

Equality Impact Assessments

A guide on **how** to carry out one and **why** it's important

Introduction

These guidance notes will help departments understand how to carry out comprehensive and robust Equality Impact Assessments (EQIAs) of all new strategies, policies and projects¹. The assessments will help you to identify equality and diversity objectives and targets as the basis for future action and improvements. Equality and diversity objectives and targets should be included in departmental business and service plans and will support departments in meeting the requirements of the Equality Standard.

The purpose of an EQIA is to make sure that the City's strategies, policies and projects do not discriminate and that, where possible, they promote equality.

This note will explore in more detail:-

- What an EQIA is
- Who the equality target groups are
- The different types of impact
- Why it is important to carry out an EQIA
- Who is responsible for EQIAs
- When to carry out an EQIA
- How to conduct an EQIA
 - Stage One: Initial Screening
 - Stage Two: Full Assessment

For the purposes of this note the term 'policy' will be used throughout this document to describe a strategy, policy or project.

Please note that EQIAs are designed to be a challenging process, but they are not intended to be over-complicated. There is no 'right answer' and a 'common sense' approach should be taken. It is best to go through the assessment as soon as possible in the development process of a new policy, rather than use the assessment as a last minute check. You will need to be prepared to make changes as a result of the assessment.

Further advice and guidance

Contact the Equalities Manager

Telephone: 020 7332 3328

Email: equalities.team@cityoflondon.gov.uk

Or contact your departmental equality champion (see list attached at Appendix 1).

What is an Equality Impact Assessment (EQIA)?

¹ Strategy refers to both the statutory and non-statutory strategy documents the City produces.

A policy is defined as a written document outlining a decision, principle, plan or set of procedures that influences and determines the way the Corporation carries out its business internally or externally.

A project is a temporary structure created to achieve a specified objective.

The purpose of an Equality Impact Assessment (EQIA) is to improve the work of the City by making sure it does not discriminate and that, where possible, it promotes equality. It is a way to make sure that individuals and teams think carefully about the likely impact of their work on all stakeholders and take action to improve policies where appropriate. The EQIA flowchart at Appendix 2 illustrates this process.

The EQIA is a process for systematically analysing a proposed policy. It allows you to identify and record the impact of that policy on certain groups of people known as equality target groups. It involves anticipating the consequences of the policy on these groups and making sure that, as far as possible, any negative consequences are eliminated or minimised and that opportunities for promoting equality are maximised.

The EQIA is a two stage process which involves an initial screening of the policy and then a full assessment, where this is deemed necessary. A full assessment should only be completed if the initial screening identifies that any of the equality target group would be negatively affected by the policy or if the impact is assessed as being of high significance.

Equality Target Groups

The City has defined the following equality target groups:

- ✓ women;
- ✓ black and minority ethnic people (BMEs);
- ✓ young people and children;
- ✓ older people;
- ✓ disabled people;
- ✓ lesbian women;
- ✓ gay men;
- ✓ bisexuals;
- ✓ transgendered people and
- ✓ people from different faith groups.

The equality areas are gender, race, disability, age, faith and sexual orientation.

.Why it's important to carry out an EQIA

- There are legal requirements to consider the impact of the City's work on race equality under the Race Relations (Amendment) Act 2000, on disability equality under the Disability Discrimination Act 2005 and gender equality under the Equality Act 2006. However, in line with best practice, the Corporation is committed to carrying out impact assessments which consider **all** its equality target groups.
- Assessments will support the City's equalities agenda and help mainstream equality and diversity into our policies and practices
- The City must carry out such assessments to meet the requirements of the Equality Standard for Local Government.
- They provide good practice and a logical process to help us identify improvements to services and to make them more appropriate and accessible to the needs of our stakeholders

- They help to increase the skills and effectiveness of managers at planning and developing their services

Who is responsible for EQIA?

EQIAs should be mainstreamed as part of what we do as an organisation, with the ultimate responsibility resting on the Town Clerk. The following other groups and individuals also share this responsibility:

- Chief Officers/senior officers of each department
- Summit Group – acting as the corporate steering group who assist in co-ordinately the corporate assessments
- Corporate Equalities Team – developing guidance and training for departments on how to carry out an EQIA and supporting the completion of EQIAs on corporate policies
- Corporate Policy Team – integrating EQIAs into the performance management system and business planning process and integrating any corporate equalities objectives and targets into the Corporate Plan
- Departmental Equality Champions– establishing department EQIA programmes and assisting departmental officers in completing EQIAs
- Departmental Business Planners – including any actions, objectives and targets arising from the EQIA in the departmental business plan and monitoring progress as part of the quarterly reviews
- Departmental Management Teams – agreeing a programme of EQIAs and any equalities objectives and targets for inclusion in the departmental business plan

When to carry out an Equality Impact Assessment

Each department should establish a programme for assessing new policies. Departments should focus on those policies which are high level and of strategic importance or those that impact on the following:

- ✓ Community Strategy
- ✓ Corporation’s Medium Term Strategy
- ✓ Departmental business plans or associated projects
- ✓ Existing policies – service delivery, human resources, finance

The EQIA should be undertaken during the development stage, to allow for any issues to be identified as soon as possible.

