

## Equality Impact Assessment

Directorate:	Your Service Area:	Team:	Officer responsible for this assessment:	Name of the policy or project that is being assessed	Date of assessment:
Operations	Housing	All housing teams	Janette Palmer	Housing Engagement and Communication Plan 2023-2025	17 January 2023  Desktop – 19.12.23 Assessment update

### 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?	No  No	<p>No formal complaints at WCC.</p> <p>Comments made about ensuring other options are available for people to express their views are known and options to obtain information in addition to digital routes.</p> <p>Nationally its recognised that younger households are not proportionally engaged. This is an issue for many providers.</p> <p>Nationally – Govt social housing white paper looks to ensure housing providers find a way of reaching all households. The white paper states (page 47) that `There will be tenants who want to proactively engage with the policies of their landlord, and</p>

			others who simply want to know that their landlord is thinking of them in the way it implements change and is keeping them informed’
2	Have all officers who will be responsible for implementing the policy or project been consulted, and given the opportunity to raise concerns about the way the policy or function has or will be implemented?	Yes	<p>The plan has been developed not only in consultation with officers, but also in partnership with Housing senior leadership team (DMT), tenants, leaseholders and members.</p> <p>Officer consultation</p> <ul style="list-style-type: none"> <li>• DMT Tenant involvement service review discussions – March 2022</li> <li>• 25 August 2022 – Service Lead debate regarding content of first draft of plan</li> <li>• 2 Nov 2022 – Tenant Engagement service lead planning meeting</li> <li>• 04 Jan 23 – revised draft of plan emailed to service leads</li> <li>• 11 Jan 23 – revised draft of plan emailed to team leads</li> </ul> <p>Appendix – 2 of Business and Housing Policy Report - BHP40 – provides comprehensive details of the consultation activities along with the outcomes.</p> <p>The Spring/Summer 2023 HQN Review of the Engagement Service included several focus groups and interviews with housing staff from all teams to incorporate their views and what works well and where improvements are required. The feedback informs HQN recommendations. The findings of the review were that there was sufficient investment in staff resources and that housing teams largely accepted their responsibilities for engagement and that there were good links with other council teams with shared goals.</p> <p>The Tenant Satisfaction Survey results were discussed with representatives from all housing to agree the improvement plan at a meeting in October 2023.</p>
		Yes	

3	<p>Have previous consultations highlighted any concerns about the policy or project from an equality impact perspective?</p>	<p>No</p> <p>Yes</p>	<p>Feedback centres around communication and listening to service users in delivery of services rather than elements of the HTEC Plan.</p> <p>TACT Committee representatives verbally stated, at Business Housing Policy Committee in February 2023, the need to change to ensure that the voices of a more diverse range of tenants are heard including those from different ethnic backgrounds and younger households. Tenants who attended the feedback sessions with the author of the HQN report accepted that younger households were not part of the formal structure and reasons why were discussed and that these thoughts needed to be confirmed to determine the action needed to address the gap.</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>	<p>No</p> <p>No</p>	<p>No concerns about implementation.</p> <p>Self-assessment frameworks have been used for gap analysis.</p> <p>No change</p>
5	<p>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?</p>	<p>Yes</p>	<p><b>The Tenant Involvement Annual Report – May 2022</b></p> <p>Profile of involved tenants reported annually at TACT AGM shows a disparity between customer profile and those involved in that older households are disproportionately engaged.</p> <p><b>Table 2 – Number and profile of involved tenants</b></p>



					involved through Meetings	Digital survey respondents, tenant only (Nb <sup>3</sup> )	attended Focus Groups (Nb <sup>4</sup> )	
				Number	6, 165 <sup>1</sup>	32	589	30
				16-34	11% <sup>1</sup>	0%	7%	4%
				35-54	32% <sup>1</sup>	13%	23%	25%
				55-74	38% <sup>1</sup>	47%	69%	54%
				75+	19% <sup>1</sup>	41%	2%	18%
				City	56% <sup>2</sup>	75%	51%	62%
				Rural	44% <sup>2</sup>	25%	50%	38%
				Area <sup>6</sup>				
				• Stanmore	17% <sup>2</sup>	31%	17%	14%
				• Weeke	9% <sup>2</sup>	3%	6%	3%
				• Winnall & Highcliffe	16% <sup>2</sup>	6%	15%	17%
				• City other	14% <sup>2</sup>	34%	14%	28%
				• Rural North	16% <sup>2</sup>	9%	18%	10%
				• Rural South	27% <sup>2</sup>	16%	32%	28%

			General Needs	89% <sup>2</sup>	78%	87%	83%
			Sheltered & extra care	10% <sup>2</sup>	22%	13%	17%
			Temporary Accommodation	1% <sup>2</sup>	0	1%	0
			Ethnicity			Nb 8	
			• White British	86% <sup>1</sup>	97%	91%	93%
			• White other	4% <sup>1</sup>	0%	4%	3.5%
			• All other groups	7% <sup>1</sup>	0%	2%	3.5%
			• Prefer not to say	3% <sup>1</sup>	3%	3%	0%
			Disability <sup>7</sup>	44% <sup>2</sup>	Nb 5	Nb 9	Nb5

Table 1 Notes

1 – Business Objects Report 13.07.23

2 – Tenant Satisfaction Survey 2023 (Data prepared for or from the survey)

3 - Two ALL tenants survey sent in 2022 – TSM & Heating Systems. These represent an average of both.

