



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	Asset Management Strategy (AMS) and related policies. The AMS is an overarching Strategy which covers all the Polices within the remit of the Asset Management department.
Lead EIA Officer and Job Title (The EIA lead must be a manager)	Nicholas Kyprianou – Head of Asset Management
EIA Team Members	Director of Asset Management, Head of Asset Management, Administrator Team Leader, Housing Diversity Manager.
Director and Head of Service	Terry Bird
Does the EIA relate to an existing policy? (Yes / No)	This EIA is for a refreshed and enhanced Strategy (currently in development) and related Policies within the remit of Asset Management.
Who implements the Policy?	Asset Management
Date that the Policy / strategy is due for review (if applicable)	Strategy currently in development. The Strategy will next be due for review in September 2015.

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.

Asset Management Strategy

Swan Housing Association's Asset Management Strategy sets the framework within which the organisation will work to uphold the condition of its property portfolio, deliver enhancements beyond the government's basic decent homes standard and ensure that our homes provide a safe place for our residents to live in. Asset management encompasses a broad range of activities, which ensures that our housing stock meets needs and standards both now and in the future.

In setting out the Strategy we have been mindful of ensuring we have given due consideration to best practice and innovation in the delivery of quality services. In this way we aim to engage our partners and stakeholders in everything we do. Equality and diversity considerations are also a mainstream factor in our approach.

The other policies and strategies included in the above framework and covered by this assessment listed below.

Fuel Poverty and Affordable Warmth Strategy

A fuel-poor household is one where residents are unable to heat their home to adequate levels of comfort during the winter months at a reasonable cost. The most widely accepted definition of a fuel-poor household is one that needs to spend more than 10% of

its income on fuel to heat their home to an adequate standard for warmth.

Swan Housing Association is committed to reducing fuel poverty and improving access to affordable warmth for all residents. Fuel poverty and affordable warmth is a key driver of the associations Asset Management Strategy and the Fuel Poverty and Affordable Warmth Policy sets out how we aim to achieve this for all properties owned and managed by Swan. The Policy objectives are to:

- Promote the development of the Affordable Warmth Policy
- Improve the efficiency of Swan's owned dwellings
- Provide effective energy advice that reaches the most vulnerable residents
- Ensure that households know about benefits and grants that are available
- Assist residents to access affordable fuel supplies
- Provide energy efficient housing
- Provide cost effective and adequate heating systems
- Provide information and raise awareness on energy consumption
- Minimise use of pre-payment meters
- Maximise the take up of energy efficiency initiatives and grants
- Monitor and assess the effectiveness of the energy cost and Standard Assessment Procedure (SAP) ratings of the properties through stock condition surveys and Energy Performance Certificates (EPC's).

Partnering and Joint Venture Arrangements

The Asset Management Department has responsibility for delivering the strategic services relating to property management. Such services are a core business area for the association, where service delivery, equal opportunity and value for money are paramount to success and is therefore likely to benefit considerably from a strategic partnering approach. The policy is designed to ensure that all partnering arrangements entered into, are successful and meet Swans business aims and objectives.

Recharge Policy

The Recharge Policy:

- Is designed to provide direction and certainty for employees and stakeholder partners when dealing with circumstances that warrant the recovery of cost
- Sets out clear practices and processes for the recovery of all valid costs incurred that are not the direct responsibility of the Association
- Clearly defines what is meant by a “Re-chargeable Cost”
- Provides solutions that enable residents and other third parties to procure services from the association whilst having the ability to reimburse the association for those costs and for the association to recover the debt incurred
- Recovers costs effectively and efficiently using a consistent approach.
- Maximises the resources available to allow re-investment in our stock and provide services to our customers
- Ensures that responsible tenants/customers and members of the general public are not penalised
- Addresses the implications of future maintenance and servicing costs relating to adaptations and the means to recover such costs
- Policies, procedures and agreements are adhered to and enforced when appropriate.

