

Equality Impact Assessment (EqIA)

The purpose of the Equality impact assessment is to consider the equality implications of your strategy, policy, project or other activity on different groups affected by it and consider if there are ways to proactively advance equality.



The EqIA will need to be completed by the project manager, policy author etc and approved by a Head of Service or Director. For guidance, please refer to the training material and example forms.

Name of Activity:	Good Practice consultation	Type of Activity:	Project	
			Service Improvement	
			Strategy	
			Policy	
			Other, please specify	x
			Consultation	
Activity Purpose:	Consultation on the principles of Good Practice and potential topics for first issues.	Activity Owners:	Rebecca Reed	
Assessment completed by:	Alan Park, Compliance and Systemic Investigations Manager	Assessment Date:	21/12/2023	
1.	Please describe what evidence, data and intelligence you have used to assess the impact of this activity.	Resident customers and representatives		
		<ul style="list-style-type: none"> Diversity profile of social housing tenants - English Housing Survey (EHS) Diversity profile of residents accessing the Housing Ombudsman – WorkPro <u>Exploring the UK's digital divide - Office for National Statistics (ons.gov.uk)</u> 		

2.	List who this activity affects.	Resident customers	Yes
		Resident representatives	Yes
		Service complainants	Yes
		Resident Panel	Yes
		Landlord employees/agents	Yes
		Colleagues	Yes
		Others, please specify	Regulator of Social Housing (RSH) Department of Levelling up Housing and Communities (DLUHC)
3.	Describe how these groups are likely to be affected.	<p>Resident Customers and Representatives</p> <p><u>Good practice:</u></p> <p>Good practice, when issued, will affect landlord services across the c4.7 million social housing households. Therefore, it is important to ensure that the provisions of individual good practice do not inadvertently disadvantage any groups of residents and representatives.</p> <p><u>Individual good practice consultations</u></p> <p>Each individual piece of good practice issued requires a statutory consultation. Therefore, it is important that a suitably diverse group of residents and representatives have the opportunity to feedback on every item of good practice, so that impacts and concerns can be addressed following the consultation period.</p> <p>Awareness, participation and responses may be affected by the consultation questions and methodology.</p>	

The focus on a digital approach to the consultations will affect digitally excluded residents and their opportunity to raise concerns regarding the proposed good practice.

Resident Panel

Good practice

Members of the Resident Panel are all social housing residents, and therefore will be affected by the provisions within individual good practice once implemented.

Individual good practice consultations

Similarly to residents and their representatives, the Resident Panel will be affected because they are tenants of member landlords. The outcome of each consultation will lead to statutory good practice which will impact on the services of member landlords.

For those who choose to participate as social housing tenants, participation and responses may be affected by the consultation questions and methodology.

Member Landlord employees / third parties acting on their behalf

Good practice

Good practice will affect the individual services that landlords will be required to comply with once issued. This will include landlord agents (such as contractors, management agents and/or other third parties). This is because they will be required to meet the requirements of the individual good practice.

Third parties (such as contractors) may be affected by good practice depending on the topic, as they must meet the requirements.

Overall approach consultation

The consultation methodologies and the question style and structure are both likely to impact on participation. Organisations will be asked to submit a corporate response.

Individual good practice consultations

The consultation methodologies for individual items of good practice and the question style and structure are both likely to impact on participation. Organisations will be asked to submit a corporate response.

Colleagues

Good practice

Colleagues within the organisation may be affected by the provisions within good practice should they be residents of social housing themselves.

In addition, those who are required to refer to the good practice in their day to day duties, such as finding maladministration where there is evidence that the good practice has not been complied with and reviewing a landlord's self-assessment against the good practice.

Overall approach consultation

		<p>Colleagues will be given the opportunity to feed into the Good Practice. Their views will be captured through a variety of more informal methods including an internal consultation questionnaire, team meetings and feedback channels.</p> <p><u>Individual good practice consultations</u></p> <p>Colleagues will be informed of the intended consultations as they occur, and may decide to participate in the formal consultation if they are residents of social housing. Alongside the formal consultation, colleagues will be given the opportunity to feed into the Good Practice.</p> <p>For those who choose to participate as social housing tenants, participation and responses may be affected by the consultation questions and methodology.</p> <p>For those not participating in the formal consultation, their views will be captured through a variety of more informal methods including an internal consultation questionnaire, team meetings and feedback channels.</p>
4.	<p>What consultation have you undertaken, detail who you have engaged and consulted with.</p>	<p>Reviewed previous consultation-related EIAs for consistency and lessons learned. Consultation with communications team.</p>
5.	<p>Does this activity affect one group more or less favourably than another, on the basis of the Equality protected characteristics:</p>	

