

Equalities Impact Assessment (EqIA) Guidance

This document gives you information and guidance on how to carry out an Equality Impact Assessment.

Before carrying out a full assessment as set out under 'stage 2', please complete an initial screening form, 'stage 1,' to see if it is necessary to carry out an equality impact assessment for your decision/ activity/ project.

STAGE 1– Initial Screening.

Details of Officer completing this form:					
Name:	Sarah Fryer	Job Title:	Head of Service	Date:	07/12/21
Dept:	CEx	Service:	SPS		
What change is being proposed? Provide a brief description (and title if applicable)					
Abolish Staff Forum and create alternative meetings for School Professional Associations, Council Members and other senior officers					
Does the proposal?					
Affect service users, employees or the wider community					<input type="checkbox"/> NO
Have a significant impact on how services are delivered					<input type="checkbox"/> NO
Plan to withdraw a service, activity or presence					<input type="checkbox"/> NO
Plan to introduce a new service or activity					<input type="checkbox"/> NO
Aim to improve access to, or the delivery of a service					<input type="checkbox"/> NO
Involve a significant commitment of resources					<input type="checkbox"/> NO

Relate to an area where there are known inequalities	<input type="checkbox"/>	NO			
If you have answered NO to all of the questions above then the screening process is complete and you do not need to complete a Full Equality Impact Assessment or Action Plan. This decision must be signed off by your Head of Service.					
Sign off by Head of Service:					
Name:	Tony Theodoulou	Signature:		Date:	
Please note: If equality issues are identified during the course of the policy, plan or practice development/review, the EqIA Initial Screening will need to be revisited. This may result in a full EqIA being required where it previously was not.					

STAGE 2- Carry out full EqIA

Before completing the Equality Impact Assessment, (EqIA), it is important to understand what an EqIA is, why it is necessary to carry one out and when you should begin the EqIA.

What is an EqIA?

The aim of an EqIA is to identify and remove any potential barriers to fairness and equality in a service provision and take all reasonable steps to advance equality, by considering the impact that a proposed change could have on different groups with protected characteristics.

The analysis is not an end in itself but should be used to inform the organisation's decision making and service improvement plans.

Why is EqIA needed?

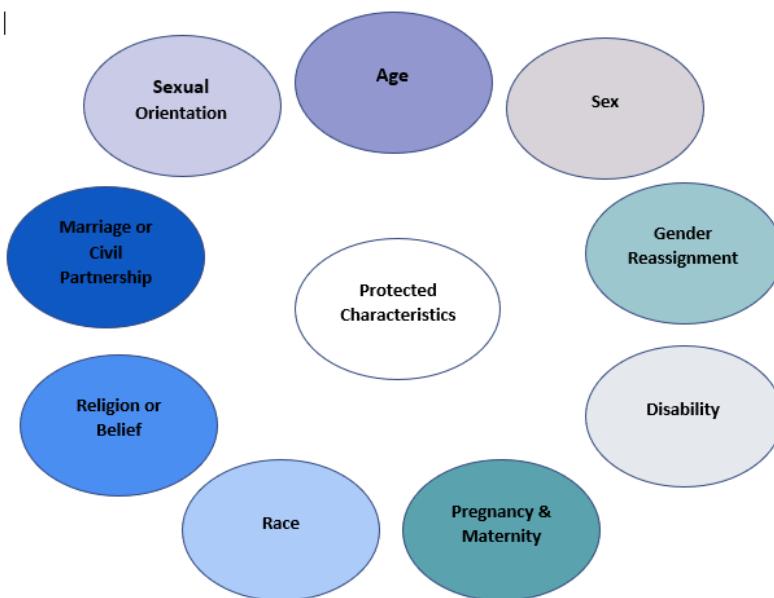
Under the Equality Act 2010 Enfield Council has a legal duty, in the performance of its functions, to have **due regard** to the need to:

- eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Equality Act.
- taking steps to meet the needs of people with protected characteristics where these are different from the needs of other people.
- advance equality of opportunity between people who share a relevant protected characteristic and people who do not share it
- foster good relations between people who share a relevant protected characteristic and those who do not share it

An Equality Impact Assessment helps to make sure we are fulfilling this statutory requirement by considering how our services, policies, budgets, and projects are designed to help eliminate discrimination, advance equality and foster good relations.