Mitigating action has been incorporated in the policy to ensure that vulnerable tenants across the equality strands receive consideration according to their circumstances.

Land and Property Disposal Policy

The Land and Property Disposal Policy sets out the approach that Swan Housing Association will adopt towards the disposal of land and properties. Swan Housing Association has an Asset Management Strategy and its aim is to assist the company in being viable, financially strong and well managed. The Strategy requires that we make best use of the Assets.

Reactive Repairs Policy

Through the Policy Swan HA aims to exceed the performance standards and best practice defined by the Tenant Services Authority (TSA) and Audit Commission. The policy must also comply with the Landlord & Tenant Act 1985 and Housing Acts 2004, 1996, and 1985.

This Policy refers to repairs required within individual dwellings or blocks. The definition of which repairs will be carried out by Swan HA and in which timescales is available to view on Swan's website. This definition has been drawn up in consultation with residents.

The repair service aims to be accessible to all and to treat all requests for repairs fairly and without discrimination, based on the maintenance needs of the property. However the repair service may be exceeded in terms of faster timescales or additional works for tenants who are living in Supported Housing or are deemed vulnerable by their Housing Officer or Floating Support Worker.

Gas Safety Policy

The Gas Safety Policy aims to ensure that Swan achieves compliance with the Gas in Use regulation and to ensure the Health & Safety of all our residents.

Asbestos Policy

The Asbestos Policy sets out how Swan will comply with its statutory duties under the provisions of the relevant control of Asbestos and to ensure that all asbestos within our properties are maintained in a safe condition so as to control the risk of health of any person.

Legionella Policy

The Legionella Policy sets out how Swan will comply with its statutory duties under the provisions of the relevant control of

Legionnaires' disease safety legislation, and to ensure that all water systems are maintained in a safe condition so as to control the risk of health of any person. Specifically, we intend to adhere to the landlords duties placed upon us by The Approved Code of Practice and Guidance L8 published in 2000.

Electrical Safety

This policy sets out how Swan will comply with its statutory duties under the Electricity at Work Regulations 1989 together with all HSE best practice guidance. Swan commits to adopt best practice in installing, maintaining, upgrading and periodically inspecting and testing all electrical installations and portable appliances which it has supplied and therefore has a responsibility to maintain.

Adaptations Policy

The Adaptations Policy ensures that Swan staff and customers have clear guidelines on the availability of adaptations and to provide our tenants full use of the home they live in by means of altering, adapting the property and installation of equipment. This policy aims promote independence and enable disabled residents to fully use their home. This is implemented by ensuring that sufficient budgets are set each year to accommodate the works required. Where necessary Swan also liaises with Local Authorities by undertaking a Disability Facilities Grant which will enable the Local Authorities to adapt the home.

Assisted Decorations

Swan Housing Group recognises there are certain groups that may be at a disadvantage in ensuring their homes are kept to an acceptable standard of internal decorative condition. As part of our wider community commitment and in recognition of our corporate social responsibility agenda, we seek to assist such groups.

We have identified and recognise that our older residents and those in receipt of a Disability Living Allowance are far less likely to be able to undertake internal decorations themselves. In recognition of this we will seek to assist those groups wherever possible. The Assisted Decorations Policy sets out how we aim to do this.

Construction Design and Management Regulations (CDM)

The Construction Design and Management Regulations (CDM) Policy sets out how Swan will comply with its statutory duties under the Health & Safety at Work Act 1974 where extended to include the CDM Regulations as part of broad framework for controlling health and safety at work. The Policy is applicable to the work of Asset Management only.

