

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: Anti Social Behaviour Procedure & Harassment Procedure	
Subsidiary/Directorate: PCHA	
Officer completing the assessment	
Name:	Job title: Tenants Support Manager; Housing Service Manager
Tel. no:	Email address:
Date of assessment: June 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)	
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)	
Neighbourhood Liaison Manager	
1.3 Who else, both internally and externally, influences delivery of this function/policy?	
Neighbourhood Liaison Team Housing Services Neighbourhood Team Tenants Support Team PCHA Solicitor	

**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?

Both the ASB Procedure and Harassment Procedure are to ensure that there are measures in place to prevent and deal effectively with complaints of ASB or harassment.

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

Staff, residents & others (general public who experience harassment or ASB in the neighbourhood)

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

Both the ASB Procedure and Harassment Procedure are for improving the safety of vulnerable tenants and to ensure their tenancy can be sustained. The Procedures also help to ensure staff who deal with residents are trained and equipped to deal with any ASB/harassment incidents effectively.

**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)**

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:

	Positive	Adverse	Not sure
	Yes/No	Yes/No	Yes/No

3.1.1 Ethnic Groups

Yes

List the evidence:

Residents who complain/report ASB/harassment incidents will be treated according to the procedures and residents who have additional support needs will also be catered for.

PCHA has a range of internal safeguards to reduce the potential for discrimination against residents on the basis of diversity. We also have a clear procedure for promoting equality and diversity, and meeting residents' different needs. This includes the use of translation service, Language Line, sign language interpreters, induction leaflets, and disability access formats.

Residents can access information about how to report ASB/harassment incidents in a number of different languages through the website, at receptions or by phone.

PCHA is committed to providing a responsive and culturally sensitive service, and Housing Officers will help to meet residents' cultural needs as much as possible. They will pick up on any language needs before tenants move in during the housing

<p>application interview or during reporting of an incident. If there are translation needs we will provide interpreters where requested. Residents may also have a friend, family member or advocate with them when the incident is being reported.</p> <p>In line with the ASB/harassment procedures, we will record categories of ASB/harassment, vulnerability issues, and the alleged perpetrator and complainant details. From this we will be able to produce reports on ASB/harassment against diversity strands, this reporting is not currently in place but will be part of the new case management system we are implementing.</p>	
<p>3.1.2 Gender (including transgender)</p>	<p style="text-align: right;">Yes</p>
<p>List the evidence:</p> <p>The ASB Procedure and Harassment Procedure apply equally to all residents regardless of gender.</p> <p>In line with the ASB/harassment procedures, we will record categories of ASB/harassment, vulnerability issues, and the alleged perpetrator and complainant details. From this we will be able to produce reports on ASB/harassment against diversity strands, this reporting is not currently in place but will be part of the new case management system we are implementing.</p>	
<p>3.1.3 Disability</p>	<p style="text-align: right;">Yes</p>
<p>List the evidence:</p> <p>We are committed to encouraging diversity and ensuring access to our services especially from residents who have disabilities. Information about PCHA and its procedures is available in a range of access formats, for example Braille, upon request</p> <p>If a resident is unable to travel, we will make efforts to meet with them in person in order to help with reporting or investigation. They may bring an advocate or support worker to meeting and we will also seek to provide a signer when requested.</p> <p>Through the Residents' Support Plans, Housing Officers consult residents in order to identify any vulnerabilities and to provide support. Where there are concerns, the Tenant Support Team will visit the resident at home; this will enable them to identify and communication needs, and to offer appropriate support.</p> <p>PCHA will take legal actions against perpetrators. We will carry out a case review for any resident who is disabled within the definition of the Disability Discrimination Act and against whom legal action is being considered. The review will be carried out by Housing management and the Tenant Support Team and signed off by a manager.</p> <p>In line with the ASB/harassment procedures, we will record categories of ASB/harassment, vulnerability issues, and the</p>	

