

Sandwell Homes

Legislation - General duties:

As a social housing service provider, Sandwell Homes has a legal responsibility to ensure that:

Race:

- Eliminate unlawful racial discrimination
- Promote equality of opportunity
- Promote good relations between people of different racial groups

Disability:

- Promote equality of opportunity between disabled persons and other persons
- Eliminate discrimination that is unlawful under the Act
- Eliminate harassment of disabled persons that is related to their disabilities
- Promote positive attitudes towards disabled persons
- Encourage participation by disabled persons in public life
- Take steps to take account of disabled persons' disabilities, even where that involves treating disabled persons more favourably than other persons

Gender:

- Eliminate unlawful discrimination and harassment on the grounds of sex
- Eliminate unlawful discrimination and harassment on the grounds of gender re-assignment
- Promote equality of opportunity between women and men
- Not to discriminate on the grounds of marital status

Age, Sexuality, Religion and / or Belief, Transgender:

- Eliminate direct discrimination
- Eliminate indirect discrimination
- Eliminate Harassment
- Eliminate Victimisation

Equality Impact Assessment



Sandwell Homes

If you require assistance completing this assessment, contact the Equality Team on: 6384 / 6030

1	<p>Title of Function/ Policy/ Procedure/ Service to be assessed: Sandwell Homes Equality and Diversity Policy</p>
	<p>Type of policy, function, procedure, service:</p> <p>Existing <input checked="" type="checkbox"/></p> <p>New/proposed <input type="checkbox"/></p> <p>Changed <input type="checkbox"/></p>
	<p>Who has been involved in writing/reviewing this policy/procedure/function? Humaa Noori, Kashmir Randhawa and Vanessa Nevin</p> <p>Were any customers/employees/equality groups involved in writing/reviewing this policy/function/procedure/service? Customers (HSP members), Employee Diversity Group (Community Organisations representing all 7 equality strands) and Managers</p>
2	<p>Lead Officer for this assessment: Kashmir Randhawa</p>
3	<p>Officers assisting with this assessment: Vanessa Nevin, Michelle Fletcher</p>
4	<p>Executive Director: Adrian Scarrott</p>
5	<p>Date completed: 13 September 2010</p>

	The Impact Assessment
6	<p>Policy / Function: (summarise the aims, objectives and purpose of the function or policy and service provided)</p> <p>Sandwell Homes is committed to promoting equality and embracing diversity. Our aim is equitable treatment for everyone who uses our services and works for Sandwell Homes. We also recognise that by reflecting and valuing the diversity of our community, we will be a better employer and will deliver better services.</p> <p>Sandwell Homes will ensure that no resident, service user, employee or job applicant is discriminated against or receives less favourable treatment on the grounds of gender, race, colour, nationality, ethnic or national origin, disability, marital status, sexual orientation (including gay men, lesbians and bi-sexuals), gender re-assignment, responsibility for dependants, age, trade union or political activities, religious beliefs, spent offences or any other status as identified in the European Convention of Human Rights.</p> <p>Sandwell Homes strives to eliminate all forms of discrimination. We recognise that this requires not only a commitment to remove discrimination, but also action, through positive policies to redress the inequalities produced by the past. Sandwell Homes will set aside specific resources for improving equality practice.</p> <p>What specific groups is this policy designed to benefit /affect? (e.g., employees, people with disabilities, young people)</p> <p>Every person who uses and accesses our Services and works for us</p> <p>What other policies/procedures/functions relate to/impact on this policy?</p> <p>All policies, procedures and functions.</p>
7	<p>What existing information / data do you have on the community/equality groups in relation to this service/policy/function/procedure? (Equalities profile, service reports, customer feedback etc)</p> <ul style="list-style-type: none"> • Getting to Know You data on IT system provides whole Tenant profile. • HR profile data for all employees <p>If none, what data do you need to collate?</p> <p>For employees, data to be collated on sexual orientation and Religion / Belief</p>

