



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"> • Community Grants Policy • Resident Involvement Expenses Policy
Lead EIA Officer and Job Title (The EIA lead must be a manager)	Alethea Dougall – Head of Resident Involvement and Community Development
EIA Team Members	Samantha Sizeland – Housing Diversity Manager Terry Webb – Community Development Officer Kari-Ann Waldon – Resident Involvement Officer
Director and Head of Service	Sandra Fawcett - Director of Housing London Alethea Dougall - Head of Resident Involvement and Community Development
Does the EIA relate to an existing policy? (Yes / No)	Yes
Who implements the Policy?	Resident Involvement and Community Development Team
Date that the Policy / strategy is due for review (if applicable)	<ul style="list-style-type: none"> • Community Grants Policy – September 2011 • Resident Involvement Expenses Policy – September 2012

This pro-forma should be used to:

- Determine and record whether an Equality Impact Assessment (EIA) is required
- Determine and record the focus of an EIA if one is required
- Record the evidence considered
- Record the outcome of the impact assessment
- Record mitigating actions to be taken and measurable targets to assess progress.

Equality Impact Assessments are required to be undertaken on all proposed policies, strategies and significant decisions that could potentially have an adverse or disproportionate impact on any of the diverse communities for which Swan provides services. An EIA should address potential impact in respect of ethnicity / race, gender, transgender, disability, age, sexual orientation and religion or belief where relevant. This pro-forma also asks you to consider socio-economic status and community cohesion and have due regard for the protected characteristics introduced by the new Equality Act.

It is essential that officers refer to the **Equality Impact Assessment Guidance** when completing this pro-forma. The pro-forma is in two parts.

Part A: This part helps you determine and record whether an EIA is necessary and is essential documentary evidence to show that the Swan considers equality in respect of all significant policy and function decisions it makes. Part A must be completed in respect of all proposed policies, strategies or significant decisions that have an impact on service functions. Part A also helps you determine and record the focus of the EIA, if one is required. Part A covers steps 1 and 2.

Part A should be completed by a manager, with support from staff in the relevant service area (forming an EIA Team). Part A must be authorised by the manager responsible for the policy, strategy, or function before proceeding to Part B of the Impact Assessment. Housing managers should also ensure that drafts of both Part A and Part B are sent to the Housing Diversity Manager for comments before they are finalised.

Part B: Proceed to Part B if it is determined in Part A that a full EIA is required and once the focus of the EIA has been determined and agreed. This part of the pro-forma covers steps 3 to 6 as described in the Guidance.

Please remember that the completion of an EIA and the actions identified within it are the responsibility of the relevant service manager.

Equality Impact Assessment Part A:

Reason and context for the new policy, strategy, proposal or decision

Please set out the aims and objectives of and contextual reasons for the proposed policy, strategy or decision. Contextual reasons may include changes in legislation, demographic changes or budgetary considerations. Alternatively, if this information is provided in another document, please append to this form.

Community Grants Policy

Swan Housing Association welcomes its social responsibility to invest in local communities in a way that improves quality of life. The aim of the Community Grant is to assist local communities to achieve their aspirations and objectives by providing grant funding for projects which meet the relevant criteria. The Community Grant is operated in a way that is open and accountable to Swan residents and in a way that minimises risk.

The Community Grants Policy sets out how the Grant is operated and how appropriate controls and safeguards are applied.

Resident Involvement Expenses Policy

Resident Involvement is central to everything that Swan Housing Association does. The Resident Expenses Policy aims to make it easier for residents to get involved and stay involved. It sets out the training and support is available to enable residents to participate in the decisions that affect their homes, neighbourhoods and the services they receive. It also sets out how and when Swan can reimburse out of pocket expenses.

The Policy covers the following areas:

- Training and support
- Travel and mileage
- Dependents allowance
- Resident representatives allowances.

It should be noted that equality and diversity considerations are mainstream in the work of the Resident Involvement and Community Development Team and all Swan policies are carried out in accordance with Swan's Equality and Diversity Policy and wider social inclusion aims.

This Equality Impact Assessment (EIA) is an overarching EIA of both of these Policies. The Policies have been assessed together as they both focus on supporting people to get involved with Swan and / or their local community. There are also financial control aspects to both policies.