		No impact/ Positive Impact/ Negative Impact/ Unknown	Detail the impact, who's affected, the proportion of individuals, and the actions taken to mitigate impact and advance equality, diversity, and inclusion
	<ul style="list-style-type: none"> Age 	<p>Positive Impact</p> <p>Negative impact of those over 65+, due to digital exclusion.</p>	<p>Proportionally the 65+ age range access the service and complain less than the EHS population. However, 28% of social renters are 65+ years (EHS).</p> <p>Since 2011, adults over the age of 65 years have consistently made up the largest proportion of the adult internet non-users, and over half of all adult internet non-users were over the age of 75 years in 2018.</p> <p>Digital exclusion: 17% of social rented households (around 700,000 households) had no internet access at home (EHS).</p> <p><u>Consultations:</u></p> <p>The Resident Panel has a higher proportion of older residents and may not be representative of younger residents – who are likely to complete the online surveys.</p> <p>With the Resident Panel participation, this may lead to a representative group within the 65+ age group.</p>
	<ul style="list-style-type: none"> Disability 		<p>54% of resident households have recorded a disability as part of the EHS. In the ONS housing and disability</p>

		Neutral	<p><u>Consultations</u></p> <p>Based on the current data, the proposed consultation approach will have no significant impact.</p>
	<ul style="list-style-type: none"> Gender 	<p>Neutral</p> <p>Neutral</p>	<p>Women make up 63% of residents approaching the Ombudsman which is broadly in line with the proportion of residents in social housing (EHS survey and HOS internal case management system).</p> <p><u>Good practice</u></p> <p>Based on the current data, the Good Practice will have no significant impact.</p> <p><u>Consultations</u></p> <p>2019 report by ONS indicate that women account for more than half of the non-internet users, potentially putting them experiencing a negative impact of participating via an online survey.</p> <p>58% of the contact HOS receives from women is digital. The assessment has determined the impact neutral, with the option of requesting a survey via the telephone.</p>
	<ul style="list-style-type: none"> Gender reassignment 	Unknown	This information is not collected for residents contacting the Housing Ombudsman Service.
	<ul style="list-style-type: none"> Marriage or civil partnership 		

		Neutral	<p>Proportionally individuals not married or in a civil partnership made more complaints. This may be reflective that more households are single/lone persons. It may also be indicative of the number of complaints from London Boroughs, where smaller accommodation exists i.e. high rise flats.</p> <p><u>Good Practice</u></p> <p>Based on the current data, the Good Practice will have no significant impact.</p> <p><u>Consultations</u></p> <p>ONS Data: Although the percentage of households without an internet connection has generally been declining, those who live alone are less likely to have an internet connection at home, than their peers.</p> <p>41% of households with a single adult aged 65 years and over had no household internet connection compared with 13% of households with two adults, at least one of whom was 65 years or older.</p> <p>99% of contact is from those married or in a civil partnership is digital.</p>
	<ul style="list-style-type: none"> Pregnancy and maternity 	Unknown	<p>This information is not collected for residents contacting the Housing Ombudsman Service.</p>

	<ul style="list-style-type: none"> Religion or beliefs 	Neutral	<p>64% of the cases don't have an EDI record for religion / belief and 19% of those who provided data opted to record "prefer not to say".</p> <p><u>Good Practice</u></p> <p>Based on the current data, the Good Practice will have no significant impact.</p>
	<ul style="list-style-type: none"> Sexual orientation 	Neutral	<p>64% of the cases don't have an EDI record for sexual orientation, compared with 41% for age. 16% of those who provided data opted to record "prefer not to say".</p> <p><u>Consultations</u></p> <p>Based on known resident data, Hindus and Sikhs indicate preferred contact method is telephone, with less than 35% of contact being done digitally. The judgement is that those individuals are not as digitally active. The assessment has determined the impact neutral, with the option of requesting a survey via the telephone.</p> <p>Proportionally those of a Hindu or Muslim religion, and those who recorded no religion or belief, raised more service complaints.</p>
		Neutral	<p><u>Good Practice</u></p> <p>Based on the current data, the Good Practice will have no significant impact.</p>
		Neutral	<p><u>Consultation</u></p>