8 What does this information/data tell you? (Are there any gaps, trends, issues?)

GTKY data covers all areas but it is up to tenants if they wish to answer. Analysis shows that there are some discrepancies in performance / access to some services around age and ethnicity. Equality targets have been set for the second year to address these areas. It hi-lights the need for us to look at different approaches to address the needs of the BME and young community to enable them to access services more easily. For example: there is a need highlighted for more work to be done with young and BME tenants around:

- Income Management – rent arrears and evictions due to rent arrears (BME).
- Accessing the Community Alarms and Sheltered Housing Service (BME).
- Preventing homelessness (BME).
- Successful bidding for properties (BME).
- Complaints Process (BME).
- Satisfaction Levels (Young)

Equality targets have been set to address these areas.

HR use employee profile data to identify and set equality targets around recruitment to develop positive action strategies for employment. Analysis has identified:

- The need to increase the number of women and BME employees at Senior Management level.
- The number of disabled employees does not reflect community makeup.
- Some areas are disproportionate in the number of male / female employees.

Established quality targets and positive Action Plans to address these issues.

9	In light of the data and your own knowledge and awareness, please identify whether the policy has a positive, negative or neutral impact on the groups specified below, in relation to equal access. (please refer to the general duties on the front page)					
		Positive Impact	Negative Impact	Neutral Impact	Comments / Concerns (please identify data used when making judgement)	Actions (Also include in your unit plan)
	Age (younger/older)	✓				
	Disability (e.g. physical / sensory / unseen)	✓				
	Gender (women/men)	✓				
	Transgender	✓			Gender Advisory Bureau supports policy and has audited it from a gender identity perspective	
	Race, Ethnicity, Culture (Asian, Black, Chinese, White, Mixed, Travellers and gypsies, other)	✓				
	Religion, Belief	✓				
Sexuality (lesbian, gay, bisexual)	✓					

Other socially excluded groups (e.g., deprivation, low literacy, carers)	✓			Our systems and policies do address the needs of these more vulnerable groups however this is not mentioned in the policy.	To include in policy, a section on vulnerability
--	---	--	--	--	--

	Evidence of Discrimination? (Is the service being delivered the way the policy / Procedure / function states it should be?)			
10	<p>Is there any evidence of discrimination against the following groups: (are any groups affected in different ways to others?)</p> <p style="text-align: center;">please refer to the general duties on the front page</p>			
	Yes	No	Don't Know	<p>Please give details:</p> <ul style="list-style-type: none"> • Obvious – e.g. cases / complaints against your organisation , consultation • Non-Obvious – potential evidence of indirect / institutional discrimination: - statistical profiles / user information / commissioned research etc
	Age	✓		<p>Tenant Inspections on our Service areas have highlighted, not discrimination, but lack of consistency. These are addressed via training / team briefings.</p>
	Disability	✓		
	Gender	✓		
	Transgender	✓		
	Race, Ethnicity, Culture	✓		
	Religion / Belief	✓		
	Sexuality	✓		
	Other socially excluded groups	✓		
	Monitoring:			
11a	<p>How do you monitor equality within this service to ensure all groups listed receive an equal service? E.g. access to service/ satisfaction (please explain)</p>			
	Age	<p>Included in all recruitment activity and used for analysis purposes.</p> <p>Included in GTKY data for tenants / applicants which is used for analysis purposes.</p>		
	Disability	<p>Included in employee profile data which is used for analysis of access to HR policies e.g. Respect and Dignity etc.</p> <p>Included in GTKY data for tenants / applicants which is used for analysis.</p>		
	Gender	<p>Included in employee profile data which is used for analysis purposes.</p>		
	Transgender	<p>Question not asked of employees or customers.</p>		

