



EQUALITY IMPACT ASSESSMENT (EIA) PRO-FORMA

This pro-forma is to be used to determine whether an Equality Impact Assessment (EIA) is required for a proposed policy, strategy or significant decision relating to service provision; and for recording details and outcomes of an impact assessment.

Title of policy / strategy, or brief description of the decision relating to service provision	Overarching Equality Impact Assessment (EIA) of: <ul style="list-style-type: none">• Anti-Social Behaviour Policy• Neighbourhood Services Policy
Lead EIA Officer and Job Title (The EIA lead must be a manager)	Jackie King, London Regional Housing Manager
EIA Team Members	Jorgen Dyer, Head of Estate Services
Director and Head of Service	Sandra Fawcett, Regional Director of Housing - London
Does the EIA relate to an existing policy? (Yes / No)	An ASB Policy is currently in place, but this EIA is being undertaken on a new draft policy and a new Neighbourhood Management Policy.
Who implements the Policy?	All Swan Housing Teams.
Date that the Policy / strategy is due for review (if applicable)	The ASB Policy was under review when Part A of this EIA was first undertaken (August 2010). The Neighbourhood Management Policy is due for review in December 2013.

This pro-forma should be used to:

- Determine and record whether an Equality Impact Assessment (EIA) is required
- Determine and record the focus of an EIA if one is required
- Record the evidence considered
- Record the outcome of the impact assessment
- Record mitigating actions to be taken and measurable targets to assess progress.

Equality Impact Assessments are required to be undertaken on all proposed policies, strategies and significant decisions that could potentially have an adverse or disproportionate impact on any of the diverse communities for which Swan provides services. An EIA should address potential impact in respect of ethnicity / race, gender, transgender, disability, age, sexual orientation and religion or belief where relevant. This pro-forma also asks you to consider socio-economic status and community cohesion and have due regard for the protected characteristics introduced by the new Equality Act.

It is essential that officers refer to the **Equality Impact Assessment Guidance** when completing this pro-forma. The pro-forma is in two parts.

Part A: This part helps you determine and record whether an EIA is necessary and is essential documentary evidence to show that the Swan considers equality in respect of all significant policy and function decisions it makes. Part A must be completed in respect of all proposed policies, strategies or significant decisions that have an impact on service functions. Part A also helps you determine and record the focus of the EIA, if one is required. Part A covers steps 1 and 2.

Part A should be completed by a manager, with support from staff in the relevant service area (forming an EIA Team). Part A must be authorised by the manager responsible for the policy, strategy, or function before proceeding to Part B of the Impact Assessment. Housing managers should also ensure that drafts of both Part A and Part B are sent to the Housing Diversity Manager for comments before they are finalised.

Part B: Proceed to Part B if it is determined in Part A that a full EIA is required and once the focus of the EIA has been determined and agreed. This part of the pro-forma covers steps 3 to 6 as described in the Guidance. Please remember that the completion of an EIA and the actions identified within it are the responsibility of the relevant service manager.

Equality Impact Assessment Part A:

Reason and context for the new policy, strategy, proposal or decision

Please set out the aims and objectives of and contextual reasons for the proposed policy, strategy or decision. Contextual reasons may include changes in legislation, demographic changes or budgetary considerations. Alternatively, if this information is provided in another document, please append to this form.

Anti-Social Behaviour (ASB) Policy

It is important that Swan Housing Association takes appropriate action in response to any incidents of Anti-Social Behaviour (ASB). The Policy sets out Swan's approach to dealing effectively and consistently with incidents of ASB.

We recognise that everyone has the right to peaceful enjoyment of their home, and that left unchallenged, ASB can have a significant negative impact on the lives of our residents. Swan is therefore committed to providing a safe environment for all by taking effective action against perpetrators of ASB and preventing any further ASB occurring.

We recognise that the causes and effects of ASB are wide ranging and can affect all members of the community and not just Swan tenants. Therefore we will always seek to work in partnership with other agencies to ensure that all the measures available are used effectively to tackle ASB problems, regardless of tenure.

Swan has signed up to the Government's Respect Standard for Housing Management and is committed to ensuring our services for tackling ASB are actively reviewed against the standard and that the service we offer meets the standard.

