

**Sandwell Homes**

**Background**

An Equality Impact Assessment is an improvement tool. It will assist you in ensuring that you have thought about the needs and impacts of your service/policy/function in relation to the protected characteristics. It enables a systematic approach to identifying and recording gaps and actions.

**Legislation - Equality duty:**

As a social housing service provider, Sandwell Homes has a legal responsibility to ensure that we can demonstrate having paid due regard to the need to:

- ✓ Eliminate discrimination, harassment and victimisation
- ✓ Advance Equality of Opportunity
- ✓ Foster good relations

For the following protected characteristics:

1. Age
2. Disability
3. Gender / Sex
4. Gender reassignment
5. Marriage and civil partnership
6. Pregnancy and maternity
7. Race
8. Religion and belief
9. Sexual orientation

What is prohibited?

1. Direct discrimination, including by association and perception.
2. Indirect discrimination – now covers all characteristics.
3. Pregnancy and maternity discrimination.
4. Harassment.
5. Third party harassment.
6. Discrimination arising from disability.
7. Duty to make reasonable adjustments.

## Equality Impact Assessment

### Sandwell Homes

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

1a	<p style="color: #800000;">Title of Function/ Policy/ Procedure/ Service to be assessed:</p> <p>Harassment (Policy &amp; Procedure)</p>
1b	<p style="color: #800000;">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>
1c	<p style="color: #800000;">Who has been involved in writing/reviewing this policy/procedure/function? Which specific groups were involved?</p> <ul style="list-style-type: none"> <li>Sandwell Homes Officers</li> <li>West Midlands Police</li> <li>Rights &amp; Equalities Sandwell (Formerly Race Equality Sandwell)</li> <li>S.C.I.Ps</li> </ul>
2	<p style="color: #800000;">Lead Officer for this assessment: Surjit Singh</p>
3	<p>Officers assisting with this assessment:</p> <ul style="list-style-type: none"> <li>Rebecca Low</li> <li>Belinda Blake</li> </ul>
4	<p style="color: #800000;">Executive Director: Adrian Scarrott</p>
5	<p style="color: #800000;">Date completed: 18<sup>TH</sup> August 2011</p>

<b>The Impact Assessment</b>	
6a	<p><b>Policy / Function - summarise the aims, objectives and purpose of the function or policy and service provided.</b></p> <p>Sandwell Homes believes in equality and will not tolerate any form of Harassment, discrimination or intimidation.</p> <p>The policy confirms Sandwell Homes commitment to deal with all incidents involving its tenants and residents promptly and positively ensuring that they are able to live in any part of Sandwell free from Harassment, intimidation and victimisation</p>
6b	<p><b>What specific group is this policy designed to benefit /affect? (e.g., employees, people with disabilities, young people, tenants, residents)</b></p> <p>All Sandwell Tenants and Residents</p>
6c	<p><b>What other policies/procedures/functions relate to/impact on this policy?</b></p> <p>This policy is related to all Sandwell Homes policies and services that effect tenants and residents</p> <p>Specifically:</p> <ul style="list-style-type: none"> <li>• Complaints</li> <li>• Anti Social Behaviour</li> <li>• Interpreting &amp; Translation</li> <li>• Homelessness</li> <li>• Allocations</li> </ul>

7a	<p><b>What existing information / data do you have on the community/equality groups in relation to this service/policy/function/procedure? (customer profiles, service reports, customer feedback, complaints etc)</b></p> <ul style="list-style-type: none"> <li>• Sandwell Homes Tenants profile</li> <li>• Sandwell MBC Borough profile</li> <li>• Harassment report 2010/11</li> <li>• Perpetrators &amp; Victim profile</li> <li>• Customer feedback &amp; Satisfaction</li> <li>• tenants Inspector report</li> </ul>
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7b	<p>If none, what data do you need to collate?</p> <p>N/A</p>
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8	<p>What does this information/data tell you? (Are there any gaps, trends, issues?)</p> <ul style="list-style-type: none"><li>• Report identifies hotspots area and geographical trends</li><li>• Trends in the nature of complaints ( monitoring strands)</li><li>• Allows us to make judgements in the way the service structured and delivered</li><li>• Allows us to determine roles and responsibilities ( protocol)</li><li>• Training needs and requirement</li></ul>
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In light of the data and your own knowledge and awareness, please identify whether the policy has a positive or negative impact on the groups specified below (please refer to the general duties on the front page)