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 Asset Management Strategy is an overarching strategy which has the potential for both positive and negative equality impacts across all equality strands / protected characteristics. For this reason it is known at this stage that a full EIA will be required on the Strategy and all its associated policies. It is important to ensure that: <ul style="list-style-type: none">• Opportunities to promote equality are maximised• Any unintentional disparities across equality groups are identified and addressed.
Disability	As per the explanation under the Ethnicity / Race section. The Fuel Poverty and Affordable Warmth Policy, Adaptations and Assisted Decorations policies will have particular relevance to disability, due to the increase in potential vulnerability for residents with certain

	disabilities.
Gender (including pregnancy and maternity)	As per the explanation under the Ethnicity / Race section.
Transgender (including gender reassignment)	As per the explanation under the Ethnicity / Race section.
Age	<p>As per the explanation under the Ethnicity / Race section.</p> <p>The Fuel Poverty and Affordable Warmth Policy, Adaptations and Assisted Decorations policies will have particular relevance to age, due to the increase in potential vulnerability for older residents and very young children. Older people and very young children are often worst effected if they or their families cannot afford to heat their homes at a reasonable cost. The occurrence of disability also tends to be higher amongst older age groups.</p>
Sexual Orientation	As per the explanation under the Ethnicity / Race section.
Religion/Belief	As per the explanation under the Ethnicity / Race section.
Marriage and Civil Partnership	As per the explanation under the Ethnicity / Race section.

<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>As per the explanation under the Ethnicity / Race section.</p> <p>The Fuel Poverty and Affordable Warmth, Adaptations and Assisted Decorations Policies are particularly applicable to socio-economic status.</p>
<p>Community Cohesion</p>	<p>This Strategy and related policies have limited relevance to wider community cohesion.</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> <p>The key focus of the EIA will be to:</p> <ul style="list-style-type: none"> • Assess access to service by equality group across the key Asset Management services. This should identify any disparities to be addressed. • Assess satisfaction by equality group to identify and address any potential disparities. • Analyse qualitative information and resident feedback in order to identify and address any potential equality issues. • Assess the procedures and practices of Swan’s partner contractor Axis to ensure that action is taken to mitigate any

- Review local and national research to ensure that common equality issues have been considered and incorporated in the Strategy and applicable policies.

Specific Focus in Relation to Equality Strands or Protected Characteristics:

Ethnicity / Race	As per the overall focus of the EIA.
Gender (including Pregnancy and Maternity)	As per the overall focus of the EIA.
Transgender (including Gender Reassignment)	As per the overall focus of the EIA.
Disability	As per the overall focus of the EIA. Ensuring that crucial information and advice on items such as affordable warmth, adaptations and repairs are provided in accessible formats and targeted at the groups most at risk of experiencing fuel poverty, including residents with a disability, older people and families with very young children. This is particularly important for Swan as less than a third of heads of household are in part-time or full-time employment.
Age	As per the overall focus of the EIA. As per the text outlined in the heading Disability above, particularly in reference to Fuel Poverty and Affordable Warmth.

Sexual Orientation	As per the overall focus of the EIA.
Religion/ Belief	As per the overall focus of the EIA.
Marriage and Civil Partnership	As per the overall focus of the EIA.

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

Does the Strategy and the related Policies seek to address the disadvantage experienced by residents and families on low incomes in the operation of the services covered?

Record whether or not an EIA is required:

Is an EIA required? <i>Please tick either yes or no</i>	Yes <div style="text-align: center;">√</div>	No
<p>If yes, add target date for completion:</p> <p>30th November 2010 (in line with the current EIA Schedule for Housing and Asset Management).</p> <p>Please note that one comprehensive overarching EIA will be completed for the Asset Management Strategy and a number of related policies. This is to ensure that the interaction of these closely linked policies is also assessed.</p>	Signature of Manager	
	Print Name: Nicholas Kyprianou	
	Date: Updated 15 th October 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 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 want to look at. For example, you may want 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
Assess Access to Service.	<p>Access to service across the repairs service - Equality Analysis March 2010.</p> <p>This is viewed as an important measure as it indicates whether or not the</p>	<p>Equality analysis undertaken at the end of March 2010 found that access to service was very representative of the overall resident profile (across equality groups). This can be seen as a positive indicator of equality in access to service.</p>	