Neighbourhood Management Policy

The management of our neighbourhoods is a fundamental aspect of Swan's role and one which can affect the quality of life of

residents. We know that anti-social behaviour, litter, vandalism, untidy gardens and abandoned cars can make our estates look run down and neglected. Neglect can then lead to further vandalism, misery amongst the local community and increased levels of crime.

The Policy sets out how we will ensure that all residents can enjoy a safe, secure and well maintained environment in which to live and this applies to all Swan properties including leasehold and shared ownership.

We clearly set out how we will design out crime in both our new and existing developments to achieve this, and how we will maintain all horticulture across our estates in line with good practice and to specifically prevent nuisance. We are committed to working with our residents to identify areas for improvement.

We recognise that everyone has the right to peaceful enjoyment of their home, and that left unchallenged, ASB can have a significant impact on the lives of our residents. Swan is therefore committed to providing a safe environment for all by taking effective action against perpetrators of ASB and preventing any further ASB occurring.

This Policy is closely linked to Estate Services and a full EIA has already been undertaken on the key Policy in this service area. Please also refer to this EIA for further information.

Although anti-social behaviour is covered by a separate policy, it is acknowledged that this could be experienced as part of a wider neighbourhood management problem. The ASB and Neighbourhood Management policies were covered by a separate EIA screening (or Part A Pro-forma) during the early policy development process, however this full overarching EIA will look at both policies together.

It should be noted that hate crime / hate incidents are covered by the separate Harassment and Hate Crime Policy and therefore these issues will not be directly covered within this EIA.

STEP ONE: Relevance - Is there potential for the policy, strategy or decision to have an impact on equality?

An EIA should be undertaken if the policy, strategy or decision is *relevant* to the promotion of equality i.e. there is potential for it to have an impact in respect of the equality strands and protected characteristics listed. Please use the box below to identify how your policy or strategy might be relevant to these strands. Please note you are not asked at this stage to determine whether there will or will not be a negative or disproportionate impact – simply whether there is potential.

<p>Ethnicity / Race</p>	<p>The policies are relevant to all equality strands / protected characteristics to some extent. This is because of the nature of the policy area and the fact that ASB and inadequate neighbourhood management can have a significant impact on the daily life of residents.</p> <p>Having one or more of the protected characteristics listed can also make a person more vulnerable to the negative effects of ASB. Although hate crime / incidents are covered by a separate policy, it is acknowledged that hate crime on the basis of one or more of the protected characteristics could be experienced as part of a wider ASB problem.</p> <p>Having one or more of the protected characteristics listed can potentially make a person more vulnerable to the negative effects of the poor neighbourhood management.</p>
<p>Disability</p>	<p>As per the text in the Ethnicity / Race section.</p> <p>People with a disability may have a degree of added vulnerability which could make the experience of ASB more threatening and intimidating. Damage to the home of a person with a disability could also have a more significant impact on their health. Therefore it is important that measures are taken to ensure that adequate action is taken and support provided to the victim(s).</p>
<p>Gender (including pregnancy)</p>	<p>As per the text in the Ethnicity / Race section.</p>

and maternity)	<p>Women living alone (without another adult in the home) may find the experience of ASB more threatening and intimidating. Even in cases where the ASB is not perpetrated on the basis of gender, lone women may find themselves targeted because a male perpetrator is aware that they do not have another adult in the home to provide support in the case of confrontation. It is important to ensure that the advice and support provided takes considerations such as these into account.</p> <p>Women living alone may also feel more vulnerable if there is a lack of security in the blocks where they live and to the neighbourhood management issues across their estate. It is important that these factors are considered.</p>
Transgender (including gender reassignment)	<p>As per the text in the Ethnicity / Race section.</p> <p>Although hate crime / incidents are covered by a separate policy, it is acknowledged that residents who are known to identify as transgender may be at a higher risk of hate crime. It may be particularly difficult to distinguish between ASB which is hate motivated and that which is not.</p>
Age	<p>As per the text in the Ethnicity / Race section.</p> <p>Older people and very young adults may find the experience of ASB more threatening and intimidating than some other groups, particularly if they also identify with another of the characteristics listed.</p>
Sexual Orientation	<p>As per the text in the Ethnicity / Race section.</p> <p>Although hate crime / incidents are covered by a separate policy, it is acknowledged that residents who are known to identify as being lesbian, gay or bisexual may be at a higher risk of hate crime. It may be particularly difficult to distinguish between ASB which is hate motivated and that which is not.</p>
Religion/Belief	<p>As per the text in the Ethnicity / Race section.</p>