	<b>Positive Impact</b>	<b>Negative Impact</b>	<b>Comments / Concerns</b> (please identify data used when making judgement)	<b>Actions</b> (Also include in your unit plan)
Age (younger/older)	✓		Publicise ( Using following methods): <ul style="list-style-type: none"> <li>• Tenants Handbook</li> <li>• Leaflets &amp; Posters</li> <li>• S/H Website</li> <li>• Third party reporting centres</li> </ul> Access Service (using following methods): <ul style="list-style-type: none"> <li>• By telephone &amp; email</li> <li>• Neighbourhood &amp; estate office</li> <li>• Support services</li> <li>• Third party reporting centres</li> <li>• Website &amp; on line</li> <li>• Interpreting, Translation, Brail &amp; DVD</li> <li>• Language line</li> <li>• Hearing loop system</li> <li>• Home visits</li> </ul>	

<p>Disability (e.g. physical / sensory / unseen)</p>	<p>✓</p>		<p>Publicise ( Using following methods):</p> <ul style="list-style-type: none"> <li>• Tenants Handbook</li> <li>• Leaflets &amp; Posters</li> <li>• S/H Website</li> <li>• Third party reporting centres</li> </ul> <p>Access Service (using following methods):</p> <ul style="list-style-type: none"> <li>• By telephone &amp; email</li> <li>• Neighbourhood &amp; estate office</li> <li>• Support services</li> <li>• Third party reporting centres</li> <li>• Website &amp; on line</li> <li>• Interpreting, Translation, Brail &amp; DVD</li> <li>• Language line</li> <li>• Hearing loop system</li> <li>• BSL signers</li> <li>• Browse aloud</li> <li>• Home visits</li> </ul>	
<p>Gender/Sex (women/men)</p>	<p>✓</p>		<p>Publicise ( Using following methods):</p> <ul style="list-style-type: none"> <li>• Tenants Handbook</li> <li>• Leaflets &amp; Posters</li> <li>• S/H Website</li> <li>• Third party reporting centres</li> </ul> <p>Access Service (using following methods):</p> <ul style="list-style-type: none"> <li>• By telephone &amp; email</li> <li>• Neighbourhood &amp; estate office</li> <li>• Support services</li> <li>• Third party reporting centres</li> <li>• Website &amp; on line</li> </ul>	

<p>Transgender</p>	<p>✓</p>		<p>Publicise ( Using following methods):</p> <ul style="list-style-type: none"> <li>• Tenants Handbook</li> <li>• Leaflets &amp; Posters</li> <li>• S/H Website</li> <li>• Third party reporting centres</li> </ul> <p>Access Service (using following methods):</p> <ul style="list-style-type: none"> <li>• By telephone &amp; email</li> <li>• Neighbourhood &amp; estate office</li> <li>• Support services</li> <li>• Third party reporting centres</li> <li>• Website &amp; on line</li> </ul>	
<p>Race, Ethnicity, Culture (Asian, Black, Chinese, White, Mixed, Travellers and gypsies, other)</p>	<p>✓</p>		<p>Publicise ( Using following methods):</p> <ul style="list-style-type: none"> <li>• Tenants Handbook</li> <li>• Leaflets &amp; Posters</li> <li>• S/H Website</li> <li>• Third party reporting centres</li> </ul> <p>Access Service (using following methods):</p> <ul style="list-style-type: none"> <li>• By telephone &amp; email</li> <li>• Neighbourhood &amp; estate office</li> <li>• Support services</li> <li>• Third party reporting centres</li> <li>• Website &amp; on line</li> <li>• Interpreting, Translation, Brail &amp; DVD</li> <li>• Language line</li> <li>• Hearing loop system</li> <li>• Home visits</li> </ul>	