Question/Focus to be addressed	Data/information source	Summary	Gap in data
	operation of the Asset Management Strategy and related policies facilitate equality in access to the Repairs and Maintenance services as a whole.		
Assess Access to Service.	Gas Servicing Access to Service	<p>As at 11th March 2010 there were only six residents who had not had a gas service undertaken within the previous twelve months. Of these, one was void and three had not completed resident profiling information. There are not any equality trends identified in relation to access to gas servicing.</p> <p>As part of standard procedures a translation sheet is sent with all Axis letters to ensure residents are aware of importance.</p>	
Assess Access to Service.	Improve access to services for people with low literacy skills or learning difficulties	Have translated repairs leaflet into Makaton. Repairs timescales can also be accelerated for people with disabilities that can make them more vulnerable.	
Assess Access to Service.	Planned & Decent Homes work.	During 2009-10 BME communities were under represented in access to Planned and	

Question/Focus to be addressed	Data/information source	Summary	Gap in data
		Decent Homes work, (4% of all works). This is due to the estates with high BME representation have under gone regeneration works via Higgins construction and therefore the reporting figures would be included in other reports.	
Assess Access to Service.	Aids and Adaptations Access to Service	<p>During the year 2008-2009, BME communities were under represented in access to aids and adaptations (3% of all adaptations). This may indicate that further work is needed to ensure that BME communities are aware of the policy and how to access the service.</p> <p>From the 2009 -10 survey 14% of the returns were from BME residents compared to 3% the previous year. This indicates a slight improvement in representation. However, action has been already been taken to publicise the service (also see the EIA Action Plan).</p>	
Assess satisfaction by equality group to identify and address any potential disparities.	1) The Leadership Factor Status / Satisfaction Survey June 2009.	Swan's Satisfaction Survey (including the STATUS questions) was carried out by The Leadership Factor in June 2009 & July 2010. In March 2010 additional equality analysis	There was insufficient data to draw any conclusions on the basis of sexual

Question/Focus to be addressed	Data/information source	Summary	Gap in data
	<p>2) Repairs Satisfaction Survey 2010.</p> <p>3) The Leadership Factor Status / Satisfaction Survey July 2010.</p>	<p>was undertaken on the STATUS question results relating to repairs and maintenance. (How satisfied or dissatisfied are you with the way Swan Housing deal with repairs and maintenance?) The key summary points are listed below.</p> <p>Age – Generally satisfaction with repairs and maintenance appears to increase with age. This could be viewed as a positive indicator in terms of meeting the needs of older residents across the service, which may experience more vulnerability factors. However, equality is fully achieved when all groups are equally satisfied.</p> <p>Gender – There is little difference in satisfaction between genders, however women are slightly less satisfied with repairs and maintenance than men.</p> <p>Disability – Satisfaction is higher amongst disabled residents than residents who do not have a disability. This could be viewed as a positive indicator in terms of meeting the needs of disabled residents across the service.</p>	<p>orientation or transgender. Our resident profiling data shows that a very small proportion of residents have identified themselves as being lesbian, gay, bisexual or transgender.</p>

Question/Focus to be addressed	Data/information source	Summary	Gap in data
		<p>Religion and Belief - Respondents who do not have any religious beliefs are less satisfied than other groups.</p> <p>Ethnicity - Black Caribbean respondents were less satisfied than other groups, however the sample size of this group was too small to draw conclusions from.</p> <p>The 2010 Repairs and Maintenance Satisfaction Survey did not indicate any significant disparities between equality groups.</p> <p>The 2010 July Leadership survey showed that BME groups are less satisfied than White British residents in communicating with us and the ease of reporting repairs.</p>	
Assess satisfaction by equality group to identify and address any potential disparities.	Satisfaction with Planned & Decent Homes work.	In 2009-10 88% of the satisfaction questionnaire respondents reported being fairly satisfied or very satisfied with works undertaken. No significant disparities in satisfaction exist between equality groups for aids and adaptations.	

