

Colchester Borough Homes

Equality Impact Assessment Form - An Analysis of the Effects on Equality

Section 1: Initial Equality Impact Assessment

Name of policy/ decision to be assessed:

Emergency Response to Covid-19

1. What is the main purpose of the policy?

No one policy or strategy is being assessed. This assessment is on the impact of CBH's response to Covid-19 upon customers and staff.

2. What main areas or activities does it cover?

Listed below are the key changes to services/ ways of working being considered:

- 'Critical services only' footing
- CMT and Board meeting remotely
- Special Partnership Arrangements in place through the Essex Resilience Forum
- Daily log of the working status of staff.
- Remote (as opposed to face to face) meetings between staff
- Overwhelming reduction in staff face-to-face contact with customers
- Customer appointments overwhelmingly by phone/ video conferencing only
- Suspension of non-emergency repairs
- Social distancing within emergency repairs
- Suspension of the advertising and allocation of properties on Gateway to Homechoice

3. Are there changes to an existing policy being considered in this assessment? If so what are they?

This EqIA is considering changes to services and ways of working which form part of the CBH response to Covid-19.

4. Who are the main audience, users or customers who will be affected by the policy?

- Customers
- Staff
- Residents

5. What outcomes do you want to achieve from the policy?

DMT has agreed the following Strategic COVID Response Objectives:

- To deliver the critical services to our customers.
- To continue to provide a safe environment for our customers to live in.
- To protect the health and wellbeing of our staff.
- To support the Council's implementation of the Government response to Covid-19.
- To ensure the right decisions are made and implemented at the right time, through good governance and clear accountability.
- To plan for the recovery of all services once the pandemic is over.

6. Are other service areas or partner agencies involved in delivery? If so, please give details below:

- CBC
- ECC
- Voluntary sector partners
- Contractors
- Government (via Guidance)

7. Are you aware of any relevant information, data, surveys or consultations which help us to assess the likely or actual impact of the policy upon customers or staff?

The author has made use of: information and data available in Board papers; discussions of available data and impacts with directors and the company's CEO; reports on the working status of staff; and discussions on impacts within the Equality Focus Group (28/04/20).

8. The 'general duty' states that we must have "due regard" to the need to:

- (a) eliminate unlawful discrimination, harassment and victimisation
- (b) advance equality of opportunity between people who share a 'protected characteristic'¹ and those who do not²
- (c) foster good relations between people who share a protected characteristic and those who do not³

State how the policy helps us to meet each aim of the general duty.

Not applicable. The changes being considered are in response to the disruption caused by Covid-19. There is no net benefit in terms of equality in having to move to "critical services only". This applies to all aims of the general duty.

9. This section helps us to identify any disproportionate impacts.

Note: Since 23 March CBH has been on a "critical services only" footing under the provisions in the Business Continuity Plan. Critical services are:

- Contact with and support for our sheltered and vulnerable tenants
- Emergency repairs service
- Customer services
- Homelessness and management of temporary accommodation

(see table of impacts overleaf...)

¹ The Equality Act's 'protected characteristics' include age, disability, gender reassignment, pregnancy and maternity, race, religion or belief and sex and sexual orientation. It also covers marriage and civil partnerships, but not for all aspects of the duty.

² This involves having due regard, in particular, to the need to: (a) remove or minimise disadvantages suffered by persons who share a protected characteristic that are connected to that characteristic; (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it, and (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

³ This involves having due regard, in particular, to the need to (a) tackle prejudice, and (b) promote understanding.

'Protected characteristic' group		Positive Impact	Explain how it could particularly benefit the group	Negative Impact	Explain how it could particularly disadvantage the group
Age	Older people (60+)		None identified.	X	<p>Older people (especially the elderly frail) are more likely to have a disability. Older customers may therefore be more vulnerable to the negative impact of “critical services only”.</p> <p>3.7% of staff (8) are over 70 or have a medical condition and unable to work due to the impact of social distancing guidelines upon their specific work role. (This compares to 7.3% (16) whose work role allows them to work from home.</p> <p>See Section 10 for details on how the above impacts have been addressed/ mitigated. <u>This applies for all identified negative impacts below.</u></p>
	Younger people (17-25) and children (0-16)		None identified.	X	Customers who are 17 may be particularly vulnerable to homelessness.
Disability	Physical		None identified.	X	<p>Customers with a physical disability may be disproportionately impacted by the move to critical services only, and the greatly reduced opportunity for face to face contact.</p> <p>(A customer with a disability is more likely to have complex needs, which may be identified and supported more effectively though face to face engagement.)</p> <p>Staff/ Board members with a physical disability may be negatively impacted by the involuntary move to WFH given that workstation assessments may not have been carried out at home.</p>

