	<p>Yes</p>	<p>No</p>	<p>No</p>
<p>List the evidence:</p> <p>Sheltered housing is accommodation specifically for older people. Prospective residents must therefore meet age requirements and by its nature the accommodation is restrictive in terms of access.</p> <p>During support planning, residents have the opportunity to tailor services to their needs. They can request a review of their support plan at any time, for example if there has been a change in circumstances and additional support needs to be put in place. Information about our procedures is available in a range of formats, for example large print and audio-cassette upon request.</p> <p>In line with our anti-social behaviour procedure, we will record categories of anti-social behaviour, vulnerability issues, and the alleged perpetrator and complainant details. From this we will be able to produce reports on anti-social behaviour against diversity strands, but we are not currently doing this on a regular basis.</p>			
<p>3.1.5 Sexual orientation</p>	<p>No</p>	<p>No</p>	<p>Yes</p>
<p>List the evidence:</p> <p>We advertise our sheltered housing to all residents, regardless of sexual orientation, through a variety of media such as website, in brochures and over the phone. All residents will receive a full assessment of their support needs and any risk factors. We are committed to providing a responsive and culturally sensitive service that is tailored to the individual resident.</p> <p>In line with our anti-social behaviour procedure, we will record categories of anti-social behaviour, vulnerability issues, and the alleged perpetrator and complainant details. From this we will be able to produce reports on anti-social behaviour against diversity strands, but we are not currently doing this on a regular basis.</p>			
<p>3.1.6 Religion or belief</p>	<p>Yes</p>	<p>No</p>	<p>No</p>
<p>List the evidence:</p>			

<p>We are committed to providing a responsive and culturally sensitive service, and Scheme Managers will help to meet residents' cultural needs as much as possible. As part of the support plan the Scheme Manager will identify any social and cultural needs that the resident would like help with, for example arranging for regular transport to attend religious establishments. The support plan is resident-led and can be reviewed at any time at the request of the resident. All schemes have communal notice boards which will display information on cultural events and activities in the local area.</p> <p>In line with our anti-social behaviour procedure, we will record categories of anti-social behaviour, vulnerability issues, and the alleged perpetrator and complainant details. From this we will be able to produce reports on anti-social behaviour against diversity strands, but we are not currently doing this on a regular basis.</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
		X
<p>Please specify: Sheltered housing is housing for older people, therefore we must inevitably discriminate on the basis of age when letting our properties. Prospective residents must also have low to medium support needs that can be met by the accommodation on offer. This may impact on how we let properties to those with disabilities, as where support needs are very high the housing may not be able to meet these needs. On other diversity strands we cannot be sure whether we are providing an equal service because we do not carry out regular diversity analysis by service area.</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>		
<p>Risks: Although we currently collect diversity information we are not analysing it on a regular basis. This means that we could be discriminating against certain groups.</p>		
<p>Benefits: We advertise our services in a range of ways in order to make it accessible to all residents and potential residents. There are in depth assessments for potential residents and clear criteria for rejecting them. Internal safeguards reduce the potential for discrimination against residents or potential residents on the basis of diversity. We also have a clear procedure for promoting equality and diversity, and meeting residents' different cultural needs.</p>		
<p>Section 4. Assessment of Equality Impact (refer to 5.4 in pages 15 - 16 in guidance notes)</p>		
<p>4.1 It is possible to determine the equality impact of the function/policy by answering the following questions:</p>		
	Yes	No
<p>4.1.1 Is any of the adverse impacts identified in 3.1.1 – 3.1.6 justified?</p>	X	
<p>4.1.2 Is the differential treatment identified in 3.2 significant and justifiable in the wider policy objectives?</p>	X	
<p>4.1.3 Is the risk identified in 3.3 justified?</p>		X
<p>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?</p>		
	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
Set up a spreadsheet to log and track anti-social behaviour cases, including the category, complainant and alleged perpetrator details, and action taken.	Sheltered Housing Officer	End March 2009
Input anti-social behaviour information into V5 to enable reports to be produced.	Sheltered Housing Officer	Ongoing
Provide a quarterly analysis of anti-social behaviour cases by diversity strand to identify any potential discrimination in our procedures. Report to go to the Older Persons' Services Manager	Sheltered Housing Officer	Quarterly
Keep a record of any prospective residents that we have refused to accept into sheltered accommodation and the reason for the refusal.	Allocations Officer	Ongoing
Compile an annual report of refusals in order to identify any potential discrimination.	Older Persons' Services Manager	Annually
5.2 Will more evidence be needed for supporting the amendments?		
	Yes	No
		X
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
		X
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		X

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?					X
5.7.3	Could the adverse impact result in unlawful discrimination?					X
5.7.4	Could the adverse impact hinders equality of opportunity?					X
5.7.5	Could the adverse impact lead to tension between different groups?					X
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
						X
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:						
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?						

Name of officer completed this assessment: Jenny Preece

Signature:

Date: April 2009

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