Question/Focus to be addressed	Data/information source	Summary	Gap in data
Assess satisfaction by equality group to identify and address any potential disparities.	Satisfaction with aids and adaptations.	<p>In 2010 100% of aids and adaptation satisfaction questionnaire respondents reported being fairly satisfied or very satisfied with aids and adaptations undertaken in 2008-2009. Therefore no significant disparities in satisfaction exist between equality groups for aids and adaptations.</p> <p>However, as previously stated, it has been identified that that fewer BME residents accessed the aids and adaptations service during the period.</p>	
Assessment of other equality factors.	Equality and Diversity Assessment of Repairs and Maintenance	<p>The Housing Diversity Manager completed an Equality and Diversity Assessment of Repairs and Maintenance in line with the Equality and Diversity KLOE / NHF Framework.</p> <p>This also checked for the use of accessible communications, the use of equality flags on the Axis IT system and other relevant procedures and tools etc.</p> <p>The key processes are in place but the Housing Diversity Manager is working with Axis on Equality and Diversity improvements</p>	

Question/Focus to be addressed	Data/information source	Summary	Gap in data
		for the current financial year. This is largely to ensure that there is not a gap between policy / procedure and what happens in practice.	
Assess the procedures and practices of Swan's partner contractor Axis to ensure that action is taken to mitigate any potentially negative equality impacts and that opportunities for positive equality impacts are maximised.	As part of the 14 year partnership contract set up as of 1 st April 2009 all contractors who tendered for the contract were reviewed for E&D, customer care and community investment.	As part of the tender submission Axis provided information on: Create Opportunities for new trainees from all walks of life, as a diverse workforce broadens the level of service they provide. Axis has actively tried to recruit a resident from the Bengali committee for our Exmouth Estate. Hold regular toolbox talks on customer care and diversity.	
Analyse qualitative information and resident feedback in order to identify and address any potential equality issues.	Resident feedback through complaints and customer feedback processes.	Some equality issues in relation to awareness and understanding amongst contractors of the needs and concerns of older residents have been raised through Swan's customer / resident feedback channels. Where issues have been raised these have been followed up on an individual basis. However, this is recognised as a potential equality issue and further work is needed to address this.	

Question/Focus to be addressed	Data/information source	Summary	Gap in data
		See the consultation section for further information on resident feedback.	
Analyse qualitative information and resident feedback in order to identify and address any potential equality issues.	Resident feedback and Supported Housing staff feedback.	<p>Feedback from Supported Housing residents suggests that residents with a higher level of support need and / or a disability sometimes find it difficult to get repairs issues dealt with quickly enough.</p> <p>Supported Housing staff and managers have also suggested that further awareness and relationship (between Axis and Supported Housing tenants) building may be needed.</p>	
Review local and national research to ensure that common equality issues have been considered and incorporated in the Strategy and applicable policies.	Benchmarking, best practice	<p>In presenting the Strategy a number of topical aspects have been taken into consideration which would impact housing and directly the residents we house. Common aspects highlighted through working groups such as Tower Hamlets Housing Strategy in terms of over crowing and under occupancy have been taken into account as well as considering government initiatives to reduce fuel poverty through retrofit technology and maximising grants through “feed in tariffs” as an example.</p>	