'Protected characteristic' group		Positive Impact	Explain how it could particularly benefit the group	Negative Impact	Explain how it could particularly disadvantage the group
	Sensory		None identified	X	<p>Customers, staff and Board members with a hearing impairment may be disproportionately impacted by an increased reliance upon remote communication platforms.</p> <p>Staff/ Board members with a physical disability may be negatively impacted by the involuntary move to WFH given that workstation assessments may not have been carried out at home.</p>
	Learning		None identified.	X	<p>Customers with a learning disability may be disproportionately impacted by the move to critical services only, and the greatly reduced opportunity for face to face contact (which may be more likely to identify unmet needs and facilitate support.)</p>
	Mental health issues		None identified.	X	<p>Customers with a mental health disability or vulnerability may be disproportionately impacted by the move to critical services only, and the greatly reduced opportunity for face to face contact (which may be more likely to identify unmet needs and facilitate support.)</p> <p>Customers presenting as homeless and 'rough sleepers' are particularly vulnerable where they have a mental health disability.</p> <p>Staff with a mental health disability or vulnerability may be disproportionately impacted by increased or different stresses associated with the involuntary move to WFH and the lack of the usual support networks.</p>
	Other – <i>specify</i>		None identified.		None identified

'Protected characteristic' group		Positive Impact	Explain how it could particularly benefit the group	Negative Impact	Explain how it could particularly disadvantage the group
Ethnicity ⁴	White		None identified.		None identified
	Black		None identified.	X	Customers that belong to 'BAME' ethnic groups (including Roma Gypsies and Irish Travellers) are more likely than 'White' ethnic groups <i>not</i> to have English as a first language. See section on 'Language' (below). 'BAME' groups are more likely to be victims of Hate Crime. There has been an increase in reports of ASB at this time.
	Chinese		None identified.		
	Mixed Ethnic Origin		None identified.		
	Gypsies/ Travellers		None identified.		
	Other – <i>please state</i>				
Language	English not first language		None identified.	X	Customers who do not have English as a first language may be more vulnerable (to exploitation) and are more likely to have unmet needs. The move to critical services only and the reduced opportunity for face to face contact may disproportionately impact this group.
Pregnancy and Maternity	Women who are pregnant or have given birth in last 26 weeks		None identified.	X	This group usually benefits from enhanced priority on the housing register which is not operating as normal. This group may also be more likely to have unmet needs. The move to critical services only and the reduced opportunity for face to face contact may disproportionately impact this group.
Religion or Belief	People with a religious belief (or none)		None identified.		Note: It is recognised that customers may be disproportionately impacted by social distancing where key religious festivals fall over this period. This is not however an impact of changes to CBH services/ working practices but rather an impact of Covid-19 and associated Government/NHS guidance. This will not therefore be addressed in section 10.
Sex	Men		None identified.		

⁴ National Census 2011 categories are: Bangladeshi, Indian, Pakistani, Other Asian (Asian or Asian British), African, Caribbean, Other Black (Black or Black British), White and Black African, White and Asian, White and Black Caribbean (Mixed), British, Irish, Other White (White), Chinese, Other (Other Ethnic Group).

'Protected characteristic' group		Positive Impact	Explain how it could particularly benefit the group	Negative Impact	Explain how it could particularly disadvantage the group
	Women		None identified.	X	<p>Women are statistically more likely than men to be victims of domestic abuse. The increased risk of domestic abuse at this time has been highlighted in the media and by Government. The reduced opportunities for staff/ customer face to face contact (allowing the better identification of needs and facilitation of support) may therefore further compound the vulnerability of this group at this time.</p> <p>Female staff may be more likely than men to be negatively impacted by the demands of childcare (and other caring roles) whilst WFH.</p> <p>Women are more likely to be single parents than men. The move to critical services only and the reduced opportunity for face to face contact may disproportionately impact this group.</p>
Gender Reassignment ⁵	Transgender/ Transsexual ⁶		None identified.	X	Trans customers are more likely than cisgender customers to be victims of Hate Crime. There has been an increase in reports of ASB at this time.
Sexual Orientation	Bisexual, Heterosexual, Gay or Lesbian		None identified.	X	Bisexual, gay and lesbian customers are more likely to be victims of Hate Crime. There has been an increase in reports of ASB at this time.
Marriage and Civil Partnership	People who are married or in a civil partnership		None identified.		None identified

⁵ The protected characteristic of gender reassignment is defined by the Equality Act 2010 as “a person proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attributes of sex.” This is a personal process that may involve medical interventions such as counselling, psychotherapy, hormone therapy or surgery, but does not have to.