Marriage and Civil Partnership	As per the text in the Ethnicity / Race section. However, it should be noted that there is much less relevance to this strand.
---------------------------------------	--

If you think that your policy / strategy or significant decision has relevance to socio-economic status or community cohesion then please use the box below to describe how it might be relevant. Please note that you are not asked at this stage to determine whether there will or will not be a negative or disproportionate impact – simply whether there is potential.	
Socio-economic Status	<p>There is limited relevance to socio-economic status. However, it is recognised that experiencing ASB can have a significant effect on quality of life, stress levels and consequently the ability to work effectively. This could indirectly effect the employment and or earning potential of a resident experiencing ASB.</p> <p>In relation to neighbourhood management, Swan recognises that working patterns can prevent residents from attending Estate Inspections. A solution that is already in development is discussed in the evidence section of this EIA Pro-forma.</p>
Community Cohesion	<p>Preventing and tackling ASB can contribute heavily to community cohesion. The promotion of community cohesion is a theme within the ASB Policy and the approach to its application.</p> <p>Effectively maintaining our neighbourhoods and improving our estates contributes to community cohesion. Building thriving neighbourhoods where people choose to live is a key theme within the Policy and we aim to work with residents to find local solutions to local problems in order to achieve this.</p>

STEP TWO: Determine the Focus of the EIA

Please list below what you will look at when undertaking your EIA i.e. what will be the focus. In most cases the focus will be whether the policy or decision will ensure equality of access to its benefits or outcomes; whether there are likely to be barriers for particular communities or if there are likely to be negative or disproportionate impacts for particular communities.

Key focus of EIA:

The Key focus of the EIA will be:

- 1) To assess whether there are any disparities between different equality groups in:
 - Experiencing ASB
 - Satisfaction in the way that ASB has been dealt with by Swan.

- 2) To assess whether there are any disparities between different equality groups in:
 - Management of anti-social behaviour
 - Provision of Estate ServicesThese are the key aspects of Neighbourhood Management that are measurable.

- 3) Qualitative data from complaints / reports of ASB and feedback through the ASB Forum will be reviewed to ensure that any potential equality issues have been identified and addressed.

Specific Focus in Relation to Equality Strands or Protected Characteristics:

Ethnicity / Race

As per the key focus of the EIA.

Is important information about ASB and neighbourhood management available in other languages on request?

Gender (including Pregnancy and Maternity)	<p>As per the key focus of the EIA.</p> <p>Does advice and support around anti-social behaviour and security take into account the added vulnerability of women who are living without another adult in the home?</p>
Transgender (including Gender Reassignment)	<p>As per the key focus of the EIA.</p> <p>To ensure that engagement and involvement mechanisms are open and welcoming to the transgender community.</p>
Disability	<p>As per the key focus of the EIA.</p> <p>To ensure that residents with a disability are able to access Swan’s communal areas / buildings.</p> <p>Is there adequate support in place for residents with a disability who may be more vulnerable following an experience of ASB?</p> <p>Is important information about ASB and neighbourhood management available in accessible formats on request?</p>
Age	<p>As per the key focus of the EIA.</p> <p>Older people often have more fear of crime and feel more isolated in their neighbourhoods. This can lead to concerns around security associated with poor neighbourhood management.</p> <p>Are there adequate opportunities to engage effectively with staff around neighbourhood management?</p> <p>Are Swan staff proactive in making arrangements to visit residents in their homes when necessary?</p>

Sexual Orientation	<p>As per the key focus of the EIA.</p> <p>Recent research from Stonewall (Cited in 'Why Sexual Orientation is Important for Housing Providers', Stonewall Housing & HQN, August 2010) indicates that many people who are lesbian, gay or bisexual (LGB) feel detached from their local community. There is a need to ensure that people who are LGB are able to participate in resident activities designed to improve neighbourhoods. Are involvement and engagement opportunities relating to ASB and neighbourhood management open and welcoming to residents who are lesbian, gay or bisexual?</p>
Religion/ Belief	<p>As per the key focus of the EIA.</p>
Marriage and Civil Partnership	<p>Qualitative data from complaints / reports of ASB and feedback through the ASB Forum will also be reviewed to ensure that any potential equality issues have been identified and addressed.</p>

Key focus of EIA in relation to socio-economic status and / or community cohesion (if appropriate):

An aim of these policies is to promote community cohesion and maintain good relations. The EIA will review opportunities for community cohesion to ensure that these are maximised.