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

Resident involvement and community development and the ways in which Swan delivers opportunities is relevant to all of the equality strands / protected characteristics to some extent. Therefore policies developed to facilitate resident involvement and community development will also be relevant. It is important that Swan is able to maximise opportunities to support representative resident involvement and

	support local communities to develop projects that are beneficial to them. This is likely to contribute towards achieving equality and greater social inclusion and community cohesion.
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	The policies have relevance to socio-economic status because they aim to remove or lessen the economic barriers and skills gaps that can prevent both individual Swan residents and wider communities from influencing key decisions or achieving local aspirations.
Community Cohesion	The facilitation of resident involvement and community development is an important factor in promoting community cohesion. Therefore the policies do have relevance to 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:

- Do the policies maximise opportunities to remove economic barriers to involvement and community development?
- Does the Resident Expenses Policy allow for adequate provision of training in ways which are accessible to all equality groups?
- Is the take up of training opportunities representative of the wider resident profile?
- Are adequate safeguards in place to protect both community groups / residents accessing funds and the wider Swan resident population? (This is considered an equality issue because failure to mitigate risk can impact more heavily on particular equality groups.)
- Can positive impacts in relation to equality, inclusion and cohesion be evidenced from community grant projects to date?
- Is information on resident expenses and the community grant available in accessible formats and advertised widely?

Specific Focus in Relation to Equality Strands or Protected Characteristics:	
Ethnicity Race	As per the overall EIA focus.
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.
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.

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

Incorporated in the key focus of the EIA.

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 of November 2010	Signature of Manager	
	Print Name: Alethea Dougall	
	Date: 19 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
Do the policies maximise opportunities to remove economic barriers to involvement and community development?	Review of Policy and current activity.	The Resident Expenses Policy: <ul style="list-style-type: none"> • Covers potential travel costs that are incurred by residents when attending Swan meetings and events • Provides for a childcare and carers allowance • Provides for a Resident Representative Allowance that covers costs associated with being an involved resident • Provides for access to key housing information, publications and skills and development training at no cost to the resident. 	

Question/focus to be addressed	Data/information source	Summary	Gap in data
		<p>The Policy covers all standard costs associated with resident involvement and includes a commitment to consider any measures to overcome any further barriers on a case by case basis.</p> <p>To date the provisions made within the policy have been well accessed by involved residents and the provisions available are publicised when Swan looks to increase its pool of formally involved residents.</p> <p>The Community Grant: The Community Grant is designed to help overcome economic barriers to completing a community initiatives or projects where Swan residents benefit from them. The Grant objectives and criteria mean that there are few restrictions on the types of projects that can be successful in obtaining a grant, whilst ensuring that the grant is used appropriately.</p>	
Does the Resident Expenses Policy allow for adequate provision of training in ways which are accessible to all equality groups?	Review of Policy and current activity.	Swan acknowledges that accessible support and training is essential for increasing the knowledge, skills and confidence of many residents. The Policy sets out the offer of a Personal Development Plan for residents who enter the involvement structure. In practice the Resident Involvement and Community Development Team also work very closely	

Question/focus to be addressed	Data/information source	Summary	Gap in data
<p>Is the take up of training opportunities representative of the involved resident profile / wider resident profile?</p>	<p>Equality monitoring analysis</p>	<p>with residents to develop, advertise and encourage participation in a wide range of training and development opportunities. These are available at different levels and are provided at a range of venues, dates and times with the aim that there are accessible opportunities available for people with diverse needs.</p> <p>Residents are also encouraged to consider equality and diversity aspects when providing feedback on training activities.</p> <p>In December 2009 an equality monitoring analysis of training and development events was undertaken. It found that:</p> <ul style="list-style-type: none"> • Disabled residents were well represented • There was a reasonable spread across age groups and between the male and female genders • Some of the activities and events appeared to be over represented by White English residents with Christian religious beliefs • Because of the gaps in the provision of equality monitoring information from many participating residents, the overall analysis had to be treated with caution; missing data can sometimes disguise the representation of equality groups. 	<p>Comprehensive equality monitoring analysis of training uptake– see action plan.</p>

