

Equality Impact Assessment

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 reassignment
4. Marriage and civil partnership
5. Pregnancy and maternity
6. Race
7. Religion and belief
8. Sex
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

1	<p>Title of Function/ Policy/ Procedure/ Service to be assessed: Interpreting, Translation and Communication Policy and ISO.</p>
	<p>Type of policy, function, procedure, service:</p> <p>Existing <input type="checkbox"/> ✓ ISO</p> <p>New/proposed <input type="checkbox"/> ✓ Policy</p> <p>Changed <input type="checkbox"/></p>
	<p>Who has been involved in writing/reviewing this policy/procedure/function? Humaa Noori (Equality Officer) Equality Team</p> <p>Were any customers/employees/equality groups involved in writing/reviewing this policy/function/procedure/service? Yes – Equality Team</p>
2	<p>Lead Officer for this assessment: Michelle Fletcher</p>
3	<p>Officers assisting with this assessment: Humaa Noori</p>
4	<p>Executive Director: Adrian Scarrott</p>
5	<p>Date completed: 16th December 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>To outline our commitments in relation to interpreting and translation; to assist customers who face barriers to communication and access to our services.</p> <p>What specific groups is this policy designed to benefit /affect? (e.g., employees, people with disabilities, young people, tenants, residents)</p> <p>Customer accessing Sandwell Homes services or who are contacting Sandwell Homes.</p> <p>Employees who want to communicate with someone who has communication needs</p> <p>What other policies/procedures/functions relate to/impact on this policy?</p> <p>Every Policy/service is impacted by this policy and we have to ensure that there are no barriers to access or communication to any of our services or policies.</p>

7	<p>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)</p> <p>GTKY information which tells us tenants preferred method of communication, language spoken and read and any other communication needs.</p> <p>Information is collated through tenant visits</p> <p>Complaints process highlights areas of improvement for communication</p> <p>All translation and interpretation is monitored and recorded by the Equality Team.</p> <p>If none, what data do you need to collate?</p> <p>N/a</p>
---	---

8	<p>What does this information/data tell you? (Are there any gaps, trends, issues?)</p> <ul style="list-style-type: none"> • We are able to identify the key languages read and spoken by our
---	--

tenants using the GTKY data

- We are able to identify which tenants require BSL, audio, documents in Braille or large print via GTKY data.
- We are able to use reports on the translation and interpretation carried out to identify trends and need in terms of service delivery.
- We are able to identify where there are gaps by cross referencing GTKY information with translation and interpreting monitoring reports (look at take up v need)

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	Comments / Concerns (please identify data used when making judgement)	Actions (Also include in your unit plan)
Age (younger/older)	✓		The services available to support people with communication needs apply to people of all ages. We have given our customers the opportunity to use whoever they want to interpret on their behalf. We have also developed strategies to ensure that we are able to effectively communicate with younger and older people more generally such as the Young Persons Strategy.	
Disability (e.g. physical / sensory / unseen)	✓		The Policy specifically highlights provisions we will make to communicate with people who are deaf, visually impaired, have learning disabilities.	
Gender/Sex (women/men)	✓		If requested, we will make provisions to provide a female interpreter where possible.	
Transgender	✓	✓	The policy applies to everyone who has communication needs, this is regardless of their gender, ethnicity etc, However it is recognised that if assumptions are made regarding a person's gender via telephone conversations, this could result in a negative impact for some customers.	Caveat to be included in procedure to highlight employees should not presume the gender of the caller based on their voice.
Race, Ethnicity, Culture (Asian, Black, Chinese, White, Mixed, Travellers and gypsies, other)	✓		The policy makes positive provisions for customers who speak languages other than English. It also puts in place a robust system for interpretation and translation. We also pro-actively offer to translate documents into the key seven languages, although the policy specifies that this will only be done for 'key information.	Clarification on what is considered as key needs to be included in the policy.

Religion / Belief	✓		The policy applies to everyone who has communication needs, this is regardless of their gender, ethnicity etc. The policy makes provision for female only interpreters when requested and where possible.	
Sexuality (lesbian, gay, bisexual)	✓		The policy applies to everyone who has communication needs; this is regardless of their sexuality.	
Other protected groups: pregnancy & maternity, marriage and civil partnerships	✓		The policy applies to everyone who has communication needs; this is regardless of their gender, ethnicity etc or any other characteristic protected or otherwise.	
Other socially excluded groups (e.g., deprivation, low literacy, carers)	✓	✓	<p>The policy outlines our commitment to provide key documents in Easy Read format. There are some concerns around how we communicate with people who are illiterate and do not speak English. E.G a Somali speaking tenants does not read English or Somali.</p> <p>We can and will provide information in audio format or via verbal translation if required.</p>	<p>Explore what we do for people who cannot read or write and who do not speak English.</p> <p>Raise awareness with front line employees of issues relating to illiteracy.</p>