			<p>Based on known data, 57% of contact from the LGBTQ+ community is digital.</p> <p>The assessment has determined the impact neutral, with the option of requesting a survey via the telephone.</p> <p>Proportionally gay/lesbians have raised more service complaints.</p>
Other non-protected characteristics to be considered			
	<ul style="list-style-type: none"> • Caring responsibilities 	Unknown	This data is not collected.
	<ul style="list-style-type: none"> • Literacy 	Negative	<p><u>Consultation</u></p> <p>This data is not collected, however, the judgement that the proposed consultation process will have a negative impact as participants will need to engage with written documents, even where translated or in plain English. This may be a barrier to participation.</p>
	<ul style="list-style-type: none"> • Socio-economic status (by law Scotland & Wales) 	Unknown	This data is not collected.
	Detail for each group if more than one group is affected		
6.	If there is a negative impact on any equality target groups, can this impact be legally and objectively justified?	<p><u>Good Practice</u></p> <p>No negative impacts have been identified.</p> <p><u>Consultations:</u></p>	

	Detail the actions that will be taken to reduce any negative impact.	<p>Due to the potential negative impact on those digitally excluded, telephone and written options should be extended and simplified access to the survey.</p> <p>The publications and the announcement of consultation should focus on landlords informing residents via their non-digital channels.</p>
7.	Assess and detail any potential for dual impact, based on more than one characteristic.	<p><u>Good Practice</u></p> <p>No negative impacts have been identified.</p> <p><u>Consultations:</u></p> <p>The approach needs to consider the dual impact on the visually impaired, especially those over 65+ years to take into account the digital exclusions of the 65+ and those with a disability.</p>
8.	If the impact unknown, describe the assessment for reaching that conclusion	<p>Gender reassignment, pregnancy and maternity, caring responsibilities and socio-economic status are all identified as unknown.</p> <p>This conclusion has been reached as this information is not collected for individuals contacting the Housing Ombudsman. When reviewed, no potential impacts were identified by the Equality, Diversity and Inclusions group.</p>
9.	Recommend alternatives to achieving the activity without having an impact.	Not applicable.
10.	Considering wider accessibility and inclusion, and those affected by the activity, what other alternative recommendations would support this	<p><u>Good Practice</u></p> <p>Non identified</p> <p><u>Consultations:</u></p>

	<p>activity to ensure that it is accessible and inclusive to all.</p>	<p>Those digitally excluded:</p> <ul style="list-style-type: none"> • Post out the consultations in writing. • Provide an extended telephone service officer. • Produce the consultation in different non-digital media, for example braille. • Provide guidance to landlords to promote the consultation. • Consult and approach smaller / specialist housing organisations. • Reach out to advocacy services.
<p>11.</p>	<p>Please give a brief description of how this activity promotes equality.</p> <p>If there is no evidence that this promotes equality, what changes, if any, could be made to achieve this.</p>	<p><u>Good Practice</u></p> <p>Throughout each item of Good Practice is the intention to ensure consistency in approach whilst ensuring sufficient flex to ensure individual circumstances are considered is clearly stated, whatever the service area.</p> <p><u>Consultations</u></p> <p>Digital exclusion is a strong theme in resident responses, HOS Spotlight reports and is reflected in the English Housing Survey findings referred to above.</p> <p>Taking a ‘one size fits all’ approach doesn’t promote equality. Expanding to incorporate the wider considerations recommended will enable non-digital access and awareness.</p>
<p>12.</p>	<p>Outcome</p>	<p>Supporting Comments</p>

	<p>A – No change required. There is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken.</p>	
	<p>B – Adjustments required. This involves taking steps to remove any barriers, to better advance equality.</p>	<p><u>Good Practice</u></p> <p>Following each consultation, the Ombudsman will review and update its Equality Impact Assessment, taking into account the responses and comments by participants in the consultation activities. This will be published and regularly reviewed.</p> <p><u>Consultations</u></p> <p>Steps have been taken to address the barriers around digital exclusion in the communications plan for the consultation.</p> <p>This includes providing the option for telephone responses; printed copies of the consultation; large print and Braille; and working with partners to raise awareness of the exercise.</p> <p>Further work is being undertaken to interrogate potential impacts on groups where we have gaps in data.</p>
	<p>C – Continue. There is the potential that the activity has an adversely impact some groups or help some groups more than others. The reasons for this can be well justified and the activity can continue without amendments.</p>	

	D – Cease. The assessment shows that the activity is having a discriminatory effect and should not continue.	
13.	Reviewed and Approved By: (Head of Service or Director)	Name: Rebecca Reed Position: Head of Insight & Development Date: 02/01/2024