⁶ It is generally held that people who are *transgender* disguise their features or clothing to resemble their preferred sex, whereas people who are *transsexual* wish to change their body to completely resemble their preferred sex.

10. If you have identified any negative impacts (above) how can they be minimised or removed?

Each negative impact has been considered in turn.

Age

Older people (especially the elderly frail) are more likely to have a disability. Older customers may therefore be more vulnerable to the negative impact of “critical services only”.

CBH has been proactive in contacting its most vulnerable customers for a welfare check including access to medication and food, and signposting and referring for support and befriending services. This has included 1500 tenants specifically on the basis of age (70+).

3.7% of staff (8) are over 70 or have a medical condition and are unable to work due to the impact of social distancing guidelines upon their specific work role. (This compares to 7.3% (16) whose work role does allow them to work from home.)

CBH has ensured that these staff are not disadvantaged by being unable to work at this time.

Customers who are 17 may be particularly vulnerable to homelessness.

There continues to be temporary and emergency accommodation available for customers we have a duty to provide accommodation to when they approach as homeless. “Direct lets” of vacant homes can also be made to people in temporary accommodation or who are homeless.

Disability

Customers with a physical disability may be disproportionately impacted by the move to critical services only, and the greatly reduced opportunity for face to face contact.

As stated above, CBH has contacted its most vulnerable customers to check on welfare. This has included 1300 tenants (under 70) who have been identified as being vulnerable including in connection with a disability. 48% of CBH tenants who have a disability have a physical or mobility disability.

Staff/ Board members with a physical disability may be negatively impacted by the involuntary move to WFH given that workstation assessments may not have been carried out at home.

HR and IT work with staff and line managers to identify and respond to individual requirements.

Customers, staff and Board members with a hearing impairment may be disproportionately impacted by an increased reliance upon remote communication platforms.

Staff and Board members are supported to use ‘live captions’ in Team meetings. On 8 May, an all staff email was sent highlighting the “live captions” facility for the use of staff and customers.

Staff/ Board members with a physical disability may be negatively impacted by the involuntary move to WFH given that workstation assessments may not have been carried out at home.

HR and IT work with staff and line managers to identify and respond to individual requirements.

Customers with a learning disability may be disproportionately impacted by the move to critical services only, and the greatly reduced opportunity for face to face contact (which may be more likely to identify unmet needs and facilitate support.)

Tenants contacted for a welfare check (as above) include those who are vulnerable due to a learning disability. The ASB Team has noted an increase in exploitation of vulnerable tenants and has worked with Essex Police at this time to counter ‘cuckooing’.

Customers with a mental health disability or vulnerability may be disproportionately impacted by the move to critical services only, and the greatly reduced opportunity for face to face contact (which may be more likely to identify unmet needs and facilitate support.)

Tenants contacted for a welfare check (as above) include those who are vulnerable due to a mental health disability.

Customers presenting as homeless and ‘rough sleepers’ are particularly vulnerable where they have a mental health disability.

Although advertising and bidding on Gateway to Homechoice has been suspended, CBH is still able to offer direct lets of vacant homes to people who are homeless or at risk of homelessness. CBH has prioritised finding emergency accommodation for ‘rough sleepers’ over a short timeframe (as required by the Ministry for Local Government and Homelessness on 26 March).

Staff with a mental health disability or vulnerability may be disproportionately impacted by increased or different stresses associated with the involuntary move to WFH and the lack of the usual support networks.

CBH has been proactive in promoting staff health and welfare at this time which has been a key focus. The document ‘Protecting your mental health’ was distributed to staff via email on 31 March and the document ‘WFH Health and Safety Guidance’ was distributed on 8 April. CBH Comms sent its ‘Four Week Lockdown Challenge’ email on 24 April and the latest Wellbeing Survey will be launched during the week beginning 4 May. This will provide valuable feedback including around equality impacts. The CBH Staff Handbook was updated to include information on protecting mental health, and additional guidance has been made available on the staff SharePoint area including a [COVID-19 Staff Guide](#) and a [COVID-19 Managers Guide](#).

