



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	<p>Income Management EIA - this is an overarching EIA covering the:</p> <ul style="list-style-type: none"> • Income Management Strategy • Rent Repayment Policy • Rent Arrears and Income Maximisation Policy • Financial Inclusion Strategy. <p>Undertaking an overarching EIA enables the assessment of potential equality impacts of key income management policies and strategies and the way in which they interact.</p>
Lead EIA Officer and Job Title (The EIA lead must be a manager)	<p>Amanda Oakley (Regional Housing Manager, Essex)</p>
EIA Team Members	<p>Jeremy Acott (Income Manager, Essex) Abi Akande (Income Manager, London)</p>
Director and Head of Service	<p>Mary Gibbons (Housing Director, Essex) Sandra Fawcett (Housing Director, London)</p>
Does the EIA relate to an existing policy? (Yes / No)	<p>Yes</p>
Who implements the Policy?	<p>Housing Management Income Teams</p>

Date that the Policy / strategy is due for review (if applicable)	<ul style="list-style-type: none"> • Income Management Strategy due to be reviewed April 2012 • Rent Repayment Policy is due to be reviewed February 2012 • Rent Arrears and Income Maximisation Policy is due to be reviewed December 2011 • Financial Inclusion Strategy is due to be reviewed July 2013
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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.

These strategies and policies show Swans commitment for a more focused and pro-active approach to income management as a whole.

This Financial Exclusion Strategy has been developed to:

- To initially reduce, and then eliminate, financial exclusion in the areas that we manage
- Provide background information on financial exclusion in the UK
- To identify current financial inclusion activities at Swan
- Set out and define the financial inclusion objectives and how and when these will be achieved
- Determine how achievement of the objectives will be monitored and how success and effectiveness will be measured.

Swans Income Management Strategy has been developed to:

- Support the Corporate Aims and Objectives of achieving performance in the top 25% of housing associations whilst providing an excellent service to our residents and customers

- Increase the amount of money we can spend on tenant services by recharging tenants where appropriate (e.g. rechargeable repairs), or recharging leaseholders the cost of providing services to them in the form of management and administration costs
- Set out and define the income management service objectives and how and when these will be achieved (this includes references to the challenges facing the service and what actions and resources are necessary to overcome them)
- Determine how achievement of the objectives will be monitored and how success and effectiveness will be measured.

Swans Rent Arrears and Income Maximisation Policy has been developed to:

- Take all appropriate action to recover former tenant arrears and other debts
- Work closely with other agencies e.g. Local Authorities, Social Services, PCT and informal carer and support networks in order to prevent homelessness
- Ensure tenants have access to welfare benefits, debt and money advice services in order to maximise income and manage debt
- Provide all services in adherence to the Equality & Diversity Policy
- Ensure that tenants who experience difficulty with rent payments are treated with respect at all times
- Ensure vulnerable tenants will be provided with sensitive and appropriate support
- Ensure communication with residents is clear, appropriate and encourages contact
- Legal proceedings leading to possession or eviction will be a last resort when all other reasonable steps have failed.

Swans Rent Payment Policy sets out how Swan Housing will collect rent and other charges from its tenants.

The overall aim of the Policy is to collect rent and other charges due promptly from tenants to protect the provision of services. In the context of this policy, Swan will:

- Promote and encourage a payment culture whereby tenants are obliged to pay their rent in advance as per their tenancy agreement, if tenants wish to pay their rent monthly then the payment should also be made in advance
- Encourage tenants to take full responsibility for the payment of their rent
- Provide a choice of payment methods that are cost effective, convenient, easy to use and accessible
- Take time with new tenants to explain payment methods and obligations, help with benefit claims and warn of the possible consequences if they fall into arrears
- Reiterate key messages relating to rent payment at the 4 week follow-up visit after the tenancy starts

- Deliver services to meet the diverse needs of our tenants.