Question/Focus to be addressed	Data/information source	Summary	Gap in data
<p>Does the Strategy and the related Policies seek to address the disadvantage experienced by residents and families on low incomes in the operation of the services covered?</p>	<p>Review of draft Strategy and related policies.</p>	<p>Within the Strategy and the related policies there is a range of mitigating action that seeks to provide positive impacts for residents and families on low incomes or who are experiencing disadvantage.</p> <p>The Affordable Warmth and Fuel Poverty Policy provides examples of how we aim to tackle fuel poverty:</p> <ul style="list-style-type: none"> • Utilise computer databases to direct programmes of improvement to those properties that fail decent homes. • Utilise computer databases to direct programmes of improvement to those properties that have a low SAP rating. • Introduce a pilot for installing photovoltaic panels. 	
<p>Ensuring that crucial information and advice on items such as affordable warmth, adaptations and repairs are provided in accessible formats and targeted at the groups most at risk of experiencing fuel</p>	<p>Review of draft Strategy and related policies / practice.</p>	<p>Information on all key elements of the Repairs and Maintenance Service and available in accessible formats.</p> <p>The Fuel Poverty and Affordable Warmth Policy is a newly developed Policy. Therefore extra care should be taken to ensure that it is effectively targeted at the</p>	

Question/Focus to be addressed	Data/information source	Summary	Gap in data
poverty, including residents with a disability, older people and families with very young children.		groups most at risk of experiencing Fuel Poverty.	

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>
Consultation on the Asset Management Strategy and related policies - All policies and their original EIA's have been circulated to Service Improvement Managers and taken to the Residents	Partnering and Joint Venture Arrangements – Oct 2009 Recharge Policy – May 2009 Land and Property Disposal Policy – May 2010	No significant equality issues were raised, where minor questions were raised these were addressed.

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>
Consultative Committees in Essex and London.	Reactive Repairs Policy – Nov 2007 Gas Safety Policy – June 2008 Asbestos Policy – New policy to be written Legionella Policy – Aug 2009 Electrical Safety – Aug 2009 Adaptations Policy – June 2008 Assisted Decorations – May 2009 Construction Design and Management Regulations – Aug 2009 The new Asset Management Strategy will be sent to the Resident Consultative Committees in September 2010.	

STEP FOUR: Assess Impact

Having considered the data and information and the findings of 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. 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.)
Assess Access to Service.	<p>Access to service in terms of the provision of general repairs and maintenance services is reflective of the wider resident profile. Although this is only a statistical measure, this is what a service aims to achieve in terms of equality in access to service. Therefore this indicates a positive equality impact.</p> <p>However, access to Aids and Adaptations indicates that there may be an unintentional negative impact on BME communities in terms of access to service.</p>	<p>This disparity is not justifiable at this moment in time without further investigation into the reasons behind it. This will be addressed in the EIA Action Plan.</p>
Assess satisfaction by equality group to identify and address any potential disparities.	The initial results from the recent 2010 Swan Satisfaction Survey indicate that satisfaction is lower amongst BME residents.	These apparent trends will require further investigation and more data has been requested from the survey providers.

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>However, any genuine disparities of this nature are not justifiable. Action is already underway to increase satisfaction amongst BME residents using the repairs service. This action is detailed in the EIA Action plan (in this pro-forma) and the Diversity Action plan.</p>
<p>Analyse qualitative information and resident feedback in order to identify and address any potential equality issues.</p>	<p>Qualitative information and resident feedback indicates that although the Strategy and related policies / procedures do not produce any negative equality impacts. In the operation of the service itself there may be some indirect negative equality impacts for older residents with an element of vulnerability and residents with a disability. These will be addressed by further work with the repairs contractor. Much of this work is already underway or has been planned through the Diversity Action Forums (DAF's).</p>	<p>This is an indirect and unintentional impact. However, this is not justifiable and mitigating action will be taken.</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.)
Appendix 1 lists the key activities already embedded in the Strategy or related policies which are designed to promote positive equality impacts.		

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.