Record whether or not an EIA is required:

Is an EIA required? <i>Please tick either yes or no</i>	Yes ✓	No
If yes, add target date for completion: 30 th November 2010 (in line with the Housing Managers EIA Schedule for 2010).	Signature of Manager	
	Print Name: Jackie King	
	Date: Updated 30 th November 2010	

Please note that:

- 1) **Housing Managers** should send their completed PART A to the Housing Diversity Manager for comments before it is finalised.
- 2) A copy should be passed to the Diversity Action Forum (DAF) once completed.
- 3) Managers should keep a signed copy for their records.
- 4) All other Swan managers should send a copy of the PART A pro-forma to Central Services for the corporate EIA Log (this will be done for Housing Managers by the Housing Diversity Manager once EIA's are agreed).

Equality Impact Assessment Part B:

This part should be completed if it has been determined that an Equality Impact Assessment is required i.e. that the policy, strategy or significant decision has equality relevance and a service manager has agreed the focus of the assessment as set out in PART A.

STEP THREE: Look at the Evidence

Data sources

Having determined the types of questions or area of focus you want to address in the EIA, consider what data or information sources you may need to look at. For example, you may need to look at data/information that gives you an understanding of diversity in the areas in which Swan and / or your service operates; the needs of different sections in the community in respect of the policy area under review; national or local trends.

Record the data sources considered below in respect of each question / area of focus to be addressed in the EIA, providing a brief summary of what this told you and whether there were gaps in information e.g. if there is no or only limited data available.

Question/focus to be addressed	Data/information source	Summary	Gap in data
<p>Are there are any disparities between different equality groups in:</p> <ul style="list-style-type: none"> • Experiencing ASB • Satisfaction in the way that ASB has been dealt with by Swan? 	<p>Customer satisfaction surveys (which are sent out to all residents when their case for ASB is closed).</p>	<p>Due to difficulties with the ASB recording system that was in place until recently, Swan does not have sufficient data in place to analyse the occurrence of reported ASB by equality group.</p> <p>Satisfaction survey information does include equality monitoring information. Changes to the way information was recorded has enabled analysis of the equality information, however to date there</p>	<p>This is acknowledged as a gap in data, however action has already been taken to rectify this.</p> <p>The new ASB IT system ReAct enables information on ASB and equality characteristics to be recorded, stored and analysed. This will</p>

Question/focus to be addressed	Data/information source	Summary	Gap in data
		is insufficient data to comment on trends.	enable Swan to identify trends in the future. This will also enable equality analysis of satisfaction in the way that ASB has been dealt with.
<p>Are there are any disparities between different equality groups in:</p> <ul style="list-style-type: none"> • Management of anti-social behaviour • Provision of Estate Services? 	<p>Qualitative information on the management of ASB.</p> <p>Estate Services Satisfaction Survey.</p>	<p>To date qualitative information on the management of ASB has not identified any disparities across equality groups.</p> <p>See gap in data column.</p>	<p>The previous the Estate Services Satisfaction survey did not collect equality monitoring information. The most recent survey did collect this data, but it has not yet been analysed. This is a task that will be completed in accordance with the Service Improvement Plan.</p>
<p>Reviewing qualitative data from complaints / reports of ASB and feedback through the ASB Forum for potential equality issues.</p>	<p>Review of current activity.</p> <p>Qualitative information</p>	<p>ASB learning circles are to be held quarterly to discuss and learn from the ASB cases dealt with. The purpose will be to identify improvements for the future.</p> <p>The regular ASB Forum enables equality</p>	

