



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	Estate Services Policy The Satellite Policy is also considered within this EIA.
Lead EIA Officer and Job Title (The EIA lead must be a manager)	Jorgen Dyer – Head of Estate Services
EIA Team Members	Diane Kett – Estate Services Manager Richard NZoghe – Caretaking Team Leader Anna Bukczynska – Caretaking Team Leader Dean Woodley. – Caretaking Team Leader Magda Pieniazek – Caretaking Team Leader
Director and Head of Service	Sandra Fawcett – Director of Housing London
Does the EIA relate to an existing policy? (Yes / No)	Yes
Who implements the Policy?	Estate Services
Date that the Policy / strategy is due for review (if applicable)	July 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.

The overall aim of the Estate Services Policy is to ensure that all services provided by the Estate Services team have a customer led approach and that the service is tailored to the needs of each area. This enables residents to live in an attractive, well maintained and safe and secure environment.

The specific objectives are:

- To develop a proactive approach to all matters relevant to estate services on all our properties and estates
- To manage the environment around our properties and common areas effectively
- To ensure all residents are aware of their respective responsibilities
- To set appropriate standards to ensure we deliver on performance and within our targets.

Estate Services include the activities below, although this is not an exhaustive list.

- Caretaking
- Common area cleaning and reporting of repairs
- Making safe where needed
- Grounds maintenance
- Litter waste collection

- Reporting of Abandoned vehicles
- Reporting of all Anti Social behaviour
- Reporting and removing of Graffiti within time scales
- Estate inspections
- Playground equipment (where provided).

The Satellite Policy aims to assist staff to:

- Apply and where necessary enforce tenancy conditions relating to satellite dishes in a fair and consistent manner
- Ensure that residents have a clear understanding of the conditions under which they can install satellite dishes on their homes.

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

Estate Services is largely a public facing service and involves interacting and working with residents. The Estate Services Team also spends a lot of time providing services in communal areas and has a presence in the local community. For this reason the Estate Services Policy and its application will have some relevance to all equality strands / protected characteristics.

The Satellite Policy has some (although limited) relevance to Ethnicity / Race, as access to Satellite television is necessary for receiving television channels from outside the UK.

Disability	<p>As per the ethnicity / race section.</p> <p>The Satellite Policy has some (although limited) relevance to disability as access to Satellite television may be more important for people with a disability who are less able to leave their homes.</p>
Gender (including pregnancy and maternity)	As per the ethnicity / race section.
Transgender (including gender reassignment)	As per the ethnicity / race section.
Age	As per the ethnicity / race section.
Sexual Orientation	As per the ethnicity / race section.
Religion/Belief	<p>As per the ethnicity / race section.</p> <p>The Satellite Policy has some (although limited) relevance to Religion / Belief. People from different faith groups may seek access to Satellite television in order to receive faith based television programmes from outside of the UK.</p>
Marriage and Civil Partnership	As per the ethnicity / race section. Although relevance is much more limited.

<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>	
<p>Socio-economic Status</p>	<p>There is limited relevance to socio-economic status.</p>
<p>Community Cohesion</p>	<p>This policy and service area does have some relevance to Community Cohesion. The Team members have a presence in the community and can contribute to maximising opportunities for promoting good relations. Maintaining the physical environment also contributes to the creation of safe community spaces.</p>

STEP TWO: Determine the Focus of the EIA

<p>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.</p>
<p>Key focus of EIA:</p> <ul style="list-style-type: none"> • Assessing whether there are any disparities in satisfaction between equality groups and taking action to address them. • Ensuring that all key Estate Services functions are carried out in a way that accommodates individual needs as far as is reasonable. • Ensuring that there is a sufficient mechanism in place for residents to raise equality and diversity issues if and when they

- Ensuring that all staff receive equality and diversity training. This is particularly important for this service area as the awareness and attitudes of staff when undertaking their day to day roles is crucial for ensuring good practice in terms of equality.
- Ensuring that Estate Services feed in and out of the Housing Diversity Action Forums (DAF's) so that potential issues are brought to the forum and information and best practice is disseminated to the wider Estate Services Team.
- As the Estate Services Team have a physical presence in the neighbourhood, are Estate Services staff able to signpost residents appropriately if they have been a victim of a hate incident or hate crime (on the basis of age, disability, ethnicity / race, gender including transgender, religion and belief, or sexual orientation).

Please note: it is acknowledged that the equality impact of the Estate Services Policy can only be judged by looking at its application in the operation of the service area as a whole. Therefore, this EIA has a somewhat operational approach.

The Satellite Policy was judged to have a neutral equality impact in January 2010. However, Swan will monitor the acceptance and refusal rates across equality strands to ensure that there are no disparities between equality groups and that the policy has been applied in a fair manner. This commitment has been made within the policy document itself.