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 relevance across the equality strands / protected characteristics given the nature of the policies and strategies.
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.
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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 relevance to socio-economic status, particularly as these policies and strategies relate to income management and financial inclusion / exclusion.</p> <p>The Financial Inclusion strategy has a distinct emphasis on ensuring that tenants are not financially excluded. The service has Welfare Benefit Officers and Income Officers who help to maximise tenants' income. Therefore much mitigating action has already been incorporated.</p>
Community Cohesion	It is acknowledged that strategic decisions that effect socio-economic conditions in a particular area can also impact on community cohesion. However, there is very limited relevance to wider community cohesion in this case as the potential equality impacts of these policies and strategies are likely to be more individual in nature. For this reason community cohesion will not be addressed within this EIA.

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.

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 will be to:

- Ensure equal access to our Income Services across equality groups and the identification of potential barriers
- Check there are no significant disparities across equality groups amongst tenants in arrears or tenants who have been evicted due to rent arrears
- Check that there are no significant disparities in satisfaction with income related services across equality groups.

Specific Focus in Relation to Equality Strands or Protected Characteristics:

Ethnicity / Race	As per the overall focus above, including a focus issues relating to language barriers that may prevent a resident meeting obligations, accessing services or seeking advice.
Gender (including Pregnancy and Maternity)	As per the overall focus above.
Transgender (including Gender Reassignment)	As per the overall focus above.

Disability	As per the overall focus above, including a focus on: <ul style="list-style-type: none"> • Whether people with a disability are experiencing financial exclusion and are able to access our services, particularly benefits advice and information.
Age	As per the overall focus above, including a focus on: <ul style="list-style-type: none"> • Financial exclusion and older people • Access to benefits advice and information.
Sexual Orientation	As per the overall focus above.
Religion/ Belief	As per the overall focus above.
Marriage and Civil Partnership	As per the overall focus above.

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

The EIA will seek to identify and mitigate any areas of avoidable negative socio-economic impact and promote opportunities for financial inclusion and positive socio-economic impact.

Record whether or not an EIA is required:

Is an EIA required? <i>Please tick either yes or no</i>	Yes ✓	
If yes, add target date for completion: 30 th November 2010	Signature of Manager	
	Print Name: Amanda Oakley	
	Date: Draft revised 13.07.2010	

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 there any disparities in satisfaction between equality groups?	Income Management Survey Results	<p>The Income Management Survey Report (2009) showed that:</p> <ul style="list-style-type: none"> • 69% felt it was very or fairly easy to contact their rent officer • 88% felt staff were helpful • 88% felt staff were courteous • 81% felt staff were sensitive • 91% felt staff were responsive • 91% felt staff were 	<p>There is a gap in equality monitoring data. This is due to the overall response rate and lack of provision of equality monitoring data needed for the equality analysis of satisfaction.</p> <p>However, Swan will continue to collect this data and encourage completion. Equality analysis</p>

Question/focus to be addressed	Data/information source	Summ	Gap in data
		<p>knowledgeable</p> <ul style="list-style-type: none"> 85% were satisfied with the information given to them by staff. <p>The survey does collect equality monitoring information to facilitate analysis by equality group. However, due to low response rates there was insufficient data to analyse satisfaction by equality group.</p>	<p>will be revisited in the next financial year.</p>
<p>Are there any significant disparities across equality groups amongst tenants in arrears?</p> <p>Are there any significant disparities across equality groups amongst tenants who have been evicted due to rent arrears?</p>	<p>Equality analysis of rent arrears and evictions.</p>	<p>Work on collating and analysing this data is currently underway. However, this has been delayed due to complexities with system reports.</p> <p>Evictions data has now been analysed, however the number of evictions are too small to identify valid trends across equality groups.</p>	<p>This is acknowledged as a current gap in data. However, any disparities found will be investigated and action will be built into the Service Improvement Plan or Diversity Action Plan as appropriate. Also see the EIA Action plan in this pro-forma.</p>

