

# 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:

#### **Covid-19 Recovery Plan**

1. What is the main purpose of the policy?

No one policy or strategy is being assessed. This assessment is on the possible equality impacts of CBH's Covid-19 Recovery Plan. The Plan is a working document detailing options for how to achieve and manage recovery following the impact of the emergency response to Covid-19. The emergency response itself has been subject to a separate assessment which can be viewed [here](#).

2. What main areas or activities does it cover?

There are three project cells as follows:

- Organisation
- Business
- Customer & Community

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

- The assessment considers the possible impacts of the Recovery Plan which is the planning strategy for the transition from the Covid-19 emergency response towards more 'normal' services.

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?

The stated objectives within the Recovery Plan (at Tab 5) are:

- To restart non-critical services for our customers.
- To use the recovery plan as a business transformation opportunity and retain the beneficial new ways working.
- To contribute to CBC's recovery plan.
- To maximise the use of technology internally and in how we deliver our services to our customers.
- To strengthen our business continuity plan to ensure minimum disruption for future outbreaks.
- To capture and continue the community spirit shown during C-19 and review our partnering arrangements.

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 the internal working document '[Programme Reporting](#)' containing information on the three project cells and has discussed available data and possible impacts with members of CMT.

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'<sup>1</sup> and those who do not<sup>2</sup>

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<sup>1</sup> 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.

<sup>2</sup> 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.

(c) foster good relations between people who share a protected characteristic and those who do not<sup>3</sup>

*State how the policy helps us to meet the general duty.*

The Recovery Plan is a vehicle for the phased transition towards 'normal' housing management services. This will help us to better meet all aims of the general duty.

- The plan will help **eliminate unlawful discrimination, harassment and victimisation** through increased HR, and housing management functions (for example in respect of countering ASB and domestic abuse).
- The plan will help **advance equality of opportunity** through increasing and deepening support for our most vulnerable customers.
- The plan will help **foster good relations** through facilitating greater engagement with customers and communities thereby helping to tackle prejudice and promote understanding.

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

*Continue to next page*

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<sup>3</sup> 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  <i>Further detail / explanation is included in the mitigation table further below.</i>
Age	Older people (60+)	X	Customers: <ul style="list-style-type: none"> <li>• HRA – (Elfreda House sheltered scheme improvements will particularly benefit older people)</li> <li>• Revenue Programme</li> <li>• Leasehold Services (since this group may particularly benefit from Sec 20 improvements)</li> <li>• Tenants’ Behaviour/ Support – assisted gardening services</li> <li>• Service provision – Sheltered</li> <li>• Safety Compliance – Gas Servicing (due to increased vulnerability to fire or carbon monoxide escape)</li> <li>• Repairs – restoring scheduling and Comms</li> </ul>	X	Customers: <ul style="list-style-type: none"> <li>• HRA</li> <li>• Rent Arrears Collection - Financial Support</li> <li>• Capital Programme BMP</li> <li>• Revenue Programme</li> </ul> Staff: <ul style="list-style-type: none"> <li>• Accommodation/ working practices</li> <li>• BMP</li> <li>• Capital Programme and Capital Procurement</li> <li>• Revenue Programme</li> <li>• Homelessness</li> <li>• Voids &amp; Lettings</li> <li>• G2H</li> <li>• Leasehold Services</li> <li>• Temp Accommodation</li> <li>• Tenants’ Behaviour/ Support</li> <li>• Service Provision – Sheltered</li> <li>• Safety Compliance – Gas Servicing</li> <li>• Repairs</li> </ul>
	Younger people (17-25) and children (0-16)	X	Customers: <ul style="list-style-type: none"> <li>• HRA (Temporary Housing improvements may particularly benefit younger people)</li> <li>• Homelessness</li> <li>• G2H</li> <li>• Temp Accommodation</li> </ul>	X	Customers: <ul style="list-style-type: none"> <li>• HRA projects</li> <li>• Voids &amp; Lettings</li> </ul>