4 – if tenants attend more than one focus group they're counted only once, focus groups topics were – Heating Provision, Listening to Views (August 2022), HQN Engagement Service review (March 2023)

5 - figures are calculated but are not included in the report for data protection reasons

6 – Area figures include extra care, sheltered and TA

			<p>7 – % of those who responded that their day to day activities are reduced by a condition or illness lasting 12 or more months.</p> <p>8 - Question only asked in TSM survey (not Heating Systems) will be included in future surveys</p> <p>9 – Question not asked – will be included in future surveys.</p> <p><b>HQN Report from review of tenant engagement service (August 2023)</b>  Found both that membership of TACT, the formal link with the council’s governance framework, was not representative of wider resident base.</p> <p><b>Tenant Satisfaction Survey 2023</b>  Results were that under 55s and under 35s especially reported statistically significant lower levels of satisfaction compared to the older households. This highlighted the importance of engaging more widely as being fundamental to successfully shaping the service around what’s important to all tenants.</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?	<p>Yes</p> <p>Yes</p>	<p>Plan replaces the previous Tenant Engagement Strategy 2017 – 2019.</p> <p>No change</p>
7	Are there any other issues that you think will be relevant?	No	

## Section 2 - Your Equality Impact Assessment form

Directorate:	Your Service Area:	Team:	Officer responsible for this assessment:	Date of assessment:
Operations	Housing	All housing teams	Janette Palmer	17 January 2023  Desktop – 19.12.23 Assessment update

	Question	Please provide details
1	What is the name of the policy or project that is being assessed?	<b>Housing Engagement and Communication Plan 2023-2025</b>
2	Is this a new or existing policy?	Product of a review of the previous Tenant Engagement Strategy and Tenant Involvement Service in preparation for meeting the requirements of the Govt social housing white paper.
3	Briefly describe the aim and purpose of this work.	Know our tenants and their priorities and shape our business on balanced feedback.
4	What are the associated objectives of this work?	More people from a wide range of households find it easy to tell the council their views and understand what the council has done in response and why.

		<p>Views are captured from those for whom a formal engagement option isn't how they want to share what they think with the council.</p> <p>Engagement with a wider range of households.</p> <p>Following HQN Review – Work programme expanded to incorporate changes needed to the formal structure as well as introducing informal initiatives along with improving the balance of the resource allocation between the 2 types of activity.</p>
5	Who is intended to benefit from this work and in what way?	Tenants, leaseholders, licensees, members and the council
6	What are the outcomes sought from this work?	<p>Representative engagement – reaching younger households</p> <p>Listening better - making it possible to shape our business on balanced feedback.</p> <p>Following HQN Review – Initiatives included to improve reach to households seldom heard from.</p>
7	What factors/forces could contribute or detract from the outcomes?	<p>Lack of adequate resourcing i.e. formal engagement routes use a disproportionate amount of the engagement resources available.</p> <p>Stakeholders fail to respect the value and outcomes of less formal engagement activities.</p> <p>Current profile of involved tenants not representative of wider customer group and therefore doesn't meet the balanced feedback requirement.</p>

		Direction based on tenants views collected through Nov 2023 Listening Better survey – however shortcomings of survey recognised i.e. return bias from older households, may not reach younger households and those for whom a survey in that format is accessible. Finding the silence added to the programme to address the shortcoming.
8	Who are the key individuals and organisations responsible for the implementation of this work?	Tenant Involvement Team All other housing landlord service teams
9	Who implements the policy or project and who or what is responsible for it?	Gillian Knight Corporate Head of Housing

	<p><b><u>Summary – January 2023</u></b></p> <p>The premise of the plan is to improve the representative profile of engaged households by having measures in place to tackle what may prevent people from sharing their views with the council and ensure all households are equally able to influence the service they received.</p> <p>The <b>Housing Accessibility statement</b> is a key document as it sets out the measures housing takes to make it easy for all households to use its services. This has recently been updated and is now in the implementation phase.</p> <p>The Housing services will make reference to the above and the council’s <b>EDI Statement of Policy and Plan</b> and <b>‘Listening Better – our approach’</b> throughout service delivery.</p> <p>Potential disadvantage, based not only on the protected characteristics but due to other household limitations, may occur as follows:</p>
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- Written activities - can impact on those with poor literacy skills, those with translation needs, those with sight impairments
- Face to face activities – can impact on
  - Rural communities due to transport availability and cost
  - Disabilities – physical, hearing, sight, mental health conditions
  - Language
- Digital based activities – impact on those with poorer digital skills and lack of access to equipment and broadband connections to use
- All activities – impact of time restricted households – e.g. carers of all groups, those at work, those with multiple commitments

