

Cunninghame Housing Association Ltd

Equality and Human Rights Impact Assessment (EIA)

Assessment Details

Title of policy / practice	Harassment Policy
Assessment carried out by <i>(name and post)</i>	Jan Nelson Area Team Manager
What is the purpose of the proposed policy / practice or changes to be made to the policy / practice?	The policy sets out Cunninghame Housing Association's approach to managing harassment complaints, including hate crimes. The Policy links directly with the Association's Neighbour Disputes and Anti-Social Behaviour Policy.
What involvement and consultation has been done in relation to this policy / practice? <i>(e.g. with relevant groups and stakeholders)</i>	There are minimal changes to the principles of the policy, so no consultation has been done on this version.
Who is affected by the policy / practice? <i>(indicate stakeholder / service user groups and any known equality groups)</i>	Tenants of Cunninghame Housing Association. This will include older people, people with disabilities, LGBTQ+, people of different ethnic origins, pregnant women, people with different religious beliefs.

Public Sector Equality Duty – 'Three Key Needs'

Which aspects of the policy / practice eliminate unlawful discrimination, harassment and victimisation?	There are no issues in the policy that will impact on the protected characteristics.
Which aspects of the policy / practice advance equality of opportunity between people which share a relevant protected characteristic and those who do not?	Ensuring that vulnerabilities are identified at allocation interviews such as language barriers, literacy issues and those with sight issues. Clear processes should be put in place to ensure the Association is corresponding with tenants appropriately making ensure they understand our correspondence.
Which aspects of the policy / practice foster good relations between people who have a protected characteristic and those who do not?	Policy clearly identifies the legal framework required to be met including the Disability Discrimination Act. There is recourse via the Complaints Policy and where they are dissatisfied with the outcome through the Scottish Public Ombudsman.

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Impact of the Policy

Protected Characteristic Group	Is there the potential for a positive or negative impact?	Explain the potential impact and give examples of any evidence / data used (e.g. SIMD)	Action taken to address any negative impact (e.g. adjustment to the policy / practice)
Age	No		
Disability	No		
Gender reassignment	No		
Marriage and civil partnership	No		
Pregnancy and maternity	No		
Race	No		
Religion or Belief	No		
Sex	No		
Sexual orientation	No		
Other	Yes	There is the potential that tenants fail to engage following making an application due to literacy issues, English not being their first language or sight issues.	Robust procedures to ensure that the preferred method of contact is identified and appropriate resources are in place to correspond in other languages. The Association should regularly publicise alternative contact arrangements via newsletters and social media.

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Evaluation

Is it possible the proposed policy / practice could discriminate or unfairly disadvantage people?	Target response times contained within the Neighbour Disputes and Anti-Social Behaviour, could impact those with learning disabilities, where language is not their first language or those with sight issues.
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Recommended Course of Action	Tick appropriate box	Include any justification / explanation required
Outcome 1 Proceed – no potential for unlawful discrimination, and no adverse impact or breach of human rights articles has been identified.		
Outcome 2 Proceed with adjustments to address discrimination, remove barriers to the advancement of equality of opportunity and fostering good relations, address breaches of human rights.	✓	Clear record keeping recording vulnerabilities for tenants who have learning disabilities, where English is not their first language and those with sight issues. Record the tenant's preferred method of contact which can be used in line with legislative requirements.
Outcome 3 Continue despite having identified some potential for adverse impact or missed opportunity to advance equality and human rights (justification to be clearly set out).		
Outcome 4 Stop and rethink as actual or potential unlawful discrimination or breach of human rights articles has been identified.		

Completion date	January 2025
Authorisation date	
Authorised by	
Review date	January 2028
Will this EIA be published? (EIAs should be published)	Yes

Change Log

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Name	Date	Changes