

**EQUALITY IMPACT ASSESSMENT**

<b>POLICY / SERVICE AREA DETAILS:</b>	
Name of policy / service area:	Housing Services
Details of person carrying out EIA: <i>(Name; title; contact details)</i>	Ben Ollier
What does this EIA relate to?	Adaptations Policy
What service areas does this EIA relate to?	This is a cross cutting strategy applying to all areas of service delivery in housing.
Other persons involved in the EIA:	Adaptations review team (tenants) Operations Director Continuous Improvement Manager
<b>POLICY / SERVICE DESCRIPTION</b>	
<b>What are the aims of the policy / service review?</b>	
<p>The aim of the adaptations policy is to;</p> <ul style="list-style-type: none"> <li>• To improve services and customer satisfaction</li> <li>• To provide clear guidelines and information for customers</li> <li>• To promote the service to tenants</li> <li>• To make the best use of the housing provision</li> </ul> <p>The policy aims to achieve a common and consistent approach, which is in line with legislation and good practice.</p>	
<b>How do the proposals link with the corporate objectives?</b>	
<p>Achieve continuous improvement in resident satisfaction – Cosmopolitan Housing Association Enhance the Association through a commitment to diversity &amp; value for money - Cosmopolitan Housing Association Champion Equality and Diversity – Cosmopolitan Housing Group</p>	

**Who will the proposals benefit?**

All tenants, or members of their household.

**What outcomes will the proposals achieve?**

Intended outcomes

- To provide a comprehensive service within the allocated budget.
- To provide promotional material with clear guidance on the service.
- To provide an efficient, value for money service
- To maximise the independence of physically disabled tenants (or physically disabled members of their household) within their homes

**Are there any aspects of the policy / service that could contribute to inequality?**

**YES**

**Service Users** – Current tenant census information shows our tenant profile as follows (please note that data has been collected for 73% of tenants – Sept 2009):

- Age
- Gender
- Transgender
- Ethnicity
- Religion & beliefs
- Sexual orientation
- Disability

Experiences within the unit have shown a need to develop a greater understanding of cultural and individual need when delivering services to BME communities. The policy is designed to combat any potential inequalities that could arise either directly or indirectly as a result of the action or inaction of the Group.

All adaptations are prioritised by the adaptation requirements and the assessments are undertaken by Occupational Therapists. Therefore, by the nature of the service there may be some inequality in relation to the disability, compared to the other diversity strands, simply because it would be as a result of some form of disability or impairment that a person would be requesting an adaptation. Failure to properly take into account the needs of particular minority groups could result in their needs not being properly catered for. For example, it is acceptable in certain circumstances to treat disabled persons differently, if it would result in an equality of outcome as a result of a particular activity. Failure to do so could in itself result in discrimination occurring.

All adaptations and adaptation requests are processed and considered taking into account the Disability Discrimination Act. Other legislation that also needs to be taken into account includes:

- Sex Discrimination Act 1975 and 1986
- The Race Relations Act 1976, and associated Codes of Practice issued by the Commission for Racial Equality (CRE) (now the Equality and Human Rights Commission (EHRC))
- The Housing Act 1988 (in particular Section 56)

- Disability Discrimination Acts 1995 and 2005
- Asylum & Immigration Act 1996
- The Housing Act 1996
- Police Act 1997
- The Protection from Harassment Act 1997
- The Human Rights Act 1998
- Gender Reassignment Regulations 1999
- Race Relations (Amendment) Act 2000
- EC Council Directive 2000/43/EC (equal treatment between people irrespective of their racial or ethnic origin) and UK legislation to implement this, including the Race Relations Act 1976 (Amendment) Regulations 2003
- Race Relations (Amendment) Regulations 2003
- Race Relations (Amendment) Regulations 2003
- Housing Act 2004 Gypsies and Travellers
- Civil Partnership Act 2005
- Equality Act 2006
- Equality Act (Sexual Orientation) Regulations 2007

In addition, Cosmopolitan Housing Association also needs to adhere to the following:

- Tenant Services Authority Regulatory Code
- Tenant Services Authority Good Practice Note 8
- Tenant Services Authority – How We Regulate 4: Our Overall Approach
- Audit Commission’s Diversity Key Line of Enquiry (KLOE 31)

**Please summarise how the policy / service contributes to the Group’s equality and diversity commitments:**

Cosmopolitan Housing Association has already sought to address any issues or inequality and to contribute to the Group’s equality and diversity commitments through the adaptations services through the following:

- Referrals made for vulnerable tenants to supported housing providers/providers of more suitable & specialist accommodation
- Through the operation of an Aids and Adaptations Scheme which involves Occupational Therapists’ recommendations and allows disabled tenants, and members of their households, to remain in their homes.
- Working with Local Authorities to operate choice based letting services that gives housing applicants more information on the availability and facilities in different areas, and also assists tenants to seek alternative accommodation that may be more suitable to their needs
- Language Line is available and promoted – large print, Braille and audio options also available
- Staff regularly attend training on different stakeholder needs to assist them when dealing with adaptation requests including training on disability awareness, mental health awareness training and Equality and Diversity training.
- The monitoring data collation of tenants and leaseholders of Cosmopolitan Housing Association was introduced in 2008. The data collated will provide the Association with details covering all seven diversity strands and will also highlight any language and

translation needs. This information will be reviewed as required to ensure that all information available is relevant and up to date to ensure that all services delivered are accessible and appropriate to all tenants.

