



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	Needs Assessment Policy
Lead EIA Officer and Job Title (The EIA lead must be a manager)	Shalene Brooker – Support Services Manager
EIA Team Members	Shalene Brooker, Valerie Feakins
Director and Head of Service	Mary Gibbons, Director – Housing Essex
Does the EIA relates to an existing policy? (Yes / No)	Yes
Who implements the Policy?	Supported Housing
Date that the Policy / strategy is due for review (if applicable)	October 2011

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.

Swan aims to provide the highest possible standards of service delivery ensuring that important emphasis is placed on the accurate assessment of need, individual planning, quality of implementation and providing opportunities for review. These are important steps in the process of ensuring Swan can provide support, reassurance and empowerment to assist vulnerable adults at risk, alone or isolated within the community. The Needs Assessment Policy and Procedure sets out how assessments are undertaken.

This procedure is designed to ensure a consistent, sensitive, supportive and high quality approach to the needs assessment process. As a result the Supported Housing Team strives towards promoting choice and increasing independent living to the service users who become Swan tenants to ensure they live as full a life as possible.

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

<p>An EIA should be undertaken if the policy, strategy or decision is <i>relevant</i> 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	The Needs Assessment Policy has some relevance across the equality strands / protected characteristics. Therefore a full EIA will be undertaken.
Disability	As above.
Gender (including pregnancy and maternity)	As above.
Transgender (including gender reassignment)	As above.
Age	As above.
Sexual Orientation	As above.
Religion/Belief	As above.
Marriage and Civil Partnership	As above.

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	There is very little relevance to socio-economic status.
Community Cohesion	There is very little relevance to wider community cohesion.

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 full EIA will address the following key issues / questions:

- Disability and vulnerability factors are central to the process. Are staff assessing the needs of applicants also aware of potential differences in need and the barriers experienced which are associated with ethnicity, culture, religion, sexual orientation and age and gender?
- Are staff trained to recognise additional risks associated to hate crime which may increase an applicant’s vulnerability and

- Are applicants encouraged and supported to invite the people they want (relatives, advocates, and other agency workers/supporters) to attend the assessment process and are staff able to signpost applicants to advocacy services?
- Does the Policy and Procedure set out how an ethical, transparent, honest and accountable approach should be maintained during the assessment? The applicant should be able to freely express their views and opinions and should be treated with respect and in a non-judgemental fashion.
- Can information on the assessment process and the appeal process (where applicable) be provided in accessible formats on request?

Other potential equality issues may be identified and addressed throughout the development of the full EIA.

Specific Focus in Relation to Equality Strands or Protected Characteristics:

Ethnicity / Race	As per the overall focus detailed above.
Gender (including Pregnancy and Maternity)	As per the overall focus detailed above.
Transgender (including Gender Reassignment)	As per the overall focus detailed above.
Disability	As per the overall focus detailed above.

Age	As per the overall focus detailed above.
Sexual Orientation	As per the overall focus detailed above.
Religion/ Belief	As per the overall focus detailed above.
Marriage and Civil Partnership	As per the overall focus detailed above.

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

This EIA will not have a specific focus on socio-economic status or community cohesion.

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	Signature of Manager	
	Print Name: Shalene Brooker	
	Date: 17th 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
Are staff assessing the needs of applicants also aware of potential differences in need and the barriers experienced which are associated with ethnicity, culture, religion, sexual orientation and age and gender?	Examination of current and planned policies, procedures and training.	<p>All staff receive needs assessment training externally in order to determine the level of support needed. This training is refreshed every year.</p> <p>The assessment focuses on the areas highlighted in the referral form and the five key headings of: Economic Well-Being, Being Healthy, Enjoying and Achieving, Making a</p>	

Question/focus to be addressed	Data/information source	Summary	Gap in data
		<p>Positive Contribution and Staying Safe. The assessment also highlights additional areas of need. Agreements are made following consultation with the service user which feed into the individual support plan.</p> <p>Equality and diversity training has been delivered to a broad range of Swan staff within supported housing teams. The teams also have representatives on the Diversity Action Forums (DAF's) that directly contribute to project work and the sharing of good practice.</p> <p>Some need has been identified to increase awareness of equality and diversity issues further. Action to address this has already been built into the Essex and London Housing Diversity Action Plans (DAP's) and identified in the separate Safeguarding Adults Equality Impact Assessment (EIA). Targeted sessions on priority equality and diversity areas will be delivered in</p>	

