

Equality Impact Assessments Toolkit

EqIA Template



Quality Control	
<p>You must consider the Equality Impact Assessment Guidance when completing this template.</p> <p>The EDI team can provide help and advice on undertaking an EqIA and also provide overview quality assurance checks on completed EqIA documents.</p> <p>EDI team contact email: edi_team@sandwell.gov.uk</p>	
Title of proposal	Compliance Policy
Directorate and Service Area	Housing
Officer completing EqIA	Tom Jones
Contact Details	Tom_jones@sandwell.gov.uk
Other officers involved in completing this EqIA	N/A
Date EqIA completed	10/6/24
Date EqIA signed off or agreed by Director or Executive Director	Sarah Ager/Alan Lunt
Name of Director or Executive Director signing off EqIA	Sarah Ager/Alan Lunt
Date EqIA considered by Cabinet	August 24
Where the EqIA is Published (please include a link to the EqIA and send a copy of the final EqIA to the EDI team)	Moderngov

Section 1.

The purpose of the project, proposal or decision required

1.1. What is the name of the proposal?

Compliance Policy Approval

1.2. What are its aims and objectives?

Describes the why of SMBC's compliance across the directorate with various Acts of parliament and subsequent secondary legislation across all property compliance functions including building safety.

1.3. What outcomes will it achieve and for whom?

The outcomes for SMBC Housing Teams of the compliance policy, will provide the framework it will follow in its procedures and guidance notes for example guidance on use of fire doors or why we carry out gas servicing, and published on its website, fire safety team for example, <https://www.sandwell.gov.uk/fire-safety> that it overarches. The Policy itself being defined in the Corporate Health and Safety Policy. The policy supports all SMBC residents and the properties they reside in and guides staff to so far as reasonably practicable keeping safety as the priority when managing the HRA stock. Where applicable it also ensures the safety of staff, and in their places of work across the housing directorate.

1.4. Outline the business case e.g. policy drivers, strategic priorities and/or financial reasons.

By approving and reviewing frequently, this document, ensures SMBC is keeping staff and residents safe from harm helping to ensure SMBC provides safe, secure, and compliant homes, offices, and workplaces.

1.5. What is the relationship with other policies, strategies, procedures, or functions, if relevant?

This policy overarches many procedures, SOP's and guidance relating to property compliance functions across the directorate.

1.6. What are the issues or likely impact on equality groups?

The Policy will help meet the issues identified in the housing needs assessment 2022.

1.7. Are there any other service areas/directorates or partners involved in or likely to be impacted upon by the proposals?

Resident groups, TLA's, Leaseholders, PFI partners, contractors.

Section 2.

Evidence used and considered. Include analysis of any missing data

The outputs outlined in the document have been formulated around a considerable amount of research and associated data most notably that sourced from the many pieces of legislation as documented in section 4 the legal framework.

The 2023 consumer standards as led by the Regulator of Social Housing defines several key measures SMBC will report and be scrutinised on. The Safety & Quality and Tenancy standards of most relevance to this policy

Additional sources include:

Best practice guidance and British Standards where in place and referenced.
Professional bodies related to the compliance areas referenced.
Competent consultants employed by SMBC carrying out audits, health checks etc.
Housing Act.

Section 3.

Consultation

Some resident groups have been consulted via SCIPS, Noting the policy is not new to SMBC and has been in various forms previously. This document brings the several former individual policies into one document.

Relevant Staff and groups have also been consulted and feedback fed into the final draft. From a Governance structure The senior leadership team for Asset Management and Housing have reviewed and agreed this Policy.

The Building Safety Group has also had sight of, reviewed and agreed this, Policy.

Building Safety Board will review 4/7/24.

Section 4.

Summary assessment of the analysis at section 4a and the likely impact on each of the protected characteristics (if any)

Feedback below - related to wanting less technical or easier to read or understand. Customers won't understand this is meant to be a high level document and many other documents that fulfil their comments are made available.

At the TRA forum meeting had a short (30 min) discussion on the draft.

13 residents attended 10 of which currently live in one of our high rises.

They thought having a version of the compliance policy for residents was a good idea.

Feedback:

The resident version would have to strip back the jargon and be in very plain English preferably in

bullet points. Also to be factored in is a lot of new tenants English is not their first language so adding link to something like Google Translate or similar.

