

Winchester City Council

Equality Impact Assessment

Section 1 - Data Checklist

When undertaking your Equality Impact Assessment for your policy or project, it is important that you take into consideration everything which is associated with the policy or project that is being assessed.

The checklist below is to help you sense check your policy or project before you move to Section 2.

		Yes/No	Please provide details
1	Have there been any complaints data related to the policy or project you are looking to implement?	Yes	<p>Complaints data available through Pentana; however financial information is also available.</p> <p>Previously no formalised policy the outcome following a complaint was to development a formal policy that set out standards around response times and settlement.</p> <p>In last 6 months 23 requests for compensation around the following</p> <ul style="list-style-type: none"> • Heating delays • Humidifier/heating costs • Repair failure – not completed as per specification in terms of time taken to resolve • Repair failure – not completed in terms of specified work quality • Service failures contractor and the council
2	Have all officers who will be responsible for implementing the policy or project been consulted, and given the opportunity to raise concerns about	Yes	Circulated to the comment to the customer Services manager, DMT including Corporate Head of Service.

	the way the policy or function has or will be implemented?		<p>Comments received to Hub Supervisor.</p> <p>Property DMT and frontline officers programmed.</p> <p>ACTION - Evidence document of comments and follow up being prepared.</p>
3	Have previous consultations highlighted any concerns about the policy or project from an equality impact perspective?	No	As this is the first formalised P&P
4	<p>Do you have any concerns regarding the implementation of this policy or project?</p> <p><i>(ie. Have you completed a self assessment and action plan for the implementation of your policy or project?)</i></p>	Yes	<p>Concerns are:</p> <ul style="list-style-type: none"> • When promoted the resource required to administer • Spurious claims
5	Does any accessible data regarding the area which your work will address identify any areas of concern or potential problems which may impact on your policy or project?	Yes	<p>Headline tenant profile data available.</p> <p>Complaints can be cross referencing against individual records to identify trends.</p>
6	Do you have any past experience delivering similar policies or projects which may inform the implementation of your scheme from an equality impact point of view?	No	Will use approach of other communication pieces to inform that element.
7	Are there any other issues that you think will be relevant?	No	

Section 2 - Your Equality Impact Assessment form

Directorate: Operations	Your Service Area: Housing	Team: Property Services	Officer responsible for this assessment: Steve White	Date of assessment: 16.05.2022 / 23.06.22
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	Question	Please provide details
1	What is the name of the policy or project that is being assessed?	Policy for Compensation and Reimbursement (Housing Services)
2	Is this a new or existing policy?	New policy
3	Briefly describe the aim and purpose of this work.	To ensure a fair and equal approach when applying compensation.
4	What are the associated objectives of this work?	To ensure all claims for compensation against the council are dealt with equally and fairly, and in line with any statutory requirements, such as The Right to Repair legislation.
5	Who is intended to benefit from this work and in what way?	Customers (tenants & leaseholders) – ensuring that all claims for compensation are handled with equal fairness. Officers – ensuring they have the guidance to accurately assess whether or not compensation is due and ensure that the request is handled promptly. Please note – this doesn't include lodgers but does include dependants of tenants and leaseholders.
6	What are the outcomes sought from this work?	As above
7	What factors/forces could contribute or detract from the outcomes?	Spurious claims
8	Who are the key individuals and organisations responsible	Customer Services Manager, Customer Liaison Officers &

	for the implementation of this work?	Customer Services Officers
9	Who implements the policy or project and who or what is responsible for it?	Responsive Maintenance Manager & Customer Services Manager

Overarching statement

The 3 areas where there is the potential for disadvantage based on the protected characteristics are

- Awareness of the policy and procedure
- Communication with those who access the scheme
- Applying the scheme i.e. understanding how failing to meet service standards impacts differently on the different customer groups.

The Policy and Procedure includes the standard clauses relating to meeting diverse needs and being compliant with the Equality Act within the document along with details of the specific measures taken. These measures include:-

- Following corporate guidance on accessible communication
- At the point sign up asking service users about communication and other needs that may impact on service delivery, recording details on the MRI Database and respecting what the tenants tell us (Please note this information is not currently held for leaseholders).
- Training for new members of staff as part of induction on
 - Equality & Diversity
 - Housing customer standards
 - Meeting diverse needs
- Skills development of all staff through the HEG Training programme on meeting needs of groups such as those with Autism. The training programme is being developed around feedback from staff
- Monitoring activities such as tenants satisfaction survey which tests satisfaction with being treated fairly and with respect which may be an issues for all households.
 - Nb - 2022 result is 10% dissatisfaction, 75% satisfaction
- Monitoring of complaints along with profile of those making compensation claims incorporated into the Policy and procedure review
- Standard clauses within contracts with service provider around respect – monitored through complaints and response made on the customer care cards sent out with every repair.