	Race, Ethnicity, Culture	<p>Included in employee profile data which is used for analysis purposes.</p> <p>Included in GTKY data for tenants / applicants which is used for analysis of services and satisfaction.</p>
	Religion, Belief	<p>Included in employee profile data which is used for analysis purposes.</p> <p>Included in GTKY data for tenants / applicants which can be used for analysis of services and satisfaction.</p> <p>Anti Social Behaviour cases and IT systems do not capture <u>all</u> strand information especially sexuality, religion/belief and transgender.</p>
	Sexuality	HR to commence exercise to capture this information
	Other socially excluded groups	<p>Vulnerability and literacy needs are captured via the GTKY process as well as our processes and practices.</p> <p>Socio – economic issues are captured via our processes and practices.</p>
b.	What do you do with the data – how will it be used?	<p>Analysis of performance and access to services using GTKY data identifies gaps in service delivery and / or access and is used to set targets to improve performance and access issues. Also used to consult and involve difficult to reach groups.</p> <p>HR – data incorporated into annual reports for managers. Also used to develop equality targets and positive action indicators. Recruitment data is incorporated into Performance Monitoring and analysis.</p>
c.	Do you need to involve and engage with service users in addressing any issues relating to discrimination/adverse impacts, as identified in Q.8? (provide details)	<p>No, this is already being done.</p> <p>Issues are identified with service users through the Tenant Inspectors Project and meetings with Diversity Links Group.</p> <p>HR – via employee focus groups and ITC workplace committees.</p>
d.	Do you need to alter the policy / function to incorporate under-represented groups? (provide details)	<p>Yes.</p> <p>Need to include vulnerable groups in policy.</p>

e.	<p>Do you need to develop Positive Action to help under-represented groups overcome barriers (this can range from public relations & marketing to specific targeted programme of activities)? (provide details)</p> <p>Plans in place for HR = positive action plans.</p> <p>Services = through equality targets we can achieve positive outcomes – equality targets reviewed and agreed annually.</p>
f.	<p>Will there be any specific improved service outcomes for groups/partners as a result of this assessment?</p> <p>No</p>
	<p>Public Relations:</p>
12	<p>How will the following know about this assessment:</p> <p>Service users / general public - Internet</p> <p>Employees - Intranet</p> <p>Partners - Internet</p>
	<p>How are you going to share positive outcomes / findings of this assessment? (add to action plan)</p> <p>Via E-Zine and Homelife</p>
	<p>Actions</p> <ol style="list-style-type: none"> 1. Complete the attached action plan addressing any issues / concerns identified in this assessment. 2. If there are any actions arising from this Impact Assessment you will need to complete the assessment again once the actions have been completed, to ensure that all adverse impacts, barriers, issues have been addressed. (See Action Plan)
13	<p>Signed (Lead Officer):</p>
14	<p>Date: 27th July 2010</p>
	<p>Conclusion: (to be completed by the <u>Executive Director</u>)</p>
15	<p>I agree / disagree with this assessment / action plan</p>
16	<p>If <i>disagree</i>, state action/s required, reasons and details of who is to carry them out with timescales:</p>
17	<p>Signed (Executive Director): Adrian Scarrott</p>
18	<p>Date: 21/2/2011</p>

Please send completed & signed assessment to: The Equality Team

Equality Impact Assessment Action Plan

Please ensure these actions are also included in your service unit plan and progress is monitored regularly
(YOU WILL NEED TO COMPLETE A NEW ASSESSMENTS ONCE THE ACTIONS HAVE BEEN COMPLETED)

Policy / Function: Equality and Diversity Policy

Question No. (Ref)	Action Required	Lead Officer	Person Responsible	Target Date	Progress
6	Data collection on Religion, Belief, and Sexual Orientation employees	Vanessa Nevin	Dave Winpenny	October 2010	
7	Information in Policy on how we support socially excluded groups	Kashmir Randhawa	Humaa Noori	September 2010	
11a	Discuss and decide if transgender question needs to be asked	Vanessa Nevin / Kashmir Randhawa	Kashmir Randhawa	December 2010	
11a	ICT system to be developed to enable recording and reporting of <u>all</u> equality information	Mark Penikett	Reg New	September 2011	
General	Conduct a new impact assessment when all actions have been completed				

Are there any actions within the action plan that need to be included in any other service area action plans?