- An adapted register has been set up in consultation with OT Department which identifies properties which have adaptations by codes and asks applicants requesting a transfer to self-assess themselves against this criteria and priority for adapted properties is given to those people who need those adaptations.
- Quarterly monitoring of satisfaction with the adaptations service will commence from September 2009 and this will be monitored against the seven diversity strands. Information on this will be reported to tenants on an annual basis as part of the overall reporting on equality and diversity.
- The Team have sought to raise awareness of the service to the wider public and to hard to reach groups and recognise the need to continue to promote the service through all available means.

**What interface is there with other organisations for implementing proposals?**

The policy will be implemented in conjunction with the following:

Relevant Primary Care Trusts  
 Knowsley Housing Trust  
 Local Authorities  
 Social Services  
 Support providers

**IMPACT ASSESSMENT**

<b>Equality and diversity area</b>	<b>Impact</b>	<b>COMMENTS</b>
<b>Gender</b> Birth sex – male or female	Positive	The service does not discriminate on grounds of gender; overall we have a gender balance of service users that reflects equality.
<b>Transgender</b> Different gender identity to birth sex	Positive	The service does not discriminate on grounds of gender; overall we have a gender balance of service users that reflects equality.

<b>Ethnicity</b> Black and other minority ethnic	Positive	The service aims to reach all groups of people and the Adaptations team have worked to promote the service to the BME communities.
<b>Disability</b> Disabled people in general, physical access, sight/hearing needs, other groups of disability	Positive	The service is offered to all people with a disability. Awareness and joint working is promoted, however work is ongoing in this area.
<b>Sexual Orientation</b> Lesbians, gay men, and bisexuals.	Positive	The service does not discriminate on grounds of sexually orientation. There is a fair and open referral process for all. Service Users sexual orientation is not gathered as part of the Assessment/referral process.
<b>Religion &amp; Beliefs</b> Faith group	Positive	We provide a holistic service to all tenants regardless of religion or belief.
<b>Age</b> Older people, younger people, children	Neutral	Lower expectations held by some older people may mean reluctance to access services and benefits. People that are economically active may be limited to their access to services during office hours. Younger people may not feel that their interests or needs are represented. Tenants are able to access the service regardless of age.

<b>FURTHER ASSESSMENT</b>	
<b>Equality and Diversity area:</b>	Adaptations Service
<b>Type of impact:</b>	Positive
<b>Is it legal?</b> <i>(i.e. not discriminatory under equality / discrimination legislation)</i>	Yes
<b>Is it intended?</b>	Yes
<b>What is the level of impact?</b>	High
<b>Could you improve the positive impact?</b>	<ul style="list-style-type: none"> <li>• Use plain English – make sure questionnaires or leaflets and letters are in plain English so you get a better response.</li> <li>• Remove barriers to communication – avoid technical language, provide translations, check on</li> </ul>

	<p>physical access, provide help for people with impaired sight or hearing and to those who cannot read.</p> <ul style="list-style-type: none"> <li>• Improved intelligence about customers through profiling exercises</li> <li>• Use satisfaction data gathered and analyse results to improve services and ensure fair &amp; equal access.</li> <li>• For Cultural reasons a tenant may not want to be visited alone at home by trades person with out a member of their family being present.</li> <li>• Religious beliefs may restrict access to properties on holy days.</li> <li>•</li> </ul>
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<b>If there is no evidence that the policy / service promotes equality and diversity, could it be adapted so that it does? How?</b>	N/A
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<b>On the basis of answers to questions for the policy screening stage, do you recommend Phase 2 - a full impact assessment should be carried out?</b>	No
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<b>If a full impact assessment is required, what experts / relevant groups need to be contacted to get further views or evidence on the issues and the assessment?</b>	N/A
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**ACTION PLANNING**

<b>Area / Issue</b>	<b>Action</b>	<b>Responsible</b>	<b>Due Date</b>	<b>Resources</b>	<b>Comments</b>
Equality Impact Assessment	Review Impact Assessment	Allocations Team Leader	September 2010	N/A	Review following first year of revised policy and further to adaptations undertaken.
Tenant profiling	Continue with Tenant Census to enhance knowledge of customer base	Operations Director	On going	Staff time only	Currently obtained over 73% response rates.
Adaptations Policy	Dissemination of revised	Allocations Team Leader	October 2009	Staff time	

	policy to staff and any additional training needs to be identified to ensure full delivery of the policy staff and contractors.				
Adaptations Service	Monitoring of adaptation works undertaken on a monthly basis to assess progress against work programme.	Allocations Team Leader	March 2010	N/A	
Adaptations Service	Satisfaction monitoring for adaptations undertaken to be implemented and monitored against seven diversity strands. Feedback from results to inform future service provision.	Continuous Improvement Manager/ Allocations Team Leader	March 2010	N/A	E&D satisfaction monitoring data to be presented to board as part of overall E&D KPI monitoring.

**Signed:** .....

**Date:** .....