	<ul style="list-style-type: none"> Housing Excellence Group – to lead on meeting diverse needs and compliance with the Equality Act. Key activity – development of the HEG Training Programme. <p>Activities included on work programmes to improve service delivery, experience and compliance</p> <ul style="list-style-type: none"> Corporate policy and procedures around compliance with the Equality Act – see Cabinet report CAB3331 for details Housing induction process – to achieve effectiveness and consistency – HPAP 2022/23 work programme Housing database fields to allow for further title fields to accommodate Mx 			
		Please select your answer in bold . Please provide detail here.		
10a	Could the policy or project have the potential to affect individuals or communities on the basis of race differently in a negative way?	Y	N	
10b	What existing evidence (either presumed or otherwise) do you have for this?	<p>Issues mainly relate to understanding the different approaches to communication to ensure all households are able to access to the scheme. Mitigating measures are in place and include the use of BigWord and translators.</p> <p>Cultural issues around communication to be clear that service is free to access.</p>		
11a	Could the policy or project have the potential to affect individuals or communities on the basis of sex differently in a negative way?	Y	N	
11b	What existing evidence (either presumed or otherwise) do you have for this?	<p>Gender neutral language will be used in communications.</p> <p>Approach to titles and pronoun raised by HEG with the corporate team for lead on approach.</p>		
12a	<p>Could the policy or project have the potential to affect individuals or communities on the basis of disability differently in a negative way?</p> <p><i>(you may wish to consider:</i></p>			

	<ul style="list-style-type: none"> • <i>Physical access</i> • <i>Format of information</i> • <i>Time of interview or consultation event</i> • <i>Personal assistance</i> • <i>Interpreter</i> • <i>Induction loop system</i> • <i>Independent living equipment</i> • <i>Content of interview)</i> 	Y	N	
12b	<p>What existing evidence (either presumed or otherwise) do you have for this?</p>	<p>Significant customer group for housing landlord service; households with disabilities will be higher than the district average.</p> <p>Key element of potential disadvantage relates to having the measures in place to meet communication needs.</p> <p>All tenants are asked about their communication needs which are checked and respected for service delivery as standard.</p> <p>Applications for compensation come through the Pentana system where communication needs are asked and respected.</p> <p>HEG Action around training on how to meet equality duties generally and especially around Autism. Training content framed around staff feedback.</p> <p>When Corporate EDI panel (as set out in CAB3331) is operational Housing will propose a review of corporate approach to communication.</p> <p>Housing new starter checklist sets out Comms details for managers to cover but is under review.</p>		

		<p>Service standards reflect impact relating to medical needs and dependants and therefore would link with how compensation was calculated.</p> <p>Application of the scheme – its recognised that some households will be impacted differently by the same service failure but given the highly subjective nature its difficult to determine an approach which is consistent and fair. Research of other providers found no evidence of good practice that specifically tackles this aspect. P&P includes the flexibility to consider exceptional circumstances.</p> <p>ACTION – Steve carry out a random check whether Coms needs are being respected.</p>		
13a	Could the policy or project have the potential to affect individuals or communities on the basis of sexual orientation differently in a negative way?	Y	N	
13b	What existing evidence (either presumed or otherwise) do you have for this?	See overarching statement.		
14a	Could the policy or project have the potential to affect individuals on the basis of age differently in a negative way?	Y	N	
14b	What existing evidence (either presumed or otherwise) do you have for this?	<p>Application of the scheme – its recognised that some households will be impacted differently by the same service failure (i.e. households with young dependants) but given the highly subjective nature its difficult to determine an approach which is consistent and fair. Research of other providers found no evidence of good practice that specifically tackles this aspect. P&P includes the flexibility to consider</p>		

		exceptional circumstances. Disability aspects linked with age covered above.		
15a	Could the policy or project have the potential to affect individuals or communities on the basis of religious belief differently in a negative way?	Y	N	
15b	What existing evidence (either presumed or otherwise) do you have for this?	See overarching statement above		
16a	Could this policy or project have the potential to affect individuals on the basis of gender reassignment differently in a negative way?	Y	N	
16b	What existing evidence (either presumed or otherwise) do you have for this?	<p>Promote use of gender neutral language in all communications as standard.</p> <p>Application of the scheme – its recognised that some households will be impacted differently by the same service failure but given the highly subjective nature its difficult to determine an approach which is consistent and fair. Research of other providers found no evidence of good practice that specifically tackles this aspect. P&P includes the flexibility to consider exceptional circumstances.</p>		
17a	Could this policy or project have the potential to affect individuals on the basis of marriage and civil partnership differently in a negative way?	Y	N	
17b	What existing evidence (either presumed or otherwise) do you have for this?			
18a	Could this policy or project have the potential to affect individuals on the basis of pregnancy and maternity differently in a negative way?	Y	N	
18b	What existing evidence (either presumed or otherwise) do you have for this?	Application of the scheme – its recognised that some households will be impacted differently by the same service		

		failure but given the highly subjective nature its difficult to determine an approach which is consistent and fair. Research of other providers found no evidence of good practice that specifically tackles this aspect. P&P includes the flexibility to consider exceptional circumstances.
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19	Could any negative impacts that you identified in questions 10a to 15b create the potential for the policy to discriminate against certain groups on the basis of protected characteristics?	Y	N	Mitigating measures – <ul style="list-style-type: none"> • Communication measures • Collecting information relating to meeting needs • Respect clauses • Monitoring through tenant satisfaction and complaints • Looking at profile of those claiming when P&P reviewed • Staff training to meet diverse needs
20	Can this negative impact be justified on the grounds of promoting equality of opportunity for certain groups on the basis of protected characteristics? Please provide your answer opposite against the relevant protected characteristic.	Y	N	Race: Sex: Disability: Sexual orientation: Age: Gender reassignment: Pregnancy and maternity: Marriage and civil partnership: Religious belief:
21	How will you mitigate any potential discrimination that may be brought about by your policy or project that you have identified above?	See 19 above		
22	Do any negative impacts that you have identified above			

	impact on your service plan?	Y	N	
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Signed by completing officer	Steven White
Signed by lead officer	