Adverse or negative impact to be addressed	Action required	Performance/outcome target	Lead Department/Section/Officer	Timescale
Addressing the disparities in customer experience and	Swan Housing Diversity Manager to provide equality and diversity advice	Interim Target: A minimum of 1 session to	Housing Diversity Manager & Axis	31 st Dec 2010 and

Adverse or negative impact to be addressed	Action required	Performance/outcome target	Lead Department/Section/Officer	Timescale
<p>/ or the indirect equality impacts experienced by:</p> <ul style="list-style-type: none"> • Older residents with a vulnerability factor • Residents with a disability • BME residents (who may be less satisfied than residents from a White British ethnic background). 	<p>sessions to Axis call centre staff on request (up to one per month). To commence from October 2010.</p>	<p>be delivered and participated in by 31st Dec 2010.</p> <p>Axis call centre staff to have a better understanding of the diversity of our residents. Resident feedback and satisfaction analysis to be reviewed annually by the Asset Management Department.</p>		<p>ongoing.</p>
<p>Addressing the disparities in customer experience and / or the indirect equality impacts experienced by:</p> <ul style="list-style-type: none"> • Older residents with a vulnerability factor • Residents with a disability • BME residents (who may be less satisfied than residents from a White British 	<p>Axis to implement a 'Buddy System' where new or less experienced staff can learn good equality and diversity practice from the colleague they are partnered with.</p>	<p>Target: System to be in place by Jan 2011. A progress report to be submitted by Axis to the London and Essex DAF's by the 31st of March 2011.</p>	<p>Axis Office Manager.</p>	<p>Jan 2011 March 2011</p>

Adverse o	Action required	Performance/outcome target	Lead Department/ Section/Officer	Timescale
ethnic background).				
<p>Addressing the disparities in customer experience and / or the indirect equality impacts experienced by:</p> <ul style="list-style-type: none"> • Older residents with a vulnerability factor • Residents with a disability • BME residents (who may be less satisfied than residents from a White British ethnic background). 	<p>Axis to deliver regular Toolbox Talks to repairs operatives (including sub contractors) on specific and practical equality and diversity issues that arise. Swan Housing Diversity Manager to provide support on request.</p>	<p>First session to be delivered by 31st Dec 2010. A progress report to be submitted by Axis to the London and Essex DAF's by the 31st of March 2011.</p> <p>Axis repairs operatives (including sub contractors) to have a better understanding of the diverse needs of our residents.</p>	<p>Axis Office Manager.</p>	<p>31st Dec 2010</p> <p>31st Mar 2010</p>
<p>Addressing the disparities in customer experience and / or the indirect equality impacts experienced by:</p> <ul style="list-style-type: none"> • Older residents with a vulnerability factor • Residents with a disability • BME residents (who 	<p>Asset Management to listen to Axis call centre telephone calls and monitor the equality and diversity approach (as part of Asset Management voice recording review). This will be reported on as an operational Performance Indicator (PI).</p>	<p>Monthly reporting completed as part of Partnering Operational PI.</p>	<p>Head of Asset Management.</p>	<p>Monthly ongoing</p>

Adverse o	Action required	Performance/outcome target	Lead Department/ Section/Officer	Timescale
<p>may be less satisfied than residents from a White British ethnic background).</p>				
<p>Under representation of BME communities in uptake of the Aids and Adaptations service.</p>	<p>Following the review of the Adaptations undertaken in 2008-9 an article was included in the Communicator and the Exmouth and Bow Cross newsletters advertising service. The Exmouth and Bow Cross news letters are translated into Bengali as we know this is a key community language in these areas. The article further publicised the service to our BME residents.</p>	<p>Task completed. Uptake of the Aids and Adaptations service will be reviewed annually.</p>	<p>Head of Asset Management.</p>	<p>Task Completed Going forward – annual review of service uptake</p>
<p>Addressing the disparities in customer experience and / or the indirect equality impacts experienced by:</p> <ul style="list-style-type: none"> • Older residents with a vulnerability factor <p>Residents with a disability</p>	<p>As part of the review of the Partnering Group personnel ensure that the Supported team are represented and invited to the monthly meetings.</p>	<p>Invite sent and accepted by Supported Housing Team Leader.</p>	<p>Head of Asset Management.</p>	<p>Task Completed and personnel attending first meeting in October 2010.</p>