Question/focus to be addressed	Data/information source	Summary	Gap in data
<p>Are there any unintentional barriers that may hinder access to services across equality groups?</p>	<p>EIA Team review of policy/ procedures and qualitative data obtained from complaints, consultation mechanisms and other sources.</p>	<p>There have not been any negative equality impacts identified to date.</p> <p>Swan’s customer care standards detail how staff should interact with customers and how customers can access our services in different ways.</p> <p>We regularly run campaigns in relation to arrears, welfare benefits and pension credits to targeted customer groups.</p> <p>A potential barrier could be Swan’s office / telephone opening times, which may prevent tenants who work from accessing our services during 9-5pm, Monday to Friday. This could have a particular impact on single parents who work full time and have family commitments. This has been addressed in the EIA Action Plan.</p> <p>We can provide information on arrears, rents and income management in community languages and in other accessible formats on request.</p>	

Question/focus to be addressed	Data/information source	Summary	Gap in data
		The Financial Inclusion Strategy is designed to mitigate potential exclusion of a variety of equality groups.	
Are there any unintentional barriers that may hinder access to services across equality groups?	<p data-bbox="510 507 943 576">Access Audit of Pilgrim house February 2010</p> <p data-bbox="510 1098 768 1134">Mystery shopping</p>	<p data-bbox="1037 507 1579 687">The access audit undertaken in February 2010 showed largely positive results, a number of minor issues were accepted and addressed following the report.</p> <p data-bbox="1037 727 1579 871">We are currently waiting for action on the suggested changes to the stop at one end of the entrance ramp which needed tactile information.</p> <p data-bbox="1037 911 1547 1054">We also seek to hold meetings with residents and partner organisations in accessible meeting rooms and venues.</p> <p data-bbox="1037 1094 1536 1166">Mystery shopping to date has not raised any specific equality issues.</p>	
Are there any unintentional barriers that may	Review of operations in terms of accessible communications and cultural awareness.	The service areas concerned use a number of methods to ensure accessible communication and	

Question/focus to be addressed	Data/information source	Summary	Gap in data
hinder access to services across equality groups?		<p>access to advice and information. This includes:</p> <ul style="list-style-type: none"> • The use of telephone standards, text messaging, textphone / minicom, email, a web portal, and the provision of translation and interpretation when necessary. • Home visits and the provision of private meeting space when providing support to vulnerable residents. • The use Hearing loops in receptions. • The use of Talk Signs (in English, Somali and Bengali) in the Chrisp Street and Exmouth Estate reception areas in London. • The provision of a Sign Up DVD translated into community languages (including information on rent). • The provision of audio translation for the Tenants and Leaseholder Handbook. 	

Question/focus to be addressed	Data/information source	Summary	Gap in data
		<p>To assist with cultural and equality awareness:</p> <ul style="list-style-type: none"> • Formal or informal equality and diversity training has been rolled out to key staff. • Income Management staff participate in the Diversity Action Forums and further awareness building activities are planned for 2010 and 2011. • Staff use resources such as the Faith Guide and use the diversity flags on the Universal Housing and Contact Manager IT systems to assist with interaction with residents. 	
<p>Are there any unintentional barriers that may hinder access to services across equality groups?</p>	<p>QHS standards</p>	<p>Swan is accredited with QHS standard, we have been audited and mystery shopped for many years prior to achieving this standard. Part of the QHS on site audit, reviews accessibility to the offices and facilities for customer's visiting these offices.</p>	

Question/focus to be addressed	Data/information source	Summary	Gap in data
		<p>We are also members of HQN & RIEN (Rent Income Excellence Network) where best practice is shared. We have also had a HQN mock short notice inspection of our Income service.</p> <p>Suggested areas for improvement identified by these audits (and the Access Audit) which have been implemented include:</p> <ul style="list-style-type: none"> • Improvements to signage enabling those customers with a sight impairment to easily read the signs • Improvements to seating for those with limited mobility • Ensuring leaflets are at the correct level for those in a wheelchair to access • Installing a electronic automatic door opening for those with a disability at Pilgrim House • Improved the translation on the back of service leaflets to 	