Religion / Belief	✓		<p>Publicise ( Using following methods):</p> <ul style="list-style-type: none"> <li>• Tenants Handbook</li> <li>• Leaflets &amp; Posters</li> <li>• S/H Website</li> <li>• Third party reporting centres</li> </ul> <p>Access Service (using following methods):</p> <ul style="list-style-type: none"> <li>• By telephone &amp; email</li> <li>• Neighbourhood &amp; estate office</li> <li>• Support services</li> <li>• Third party reporting centres</li> <li>• Website &amp; on line</li> <li>• Interpreting, Translation, Brail &amp; DVD</li> <li>• Language line</li> </ul>	
Sexuality (lesbian, gay, bisexual)	✓		<p>Publicise ( Using following methods):</p> <ul style="list-style-type: none"> <li>• Tenants Handbook</li> <li>• Leaflets &amp; Posters</li> <li>• S/H Website</li> <li>• Third party reporting centres</li> </ul> <p>Access Service (using following methods):</p> <ul style="list-style-type: none"> <li>• By telephone &amp; email</li> <li>• Neighbourhood &amp; estate office</li> <li>• Support services</li> <li>• Third party reporting centres</li> <li>• Website &amp; on line</li> </ul>	

<p>Other protected groups: pregnancy &amp; maternity, marriage and civil partnerships</p>	<p>✓</p>		<p>Publicise ( Using following methods):</p> <ul style="list-style-type: none"> <li>• Tenants Handbook</li> <li>• Leaflets &amp; Posters</li> <li>• S/H Website</li> <li>• Third party reporting centres</li> </ul> <p>Access Service (using following methods):</p> <ul style="list-style-type: none"> <li>• By telephone &amp; email</li> <li>• Neighbourhood &amp; estate office</li> <li>• Support services</li> <li>• Third party reporting centres</li> <li>• Website &amp; on line</li> </ul>	
<p>Other socially excluded groups (e.g., deprivation, low literacy, carers, language)</p>	<p>✓</p>		<p>Publicise ( Using following methods):</p> <ul style="list-style-type: none"> <li>• Tenants Handbook</li> <li>• Leaflets &amp; Posters</li> <li>• S/H &amp; SMBC Website</li> <li>• Home life</li> <li>• Third party reporting centres</li> </ul> <p>Access Service (using following methods):</p> <ul style="list-style-type: none"> <li>• By telephone &amp; email</li> <li>• Neighbourhood &amp; estate office</li> <li>• Support services (internal &amp; external)</li> <li>• Third party reporting centres</li> <li>• Website &amp; on line</li> <li>• Home visits</li> </ul>	
<p>All</p>	<p>✓</p>			

	<b>Evidence of Discrimination?</b> (Is the service being delivered the way the policy / procedure / function states it should be?)			
10	<b>Is there any evidence of discrimination against the following groups:</b> please refer to the guidance on the front page			
		<b>Yes</b>	<b>No</b>	<b>Don't Know</b>
				<b>Please give details:</b> <ul style="list-style-type: none"> <li>• <b>Obvious</b> – e.g. cases / complaints against your organisation , consultation</li> <li>• <b>Non-Obvious</b> – potential evidence of indirect / institutional discrimination: - statistical profiles / user information / commissioned research etc</li> </ul>
	Age		✓	
	Disability		✓	
	Gender		✓	
	Transgender		✓	
	Race, Ethnicity, Culture		✓	
	Religion / Belief		✓	
	Sexuality		✓	
	Other protected groups		✓	
	Other socially excluded groups		✓	
	<b>Monitoring:</b>			
11 a.	<b>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)</b>			
	Age	}	<b>Satisfaction survey (telephone &amp; questionnaire) &amp; Victim Profile</b>	
	Disability			
	Gender			
	Transgender			
	Race, Ethnicity, Culture			
	Religion, Belief			
	Sexuality			