Who is protected by the Equality Act 2010?

The Equality Act 2010 protects individuals against discrimination on the grounds of the following ‘protected’ characteristics:



A diagram illustrating the protected characteristics under the Equality Act 2010;

Age, Sex, Gender Reassignment, Disability, Pregnancy & Maternity, Race, Religion or Belief, Marriage or Civil Partnership and Sexual Orientation.

What areas of work does an EqIA apply to?

You should undertake an EqIA if you are making changes to policy, strategy, services, functions, projects or budgets that could have an impact on people or their lives.

This could include:

- new policies, strategies, budgets, projects and service reviews,
- existing services and functions, particularly when considering the withdrawal of a service,
- employment policies and procedures and governance arrangements
- tenancy and estate management policies and procedures
- procurement and partnership working
- responsive repairs and major works

When should equality analysis be carried out?

An EqIA needs to be completed **as a project starts** to identify and consider any possible impacts on people and their lives, to inform project planning and, where appropriate, to identify mitigating action.

It must be completed **before** any decisions are made or agreed so that the EqIA **informs that decision**.

It is also a **live document** that you should review and update as your project progresses.

Outcomes of the project should be monitored and reviewed to inform future decisions. Equality impact assessments should be viewed as a constant cycle of assessment, actions and monitoring, as demonstrated in the diagram.



A diagram illustrating the ongoing life cycle of an Equality Impact Assessment

Who is responsible for the EqIA?

This will usually be the person responsible for developing or implementing the policy, or the service manager.

The EqIA Template

The EqIA template provides a framework for completing the analysis.

STEP 1 – Collect data and information.

Before you start the assessment, collect as much relevant equality information about your service as possible to use as a starting point for the analysis.

What equality information is available?

You need relevant and reliable information about the different protected groups that the policy is likely to affect. The information needed will depend on the nature of the project. This may be recent consultation reports, monitoring data, or service reviews. Information from service users will be especially useful as this identifies who is affected, and what the effect is, as well as the service outcomes.

The following information may also be useful:

- analysis of enquiries, complements and complaints to understand the needs or experiences of different groups
- recommendations from inspections or audits to help you identify any concerns about equality matters from regulators
- customer profiling information and other demographic data
- recent research from a range of national, regional and local sources to identify relevant equality issues
- results of engagement activities or surveys to help you understand the needs or experiences of different groups
- customer feedback and information from voluntary or community organisations will help you understand the needs or experiences of different groups
- performance monitoring information
- previous impact assessments
- customer satisfaction surveys

What are your information gaps?

If you do not have sufficient information, you may need to do further research to fill in the information gaps. If it is not possible to collect this in time to inform your analysis, consider how you can increase your understanding in the short

term. You can also consider using national data and applying it to trends in Enfield, if appropriate.

Engagement and Consultation

If you do not have recent feedback or performance data from customers, you may need to carry out some consultation exercises and you should plan to do this early in the project development or review process.

Before undertaking further research or consultation, consider whether it is necessary and would be proportionate to the importance of the proposed policy. Remember that groups sharing protected characteristics are not homogeneous and you may need to consult more than one section of any single group. For example, you may need to consult with several different Black and Minority Ethnic communities or different groups of disabled people, rather than just one.

STEP 2- Scope the Project.

Section 1 of the EqIA Template asks for details of the project.

Section 2 asks you to give a brief overview of and reasoning behind the project, including its aims and expected outcomes. This does not need to be specifically related to protected groups or the advancement of equalities.

Section 1 – Equality Analysis Details

Title of service change / policy or budget change/project plan that you are assessing	
Team/ Department	
Lead officer(s) name(s) and contact details	
Project sponsor	
Date of EqIA completion	

Section 2 – Summary of Proposal

Please give a brief summary of the proposed project plan or change to service / policy/ budget.