Question/focus to be addressed	Data/information source	Summary	Gap in data
		<p>indicate what the leaflet is about</p> <ul style="list-style-type: none"> • Developed 'flags' for our IT system which identifies vulnerabilities, disabilities and if customer does not speak English as first language etc. <p>The audits and best practice also feed into our service improvement plan – which includes improvements planned for the future, such as:</p> <ul style="list-style-type: none"> • Improve the recording and monitoring of referrals to other agencies for vulnerable customers • Carry out further analysis of those in arrears by diversity stands • Review contents insurance scheme to ensure that we promote the best to those on low income. 	
Is the Financial Inclusion Strategy sufficient for resident	Resident Profiling Analysis, March 2010.	The March 2010 resident profiling equality analysis showed that less than a third of our tenants are in full	The Financial Inclusion Strategy was introduced in 2010 and it is recognised that

Question/focus to be addressed	Data/information source	Summary	Gap in data
groups at high risk of financial exclusion?		<p>or part time employment.</p> <p>The Strategy together with the Welfare Benefits Service (which includes a Bengali speaking advisor) helps to support tenants before or when rent arrears become a problem. We sign post to advice agencies and use a number of other methods to provide support when needed.</p> <p>We have clear information on how to pay rent, a Rent Service Standard leaflet and a debt advice leaflet. We are currently developing further benefit guidance notes.</p> <p>The Financial Inclusion Strategy (2010) has an action plan which includes targeted campaigns. This produces positive impacts for equality groups including older people and people with a disability. The promotion of credit unions is also designed to help tackle general financial exclusion.</p> <p>We will also be working with various</p>	<p>a review of its impact will be required when it has been in place for a full year.</p>

Question/focus to be addressed	Data/information source	Summary	Gap in data
		banks to provide basic bank accounts for our tenants. This includes working with banks so that they can accept tenancy agreements as proof of identification. Many of our tenants will not have previously held a tenancy or paid bills, so they may not have sufficient proof of identification.	

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 and consideration of potential equality issues.	The Resident Consultative Committees (RCC's) in Essex and London have been consulted on the policies / strategies below on the dates given. They	There were no equality and diversity issues raised through this consultation process.

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>
	<p>scrutinise Policy from a resident's perspective (including potential equality and diversity issues).</p> <p>Financial Inclusion Strategy implemented July 2010 – (RCC's reviewed in Dec 09 and Jan 10).</p> <p>Income Management Strategy implemented July 2009 (RCC's reviewed in June 09).</p> <p>Rent Repayment Policy implemented July 2009 (RCC's reviewed in June 09).</p> <p>Rent Arrears and Income Maximisation Policy implemented March 2009 (RCC's reviewed in February 09).</p>	
<p>Overall consultation and consideration of potential equality issues.</p>	<p>An Income Management Focus Group was developed in December 2009. The group also reviewed the Financial Inclusion</p>	<p>The Focus Group has reviewed and scrutinised the Financial Inclusion Strategy, the rent arrears letter structure, Swans website information relating to income management, rents and arrears. This has been undertaken with a view to making</p>

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>
	Strategy prior to it being presented to the RCC's.	information as accessible and inclusive as possible.

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.)
Are there any disparities in satisfaction between equality groups?	<p>Due to the gap in data, which we have already acknowledged within this pro-forma, we can not identify any trends at this moment in time.</p> <p>Further satisfaction data will be available in the new financial year and this analysis will be revisited.</p>	