	Evidence of Discrimination? (Is the service being delivered the way the policy / procedure / function states it should be?)				
10	Is there any evidence of discrimination against the following groups: please refer to the guidance on the front page				
		Yes	No	Don't Know	Please give details: <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		✓		
	Disability	✓			Issues have been raised by Sandwell Deaf Community Association about problems deaf tenants have had when trying to contact us.
	Gender		✓		
	Transgender		✓		
	Race, Ethnicity, Culture		✓		
	Religion / Belief		✓		
	Sexuality		✓		
	Other protected groups		✓		
Other socially excluded groups		✓			
	Monitoring:				
11 a.	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)				
	Age				
	Disability	BSL, Audio and Braille monitored through requests for translations and interpreters.			
	Gender				
	Transgender				
	Race, Ethnicity, Culture	Languages also monitored through requests for translations and interpretations			
	Religion, Belief				
	Sexuality				

	Other protected groups	Currently not monitored (pregnancy & maternity and civil partnerships)
	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"> • We are able to identify the key languages read and spoken by our tenants using the GTKY 	
c.	<ul style="list-style-type: none"> • We are able to identify which tenants require BSL, documents in Braille or large print via GTKY data. • We are able to use reports on the translation and interpretation carried out to identify trends and need in terms of service delivery. • We are able to identify where there are gaps by cross referencing GTKY information with translation and interpreting monitoring reports (look at take up V need) 	
d.	<p>Do you need to involve and engage with service users in addressing any issues relating to discrimination/adverse impacts, as identified in Q's 9 or 10? (provide details)</p> <p>Yes – work needs to be done with the deaf community based on the issues highlighted by the SDCA.</p>	
e.	<p>Do you need to alter the policy / function to incorporate under-represented groups? (provide details)</p> <p>Yes – need to include not presuming gender when communicating over the phone.</p>	
	<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>Yes- work needs to be done to raise awareness amongst employees about how to communicate with customers who have low literacy.</p> <p>More work needs to be done with deaf tenants in relation to raising awareness of our services and how to access them.</p>	

f.	<p>Will there be any specific improved service outcomes for groups/partners as a result of this assessment?</p> <p>Yes – The policy will improve communication for anyone who has communication needs. With the additional work that needs to be done with the deaf community and in raising awareness of communicating with people who have low literacy it will result in service improvements more so for these groups.</p> <p>Increase take up for interpretation and translations.</p>
	Public Relations:
12	<p>How will the following know about this assessment:</p> <p>Service users / general public: Internet</p> <p>Employees: Internet/Intranet</p> <p>Partners: Internet/Intranet</p>
	<p>How are you going to share positive outcomes / findings of this assessment? (add to action plan)</p> <p>An awareness campaign will be carried out to raise awareness of revised policy and new procedure. This will also include publicising the positive outcomes/actions of this project.</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	Signed (Lead Officer): Michelle Fletcher
14	Date: 16 th December 2010
	Conclusion: (to be completed by the <u>Executive Director</u>)
15	I agree / disagree with this assessment / action plan
16	If <i>disagree</i> , state action/s required, reasons and details of who is to carry them out with timescales:
17	Signed (Executive Director): Adrian Scarrott
18	Date: 8/2/2011

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: Interpreting, Translation and Communication Policy and ISO.

Question No. (Ref)	Action Required	Lead Officer	Person Responsible	Target Date	Progress
9/11d	Caveat to be included in procedure to highlight employees should not presume the gender of the caller based on their voice.	K.Randhawa	H.Noori	January 2011	Completed
9	Clarification on what is considered as 'key' information needs to be included in policy.	K.Randhawa	H.Noori	January 2011	Completed
9/11e	Explore what we do for people who cannot read or write and who do not speak English Raise awareness with front line employees of issues relating to illiteracy.	K.Randhawa	K.Randhawa	March 2011	
10/11c,e	Work with SDCA to address issues which have been highlighted in relation to communication with the deaf community	Humaa Noori	Humaa Noori	March 2011	Met with SDCA, agreed to produce information pack to give to deaf tenants, focus group to be held to identify which info needs to be included
12	Awareness campaign of policy and ISO internally through Ezine and externally through Homelife	K.Randhawa	M.Saunders	March 2011	

	and stakeholder organisations				
General	Conduct a new impact assessment when all actions have been completed	Equality Team	Equality Team	April 2011	

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