

EQUALITY IMPACT ASSESSMENT



Lead Officer: Frank Bartle Role: Property and Estates Manager	Service: Customer Services Directorate
New or Existing area of work?	Area of work to be assessed: Anti-Harassment Policy
1. Identify the main aims of the function, strategy, policy, procedure or service Briefly describe the aims, objectives and purpose of this policy/service/ function or area of work	<p><i>The Anti - Harassment Policy confirms Newark and Sherwood Homes' commitment to deal with all incidents involving its' tenants, leaseholders and residents promptly and positively, ensuring that they are able to live in any part of the community free from harassment, intimidation and victimisation. It defines how Newark and Sherwood Homes will deal with reported incidents of harassment and hate crime.</i></p>
2.	<p>Assessing Relevance</p> <p>Who is affected by the function, strategy, policy, procedure or service</p>

	Please assess the relevance of the policy/service/ function to the promotion of equality of each of the six equality strands (race, gender, disability, sexual orientation, religion or belief and age)		
2a.	Who is the function, strategy, policy, procedure or service for?		<p><i>This policy is for</i></p> <ul style="list-style-type: none"> • <i>Anyone who is suffering from harassment and/or hate crime</i> • <i>NSH staff and partners and contractors;</i> • <i>voluntary and statutory agencies including; Newark and Sherwood Partnership Community Cohesion Forum; Nottinghamshire Police;</i> • <i>Tenants & Residents Association; Federation of Tenants and Residents</i> • <i>Partners including Connaught and Bullock</i> • <i>Nottinghamshire Rural Community Action</i>
2b.	Does the function, strategy, policy, procedure or service affect the public directly or indirectly?	Yes	<i>This policy affects the public directly – it has been developed to enable all residents, tenants and leaseholders to live in their communities free from harassment, fear and intimidation.</i>
2c.	Does the function, strategy, policy, procedure or service affect how other policies, services or functions are provided?	Yes	<p><i>Access and Customer Care Strategy</i> <i>Equalities and Diversity Strategy 2008</i> <i>NSDC Anti-Social Behaviour Policy</i> <i>NSDC CBL Policy – (local lettings policies and management transfers)</i> <i>Tenancy breach Procedures</i> <i>NSDC Tenancy Agreement</i></p>

2d.	Have complaints been received from different equality groups about the function, strategy, policy, procedure or service and its effect on them?	No	
2e.	Does the function, strategy, policy, procedure or service have employment implications?	No	
<p>If the answer to some or all of the above questions is yes, then that function or policy will be 'relevant' – please continue with the assessment. If you are sure that your answer is no to all of the above questions, then you do not need to continue. However, it may help to check that you are correct in this assumption by continuing for the next few questions.</p>			

Full Assessment		
3.	Stakeholders/Beneficiaries Which groups are intended to benefit from this function, strategy, policy, procedure or service	<p><i>This strategy is for all our customers including tenants, leaseholders and residents</i></p> <ul style="list-style-type: none"> • <i>NSH staff and partners and contractors;</i> • <i>voluntary and statutory agencies including; Newark and Sherwood Partnership Community Cohesion Forum; Nottinghamshire Police;</i> • <i>Tenants & Residents Association; Federation of Tenants and Residents</i> • <i>Partners including Connaught and Bullock</i> • <i>Nottinghamshire Rural Community Action</i>
4.	Outsourced Services	<i>Racial Harassment and Hate Crime-Community Cohesion</i>

	If your function, strategy, policy, procedure or service is partly or wholly provided by external organisations/agencies on behalf of the service, please list any arrangements you have to ensure that the function/service promotes equality. Include this in your improvement plan.	<i>Forum and Hate Crime Forum</i>	
		If the answer to any of the Questions 5-10 below is yes, please indicate in the appropriate cell below what existing evidence (either anecdotal or documented) do you have for this? Complaints/Feedback/Consultation/Research/Data?	
5	Are there concerns that the function, strategy, policy, procedure or service does or could have a differential impact due to age?	Yes	<i>NSH tenant census data 2008 informs us that 64% of our tenants are aged 60+. There are perceived barriers to accessing services for older people due to unfamiliarity with new technology – e.g. text service and website accessibility. Data from the Tenant Census informs us of how individual tenants would like to be contacted. This policy could have a positive impact due to its commitment to seldom heard groups such as women from certain BME groups including gypsy and travellers</i>
6.	Are there concerns that the function, strategy, policy, procedure or service does or could have a differential impact due to disability?	Yes	<i>According to Census 2001 data, 19.7% of our community experience a long term limiting illness; NSH Tenant Census figures show that 61.9% of tenants have declared a disability or long term limiting illness – this leads us to believe that this policy could have a high impact on this section of the community and represents an opportunity to promote equality among this group.</i>
7.	Are there concerns that the function, strategy, policy, procedure or service does or could have a	No	