<p>Are there any significant disparities across equality groups amongst tenants in arrears?</p> <p>Are there any significant disparities across equality groups amongst tenants who have been evicted due to rent arrears?</p>	<p>Evictions have been analysed, however for the reasons already discussed we cannot identify any statistically valid trends at this moment in time.</p> <p>Work to analyse arrears is currently underway.</p>	
<p>Are there any unintentional barriers that may hinder access to services across equality groups?</p>	<p>There is a potential barrier to accessing income services caused by office opening and contact times.</p> <p>At this moment in time there does not appear to be any other significant barriers that hinder access to equality groups.</p>	<p>No. A review of evening surgeries features in our EIA action Plan to ensure that there are sufficient opportunities to contact Swan directly outside of standard working hours.</p>
<p>Is the Financial Inclusion Strategy sufficient for resident groups at high risk of financial exclusion?</p>	<p>To date there are no apparent negative equality impacts. The Strategy will be reviewed once it has been in place for a year and at regular intervals thereafter. At this point Swan will be in a better position to make a judgement about whether the Strategy is sufficient for groups at high risk of financial exclusion.</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
Ensuring that the Financial Inclusion Strategy and its implementation maximises potentially positive equality and inclusion impacts.	Undertake a review of the equality outcomes of The Financial Inclusion Strategy once it has been in place a year. Introduce further actions as appropriate into the Service Improvement Plan and Diversity Action Plan.	Review completed by October 2011. Actions added to the Service Improvement Plan or Diversity Action Plan following review by November 2011.	Amanda Oakley – Regional Housing Manager, Essex	November 2011
Are there any significant disparities across equality groups amongst tenants in arrears?	Complete equality analysis of tenants in rent arrears. Explore any disparities between equality groups further and introduce	Analysis completed by January 2011. Resulting action to be added to the Service	Amanda Oakley – Regional Housing Manager, Essex	February 2011

Adverse or negative impact to be addressed	Action required	Performance/outcome target	Lead Department/ Section/Officer	Timescale
<p>Are there any significant disparities across equality groups amongst tenants who have been evicted due to rent arrears?</p> <p>Addressing current gap in data and taking action if and where necessary.</p>	<p>actions or initiatives into the Service Improvement Plan and Diversity Action Plan.</p>	<p>Improvement Plan or Diversity Action Plan by February 2011.</p>		
<p>Checking for disparities in satisfaction across equality groups.</p> <p>Addressing current gap in data and taking action if and where necessary.</p>	<p>Carry out another satisfaction survey on the Income Service and analyse results by equality groups.</p> <p>Introduce further action as appropriate into the Service Improvement Plan and Diversity Action Plan.</p>	<p>Analysis completed by April 2011.</p> <p>Resulting action to be added to the Service Improvement Plan or Diversity Action Plan by May 2011.</p>	<p>Amanda Oakley – Regional Housing Manager, Essex</p>	<p>May 2011</p>
<p>Currently waiting for action on the remaining change to the entrance ramp (Pilgrim House) from the Access Audit.</p>	<p>Ensure that Facilities Management fulfil the recommendation regarding the use of a tactile strip on the entrance ramp to Pilgrim House.</p>	<p>Contact Facilities Management immediately.</p> <p>Ensure Facilities Management complete the minor adaptation to ramp by January 2011.</p>	<p>Amanda Oakley – Regional Housing Manager, Essex</p>	<p>January 2011</p>

Adverse or negative impact to be addressed	Action required	Performance/outcome target	Lead Department/Section/Officer	Timescale
Ensuring that residents have opportunities to contact / access services outside of the standard office hours.	Carry out review of where and when block / estate surgeries and estate inspections that are held to ensure that a sufficient number of sessions are held out of hours. Introduce further actions as appropriate into the Service Improvement Plan and Diversity Action Plan.	Review completed by May 2011. Actions added to the Service Improvement Plan or Diversity Action Plan following review by June 2011.	Amanda Oakley – Regional Housing Manager, Essex	June 2011
Increasing general awareness of equality and diversity issues across the service area.	Income Service staff to participate in the new Equality and Diversity sessions to be delivered through the Essex and London Housing Diversity Action Forums in 2011.	All income staff to attend at least one session.	Amanda Oakley – Regional Housing Manager, Essex	June 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 Amanda Oakley

Job Title Regional Housing Manager

Date 22nd October 2010

Date sent to Housing Diversity Manager (if applicable) - Final draft sent to Housing Diversity Manager on 22nd October 2010.

Date sent to DAF - November and December 2010

Date sent to Central Services for Corporate Log - 25th October 2010.