Departments are encouraged to consider carrying out EQIA during the development of their annual business plan.

Impacts

The EQIA process considers the impact of policies on certain equality target groups. There are three possible impacts which should be considered as part of the EQIA:

1. A negative or adverse impact
2. A positive impact
3. A neutral impact

Negative or adverse impact

A negative or adverse impact occurs where the policy disadvantages one or more equality target groups. This disadvantage may be differential, in the sense that the negative or adverse impact on one particular equality target groups is likely to be greater than on another.

It should be noted that some negative impacts might be intended and the initial screening will provide an opportunity to assess this.

Positive impact

A positive impact occurs where the policy influences on one or more of the equality target groups, or improves equal opportunities and/or relationships between groups. Again, this impact may be differential in that the positive impact on one group is greater than on another.

Neutral impact

This occurs when a policy has a similar impact upon all groups

How to carry out an Equality Impact Assessment

EQIA Stage One: Initial Screening

The EQIA Initial Screening Form (ISF) attached at Appendix 3, should be used once it has been decided that a specific policy requires an initial screening.

As preparation for completing the Initial Screening Form, officers should do the following:

- Collate existing monitoring information (if you do not have any monitoring data this might be an outcome of the initial screening process)
- Collate information from diversity and equality related good practice
- Identify any local or national consultation or research, which has already been undertaken and may inform the assessment.

Once any background information has been collated you should work through each of the questions on the ISF. For some questions, you may have little or no information. In these circumstances, note the lack of data and move on. Lack of data should not be a reason to not complete the form, but actions should be planned to acquire any missing information.

The Initial Screening Form

Your strategy, policy or project

Not every policy will need to go through a full assessment. This part of the form assesses the relevance of the policy by identifying the key objectives and the expected outcomes.

The impact

This section of the form requires you to consider the impact of the policy on each of the equality target groups.

Further action

This part of the form requires you to state what further action is required. Further action may include the following:

- The ISF has indicated that there may be a negative impact on certain equality target groups and a full assessment is required.
- The ISF indicates that a full assessment is not required but actions have arisen as part of the assessment.

Where actions do arise these should be recorded on the Action Sheet attached at Appendix 3. This sheet should also include details of any charges required to the policy as a result of completing the ISF.

EQIA Stage Two: Full Assessment

The full assessment is used to examine policies which the initial screening indicated may have a negative impact on certain equality target groups. This second stage should be used if there is a danger that the negative impact falls into one (or more) of the following categories:

- ✓ It is assessed as being of high impact
- ✓ It is not intentional
- ✓ It is illegal or possibly illegal

If the policy does fall into one of these categories a full assessment should be completed using the form attached at Appendix 4.

The full assessment is in two parts:

Part 1

This provides the opportunity to assess the evidence for a possible negative impact. It ensures that teams have researched and consulted with the equality targets groups who may be affected by the policy.

Part 2

This completes the assessment and leads to an action plan that will aim to minimise any negative impacts and maximise positive impacts.

Partnership Projects

The City aims to be an exemplary organisation in relation to equalities and to champion equal opportunities across all its partnerships.

The EQIA process therefore applies to all policies where the City takes the lead responsibility in a multi-agency group project. The City is the lead agency if the project was initiated by the City and if the monitoring, evaluation and strategic overview of the implementation lie with us, even if we are not the operational lead. The Community Strategy is a good example of this.

On group projects where the City is not the lead organisation, the City officer should raise the issue of the need to carry out an EQIA to comply with the requirements of the Race Relations (Amendment) Act 2000, and as best practice with other equality targets groups.

The City should carry out an EQIA initial screening before deciding to participate in any joint project.

