



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	<ul style="list-style-type: none"> • Customer Care Policy • Complaints and Compliments Policy
Lead EIA Officer and Job Title (The EIA lead must be a manager)	Debbie Palmer – Service Improvement Manager
EIA Team Members	Alethea Dougall – Head of Resident Involvement and Community Development Kirsten Njie – Customer Feedback Co-ordinator
Director and Head of Service	Sandra Fawcett – Housing Director, London Alethea Dougall – Head of Resident Involvement and Community Development
Does the EIA relates to an existing policy? (Yes / No)	Yes
Who implements the Policy?	Swan as an organisation
Date that the Policy / strategy is due for review (if applicable)	<ul style="list-style-type: none"> • Customer Care Policy - December 2012 • Complaints and Compliments Policy - July 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 Housing Association aims to provide a high standard of customer care service to all its customers. The key aims and objectives of the Customer Care Policy are to:

- Ensure customers receive an excellent service regardless of the method of contact in line with our published service standards
- We aim to deal with all correspondence promptly, ensure our visitors are dealt with courteously and customers who contact us by telephone receive a prompt, polite and efficient service
- Ensure our services are accessible and that provisions are in place in order that all customers can equitably and fairly access our services
- Understand our customers' needs and tailor our services to respond to them
- Maintain accurate records in order that we can provide a seamless service
- Ensure that customers are treated fairly (staff, Regional Committee and Board Members receive diversity training)
- Ensure that our customers are invited to provide feedback on the services they receive and lessons learnt from this are fed into future service improvement plans.

The key aims and objectives of the Complaints and Compliments Policy are to:

- Ensure that the complaints system is widely publicised, easily accessible to all customers, is simple to understand and use,

- Use complaints as a positive source of feedback and a learning opportunity in order to continuously improve the service provided
- Use compliments as a positive source of feedback and motivation to our staff for services performed well
- Improve customer satisfaction and confidence in Swan's ability to listen to its customers and resolve any problems with our services.

All of Swan Housing Associations policies are implemented in accordance to Swan's Equality and Diversity Policy and equality and inclusion aims. This is important in delivering a high standard of customer care.

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	The policies are relevant to all equality strands / protected characteristics to some extent as they impact on all service areas.
Disability	As above.
Gender (including pregnancy and maternity)	As above.
Transgender	As above.

(including gender reassignment)	
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	The Policy has limited relevance to socio-economic status.
Community Cohesion	The Policy has limited 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:

Using Resident Profiling and other equality data to:

- Check for disparities in customer experience and satisfaction by equality group
- Assess access to service
- Examine qualitative information to identify equality issues in relation to customer care
- Checking that the policies are implemented in a way that allows for diverse needs to be met.

This approach is designed to identify any unintentional negative equality impacts in the application of the policies.

Specific Focus in Relation to Equality Strands or Protected Characteristics:

Ethnicity / Race	As per the overall key EIA focus.
Gender (including Pregnancy and Maternity)	As per the overall key EIA focus.
Transgender (including Gender Reassignment)	As per the overall key EIA focus. However as Swan currently has very few residents who identify as transgender (through our resident profiling), it is not possible to look at trends in equality data in relation to this particular equality group.

Disability	As per the overall key EIA focus.
Age	As per the overall key EIA focus.
Sexual Orientation	As per the overall key EIA focus.
Religion/ Belief	As per the overall key EIA focus.
Marriage and Civil Partnership	Examine qualitative information identify and address potential equality issues.

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

These Policies have limited relevance to socio-economic status or community cohesion. Therefore the EIA will not focus on these particular 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.		Signature of Manager Print Name: Debbie Palmer Date: Updated 24 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>Check for disparities in customer experience by equality group.</p> <p>Check for disparities in satisfaction survey responses by equality group.</p>	<p>Swan Housing 2010 Customer Satisfaction Survey – The Leadership Factor</p>	<p>The overall ‘satisfaction index’ increased by 1.4% in 2010 in comparison to the previous year.</p> <p>The 2010 Satisfaction Survey identified the following trends.</p> <ul style="list-style-type: none"> • Ethnic minority communities are less satisfied overall, but tenants from the Bangladeshi community (Swan’s largest ethnic minority group) were more satisfied than those from other ethnic minority groups. • Differences in satisfaction between White British 	