Please summarise briefly:

What is the proposed project or change?

What are the reasons for the proposal or change?

What outcomes are you hoping to achieve from this change?

Who will be impacted by the project or change - staff, service users, or the wider community?

STEP 3- Analyse Equality Impact.

Section 3 of the EqIA template goes through each protected characteristic and asks you to consider the impact that the project will have on each group. It then asks you to consider potential mitigating actions which you could take, if the information you have suggests that the project could have an adverse impact on a protected group.

Have a general think about your project. Consider which protected groups and which parts of the equality duty is it relevant to. Thinking about which aspects of the project relate to equality will help you to focus on the most important area and identify the potential effect on protected groups at an early stage. The outcome of this thinking could mean that you decide to change your overall project aims to make sure it promotes equality effectively.

Section 3 – Equality Analysis

This section asks you to consider the potential differential impact of the proposed project plan or change to service/policy/budget on different groups with a 'protected characteristic', and what mitigating actions should be taken to avoid or counteract any negative impact.

"Differential impact" means that a particular group will be significantly more affected by the change than other groups. Please consider both potential positive and negative impacts, and, where possible, provide evidence to explain why this group might be particularly affected. If there is no differential impact for that group, briefly explain why this is not applicable.

Please consider how the proposed change will affect staff, service users or members of the wider community who share the following protected characteristics:

Age
This can refer to people of a specific age e.g. 18-year olds, or age range e.g. 0-18 year olds.
Will the proposed change to service/policy/budget have a differential impact [positive or negative] on people of a specific age or age group (e.g. older or younger people)?
Please provide evidence to explain why this group may be particularly affected.
Mitigating actions to be taken

Analysing the Information.

The basic question you need to ask is 'what will happen in relation to equality and good relations for each protected group if we do things this way?'. Consider all the information available. How does it suggest your proposed changes will affect each protected group?

Avoid making general conclusions. You cannot assume that a policy which applies to all service users will automatically benefit protected groups. You will need evidence to support this conclusion.

Consider what issues you need to think about. For some policies, the relevant questions will be obvious. For example, when reviewing a recruitment policy for disability equality, it would be useful to establish how many disabled people applied for, and were offered jobs, at what grades and on what salaries.

Some of the questions you may need to ask are:

- Are the services delivered at premises that are accessible?
- Is information about the service accessible?
- Are there differences in access to or use of the service?
- Does monitoring information show any differences in the levels of satisfaction or outcomes for different groups?
- What does customer feedback tell you about the how different groups experience the service?
- Could or does the policy affect different groups disproportionately?
- If yes, is this consistent with the policy aims?
- Has the policy delivered practical benefits for protected groups?
- Does the policy miss opportunities to advance equality and foster good relations, including, for example, participation in public life?
- Could the policy disadvantage people from a protected group?
- Could any part of the policy discriminate unlawfully?

Remember that equality analysis is also an opportunity to identify ways to advance equality of opportunity and to foster good relations.

The outcome of your analysis will tell you the impact, either actual or potential, of the policy on different groups. There are three types of impact you need to consider:

- **Adverse impact:** differences in outcomes or access to services for different groups
- **Positive impact:** outcomes that promote equality of opportunity and good relations between different groups
- **Differential impact:** outcomes that have a positive impact for one group but may have an adverse impact for others.

The scope of discrimination

You need to consider the potential forms of discrimination as set out in the Equality Act 2010.

- **Direct discrimination** involves treating or group **differently and worse** to other people because of their protected characteristic.
- **Indirect discrimination** occurs when there is a policy that applies in the same way for everybody but disadvantages a group of people who share a protected characteristic.

As well as direct and indirect discrimination, prohibited acts include (but are not limited to) harassment, victimisation and failure to make a reasonable adjustment.

Justifying Adverse Impact

There may be occasions where it is appropriate that an activity has an impact that is less favourable for some groups or sections of the community. In this situation, you must say why less favourable impact can be justified. **Direct discrimination, however, is unlawful and can never be justified.**

STEP 4 – What to do with your findings.