**Special communication/accessibility arrangements** are standard for engagement activities. As part of implementation process for engagement activities its standard practice to give consideration to measures required to ensure no-one has been excluded as a consequence of the approach taken. These considerations will be bespoke to the audience and the activity. Examples can be provided of this e.g. fire safety project, tenant satisfaction survey.

#### Other measures

- At the point of **sign up** asking service users about communication and other needs that may impact on service delivery, recording details on the Housing Database
- Customer **portal** allows households to keep their personal information and needs updated
- Independent organisation being invited to carry out an **audit of approach**. Good practice frameworks will be used for this health check as well as approach being mapped against the requirements of the white paper for social housing which focuses on ensuring housing providers reach all households
- **Accessibility messages** – invitations for involvement activities include statements around contact us to see how the council can help if you want to be involved but need help
- Monitoring of **complaints**
- Monitor the profile of engaged tenants
- **Housing Excellence Group (HEG)** –
  - HEG Training Programme – focus on meeting diverse needs and compliance with the Equality Act.
  - Action plan – service improvements based on good practice and learning

Outcomes from impact assessment:-

- Add further detail to section on plan 'Making engagement accessible'
- Improvement plan action 'Coffee, cake and chat' amended to highlight that this activity will focus on underrepresented groups

**Summary – January 2024**

Since the original impact assessment, a year ago there have been 2 major pieces of work which have influenced the structure of the HECP plus further learning. These are:-

- HQN Review of the Engagement Service Summer 2023
- Tenant Satisfaction Survey – summer 2023 (*please note special bespoke measures were taken to ensure survey representative and give all households the opportunity to express their views, see page 42 of the full report – returns from these households were by and large greater than the overall response rate*)
- Learning from engagement events about the reality of being successfully engaging from younger households

The HEC Plan was changed to reflect the findings and learning above:

- The formal structure has been reviewed in conjunction with involved tenants
- The key priority is representativeness across all activities
- The requirement to invest in customer insight strengthened and the importance of improved knowing who our customers are and designing the service around them
- Investment in Customer excellence training for all housing staff
- BAME households – more satisfied than White British households

A Listening Better survey was conducted in Nov 2023 to test the new informal initiatives and suggested structure. This survey was not representative, so an initiative based on HQN feedback from the Regulator has been prioritised on the plan.

- 'Finding the silence' initiative to reach those who seldom heard households

	<ul style="list-style-type: none"> <li>• Survey found that for engagement to work for all households no matter where they live or what age they are; it needs to be - <ul style="list-style-type: none"> <li>○ Online / digital / WhatsApp</li> <li>○ Quick</li> <li>○ Incentivised</li> </ul> </li> </ul>			
		Please select your answer in <b>bold</b> . Please provide detail here.		
10a	Could the policy or project have the potential to affect individuals or communities on the basis of <b>race</b> differently in a negative way?	Y	<b>N</b>	
10b	What existing evidence (either presumed or otherwise) do you have for this?	<p>Translated fire safety surveys.</p> <p>Interpreters contact for Tenant Satisfaction Survey</p> <p>Monthly festival details provided in the Housing Local Brief for consideration when planning events.</p> <p>TSS 2023 – conducted on a platform that enabled the survey to be translated. Results are that BAME households are significantly more satisfied than White British households.</p> <p>Listening Better survey – translated into Polish</p> <p>Through the Translation/ different formats corporate project in 2024 it may be possible to investigate the options for investing in website capabilities to provide translation options</p>		

11a	Could the policy or project have the potential to affect individuals or communities on the basis of <b>sex</b> differently in a negative way?	Y	N	
11b	What existing evidence (either presumed or otherwise) do you have for this?			
12a	Could the policy or project have the potential to affect individuals or communities on the basis of <b>disability</b>	Y	N	
12b	What existing evidence (either presumed or otherwise) do you have for this?	<p>A variety of measures are in place for various groups.</p> <ul style="list-style-type: none"> <li>• Lip reading guidance for TACT meetings</li> <li>• Hearing loop provision</li> <li>• Plain English writing &amp; readability tests</li> <li>• Venues e.g. Walton room – meets needs of several disabled group – ground floor access, lifts, support virtual engagement, microphones for hearing impaired, near local transport provision.</li> <li>• Reimbursement of transport costs / taxis provision</li> <li>• Timing of meetings based on bus timetable, bus pass restrictions, household commitments</li> <li>• Large print provision</li> <li>• Home visits</li> <li>• Face to face surveys</li> <li>• Hard copies</li> <li>• Hybrid meetings or those who can't or prefer not to be present in the room</li> </ul>		