	Other protected groups	} Satisfaction survey (telephone & questionnaire) & Victim Profile
	Other socially excluded groups	
b.	<p>What do you do with the data – how will it be used?</p> <ul style="list-style-type: none"> <li>• To raise awareness</li> <li>• Training</li> <li>• Share information with Safer Sandwell Partnership</li> <li>• Hotspots identified jointly with partnership information</li> <li>• Community cohesion and tension monitoring groups</li> <li>• Monthly harassment information been shared with LPU</li> </ul>	
12.	<p>Do you need to involve and engage with service users in addressing any issues relating to discrimination/adverse impacts, as identified in this assessment? (provide details)</p> <ul style="list-style-type: none"> <li>• Review of policy to be consulted with service user through S.C.I.Ps &amp; Diversity links group</li> <li>• Incorporate recommendations of the Tenant inspectors report</li> </ul>	
13.	<p>Do you need to alter the policy / function to incorporate under-represented groups? (provide details)</p> <p>No</p>	
14.	<p>Do you need to develop Positive Action to help under-represented groups overcome barriers (this can range from public relations &amp; marketing to specific targeted programme of activities? (provide details)</p> <ul style="list-style-type: none"> <li>• Increase level of awareness jointly with partners within the borough</li> <li>• Engage with different groups through the “Diversity group”</li> <li>• Future marketing to include use of Face book &amp; Twitter to capture a wider audience</li> </ul>	

15.	<p>Will there be any specific improved service outcomes for groups/partners as a result of this assessment?</p> <ul style="list-style-type: none"> <li>• Increased awareness</li> <li>• Increased satisfaction</li> <li>• Increase in reporting</li> </ul>
	<p><b>Public Relations:</b></p>
16 a.	<p>How will the following know about this assessment:</p> <p>Service users / general public: <u>Internet</u></p> <p>Employees <u>Intranet</u></p> <p>Partners <u>internet</u></p>
16 b.	<p>How do you promote/ raise awareness of the policy/procedure/function to ensure that it is accessible and available to all groups?</p> <ul style="list-style-type: none"> <li>• Community events (undertaken at Stone cross, Tipton, Tibbington, Kenrick park ,Brickhouse Victoria Park</li> <li>• Poster campaign</li> <li>• Media website</li> <li>• Newsflash</li> <li>• Leaflets</li> <li>• Posters</li> <li>• Home life</li> <li>• Neighbourhood offices</li> </ul>
17.	<p>How are you going to share positive outcomes / findings of this assessment? (add to action plan)</p> <ul style="list-style-type: none"> <li>• Internet &amp; Home life</li> </ul>
	<p><b>Actions</b></p> <ol style="list-style-type: none"> <li>1. Complete the attached action plan addressing any issues / concerns identified in this assessment.</li> <li>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. <b>(See Action Plan)</b></li> </ol>
18	<p><b>Signed (Lead Officer):</b></p>
	<p><b>Conclusion:</b> (to be completed by the <u>Executive Director</u>)</p>

19	I agree / disagree with this assessment / action plan
20	If <i>disagree</i> , state action/s required, reasons and details of who is to carry them out with timescales:
21	<b>Signed (Executive Director):</b>
22	<b>Date:</b>

[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: Harassment

Question No. (Ref)	Action Required	Lead Officer	Person Responsible	Target Date	Progress
8	<ul style="list-style-type: none"> <li>• Change ISO Procedures to reflect practice</li> <li>• Training</li> <li>• Review of policy</li> </ul>	Surjit Singh	Surjit Singh Stuart White Rushpal Dhaliwal	December 2011	
10	<ul style="list-style-type: none"> <li>• Engage with Diversity Group to better understand needs</li> </ul>	Surjit Singh	Surjit Singh	February 2012	
11A	<ul style="list-style-type: none"> <li>• Increase satisfaction</li> <li>• Raise awareness</li> </ul>	Surjit Singh	Sukhjinder Sandhu	April 2012	
11B	<ul style="list-style-type: none"> <li>• Evaluate effectiveness of information shared with SSP</li> </ul>	Surjit Singh	Surjit Singh	April 2012	
12	<ul style="list-style-type: none"> <li>• Complete review of procedure</li> </ul>	Surjit Singh	Surjit Singh Stuart White Rushpal Dhaliwal	December 2011	

14 & 16	<ul style="list-style-type: none"> <li>• Increase awareness</li> <li>• Campaign with partners</li> <li>• Engage with Diversity group</li> </ul>	Surjit Singh	Surjit Singh	February 2012	
General	Conduct a new impact assessment when all actions have been completed	Kashmir Randhawa	Surjit Singh	May 2012 (annual)	

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