Specific Focus in Relation to Equality Strands or Protected Characteristics:

Ethnicity / Race	As per the overall EIA focus. Is important Estate Services information available in community languages on request?
Gender (including Pregnancy and Maternity)	As per the overall EIA focus.

Transgender (including Gender Reassignment)	As per the overall EIA focus.
Disability	As per the overall EIA focus. Are Estate Inspections conducted in a way that makes them inclusive, particularly for residents with a disability? Is important Estate Services information available in accessible formats on request?
Age	As per the overall EIA focus.
Sexual Orientation	As per the overall EIA focus.
Religion/ Belief	As per the overall EIA focus.
Marriage and Civil Partnership	As per the overall EIA focus, although there is less relevance in terms of this characteristic.

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

Are opportunities for promoting good relations maximised?

Maintaining the physical environment also contributes to the creation of safe community spaces. Is there sufficient scope for residents to give feedback on the maintenance of communal areas?

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: Jorgen Dyer	
	Date: 7 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).

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 with Estate Services between different equality groups?	Equality analysis of estate Services Satisfaction Survey results.	See Gap in data column.	Estate Services does not currently have this information. However, a new survey will be conducted in Autumn 2010. This will collect equality monitoring information for analysis. Mitigating action will be undertaken through the Diversity Action Forum and the Service Improvement Plan if any disparities are found.

Question/focus to be addressed	Data/information source	Summary	Gap in data
			To date no other qualitative data indicates that there are any negative equality trends in relation to satisfaction.
Ensuring that key Estate Services functions are carried out in a way that accommodates individual needs as far as is reasonable.	Review of service Also see the Consultation section on the following pages.	<p>The Estate Services Team has worked with residents in their local communities to accommodate the needs of individual residents and the neighbourhood as far as possible.</p> <p>The Team also use the Housing equality and diversity resources available (such as the Faith Guide and resident profiling analysis) and participate in awareness building sessions and community events. This is important in order to contribute to the promotion of equality, social inclusion and community cohesion.</p> <p>The Estate Services Team encourages residents to raise potential equality and diversity issues as and when they arise. This is demonstrated in the consultation section of the EIA.</p>	

Question/focus to be addressed	Data/information source	Summary	Gap in data
<p>Equality and diversity training and feeding into and back from the Diversity Action Forum (DAF).</p>	<p>Review of training provided</p>	<p>All Estate Services staff receive equality and diversity training or meet separately with the Housing Diversity Manager.</p> <p>Two members of the Estate Services Team attend the London DAF. These members of staff have contributed to specific projects but also feed back good practice information to the wider Estate Services Team.</p>	
<p>Is important Estate Services information available in accessible formats?</p>	<p>Review of procedures</p>	<p>Swan is constantly striving to provide excellent standards of service to customers. We are aware that for many of our estate residents, caretakers will be their most regular form of contact with Swan employees. For this reason, Swan ensures that our caretakers work closely with housing management staff to aid the flow of information and feedback. We also have clear, concise procedures and service standards available in accessible formats (in relation to both language and sensory impairment) so that all our staff and customers are</p>	

Question/focus to be addressed	Data/information source	Summary	Gap in data
		aware of so that they understand what level of services they can expect.	
Is the Estate Services Team able to signpost residents who have experienced hate crime or a hate incident?	Review of staff knowledge and understanding (07.09.2010)	<p>Estate Services staff are able to signpost residents who have experienced hate crime or a hate incident appropriately and in a sensitive manner.</p> <p>Please note that Hate Crime, harassment and antisocial behaviour are all dealt with under separate and specific policies and procedures.</p>	
Further exploration of equality issues	Service Review 2010	The Estate Services Team acknowledges that there is a need for further exploration of potential equality issues. For this reason and in order to mainstream the consideration of equality and diversity, the 2010 Service Review will include equality and diversity as a key aspect.	As this review has not been completed yet any significant findings will be used to inform Service Improvement or DAF actions or initiatives.
Satellite Policy	Monitoring the acceptance and refusal rates across equality groups.		This data is not yet available. See EIA Action Plan.

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>
<ul style="list-style-type: none"> • Potential equality issues arising from the Estate services Policy. • All potential equality and diversity issues from the perspective of residents. • Ensuring that there are sufficient mechanisms in place for residents to raise equality and diversity issues and have them addressed. 	<p>Resident Consultative Committees (RCC's)</p> <p>The Essex and London RCC's were consulted on the draft Estate Services Policy in July 2008. The RCC's scrutinise the Policy including potential equality and diversity issues.</p> <p>The Head of Estate Services and the Estate Services Manager attend RCC meetings on a regular basis to collate and feedback on resident concerns relating to the service area.</p>	<p>No equality and diversity issues were raised during this consultation process.</p>
<ul style="list-style-type: none"> • All potential equality and diversity issues 	<p>Estate Inspections</p>	<p>Some minor equality issues have been raised through Estate Inspections and other informal</p>