		<ul style="list-style-type: none"> <li>• Dietary arrangements for catering</li> <li>• IT equipment loan</li> <li>• Contact with advocates and others for survey completion and as representatives at meetings</li> </ul> <p>The 'Finding the Silence' initiative has been prioritised to check views of seldom heard households for ideas that would help them to share their views.</p>		
13a	Could the policy or project have the potential to affect individuals or communities on the basis of <b>sexual orientation</b> differently in a negative way?	Y	N	
13b	What existing evidence (either presumed or otherwise) do you have for this?	<p>Code of conduct for volunteers to respect all those who attend formal meetings</p> <p>General qualities tenant training arranged and offered to involved tenants in committee roles (2022) but not taken up or completed by those tenants.</p> <p>Staff training to respect all groups.</p> <p>No change</p>		
14a	Could the policy or project have the potential to affect individuals on the basis of <b>age</b> differently in a negative way?	Y	N	Premise of the plan is to improve the representative profile of engaged households
14b	What existing evidence (either presumed or otherwise) do you have for this?	Current profile not representative, younger households under represented the aim of the plan is to tackle this gap		

		<p>Improvement plan action `Big conversation` amended to highlight that this activity will focus on underrepresented groups.</p> <p>Monitoring to ensure balanced and representative; reported to TACT AGM. See section 5 for table on profile of involved tenants.</p> <p>The HEC Plan was changed to reflect the findings of the HQN Review and TSS as well as and learning from sector events as follows:</p> <ul style="list-style-type: none"> <li>• The key priority is representativeness across ALL activities</li> <li>• The formal structure has been included within the plan to be reviewed as not representative of all tenants or housing type (i.e. overrepresented by sheltered tenants)</li> <li>• Improve the balance of resources channel to informal and formal activities</li> </ul>		
15a	<p>Could the policy or project have the potential to affect individuals or communities on the basis of <b>religious belief</b> differently in a negative way?</p>	Y	N	
15b	<p>What existing evidence (either presumed or otherwise) do you have for this?</p>	<p>Care taken when booking and referring to venues used for face to face activities that names don't indirectly give impressions that events are not open to all i.e. use Middle Brook Street centre rather than Hope Church. Reference</p>		

		<p>festival information in local brief when looking at the timing of events.</p> <p>No change</p>		
16a	Could this policy or project have the potential to affect individuals on the basis of <b>gender reassignment</b> differently in a negative way?	Y	N	
16b	What existing evidence (either presumed or otherwise) do you have for this?	<p>Corporate roll out of optional revised email signature format to include pronoun reference. Nov 2022.</p> <p>Use of gender neutral language.</p> <p>Changes to MRI (Housing) database to include title option Mx.</p> <p>No change</p>		
17a	Could this policy or project have the potential to affect individuals on the basis of <b>marriage and civil partnership</b> 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 <b>pregnancy and maternity</b> differently in a negative way?	Y	N	

18b	What existing evidence (either presumed or otherwise) do you have for this?	<p>Respond to requirements of breast feeding mothers at face to face activities.</p> <p>No change</p>
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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	See Summary above									
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	<table border="1"> <tr> <td data-bbox="1335 643 2042 715">Race:</td> </tr> <tr> <td data-bbox="1335 715 2042 786">Sex:</td> </tr> <tr> <td data-bbox="1335 786 2042 858">Disability:</td> </tr> <tr> <td data-bbox="1335 858 2042 930">Sexual orientation:</td> </tr> <tr> <td data-bbox="1335 930 2042 1002">Age:</td> </tr> <tr> <td data-bbox="1335 1002 2042 1074">Gender reassignment:</td> </tr> <tr> <td data-bbox="1335 1074 2042 1145">Pregnancy and maternity:</td> </tr> <tr> <td data-bbox="1335 1145 2042 1217">Marriage and civil partnership:</td> </tr> <tr> <td data-bbox="1335 1217 2042 1276">Religious belief:</td> </tr> </table>	Race:	Sex:	Disability:	Sexual orientation:	Age:	Gender reassignment:	Pregnancy and maternity:	Marriage and civil partnership:	Religious belief:
Race:													
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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?	<p>See section `Making engagement accessible' of the plan. The premise of the plan is to improve the representative profile of engaged households by having measures in place to tackle what may prevent people from sharing their views with the council.</p> <p>No further update</p>		
22	Do any negative impacts that you have identified above impact on your service plan?	Y	<b>N</b>	

Signed by completing officer	Janette Palmer
Signed by lead officer	