Protected characteristic group		Positive Impact	Explain how it could particularly benefit the group	Negative Impact	Explain how it could particularly disadvantage the group  <i>Further detail / explanation is included in the mitigation table further below.</i>
Disability	Any/ unspecified	X	Customers: <ul style="list-style-type: none"> <li>• Capital Programme &amp; Capital Procurement</li> <li>• Rent Arrears Collection - Financial Support</li> <li>• Homelessness</li> <li>• G2H</li> <li>• Leasehold Services (since this group may particularly benefit from Sec 20 improvements)</li> <li>• Temp Accommodation</li> <li>• Tenants' Behaviour/ Support (Re-establishing ASB support activities could particularly benefit people who are more likely to be victims of Hate Crime.</li> <li>• Tenants' Behaviour/ Support (Re-establishing assisted gardening services could particularly benefit people this group)</li> <li>• Service provision – Sheltered</li> <li>• Repairs – restoring scheduling and Comms</li> </ul>	X	Customers: <ul style="list-style-type: none"> <li>• HRA projects</li> <li>• Rent Arrears Collection - <i>Financial Support</i></li> </ul> Staff: <ul style="list-style-type: none"> <li>• Accommodation/ working practices</li> <li>• IT Solution</li> </ul>
	Physical	X	Customers: <ul style="list-style-type: none"> <li>• Safety Compliance - Gas Servicing (due to increased vulnerability to fire or carbon monoxide escape.)</li> </ul>		None identified
	Sensory		None identified	X	Customers: <ul style="list-style-type: none"> <li>• Voids &amp; Lettings</li> </ul>
	Learning		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 <i>Further detail / explanation is included in the mitigation table further below.</i>
	Mental health issues		None identified		None identified
	Pre-existing conditions	X	Customers: <ul style="list-style-type: none"> <li>• Revenue Programme</li> <li>• Safety Compliance – Gas Servicing (due to increased vulnerability to fire or carbon monoxide escape.)</li> </ul>	X	Customers: <ul style="list-style-type: none"> <li>• Accommodation/ working practices</li> <li>• HRA projects</li> <li>• Rent Arrears Collection - Financial Support</li> <li>• Capital Programme BMP</li> <li>• Revenue Programme</li> </ul> Staff: <ul style="list-style-type: none"> <li>• BMP</li> <li>• Capital Programme and Capital Procurement</li> <li>• Revenue Programme</li> <li>• Homelessness</li> <li>• Voids and Lettings</li> <li>• G2H</li> <li>• Leasehold Services</li> <li>• Temporary Accommodation</li> <li>• Tenants' Behaviour/ Support</li> <li>• Service Provision – Sheltered</li> <li>• Safety Compliance – Gas Servicing</li> <li>• Repairs</li> </ul>
Ethnicity <sup>4</sup>	White				None identified
	Black	X	Customers: <ul style="list-style-type: none"> <li>• Tenants' Behaviour/ Support (Re-establishing ASB support activities could particularly benefit people who are more likely to be victims of Hate Crime.)</li> </ul>		None identified
	Chinese				None identified
	Mixed Ethnic Origin				None identified
	Gypsies/ Travellers				None identified

<sup>4</sup> 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
					<i>Further detail / explanation is included in the mitigation table further below.</i>
Language	English not first language	X	Customers: <ul style="list-style-type: none"> <li>Tenants' Behaviour/ Support (Re-establishing ASB support activities could particularly benefit people who are more likely to be victims of Hate Crime.)</li> </ul>		None identified
Pregnancy and Maternity	Women who are pregnant or have given birth in last 26 weeks	X	Customers: <ul style="list-style-type: none"> <li>Rent Arrears Collection - <i>Financial Support</i></li> <li>G2H</li> <li>Temp Accommodation</li> </ul>		None identified
Religion or Belief	People with a religious belief (or none)	X	Customers: <ul style="list-style-type: none"> <li>Tenants' Behaviour/ Support (ASB support activities could particularly benefit people who are more likely to be victims of Hate Crime.)</li> </ul>		None identified
Sex	Men		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
	Women	X	Customers: <ul style="list-style-type: none"> <li>G2H (Women are more likely than men to experience domestic abuse.)</li> <li>Temp Accommodation (as above)</li> </ul>		None identified
Gender Reassignment <sup>5</sup>	Transgender/ Transsexual <sup>6</sup>	X	Customers: <ul style="list-style-type: none"> <li>Tenants' Behaviour/ Support (SB support activities could particularly benefit people who are more likely to be victims of Hate Crime.)</li> </ul>		None identified
Sexual Orientation	Bisexual, Heterosexual, Gay or Lesbian	X	Customers: <ul style="list-style-type: none"> <li>Tenants' Behaviour/ Support (ASB support activities could particularly benefit people who are more likely to be victims of Hate Crime.)</li> </ul>		None identified
Marriage and Civil Partnership	People who are married or in a civil partnership		None identified		None identified