Having considered the potential or actual effect of your policy/ service change/ decision on equality, you should be able to make an informed judgement about how to proceed with your policy/ service change/ decision. There are four options available to you:

No major change – Your analysis shows no evidence that the policy/ service change/ decision has the potential to discriminate and you have taken all appropriate opportunities to advance equality and foster good relations between groups. You must record the reasons for making this decision and the information that you have used.

Adjust– You can do more to remove barriers or to better advance equality, for example taking steps to mitigate the potential effect. Remember, it is lawful under the Equality Act to treat people differently in some circumstances, for example taking positive action or putting in place single-sex provision where there is a need for it. It is both lawful and a requirement of the general equality duty to consider if there is a need to treat disabled people differently, including more favourable treatment where necessary.

Continue– You decide to continue with the recommendation to adopt the policy/ continue with the service change or decision even though there may be adverse effects or missed opportunities to advance equality. You must be satisfied that the policy/ service change/ decision does not discriminate unlawfully, for example because it is objectively justified, and you must record what the objective justification is for continuing the policy, and how you reached this decision.

Stop– If there are adverse effects that cannot be justified or mitigated, you should consider stopping the policy/ service change/ decision altogether. You

must remove or change a policy/ service change/ decision if it shows unlawful discrimination.

STEP 5 – Planning how you will monitor and review impact.

Section 4 of the EqIA template asks you to plan how you will review the effects of the project.

Section 4 – Monitoring and Review

How do you intend to monitor and review the effects of this proposal?

Who will be responsible for assessing the effects of this proposal?

Equality analysis is an ongoing process that does not end once a policy/ service change/ decision has been agreed or implemented.

You need to think about how you will evaluate the impact of the policy/ service change/ decision. This does not mean repeating the equality analysis, but using the experience gained through implementation to check the findings and to make any necessary adjustments.

Consider:

- How you will measure the effects?
- When to review the policy/ change/ decision and what could trigger an early revision.
- Who will be responsible for monitoring and review?
- What type of information is needed for monitoring and how often it will be analysed?
- How you will engage stakeholders in implementation, monitoring and review

STEP 6 – Action Planning

The real value of completing an EqIA comes from the actions that will take place and the positive changes that will emerge through conducting the assessment. A good EqIA will result in resources and services being targeted where they should be, and where they most efficiently support the organisations priorities.

The Action Plan should be:

- SMART
- Be clear about resource implications.
- Make sure that action feed into service and team plans and other appropriate corporate documents.

What to include in the action plan?

The action plan should contain several actions to remove or alleviate adverse impact or unlawful discrimination.

The action plan should include actions to remove or alleviate adverse impact or unlawful discrimination and only the main actions or activities likely to have the greatest influence. The action plan should not be a list of all possible things that might help.

It should include details of any additional monitoring or research that was identified in the information gathering part of the process and information that is still required or was not available the point of assessment.

Section 5 – Action Plan for Mitigating Actions.

Identified Issue	Action Required	Lead officer	Timescale/By When	Costs	Review Date/Comments

STEP 7- Publication

What happens when the analysis is completed?

We must publish details of how the Council has had due regard to the general equality duty in its decision making.

The completed EqIA should be included as an appendix to relevant EMT/ Delegated Authority/ Cabinet/ Council reports regarding the service activity/ policy/ strategy/ budget change/ decision. Decision-makers should be confident that a robust EQIA has taken place, that any necessary mitigating action has been taken and that there are robust arrangements in place to ensure any necessary ongoing actions are delivered.

. Actions identified by the equality analysis should be recorded in the policy development proposal or action plan and referred to in the associated EMT/ Cabinet/ Council/ delegated authority report. These reports should also include a brief summary of the equality analysis carried out. For retrospective analysis the actions should be included in service plans to ensure they are completed, and the effect of the improvement is monitored.

The analysis and action plan must be stored in the central EqIA folder in the staff library.