Question/focus to be addressed	Data/information source	Summary	Gap in data
	from resident reports and the ASB Forum.	related issues relating to ASB to be raised, however to date the discussion has not focused on these issues. Equality will be included as an agenda item for the ASB Forum from 2011.	
<p>Is important information about ASB and neighbourhood management available in other languages on request? (Particularly applicable to residents from an ethnic minority background.)</p> <p>Is important information about ASB and neighbourhood management available in other accessible formats on request? (Particularly applicable to residents with a disability.)</p>	Review of current processes and activity	<p>Important information about ASB and neighbourhood management is available in other community languages on request. Translation of documents is available when appropriate. Language Line (telephone interpretation) is used whenever needed and face to face interpreters are used for longer conversations and meetings of a more sensitive nature.</p> <p>Swan is increasingly moving towards the offer of face to face interpreters instead of translating large complex documents. This is seen as providing both a higher level of customer service and greater value for money. This is also more appropriate for people who do not read and write in the language in which they speak.</p> <p>Important information about ASB and neighbourhood management is available in</p>	

Question/focus to be addressed	Data/information source	Summary	Gap in data
		<p>other accessible formats on request. This includes large print, audio formats, and Braille. British Sign Language Interpreters can also be arranged for meetings and hearing loops are in use in designated areas.</p> <p>The Sign Up DVD and Talk Board also provide basic visual / audio information on Swan services.</p>	
<p>Does advice and support around anti-social behaviour and security take into account the added vulnerability of women who are living without another adult in the home?</p> <p>Is there adequate support in place for older residents and residents with a disability who may be more vulnerable following an experience of ASB?</p> <p>Are Swan staff proactive in making arrangements to visit</p>	<p>Review of current policy, procedure and practice.</p>	<p>We have implemented an Out of Hours ASB service for those residents needing help and advice. This can provide assistance to those living on their own or those who are subjected to ASB in the evening and late at night.</p> <p>We recognise that not everyone is able to record ASB by completing diary sheets so we have recently introduced Dictaphones for those who would prefer to record the incidents than to use the forms provided.</p> <p>To ensure that residents are able to sustain their tenancies, vulnerability assessments are completed at the sign up. This ensures</p>	

Question/focus to be addressed	Data/information source	Summary	Gap in data
<p>residents in their homes when necessary?</p> <p>Are involvement and engagement opportunities relating to ASB and neighbourhood management open and welcoming to residents who are lesbian, gay or bisexual?</p> <p>To ensure that engagement and involvement mechanisms are open and welcoming to the transgender community.</p>		<p>that the required support packages can be put into place to help residents to live independently but with access to the help that they need to do so.</p> <p>Some residents may feel worried about coming forward to report ASB for fear of possible reprisals. We have now implemented an online ASB reporting form which allows residents to report incidents of ASB anonymously. We will also support those residents who come forward as witnesses of ASB to ensure that they have the help and support to feel comfortable to do so.</p> <p>Swan knows that safety is a key priority for many residents especially when it comes to ASB and we will always consider the provision of new locks and other protection measures so that residents feel able to come forward to report ASB whilst feeling safe in their homes.</p> <p>To address issues at a local level we now hold local focus groups in some London areas and there is an ASB forum across all geographical areas. The Forum discusses</p>	

Question/focus to be addressed	Data/information source	Summary	Gap in data
		<p>all issues relating to ASB and will include a specific equality agenda item from 2011. The Forum is open and welcoming to all, including residents who are lesbian, gay, bisexual or transgender. The importance of equality is also promoted throughout all of Swan's involvement activities.</p> <p>Swan has employed a Family Intervention worker to work with those families who are at threat of eviction or need help to sustain their tenancies and keep their homes. This may include ASB and estate management issues.</p> <p>Swan officers are proactive in visiting residents when necessary and have received training and guidance around providing services in a suitable way for the diverse communities Swan Housing serves. The use of resident profiling information also enables staff to take basic equality considerations on board and ask residents the right questions when arranging visits.</p>	
Working patterns potentially preventing attendance at	Review of current policy, procedure and practice.	Specifically in relation to neighbourhood management, Swan encourages as many	

Question/focus to be addressed	Data/information source	Summary	Gap in data
estate inspections.		residents as possible to attend estate inspections and we recognise that those residents who are working full time may not have an opportunity to join these. In light of this, we are piloting estate inspections in the evening on some of the estates, where a need has been identified.	
Sufficient access to communal buildings for disabled residents.		<p>People with a disability may have an increased difficulty in accessing Swan's communal buildings. In light of this, we will regularly assess and review the facilities for residents with disabilities.</p> <p>When access is identified as a problem, we clearly set out what is required to improve the situation.</p> <p>We also arrange home visits to residents with a disability that makes it difficult to access our services outside the home.</p>	

Consultation

Most proposed policies, decisions or changes to existing policies will require consultation in order to understand the views of those likely to be affected. This consultation should take place when proposals are at a formative stage to enable staff to have an understanding of differences in views of diverse communities.