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

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<sup>5</sup> 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.

<sup>6</sup> 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.



PROJECT	NEGATIVE EQUALITY IMPACTS	MITIGATION
<b>PROJECT CELL: ORGANISATION</b>		
(Accommodation/ Working Practices) - <i>To prepare for the return of a limited number of staff to Rowan House</i>	<p>Staff:</p> <ul style="list-style-type: none"> <li>Older People, especially 70+ may be especially vulnerable during return</li> <li>Disability – those with pre-existing health conditions may be more vulnerable to a return</li> </ul> <p>Some staff who fall into the above categories may want to return but are unable to. Some could be disadvantaged by not having full workstation access. See additional support (mitigation)</p>	<p>The following would help protect more vulnerable groups:</p> <ul style="list-style-type: none"> <li>Socially distanced desks / dividing screens</li> <li>PPE could be used by some staff where proportionate (subject to H&amp;S assessment)</li> <li>A cap on maximum numbers in office</li> </ul> <p>Additional support may be required for people WFH – workstation assessments to help identify required IT/ furniture (resource dependant)</p>
(Governance) - <i>To ensure that Governance arrangements are fit for purpose during recovery.</i>	None identified	N/A
(Health and Safety / Staff Wellbeing) - <i>To ensure that staff are kept safe and wellbeing maintained.</i>	<p>Staff:</p> <ul style="list-style-type: none"> <li>Risk of increased infection as more staff work in the office.</li> </ul>	<p>The following would help protect more vulnerable groups:</p> <ul style="list-style-type: none"> <li>Socially distanced desks / dividing screens</li> <li>PPE could be used by some staff where proportionate (subject to H&amp;S assessment)</li> <li>A cap on maximum numbers in office</li> </ul>
(Training FE) - <i>Ensure that training delivery is on track for 2020/21.</i>	Disproportionate impacts have not been identified.	N/A
(Resource planning) - <i>Staff capacity, budget and material resources harnessed to support the Plan.</i>	Disproportionate impacts have not been identified.	N/A
(Customer engagement/insight) - <i>To ensure that the recovery plan is being informed by Customer Insight.</i>	Disproportionate impacts have not been identified.	N/A
(Business Transformation) - <i>Review and revise overarching organisational outcomes for key projects including Programme 2020, and</i>	Disproportionate impacts have not been identified.	N/A