Question/focus to be addressed	Data/information source	Summary	Gap in data
		<p>tenants and tenants from an ethnic minority background are greater around issues related to repairs.</p> <ul style="list-style-type: none"> • Disabled tenants were more satisfied than non disabled residents. • There was minimal difference in satisfaction between one and two parent families. • Women were more satisfied than men. • People aged under 24 or over 55 were more satisfied than other age groups. <p>Action to improve BME (Black and Minority Ethnic) satisfaction with the repairs service has been built into the Satisfaction Survey Action Plan and the Essex and London housing Diversity Action Plans. This includes targeted work with Axis, Swan's partner contractor for repairs.</p> <p>Further equality and diversity awareness workshops on priority areas will also be delivered in 2011. These will be specific to the delivery of housing services. One of the desired outcomes is that the customer experience and satisfaction levels will improve across equality groups.</p>	
Check for disparities in customer experience by equality group.	Equality monitoring of customer complaints satisfaction responses	Equality monitoring information is requested when complaints satisfaction surveys are undertaken. However, there is currently insufficient data to undertake	Comprehensive equality monitoring of

Question/focus to be addressed	Data/information source	Summary	Gap in data
	Equality monitoring of customer complaints received by Swan	<p>an equality monitoring analysis of satisfaction with the way that complaints are dealt with.</p> <p>The standard customer complaints form also includes equality monitoring information. This is designed to enable Swan to analyse the number of complaints made by equality group. This would identify trends that may indicate negative equality impacts relating to overall customer experience. However, the vast majority of complainants do not use the complaints form and use a variety of other methods to make a complaint. As a result there is also insufficient data to undertake equality analysis of complaints submitted to Swan.</p> <p>It should be noted that complainants are often reluctant to disclose equality monitoring information within the complaints process and this is a common issue for many organisations.</p>	complaints and complaints satisfaction.
Examine qualitative information to identify equality issues in relation to customer care	Review of Complaints Learning Circle Sessions	Equality and Diversity aspects of customer complaints and customer care are also being dealt with within the 'Complaints Learning Circle' for Swan staff. An emphasis has also been put on personal contact when dealing with complaints. This can be even more important when dealing with issues of a sensitive nature or when residents have particular communication needs.	

Question/focus to be addressed	Data/information source	Summary	Gap in data
		<p>The November 2010 Learning Circle session also provided an example of where a staff member had gone the extra mile to assist a resident with an issue related to their disability.</p>	
<p>Examine qualitative information to identify equality issues in relation to customer care</p>	<p>Resident Complaints Focus Group</p>	<p>A Complaints Focus Group is now in place. This gives residents who have been through the complaints process to raise a variety of issues including those relating to equality and diversity. The focus group has been put in place to obtain important feedback which can be used to improve service delivery.</p> <p>No specific equality and diversity issues have been raised through the Focus Group.</p>	
<p>Examine qualitative information to identify equality issues in relation to customer care.</p>	<ul style="list-style-type: none"> • Complaints • Web4residents (residents website) feedback • Mystery Shopping 	<p>Complaints and customer feedback have provided information on individual cases where equality and diversity factors have played a part in the customer experience and action to mitigate potentially negative impacts has been necessary. These have been associated to age, disability, gender (including transgender), ethnicity and religious belief.</p> <p>Mitigating action is taken wherever possible and when flaws in service provision are found the examples are used to inform future learning amongst staff and</p>	

Question/focus to be addressed	Data/information source	Summary	Gap in data
		<p>managers. The Housing Diversity Manager also advises on action to be taken when necessary.</p> <p>A programme of Mystery Shopping by residents was implemented in January 2010. Resident shoppers also look out for potential equality issues.</p>	
<p>Checking that the policies are implemented in a way that allows for diverse needs to be met.</p> <p>Assess access to service.</p>	<p>Review of current policy and practice</p>	<p>Pages 5, 6 and 7 of the current Customer Care Policy document sets out standards that are applicable to maximising the accessibility of services, understanding and responding to diverse needs and promoting equality and diversity. This also links directly to the Complaints and Compliments Policy.</p> <p>Staff have received equality and diversity training and further targeted workshops for housing staff on priority equality and diversity topics are planned for 2011.</p> <p>There are front line staff and senior managers involved in the Essex and London Housing Diversity Action Forums (DAF's). The DAF's deliver a number of practical projects that deliver improved equality outcomes and share and disseminate information on good practice. At a more strategic level the Service Improvement meeting group and Action Plan includes a range of equality and diversity action and Swan's Equality and Diversity Committee oversees strategic</p>	

