



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	Service Charge Policy, Service Charge Repayment Policy and Leaseholder Forum Policy
Lead EIA Officer and Job Title (The EIA lead must be a manager)	Rob Pearce – Leasehold Services Manager
EIA Team Members	Leasehold Management Team
Director and Head of Service	Mary Gibbons – Director of Housing Essex
Does the EIA relate to an existing policy? (Yes / No)	Yes
Who implements the Policy?	Leasehold Management
Date that the Policy / strategy is due for review (if applicable)	September 2012

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.

This Service Charge Policy sets out Swan's approach to the construction, management and accounting of service charges for all residents. This policy is in support Swan's rent setting policy, diversity policy and value for money approach. The Policy applies to all shared ownership, long leasehold, assured tenants and licensees who pay charges for services, repairs, maintenance, insurance or management in addition to their rent.

The Service Charge Repayment Policy sets out Swan's approach to recognising leaseholders can face economic difficulties and allows leaseholders to repay service charge arrears in cases of hardship. The policy reflects leaseholders' responsibility to pay all relevant costs attributable to their lease.

The Leasehold Forum Policy sets out how:

- The leasehold forum will drive service improvement for leasehold and shared ownership services.
- Swan aims to promote the increased involvement of leaseholders and shared owners within Swan's governance.

Swan Housing Group strives to meet the needs of all customers and is committed to reducing inequality, eliminating discrimination and promoting good relations between people of different groups. Leasehold Services endeavours to ensure that the application of

any unjustifiable criteria.

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.

Ethnicity / Race	There is less relevance to the promotion of equality within Leasehold Services than many of the other housing services delivered by Swan, as the services provided are different in nature and are always based purely on the contractual agreement in the lease and extensive legislation. However it is important that Leasehold Services complies with and promotes corporate equality, diversity and inclusion standards and objectives as applicable across equality groups. This includes the application of the Service Charge Policy, Service Charge Repayment Policy and Leaseholder Forum Policy and the provision of information in accessible formats on request.
Disability	As per the Ethnicity / Race section above.
Gender (including pregnancy and maternity)	As per the Ethnicity / Race section above.
Transgender (including gender	As per the Ethnicity / Race section above.

reassignment)	
Age	As per the Ethnicity / Race section above.
Sexual Orientation	As per the Ethnicity / Race section above.
Religion/Belief	As per the Ethnicity / Race section above.
Marriage and Civil Partnership	As per the Ethnicity / Race section above.

<p>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.</p>	
Socio-economic Status	It is acknowledged that clear information on service charges and related requirements is crucial in order for leaseholders and shared owners to manage their own finances. The Service Charge Repayment Policy recognises that some homeowners face economic difficulties and will help them manage their own finances.
Community Cohesion	There is minimal relevance to wider community cohesion. However, increased involvement in the leaseholder forums could contribute to increased cohesion in local neighbourhoods through the discussion and resolution of issues in the local area.

If there is no relevance across ALL equality strands or in relation to socio-economic status or community cohesion, a full EIA will not be required. Please go to page 8 and record this.

There is some relevance across the equality strands / protected characteristics in relation to the service and policy areas. However, due to the current lack of equality monitoring data and qualitative data via the Leaseholder Forum a full Equality Impact Assessment is not possible at this moment in time. However, this will be reviewed in December 2011 when there should be sufficient equality monitoring information available.

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:

Specific Focus in Relation to Equality Strands or Protected Characteristics:

Ethnicity / Race	
Gender (including Pregnancy and Maternity)	
Transgender	

(including Gender Reassignment)	
Disability	
Age	
Sexual Orientation	
Religion/ Belief	
Marriage and Civil Partnership	

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

Record whether or not an EIA is required:

Is an EIA required? <i>Please tick either yes or no</i>	Yes	No <div style="text-align: center;">√</div>
If yes, add target date for completion: A full EIA will not be undertaken at this time. However, this position will be reviewed again in December 2011 when equality monitoring information will be available.	Signature of Manager	
	Print Name: Rob Pearce – Leasehold Services Manager	
	Date: 27 th September 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).