Aurora.		
<b>PROJECT CELL: BUSINESS</b>		
(HRA projects) - <i>To support CBC's recovery plan for HRA and New Council funded projects.</i>	Disproportionate impacts have not been identified.	N/A
(General Fund Projects) - <i>To support CBC's recovery plan for GF projects.</i>	Disproportionate impacts have not been identified.	N/A
(BMP Programme) - <i>To restart the Building Maintenance Programme.</i>	<p>Staff:</p> <ul style="list-style-type: none"> <li>An increase in customer contact might increase contractor/ staff sickness levels which could impact disproportionately upon older people and those with pre-existing health conditions.</li> </ul> <p>Customers:</p> <ul style="list-style-type: none"> <li>Some work may be delayed due because of customers' age or pre-existing medical conditions.</li> </ul>	<p>Staff:</p> <ul style="list-style-type: none"> <li>Staff who are over 70 or who have pre-existing health conditions will continue not to work on site.</li> <li>Where managers are aware of individual vulnerabilities, the view of the member of staff will be sought and taken into account.</li> <li>CBH may need to make contractors aware of the potential risks to vulnerable groups.</li> </ul> <p>Customers:</p> <ul style="list-style-type: none"> <li>It may not be possible to delay work to avoid unnecessary exposure of the virus to vulnerable customers. However, clear priority needs to be given to these customers when conditions allow.</li> </ul>
(Capital Programme and Capital Procurement) The delivery of the Capital Programme; method, scheduling and activity.	As above	As above
(Revenue programme) - Revenue programme (Backlog Repairs, New Repairs, Compliance)	As above	As above
(IT Solution) - <i>Minimising disruption caused by inadequate hardware</i>	<p>Staff:</p> <ul style="list-style-type: none"> <li>Inadequate hardware may impact disproportionately upon those with a disability.</li> <li>A failure to facilitate equal access to available technology could impact disproportionately upon those with a disability.</li> </ul>	<p>Staff:</p> <ul style="list-style-type: none"> <li>To ensure that all specialist needs for ICT equipment (mouse/keyboard) are identified.</li> <li>All staff with known health conditions should be prioritised for work station and equipment assessments and individual mitigation.</li> </ul>

PROJECT CELL: CUSTOMER & COMMUNITY		
(Rent Arrears Collection) - <i>Financial Support</i>	<p>Staff:</p> <ul style="list-style-type: none"> <li>An increase in customer contact might increase staff sickness levels which could impact disproportionately upon older people and those with pre-existing health conditions.</li> </ul> <p>Customers:</p> <ul style="list-style-type: none"> <li>Tenant interviews at GLHO may not be as readily accessed by people with disabilities.</li> </ul>	<p>Staff:</p> <ul style="list-style-type: none"> <li>Staff who are over 70 or who have pre-existing health conditions will continue not to work in front line roles with direct customer contact.</li> <li>Where managers are aware of individual vulnerabilities, the view of the member of staff will be sought and taken into account.</li> <li></li> </ul>
(Homelessness) - <i>Homelessness service change</i>	<p>Staff:</p> <ul style="list-style-type: none"> <li>An increase in customer contact might increase staff sickness levels which could impact disproportionately upon older people and those with pre-existing health conditions.</li> <li>Tenant interviews at GLHO may not be as readily accessed by people with disabilities.</li> </ul>	<p>Staff:</p> <ul style="list-style-type: none"> <li>Staff who are over 70 or who have pre-existing health conditions will continue not to work in front line roles with direct customer contact.</li> <li>Where managers are aware of individual vulnerabilities, the view of the member of staff will be sought and taken into account.</li> <li></li> </ul>
(Voids & Lettings) - <i>Voids &amp; Lettings service change</i>	<p>Staff:</p> <ul style="list-style-type: none"> <li>An increase in customer contact might increase staff sickness levels which could impact disproportionately upon older people and those with pre-existing health conditions.</li> <li>Letting properties with reduced contact through the use of photos and/or videos could disadvantage people with a visual impairment.</li> <li>Maintaining one offer to households in temporary accommodation could disproportionately impact customers with more complex needs such as people with disabilities and/ or children who may be present in larger households.</li> <li>Customers' use of key boxes may not</li> </ul>	<p>Staff:</p> <ul style="list-style-type: none"> <li>Staff who are over 70 or who have pre-existing health conditions will continue not to work in front line roles with direct customer contact.</li> <li>Where managers are aware of individual vulnerabilities, the view of the member of staff will be sought and taken into account.</li> <li>A physical visit may need to be prioritised in the case of a customer with a visual impairment. A friend or advocate may be available to review the property remotely and discuss its suitability. The member of staff may need to take extra time in trying to meet the customer's needs.</li> <li>Adjustments may need to be made to</li> </ul>