Adverse or negative impact to be addressed	Action required	Performance/outcome target	Lead Department/Section/Officer	Timescale
<p>Addressing the disparities in customer experience and / or the indirect equality impacts experienced by:</p> <ul style="list-style-type: none"> Older residents with a vulnerability factor Residents with a disability. 	<p>Following discussions with Axis and Supported staff, Axis to introduce a member of staff who will be the “Support Champion” and who will be called on by other Axis staff to assist with questions asked about repairs etc. Staff member not to be on call for all repairs questions from Swan staff but to be more experienced than others. “Support Champion” to visit sites and meet residents and support staff so they have a clear understanding of the needs of the residents and home.</p>	<p>Person in place and recorded at Partnering meeting. Post reviewed as part of the Partnering meeting at which representative from Swans Support team can feedback as to performance.</p>	<p>Head of Asset Management. Axis Divisional Manager.</p>	<p>31st December 2010</p>
<p>Addressing the disparities in customer experience and / or the indirect equality impacts experienced by older residents with a vulnerability factor and residents with a disability.</p>	<p>As part of the review of the repair standards and works, implement differences in the repair schedule to reflect the needs of supported housing residents.</p>	<p>Implement changes by February 2011.</p>	<p>Head of Asset Management. Axis Office Manager.</p>	<p>February 2011 (once report approved by Board and Resident Consultative Committees).</p>

Please note that a range of activity designed to improve equality outcomes has taken place across the Repairs and Maintenance Service / Asset Management in the last year. There are also a number of other Diversity Action Plan items currently in development. For more information please contact the Head of Asset Management or the Housing Diversity Manager.

STEP SEVEN: Reporting and Logging the EIA

- 1) The EIA must be approved by the relevant service manager
- 2) Managers may also wish to consider writing a covering report for EIA's of strategic documents
- 3) Housing Managers should send a copy to the Housing Diversity Manager for comments
- 4) The completed EIA should be reported to the Diversity Action Forum (DAF)
- 5) An electronic copy of the finalised EIA should be sent to Central Services for the corporate log.

Signed.....

Print Name Nicholas Kyprianou

Job Title Head of Asset Management

Date 28th October 2010

Date sent to Housing Diversity Manager (if applicable) - Final draft sent to Housing Diversity Manager 28th October 2010.

Date sent to DAF

Date sent to Central Services for Corporate Log

Positive Activities and Action within the Asset Management Strategy

Key positive activities, action or targets already incorporated in the Strategy and / or policies:

- Develop a Decent Homes PLUS standard to increase the standard of our homes for our residents beyond the government Decent Homes standard.
- Achieve a minimum SAP (Standard Assessment Procedure) rating of 60 for the majority of our homes.
- Achieve an average SAP of 73 by 2012 which will mean our homes are more efficient and cost effective for our residents to run.
- Aid the reduction of fuel poverty through the implementation of a service of sustainability and retro-fit initiatives such as wall and loft insulation, photovoltaic panels, micro CHP.
- Providing an Aids and Adaptation budget which allows Swan to undertake major works as well as minor each year and therefore provide a quicker service and a one tier service for our residents.
- Maximisation of grant funding for insulation works by ensuring where requested by residents and where noted as part of Energy Performance Certificates that homes are inspected and where necessary works undertaken.
- Implement a series of pilot schemes that include a re-modelling exercise, loft conversion or extensions.
- The use of the Vulnerable Tenants Pack to assist residents who are affected by ASB (anti-social behaviour) or feel vulnerable due to their circumstances.
- Ensure through monitoring that the Resident Profile information is used when repairs are being requested, so that services can be tailored appropriately.
- Assist in undertaking Mystery Shopping not only of the department but also of the repairs contractor(s) and use the feedback to enhance service.