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>from the perspective of residents.</p> <ul style="list-style-type: none"> Ensuring that there are sufficient mechanisms in place for residents to raise equality and diversity issues and have them addressed. Sufficient scope for residents to give feedback on the maintenance of communal areas – contributing to cohesion through the creation of safe community spaces. 	<p>Estate Inspections give an opportunity for residents to raise general concerns as well as equality and diversity issues. Estate inspections are regular and ongoing.</p> <p>Residents are informed of planned inspections in advance and invited to attend. Estate Services encourages participation from a diverse range of residents and acknowledges that this often requires sensitivity to individual needs. One example being the participation of a disabled resident with mobility issues in the inspection process in December 2009. The resident required additional time to be allocated to block inspections to enable them to travel from floor to floor using the lifts and without being rushed. The manager involved was also sensitive to the residents needs and appreciative of the input from the perspective of a disabled resident.</p>	<p>discussions in the community with residents. Action has been taken to accommodate needs as far as possible. Examples are provided below.</p> <ul style="list-style-type: none"> Introduction of weekend Inspections. Introduction of out of hours Inspections. Increasing allocated time slots for inspections to accommodate people with a disability or who need more time for other reasons.
<ul style="list-style-type: none"> All potential equality and diversity issues from the perspective of residents. 	<p>Block Surgeries</p> <p>Block Surgeries provide another opportunity for residents to raise potential equality and</p>	<p>No equality issues have been raised.</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>
<ul style="list-style-type: none"> • Ensuring that there are sufficient mechanisms in place for residents to raise equality and diversity issues and have them addressed. • Sufficient scope for residents to give feedback on the maintenance of communal areas – contributing to cohesion through the creation of safe community spaces. 	<p>diversity issues that may arise.</p> <p>During 2009 / 2010 there was also targeted work undertaken to promote surgeries to BME residents.</p>	
<ul style="list-style-type: none"> • Ensuring that there are sufficient mechanisms in place for residents to raise equality and diversity issues and have them addressed. • Sufficient scope for 	<p>Services Specification Consultation</p> <p>The specification for the level and frequency of services on an estate is agreed in consultation with residents. This process also allows for the identification of any equality related issues that may arise so that they can be addressed appropriately and / or</p>	<p>No equality issues have been raised.</p>

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>
residents to give feedback on the maintenance of communal areas – contributing to cohesion through the creation of safe community spaces.	brought to the attention of Swan’s Diversity Action Forums.	

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.	There is not likely to be a negative equality impact in relation to any of the focus points examined.	

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.)
	However, it is recognised that there is a real need for satisfaction survey data analysed by equality group. This will be reviewed once available in conjunction with the service review and further action taken if necessary.	
Maximising opportunities to promote good relations and community cohesion.	It is viewed that opportunities to promote good relations and cohesion have been maximised to date within the day to day functions of the Team. However, it is recognised that diversity awareness and enthusiasm for working with residents is vital for promoting both equality and cohesion within the local neighbourhoods in which Estate Services operate.	

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 – Estate Services Satisfaction Survey results analysed by equality group.	<ul style="list-style-type: none"> • Complete a new Estate Services Satisfaction Survey that also collects the standard equality monitoring information. • Analyse satisfaction by equality group. • Identify and take action to try to address disparities. 	<p>Complete equality analysis by 24th December 2010.</p> <p>Introduce any action required into the Service Improvement Plan or Diversity Action plan by 31st January 2011.</p>	Jorgen Dyer – Head of Estate Services.	Completion 31 st January 2011.
Maintaining insight into potential equality and diversity issues.	Undertake an annual equality review of resident complaints and build any necessary service improvements into the Service Improvement Plan.	Complete the first complaints review by the 30 th of April 2011.	Jorgen Dyer – Head of Estate Services.	Completion 30th April 2011.
Satellite Policy – addressing a gap in data /	<ul style="list-style-type: none"> • Monitor and analyse the acceptance and refusal rates 	<ul style="list-style-type: none"> • Data collation and analysis completed 	Jorgen Dyer – Head of Estate	Completion 31st July

Adverse or negative impact to be addressed		target	Lead Department/ Section/Officer	Timescale
information.	<p>across equality groups.</p> <ul style="list-style-type: none"> Identify and investigate any disparities between equality groups. 	<p>by 31st May 2011.</p> <ul style="list-style-type: none"> Work to investigate any disparities completed and summary report submitted to the Diversity Action Forum (DAF) by 31st July 2011. 	Services.	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 Jorgen Dyer

Job Title Head of Estate Services

Date 21st September 2010

Date sent to Housing Diversity Manager (if applicable)

Date sent to DAF

Date sent to Central Services for Corporate Log