Not feasible as the content is technical however other relevant procedures, guides leaflets etc will support this point.

They suggested the current document could be summarised.

The Introduction does cover this, refer to previous point also.

They suggested is sending out it should be clearly stated that it must be read!

We will publish this on the website and send out if requested.

Some wondered where contractors come within the policy as particularly in the high rise, they feel contractors and their actions cause safety concerns.

They are treated the same and must comply – this is referenced several times in the document.

They also suggested the resident version should highlight how residents can keep themselves safe and fellow residents safe. They suggested this should be given to new residents moving in as a matter of routine.

No plans for a resident version, deemed not required as is a high level document that

One of the tenants suggested different versions should be available based on archetype.

Clearly not a practical idea.

“The discussion did branch out from the policy to what information should be being shared with residents about building safety from PEEPS to recycling bins and tenants not being aware of the risks their behaviour may pose and the implications of changing legislation e.g. netting now not being acceptable on balconies.”

See previous points with regards there is lots of other information supplied to residents that would cover these areas

Other comments have changed where required.

*“I have looked over it and I know its a draft copy, but a few things for your consideration to note,
- the pages need to be numbered at the bottom even on the draft as it makes it easier to identify where things are. **done***

*- some of the diagrams are not in focus and some writing is too small. **Can't be helped in some case but have adjusted – can zoom in and are good***

*- on the last but one page highlighted in yellow it says "Insert Governance Slide", I am unsure if there should be a diagram or something else that should be there. **Added***

Other than those few things it reads pretty much like any other policy and would ultimately be up to the tenants themselves if they wish to read it or not.”

Section 4a - What are the potential/actual impacts of the proposal on the protected characteristics?

Reviewed Characteristic	Impact? Positive (P) Negative (N) Neutral (Ne)	Details of impact	Actions to address negative impact or promote positive impact (use section 8 table)	Owner of action/ Timescale
Age	Ne	Requirements are the same regardless of age of the occupier		
Disability	Ne	Requirements are the same regardless of the disability of the occupier		
Gender Reassignment	Ne	Requirements are the same regardless of the Gender of the occupier		
Marriage and civil partnership	Ne	Requirements are the same regardless of the Status of the occupier		
Pregnancy and maternity	Ne	Requirements are the same regardless of the Status of the occupier		
Race	N	Language barriers if English is not a first language.	Use of google translate or other translation Apps. Could request for document in other languages or use of an interpreter when calling	N/A

Reviewed Characteristic	Impact? Positive (P) Negative (N) Neutral (Ne)	Details of impact	Actions to address negative impact or promote positive impact (use section 8 table)	Owner of action/ Timescale
			SMBC	
Religion or belief	Ne	Requirements are the same regardless of the beliefs of the occupier		
Sex	Ne	Requirements are the same regardless of the Gender of the occupier		
Sexual Orientation	Ne	Requirements are the same regardless of the Sexual Orientation of the occupier		
Could other socio-economic groups be affected?				
Carer Low income groups Veterans/Armed Forces Community Other	N	Understanding of English generally or some of the technical terms used: If education levels are not as advanced in English and/or a person's vocabulary is less advanced as are reading a technically biased	Use of Google Translate and refer to other guidance documents SMBC may supply. Requests for further information/conversation with owners of each area. Engineers visiting can explain in simple terms when carrying out the inspection.	N/A

Reviewed Characteristic	Impact? Positive (P) Negative (N) Neutral (Ne)	Details of impact	Actions to address negative impact or promote positive impact (use section 8 table)	Owner of action/ Timescale
		document.	Noting this is written for internal teams who will have an understanding of the terms used.	

If there are no adverse impacts or any issues of concern or you can adequately explain or justify them, then please move to Sections 6.

5. What actions can be taken to mitigate any adverse impacts?
Signposting to other guides, leaflets or information supplied. Use of translating apps or Language line. Speaking with engineers, staff during visits, telephone conversations etc
6. Section 6: Decision or actions proposed
None
7. Monitoring arrangements
None

Section 8 Action planning (if required) N/A

Question no. (ref)	Action required	Lead officer/ person responsible	Target date	Progress
	N/A			

If you have any suggestions for improving this process, please contact EDI_Team@Sandwell.gov.uk