Question/focus to be addressed	Data/information source	Summary	Gap in data
		<p>priorities.</p> <p>A number of resources are available to staff to and residents to ensure that customer care overall is delivered in appropriately to the diverse communities Swan serves. For example the Faith Guide for staff and the Swan DVD for residents which is translated into key community languages.</p> <p>Key documents related to service provision and the policies themselves can be provided in accessible formats on request including translation into community languages and Braille, large print and audio. Staff have access to telephone interpretation through language line and face to face interpreters can be arranged when necessary and appropriate. The October 2010 Telephone Interpretation Analysis indicated that telephone interpreting services are being used to overcome language barriers to effective communication.</p> <p>The updated Service Standard Leaflets produced in 2010 include additional information for residents in a plain English format. They were scrutinised and approved by the Plain English Campaign and received the 'Crystal Mark'. The Equality and Diversity leaflet was also updated to provide more information on relevant standards.</p>	

Question/focus to be addressed	Data/information source	Summary	Gap in data
		Hearing loops are in use and the Head Office has had a positive access audit in relation to customer facing areas. Measures are taken to increase physical accessibility as far as possible in all offices and disabled access is taken into account when organising meetings and events.	

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 the Customer Care Policy, including equality and diversity issues.	Resident Consultative Committees (RCC's) September 2009.	There were no specific equality and diversity related issues raised during the consultation process. When policy is reviewed 2012 the consultation process will also ask residents to consider potential equality issues.

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 the Complaints and Compliments Policy, including equality and diversity issues.	Resident Consultative Committees (RCC's) May / June 2008.	There were no specific equality and diversity related 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.)
Check for disparities in customer experience by equality group. Check for disparities in satisfaction	Race / Ethnicity: At this moment in time there is some evidence to suggest that residents from BME groups are less satisfied with services than White British	No. However, action has already been built into the Satisfaction Survey, Service Improvement and DAF Action Plans. Tailored equality and diversity sessions

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.)
survey responses by equality group.	<p>residents. (As per the evidence section of this pro-forma.)</p> <p>Disability: Disabled residents are generally more satisfied than non disabled residents. Although similar levels of satisfaction across both groups is most desirable, this may indicate a positive equality impact in terms of the way that services are tailored to meet the needs of residents with a disability.</p>	<p>are planned for 2011 and targeted work is underway with Swan's repairs partner Axis.</p> <p>Not applicable – positive impact.</p>
Specific complaints equality monitoring – gaps in data.	<p>The gap in complaints equality monitoring data means that it is not currently possible to identify trends in complaints across equality groups. Although this is not directly a negative impact in itself, there is a need to address this gap in information.</p>	<p>Action to address this gap in data in the EIA Action Plan.</p>
Examine qualitative information to identify equality issues in relation to customer care.	<p>Overall qualitative information indicates that positive activity in relation to equality and diversity issues across equality strands /</p>	<p>Overall a neutral to positive impact has been demonstrated. However, further work is underway to improve the customer</p>

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.)
	<p>protected characteristics is taking place. Where potential issues arise action is taken and mistakes are used as a learning tool.</p> <p>A number of projects undertaken by the Diversity Action Forums (DAF's) in the last two years have both increased awareness of equality issues and produced positive equality outcomes for residents.</p> <p>(As per the evidence section of this pro-forma.)</p>	<p>experience across Swan Services through the Right First Time Project.</p>
<p>Assess access to service.</p>	<p>Improvements to date to increase access to service have had a positive equality outcome.</p> <p>(As per the evidence section of this pro-forma.)</p>	
<p>Checking that the policies are implemented in a way that allows for diverse needs to be met.</p>	<p>The Customer Care Policy sets out and reinforces the message that equality and diversity considerations are an important factor in delivering high quality customer care. The Customer Care Policy and the Complaints and Compliments Policy are directly linked.</p>	

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.)
	<p>The way in which the policies are implemented does allow diverse needs to be met. This produces a positive equality impact.</p> <p>(As per the evidence section of this pro-forma.)</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
Addressing the gap in complaints equality monitoring data.	Explore ways running reports for equality monitoring of complaints through Swan's Contact Manager (CM) system using existing resident profiling data.	Put a CM report in place for equality monitoring analysis of complaints by May 2011.	IDS Team and Service Improvement Manager	May 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 Debbie Palmer

Job Title Service Improvement Manager

Date 29th November 2010

Date sent to Housing Diversity Manager (if applicable) 29th November 2010

Date sent to DAF Scheduled for January / February 2011

Date sent to Central Services for Corporate Log 1st December 2010