	differential impact due to gender?		
8.	Are there concerns that the function, strategy, policy, procedure or service does or could have a differential impact due to race/ethnicity?	Yes	<i>This policy is intended to have a positive impact in this area. It will also strengthen the work carried out as part of our membership of the Community Cohesion Forum. We have forged close links with the local gypsy and traveler community through close liaison with Rural Community Action Nottingham and the Gypsy and Traveller Housing Issues Monitoring and Liaison groups. We follow good practice as set out in the CRE Code of Practice on Racial Equality in Housing to eliminate unlawful discrimination.</i>
9.	Are there concerns that the function, strategy, policy, procedure or service does or could have a differential impact due to religious belief or faith?	Yes	<i>Positive impact as before – Newark and Sherwood Homes has collected data from its tenants including religious belief. We will use this data to ensure that we deal with tenants needs sensitively.</i>
10.	Are there concerns that the function, strategy, policy, procedure or service does or could have a differential impact due to sexual orientation?	Yes	<i>Positive impact - This policy outlines the training programme including raising awareness of lesbian, gay, bisexual and transgender issues.</i>
11.	With regard to Questions 5-10 above, does your assessment show that a function, strategy, policy, procedure or service is adversely affecting relations between different equality groups?	No	If no, please go directly on to Q 14.
12.	If Yes, can this adverse impact be justified on the grounds of promoting equality of opportunity for one group, or as part of a wider strategy of positive action in relation to particular groups?	Yes /No	If yes, please explain, in the Improvement Plan section below, what steps you will take to limit this adverse impact, or any potential it may have for damaging relations between groups, or consider alternative policies that might better achieve the promotion of equality?

			Please explain your plan of action for each relevant equality heading (questions 5 - 10) on the Improvement Plan (e.g. adapt the policy; find another way to meet policy objectives; consider specific provision ; adopt changes in communication methods; language support; disability measures etc for relevant groups)
13.	If the adverse impact cannot be justified, does the adverse impact amount to unlawful discrimination?	Yes /No	Where the adverse impact is unlawful, the function, strategy, policy, procedure or service or the element of it that is unlawful must be changed or abandoned. If an adverse impact is unavoidable, then it must be justified, as outlined in the question above.
14. Consultation			
<p>What does available data and the results of any consultation show about the take up and appropriateness of your function, strategy, policy, procedure or service. This should include consultation from those who are likely to be directly affected by the policy e.g. users/potential users from the six equality categories; staff; relevant interest groups.</p> <p>Where there is insufficient data or knowledge about the equalities target groups' needs, you will need to undertake further consultation (include details of any future consultation exercises planned, or planned improvements as a result of consultation, in your Improvement Plan attached).</p> <p>The extent of the consultation exercise should be in proportion to the effect that the policy is likely to have, and may not need to be detailed.</p>		<p><i>Excellent consultation mechanisms already exist for consultation work in this area including:</i></p> <ul style="list-style-type: none"> • <i>Membership of the Newark and Sherwood Partnership Community Cohesion Forum</i> • <i>Membership of the Gypsy and Traveller Liaison Forum</i> • <i>Hate Crime Forum</i> • <i>Housing Management Monitoring Group</i> <p><i>Staff, residents and partners including Occupational Therapy, Nottinghamshire County Council and Womens Aid were consulted on the impact of this policy at Newark and Sherwood Homes Customer Impact Day in July 2008. They thought that those with eyesight difficulties may find it difficult to access the policy and those with learning difficulties may find it hard to understand. They</i></p>	

	<i>felt that users would benefit from a summary version which was easier to understand and in the appropriate language. (See IP4) They suggested wide promotion of the policy and the actions that may be taken against perpetrators.</i>
15. Monitoring	
How are you going to monitor or carry out regular checks on the effects this function, strategy, policy, procedure or service has on different racial/equality target groups?	<i>Performance Monitoring Common Monitoring Project Hate Crime Forum</i>
A list of all Impact Assessments undertaken need to be published on an annual basis	
16. Publishing & Communication	
What methods do you use to communicate this function, strategy, policy, procedure or service? (Include review and assessment of methods, media, translations, interpretation etc, bearing in mind the extent to which these media forms are accessible to all sector of the community):	<i><u>Externally</u> Website Leaflet Home from Homes Information sharing with Fed Tenants Conference <u>Internally</u> Corporate direction is required to ensure dissemination of all policies to all NSH staff</i>

<p>17. Training</p> <p>Please list any staff training issues on equalities, diversity or inclusion arising from this assessment (and include this in your improvement plan attached)</p>	<p>See IP 2</p>
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EIA Team:

- **Julie Davidson**
- **Maria Brambles**

Signed _____

Name in Print

(Service Leader Responsible for implementing this function, strategy, policy, procedure or service)

Date

Signed _____

Name in Print

(Lead officer with responsibility for the effective working of this function, strategy, policy, procedure or service)

Date

Please list actions that you plan to take as a result of this assessment (continue on separate sheets as necessary)

Improvement Plan

Issues to be addressed	Action to be Undertaken	Desired Outcome	Who is Responsible and Timescale
1.Improvement in methods of disseminating information to staff	Discuss with SLT to most appropriate method of dissemination	Raised staff awareness of subject	Frank Bartle – February 2009
2. Training	Book external Anti-Harassment Training with HR for all front line staff	Improved awareness of harassment Improved service delivery	Julie Davidson/Michelle Whittaker – June 2009
3. Tenancy Agreement needs enhancing to incorporate methods of dealing with harassment and hate crime as separate issues to ASB	Review of Tenancy Agreement	To ensure that tenants are aware of tenancy conditions and responsibilities	Julie Davidson – September 2009 (Corporate/Directorate Key Task 09/10)
4. Produce a summary leaflet	On approval of policy by NSH board produce a summary leaflet	Improved and easier understanding of subject	Julie Davidson – February 2009