Race/ Ethnicity

'BAME' groups are more likely to be victims of Hate Crime. There has been an increase in reports of ASB at this time.

The Anti-Social Behaviour Team is working to support the most vulnerable tenants primarily via telephone and video conferencing, and by working closely with Essex Police.

Customers who do not have English as a first language may be more vulnerable (to exploitation) and are more likely to have unmet needs. The move to critical services only and the reduced opportunity for face to face contact may disproportionately impact this group.

Translation and Interpreting services continue to be available which includes technologies that support home working. On 8 May, an all staff email was sent highlighting the "3 way conference call" instant telephone interpreting service, whose increased use by those working at home may further help reduce this significant barrier.

Pregnancy & Maternity

This group usually benefits from enhanced priority on the housing register which is not operating as normal.

Women who are pregnant or have given birth in last 26 weeks are still eligible to be housed at this time.

This group may also be more likely to have unmet needs. The move to critical services only and the reduced opportunity for face to face contact may disproportionately impact this group.

Tenants contacted for a welfare check (as above) include this group.

Sex

Women are statistically more likely than men to be victims of domestic abuse. The increased risk of domestic abuse at this time has been highlighted in the media and by Government. The reduced opportunities for staff/ customer face to face contact (allowing the better identification of needs and facilitation of support) may therefore further compound the vulnerability of this group at this time.

Victims of domestic abuse are still eligible to be housed at this time. The Sanctuary Scheme is still running to provide enhanced security for CBH tenants and residents, and the Women's Refuge is operating as normal.

(continues overleaf)

Female staff may be more likely than men to be negatively impacted by the demands of childcare (and other caring roles) whilst WFH.

A daily working status report on staff helps to underpin strategic direction and shape appropriate support. The usual stipulations around working from home (in respect of childcare or caring responsibilities) have been suspended at this time. CBH has ensured that staff who have been unable to work due to caring roles have not been disadvantaged.

Women are more likely to be single parents than men. The move to critical services only and the reduced opportunity for face to face contact may disproportionately impact this group.

The most recent focus of continuing ‘welfare checks’ includes single parents who, it is recognised, are more likely to experience financial hardship.

Gender Reassignment

Trans customers are more likely than cisgender customers to be victims of Hate Crime. There has been an increase in reports of ASB at this time.

The Anti-Social Behaviour Team is working to support the most vulnerable tenants primarily via telephone and video conferencing, and by working closely with Essex Police.

Sexual Orientation

Bisexual, gay and lesbian customers are more likely to be victims of Hate Crime. There has been an increase in reports of ASB at this time.

The Anti-Social Behaviour Team is working to support the most vulnerable tenants primarily via telephone and video conferencing, and by working closely with Essex Police.

11. Could the policy discriminate⁷ against any ‘protected characteristic’, either directly or indirectly⁸? **No**

⁷ The Council has a general duty to ‘eliminate unlawful discrimination, harassment and victimisation’. Direct discrimination occurs when a person is treated less favourably than another in a comparable situation because of their ‘protected characteristic’ whether on grounds of age, disability, pregnancy and maternity, ethnicity; religion or belief; sex (gender), sexual orientation, or marriage and civil partnership. Indirect discrimination occurs when an apparently neutral provision or practice would nevertheless disadvantage people on the grounds of their ‘protected characteristic’.

Summary and findings of Initial Equality Impact Assessment

12. Please put a tick in the relevant box to confirm your findings, and what the next step is:

Findings	Action required
No negative impacts have been identified <input type="checkbox"/>	Sign off screening and finish.
Negative impacts have been identified but have been minimised or removed X	Sign off screening and finish.
Negative impacts could not be minimised or removed <input type="checkbox"/>	Sign off screening and complete a full impact assessment – Section 2.
There is insufficient evidence to make a judgement. <input type="checkbox"/>	Sign off screening and complete a full impact assessment – Section 2.

13. Name and job title of person completing this form:

- Andrew Harley – Equality and Safeguarding Co-ordinator

14. Date of completion:

- April 2020

15. Date for update or review of this screening:

- During this ‘critical services only’ period, this Impact Assessment will be kept under review.

⁸ If you answer ‘yes’ to question 11 (above) you will need to complete this section *and* go on to complete Section 2 in order to conduct a full Equality Impact Assessment.