Question/focus to be addressed	Data/information source	Summary	Gap in data
		2011.	
Are staff trained to recognise additional risks associated to hate crime which may increase an applicant's vulnerability and require a tailored response?	Examination of current and planned policies, procedures and formal/informal training.	Staff have received training and are aware of issues relating to hate crime and how this can increase vulnerability.	
Are applicants encouraged and supported to invite the people they want (relatives, advocates, other agency workers/supporters) to attend the assessment process and are staff able to signpost applicants to advocacy services?	Examination of current and planned policies and procedures.	<p>On receipt of a referral, the gateway, which is the central place for all referrals to be sent to, will contact the potential service user with a specific time and date that is convenient to them. This letter will also include the opportunity for someone else to be present at the assessment and also identifies that some sensitive questions will be asked.</p> <p>At this stage we would also provide an opportunity for the referring partner/advocate to attend the assessment with the service user's permission.</p> <p>Staff are able to signpost to local advocacy services on request.</p>	

Question/focus to be addressed	Data/information source	Summary	Gap in data
<p>Maintain an ethical, transparent, honest and accountable approach during the assessment which allows the applicant to freely express their views and opinions and have them treated with respect and in a non-judgemental fashion.</p>	<p>Examination of current and planned policies and procedures.</p>	<p>The needs assessment allows the service user to discuss their opinions and assessment officers receive training on remaining impartial.</p>	
<p>Can information on the assessment process and the appeal process (where applicable) be provided in accessible formats on request?</p>	<p>Examination of current and planned policies and procedures.</p>	<p>Information can be provided in range accessible formats on request.</p> <p>Key documents can be produced in accessible formats, including large print, Makaton, Braille and community languages.</p> <p>Supported Housing is also able to provide British Sign Language (BSL) interpreting in house.</p> <p>We are able to use textphone, text messaging and have a Hearing Loop in place in designated office areas.</p>	

Question/focus to be addressed	Data/information source	Summary	Gap in data
		All staff has access to telephone interpreting via Language Line. Face to face interpreting can also be arranged for meetings with advance notice. Face to face interpretation is particularly appropriate for meetings of a sensitive nature and where support is being provided to individuals.	

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	Description of consultation	Key findings
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addressed	considered <i>Please include details of who was consulted, numbers taking part, methodology</i>	<i>Please include differences in views/needs as expressed by different sections of the community</i>
Overall consultation on the Needs Assessment Policy	<ul style="list-style-type: none"> • Resident Consultative Committees (RCC's) • Supported Housing Committee • Staff consultation • Supporting People Team 	The only equality related issue raised in regard to this Policy was that the specific needs of applicants being interviewed should always be taken into account. For example an applicant with a hearing impairment or learning disability may need the interview process to be adapted accordingly. Staff are aware of how to respond to individual needs.

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?	Is this impact justifiable?
Overall assessment of impacts.	<p>Swan does not consider there to be any significant negative equality impacts.</p> <p>There is some need to further increase understanding of equality issues across the</p>	<p>Not applicable.</p> <p>Further work is already detailed in the housing Diversity Action Plans and this</p>

Question / focus to be addressed	Is there likely to be a positive, negative or disproportionate impact?	Is this impact justifiable?
	service area.	has been covered in the separate Safeguarding Adults Policy EIA.

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
Maintaining insight of potential equality and diversity issues and acting to make improvements where appropriate.	Review all needs assessments on a quarterly basis. The review process will also consider equality and diversity issues.	Review quarterly in line with Supporting People requirements.	Shalene Brooker	Ongoing at least until time of Policy Review

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 Shalene Brooker

Job Title Support Services Manager

Date 18th November 2010

Date sent to Housing Diversity Manager (if applicable) - Final draft sent to Housing Diversity Manager 18th November 2010

Date sent to DAF Scheduled for November and December 2010 meetings

Date sent to Central Services for Corporate Log