Question/focus to be addressed	Data/information source	Summary	Gap in data
		<p>Much work has been undertaken during 2010 to try to increase representation of residents from ethnic minority backgrounds in the resident involvement overall. This is evidenced in the Diversity Action Plan, the Service Improvement Plan and the Resident Involvement Strategy.</p> <p>Other training opportunities outside of the remit of the policies being assessed have also been provided to residents such as ESOL (English for Speakers of Other Languages) classes. Such training can produce a number of positive equality, inclusion and community cohesion outcomes.</p>	
<p>Are adequate safeguards in place to protect both community groups / residents accessing funds and the wider Swan resident population? (This is considered an equality issue because failure to mitigate risk can impact more heavily on particular equality groups.)</p>	<p>Review of Policy, procedure and monitoring mechanisms</p>	<p>The Community Grant Policy: Adequate safeguards are in place in relation to the Community Grant to ensure that appropriate projects are funded and monitored. During 2010 an increased emphasis has been placed on grant recipients producing monitoring and financial information in a timely manner. Monitoring information will be reviewed in April 2011.</p> <p>The Resident Expenses Policy: Currently child care expenses are paid to residents with minimal documentation. Expenses are paid in line with the Policy irrespective of whether a registered child minder is used. This could have a negative impact in relation to</p>	

Question/focus to be addressed	Data/information source	Summary	Gap in data
		<p>safeguarding if this indirectly encourages the use of unregistered child minders. An amended Policy and procedure where expenses are only paid to registered child minders would ensure that Swan is not providing payment for unregistered childminders / carers. Residents would also be free to use family members and friends, but this would be likely to fall outside the Resident Expenses Policy.</p> <p>Over use of taxi transport to meetings where alternative methods of transport are both safe and appropriate can sometimes be disempowering for residents as well as being very costly. Managing your own transport arrangements can contribute to greater independence. However it is essential that travel expenses are reimbursed to ensure that financial barriers to participation are removed or kept to a minimum. Taxis or specialised transport may also be the most appropriate method for people with a mobility disability.</p> <p>See the EIA Action Plan in relation to these points.</p>	
Can positive impacts in relation to equality, inclusion and cohesion be evidenced from community grant projects to date?	Review of grant applications and evaluations	Positive impacts can be evidenced from community grant projects to date from both application and evaluation information. Please see Appendix 1 for further information.	

Question/focus to be addressed	Data/information source	Summary	Gap in data
<p>Is information on resident expenses and the community grant available in accessible formats and advertised widely?</p>	<p>Review of current activity</p>	<p>The Community Grant application form is available in accessible formats on request. More importantly the Resident Involvement and Community Development Team offer personal support to community groups wishing to apply for a grant. Face to face language and British Sign Language interpreters can also be procured to assist in this process if needed.</p> <p>The Community Grant has been advertised on the Swan websites and in the Communicator publication. Leaflets are available at events and the Resident Involvement and Community Development Team have circulated leaflets at a range of resident meetings.</p> <p>More recently the Community Grant has been publicised through local schools that Swan has connections with and to the local Multi Faith Forums in Tower Hamlets and Basildon.</p> <p>However, it has been acknowledged that promotion could be broader and more consistent. The Resident Involvement and Community Development Team have been tasked with increasing promotion of the Community Grant between November 2010 and March 2011.</p>	

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 Community Grant Policy, including equality and diversity aspects.	London and Essex Resident Consultative Committees – April 2007.	There were no equality and diversity related issues raised during the consultation process.
Overall consultation on the Resident Expenses Policy, including equality and diversity aspects.	London and Essex Resident Consultative Committees – October 2009.	There were no 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.)
Overall assessment of equality impacts.	Overall the policies assessed and their implementation are likely to have a positive equality impact. However, there are some potential issues in the rows below that require further investigation / action.	Not applicable.
Are adequate safeguards in place to protect both community groups / residents accessing funds and the wider Swan resident population? (This is considered an equality issue because failure to mitigate risk can impact more heavily on particular equality groups.)	Some provisions that have been put in place to remove barriers to resident involvement could have some unintentional negative impacts. These are linked to <ul style="list-style-type: none"> • Safeguarding children • A missed opportunity to promote independence. (Discussed on pages 13 / 14 of the pro-forma.)	These indirect impacts are not justifiable without further investigation. See the EIA Action Plan.