<p>alleged perpetrator and complainant details. From this we will be able to produce reports on ASB/harassment against diversity strands, this reporting is not currently in place but will be part of the new case management system we are implementing.</p>	
<p>3.1.4 Age</p>	<p style="text-align: right;">Yes</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 the ASB/harassment procedures, we will record categories of ASB/harassment, vulnerability issues, and the alleged perpetrator and complainant details. From this we will be able to produce reports on ASB/harassment against diversity strands, this reporting is not currently in place but will be part of the new case management system we are implementing</p>	
<p>3.1.5 Sexual orientation</p>	<p style="text-align: right;">Yes</p>
<p>List the evidence:</p> <p>We advertise our housing services 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 the ASB/harassment procedures, we will record categories of ASB/harassment, vulnerability issues, and the alleged perpetrator and complainant details. From this we will be able to produce reports on ASB/harassment against diversity strands, this reporting is not currently in place but will be part of the new case management system we are implementing.</p>	
<p>3.1.6 Religion or belief</p>	<p style="text-align: right;">Yes</p>
<p>List the evidence:</p> <p>We are committed to providing a responsive and culturally sensitive service, and Housing Officers will help to meet residents' religious/cultural needs as much as possible. As part of the support plan, Housing Officers will identify any social and cultural needs that the resident would like help with. The support plan is resident-led and can be reviewed at any time at the request of the</p>	

<p>resident.</p> <p>PCHA respects tenants' religious affiliation and encourages residents to participate in religious/cultural activities. Relevant information is displayed on communal notice boards and whenever possible, will arrange for transport for vulnerable tenants to attend these events.</p> <p>In line with the ASB/harassment procedures, we will record categories of ASB/harassment, vulnerability issues, and the alleged perpetrator and complainant details. From this we will be able to produce reports on ASB/harassment against diversity strands, this reporting is not currently in place but will be part of the new case management system we are implementing.</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:</p> <p>We cannot be sure whether we are providing an fair and equal service to all our residents especially vulnerable residents because we do not have diversity data in this 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:</p> <p>All PCHA residents receive a full assessment of their support needs and any risk factors. Although we currently collect diversity information in some areas but not in ASB/harassment. It is unclear how diversity data is recorded or stored and Housing officers are not able to access information when needed. This reporting is not currently in place but will be part of the new case management system we are implementing</p>		
<p>Benefits:</p> <p>We advertise our services in a range of ways including tenants newsletters, PCHA website, leaflets and receptions, in order to make information accessible to all residents. There are in depth assessments for residents to identify their support needs, and internal safeguards to reduce the potential for discrimination against 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>As far as ASB/harassment incidents are concerned, our priority is to resolve the incidents as best as possible in order to sustain rather than to end tenancy which may result in tenants becoming homeless. For example, we encourage third party reporting and use of advocating agencies. Injunction or eviction is always the last consideration.</p> <p>Staff are trained to use the procedures in Group and PCHA internal training and ASB/harassment cases are dealt with on a case-by-case basis. They are also trained to access the V5 Case Management System which logs tenants data and the system also has the capacity to record diversity data. However, it is unsure how ASB/harassment data has been inputted into the system or whether it is capable to produce useful data report. This</p>		

reporting is not currently in place but will be part of the new case management system we are implementing

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?		
4.1.2 Is the differential treatment identified in 3.2 significant and justifiable in the wider policy objectives?		
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		
4.3.2 It will proceed to a partial assessment (Section 5)		
4.3.3 It will proceed to a full assessment (Sections 5 to 8)	X	

Both procedures are scheduled to be reviewed in 2009. It is agreed that a full assessment should be carried out when the procedures have been reviewed which will follow the full review and restructure of ASB service delivery.

The issues to be considered include:

- Review the ASB/Harassment/DV data collection & reporting systems as a whole, and ensure the systems are able to log and track cases, including the category, complainant and alleged perpetrator details, and action taken.
- Use the ASB/Harassment/DV data to benchmark with other housing associations/local authorities to identify trends
- Review the ASB Policy, Harassment Policy and DV Policy so that they are more 'user friendly' and can be used hand-in-hand with the procedures.

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	
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
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: Neil Yule

Signature:

Date: June 2009

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