Please record below the consultation that was undertaken or considered as part of the assessment and a brief summary of findings.

Question / focus to be addressed	Description of consultation considered <i>Please include details of who was consulted, numbers taking part, methodology</i>	Key findings <i>Please include differences in views/needs as expressed by different sections of the community</i>
Overall consultation on policies including equality and diversity issues	Resident Consultative Committees(RCC's) The Essex and London RCCs were consulted on: London - 9 September 2010 Essex - 24 September 2010	There were no specific equality and diversity issues raised during the consultation process.

STEP FOUR: Assess Impact

Having considered the information collected and the findings of the consultation, make an assessment of whether there may be a positive, adverse or disproportionate impact in respect of the questions or areas of focus for the EIA. If there is likely to be an adverse or disproportionate impact upon a particular community, make a judgement as to whether this is justifiable (a proportionate means of achieving a legitimate aim). Please record your conclusions below.

Question / focus to be addressed	Is there likely to be a positive, negative or disproportionate impact? (Please explain briefly the evidence that supports this.)	Is this impact justifiable? (Please explain briefly.)
All of the focus points addressed.	<p>There is not likely to be a negative equality impact in relation to any of the focus points addressed.</p> <p>The operation of the policies and the related service provision is likely to have a positive equality impact overall. However, equality monitoring information will be assessed when available.</p>	

STEP FIVE: Action to Mitigate Adverse Impact

Where there is likely to be an unjustifiable negative or disproportionate impact, consider what mitigating action might be taken and if an improvement performance target needs to be set. Complete the box below.

STEP SIX: Plan and Set targets

The actions and targets should be incorporated into any relevant strategic documents and work plans. The lead EIA officer is responsible for overseeing this.

Adverse or negative impact to be addressed	Action required	Performance/outcome target	Lead Department/Section/Officer	Timescale
Gap in data.	Equality analysis of ASB satisfaction survey results.	First equality analysis completed by April 2011. (The introduction of the new ASB IT system ReAct has only enabled this information to be recorded since the system was implemented in July 2011.)	Jackie King Regional Housing Manager	April 2011
Improve staff training and tools so that staff are better placed to respond to the diverse needs of our residents.	Equality and Diversity Workshop Sessions on priority areas to be delivered to Housing staff. Review of current procedures for ASB and Hate Crime to ensure that these are clear and up to date and that staff are aware how to handle individual cases.	First session to be delivered by March 2011. Procedures updated by February 2011.	Samantha Sizeland – Equality and Diversity Manager Jackie King – Regional Housing Manager	April 2011 April 2011

STEP SEVEN: Reporting and Logging the EIA

- 1) **Housing Managers** should send a copy of the EIA pro-forma to the Housing Diversity Manager for comments before it is finalised.
- 2) The EIA must be approved by the relevant service manager.
- 3) Managers may also wish to consider writing a covering report or paper for EIA's of a very strategic nature (this is optional).
- 4) Managers should keep a signed copy of the completed EIA pro-forma for their records.
- 5) The completed EIA should be reported to the relevant Diversity Action Forum (DAF).
- 6) All non housing managers should send an electronic copy of the finalised EIA to Central Services for the corporate log (the Housing Diversity Manager will do this for housing managers once the EIA has been agreed).
- 7) Key EIA's should be published on the Swan websites (the Housing Diversity Manager will arrange this for housing managers once the EIA has been agreed).

Signed.....

Print Name Jackie King

Job Title Regional Housing Manager - London

Date 30th November 2010

Date sent to Housing Diversity Manager (if applicable) December 2010

Date sent to DAF Scheduled for February 2011

Date sent to Central Services for Corporate Log January 2010