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.)
Can positive impacts in relation to equality, inclusion and cohesion be evidenced from community grant projects to date?	There are a number of positive equality, inclusion and cohesion impacts arising from Community Grant projects. However, there is also a need to ensure that these outcomes are clearly evidenced through the monitoring process. A review has been included in the EIA Action Plan.	Not applicable.

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
Are adequate safeguards in place to protect both community groups / residents accessing funds and the wider Swan resident population? (This is considered an equality issue because failure to mitigate risk can impact more heavily on particular equality groups.)	Review the Resident Expenses Policy to consider amendments around child care expenses and detail around transport methods. This process will involve consultation with residents.	Consult on recommendations and make any agreed amendments to the Policy by April 2011.	Alethea Dougall – Head of Resident Involvement and Community Development (Whole Resident Involvement and Community Development Team to contribute.)	April 2011
Can positive impacts in relation to equality, inclusion and cohesion be evidenced from community grant projects to date?	Review monitoring and evaluation of Community Grant projects to ensure that the process is being completed and outcomes are being sufficiently documented.	Review completed by May 2011.	Kari-Ann Waldon – Resident Involvement Officer & Samantha Sizeland – Housing Diversity Manager	May 2011
Is information on resident expenses and the community grant available	Community Grant leaflets or application forms to be circulated more widely to local:	Leaflets consistently distributed to a wider audience by April 2011.	Alethea Dougall – Head of Resident Involvement and	April 2011

Adverse or negative impact to be addressed	Action required	Performance/outcome target	Lead Department/Section/Officer	Timescale
in accessible formats and advertised widely?	<ul style="list-style-type: none"> • Doctors surgeries • Schools • Libraries • Advice centres • Equality forums. 	Target of 24 Community Grants issued during 2011-2012.	Community Development (Whole Resident Involvement and Community Development Team to contribute.)	March 2012
Addressing gaps in data around equality monitoring of training take up.	<p>Undertake comprehensive equality monitoring analysis of training take up.</p> <p>Continue to encourage participants to complete equality monitoring questions when attending training events.</p>	Comprehensive analysis completed by May 2011 and any necessary action to increase take up to be built into the Service Improvement Plan or Diversity Action Plan (DAP).	Abdullah Hossain – Community Development Officer & Samantha Sizeland – Housing Diversity Manager	May 2010

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 Alethea Dougall

Job Title Head of Resident Involvement and Community Development

Date 26th November 2010

Date sent to Housing Diversity Manager (if applicable) - Housing Diversity Manager on EIA Team.

Date sent to DAF - Scheduled for January / February 2011 DAF meetings.

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

Positive Outcomes Resulting from Community Grant Projects

The table below includes a sample of Community Grant funded projects in 2009 and 2010.

Community Grant Funded Project	Date	Positive Equality / Social Inclusion Outcome	Positive Community Cohesion Outcome
Brackendale Court Christmas Party	2009	Gifts were presented to residents who are housebound to involve them in the Christmas celebrations.	Bringing the local community together.
Brackendale Court Easter Party / Coach Trip / Summer Activities	2010	Delivered tailored activities for older residents in Brackendale Court.	
Busy Bees Preschool in Laindon – Fun Day	2010	Delivering creative activities for families and young children - bringing families together and disseminating information about services, activities and support available locally.	
Churchview Gardening Project	2010		Bringing the local community together to work on a gardening project. Building community cohesion and community spirit.
Translation of the Exmouth Estate Residents Board	2010	Increasing access to key news via the EERB by translating the newsletter into	

Community Grant Funded Project	Date	Positive Equality / Social Inclusion Outcome	Positive Community Cohesion Outcome
(EERB) Newsletter into community languages.		key community languages including Bengali.	
Exmouth Estate Fun Day (EERB)	2010	Positive activities were provided for children on the estate within a safe environment.	The Fun day brought together residents on the Exmouth Estate from a range of diverse backgrounds. Building community cohesion and community spirit.
Five Links Residents Association Gardening Project	2010		Bringing the local community together to work on a gardening project. Building community cohesion and community spirit. The evaluation document also indicated that the improvements achieved encouraged further resident involvement in the local area.
Cherry Tree School – Bike Rack Project	2010	Helping to improve facilities that promote exercise and positive activities for children in a local school.	
International One World Puppet Festival – Noak Bridge	2010	Providing a positive activity for children that promoted equality, diversity and community cohesion.	As per text in previous column.