	be as suitable for customers who need support such as people with a physical disability.	ensure that a 'one offer' approach does not disadvantage specific groups. <ul style="list-style-type: none"> <li>Customers with a physical (and/or sensory disability) should be able to be accompanied by a friend/ advocate for support.</li> </ul>
(G2H) - <i>G2H Service Change</i>	Staff: <ul style="list-style-type: none"> <li>An increase in customer contact might increase staff sickness levels which could impact disproportionately upon older people and those with pre-existing health conditions.</li> </ul>	Staff: <ul style="list-style-type: none"> <li>Staff who are over 70 or who have pre-existing health conditions will continue not to work in front line roles with direct customer contact.</li> <li>Where managers are aware of individual vulnerabilities, the view of the member of staff will be sought and taken into account.</li> <li></li> </ul>
(Leasehold Services) - <i>Leasehold Services Service Change</i>	Staff: <ul style="list-style-type: none"> <li>An increase in customer contact might increase contractor/ staff sickness levels which could impact disproportionately upon older people and those with pre-existing health conditions.</li> </ul>	Staff: <ul style="list-style-type: none"> <li>Staff who are over 70 or who have pre-existing health conditions will continue not to work in front line roles with direct customer contact.</li> <li>Where managers are aware of individual vulnerabilities, the view of the member of staff will be sought and taken into account.</li> <li>CBH may need to make contractors aware of the potential risks to vulnerable groups.</li> </ul>
(Temp Accommodation) - <i>Temp Accommodation Service Changes</i>	Staff: <ul style="list-style-type: none"> <li>An increase in customer contact might increase staff sickness levels which could impact disproportionately upon older people and those with pre-existing health conditions.</li> </ul>	Staff: <ul style="list-style-type: none"> <li>Staff who are over 70 or who have pre-existing health conditions will continue not to work in front line roles with direct customer contact.</li> <li>Where managers are aware of individual vulnerabilities, the view of the member of staff will be sought and taken into account.</li> </ul>
(Tenants' Behaviour/ Support) - <i>Re-establishing</i>	As above	As above

<i>ASB support activities Re-establishing assisted gardening service</i>		
<i>(Service provision) - Increased onsite presence in Sheltered Schemes; Restarting communal area works/ improvements</i>	Staff: <ul style="list-style-type: none"> <li>An increase in customer contact might increase contractor / staff sickness levels which could impact disproportionately upon older people and those with pre-existing health conditions.</li> </ul>	Staff: <ul style="list-style-type: none"> <li>Staff who are over 70 or who have pre-existing health conditions will continue not to work in front line roles with direct customer contact.</li> <li>Where managers are aware of individual vulnerabilities, the view of the member of staff will be sought and taken into account.</li> <li>CBH may need to make contractors aware of the potential risks to vulnerable groups.</li> </ul>
<i>(Residents' Voice) - Re-establishing resident engagement activities using online services.</i>	The effectiveness of customer engagement/ insight affects all groups. Disproportionate impacts have not been identified.	N/A
<i>(Safety Compliance) - Resource dependant increased gas servicing</i>	Staff: <ul style="list-style-type: none"> <li>An increase in customer contact might increase contractor / staff sickness levels which could impact disproportionately upon older people and those with pre-existing health conditions.</li> </ul>	Staff: <ul style="list-style-type: none"> <li>Staff who are over 70 or who have pre-existing health conditions will continue not to work in front line roles with direct customer contact.</li> <li>Where managers are aware of individual vulnerabilities, the view of the member of staff will be sought and taken into account.</li> <li>CBH may need to make contractors aware of the potential risks to vulnerable groups.</li> </ul>
<i>(Repairs) – Restore scheduling and Comms</i>	As above	As above

11. Could the policy discriminate<sup>7</sup> against any 'protected characteristic', either directly or indirectly<sup>8</sup>? **No**

<sup>7</sup> 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;

## 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.
<b>Negative impacts have been identified but have been minimised or removed X</b>	<b>Sign off screening and finish.</b>
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 – Business Partner (Equality & Safeguarding)

14. Date of completion:

- May 2020

15. Date for update or review of this screening:

- ***This EqIA will be kept updated during the implementation of the Recovery Plan***

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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'.

<sup>8</sup> 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.