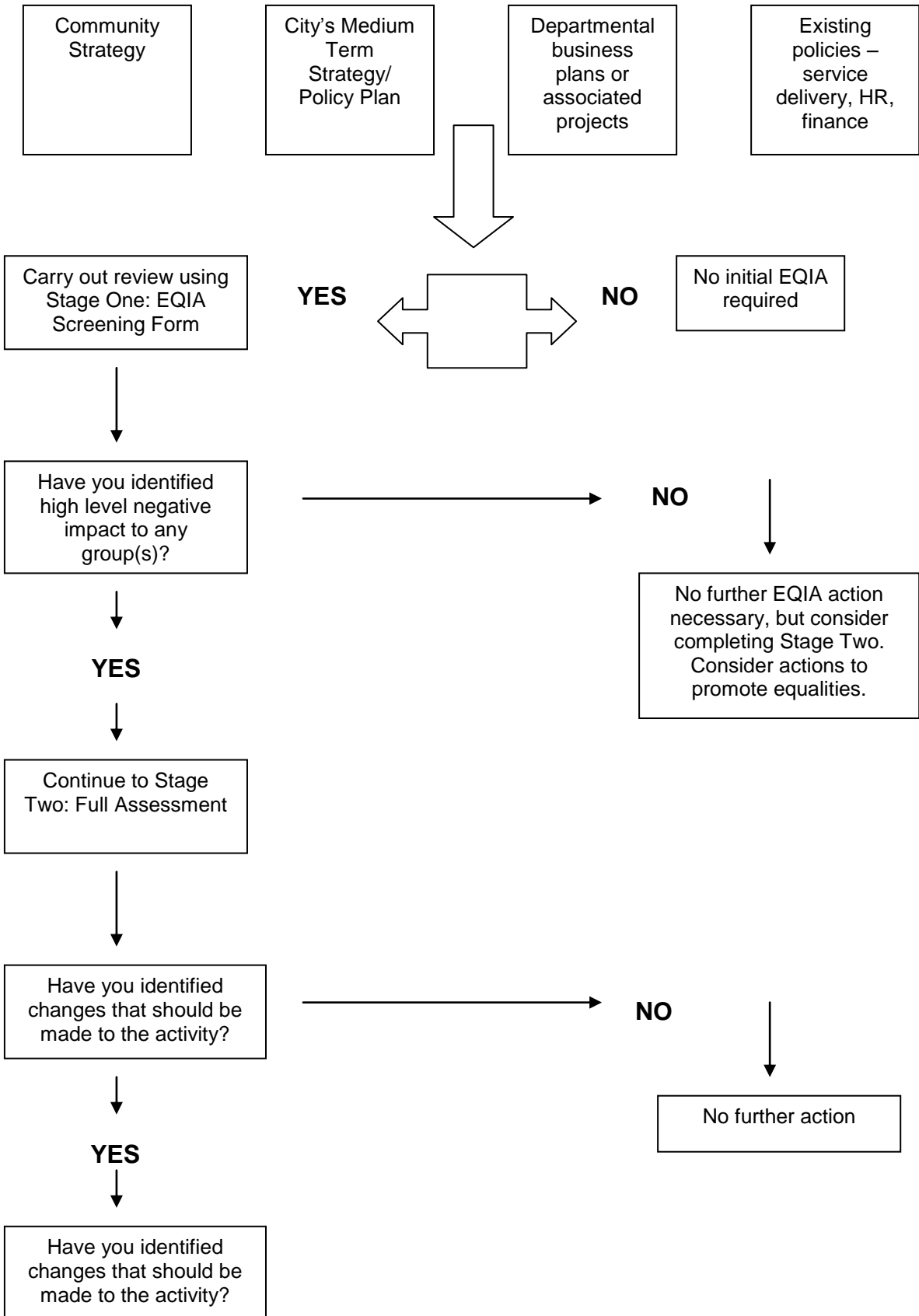
Appendix 1 - Departmental Equality/Disability Champions

Department	Equality Champion
Barbican Centre	Karen Genuiardi Paul Riddell
Central Criminal Ct	Stephen Jones
Chamberlain's	Julie Smith Patricia Somerville
City Surveyor's	Keith Winter
Community and Children's Services	Neal Hounsell (Lead) Noel Falvey Cheryl Goldie Barbara Hamilton Sharon McLaughlin (Barbican Estate/Housing) Graham Watson
Comptroller & City Solicitor	Martin Howe Angela Taylor
Economic Development	Karen Corley
Education	Graham Watson
Environmental Services	Jon Averbs Steve Blake Margaret Jackson (Lead) Susan Kirby David McCarthy Gevdet Mehmet Wendy Pook Ken Witchell Jacqui Pitman
Joint Archives Service	Geoff Pick
Libraries & Guildhall Art Gallery	Carol Boswarthack
Mansion House	Kay Brock
Markets	Jane Poulton
Open Spaces	Alison Grayson Dennis Whelton
Planning & Transportation	Elisabeth Hannah Christine Dougherty
Remembrancer's	Margaret Pooley Dean Fisher
Town Clerk's	Paul Debusse Vikki Edwards

Appendix 2 - Equality Impact Assessment Flowchart

Does the strategy, policy or project require an EQIA?

Does your action impact on one or more of the following:



Appendix A - EQIA Stage One: Initial Screening Assessment Form

This should be used once it has been decided that a specific strategy, policy or project requires an initial screening.

Name of strategy, project, policy: **Golden Lane Listed Building Management Guidelines**_____

Department: **Department of the Built Environment**_____

Officer/s completing assessment: **Petra Sprowson**_____

The strategy, policy or project		
1.	What is the main purpose of the policy?	To assess the significance of Golden Lane Estate as a Heritage Asset and to provide guidance to residents and other stakeholders regarding any proposed changes to the estate
2.	Is the policy affected by external drivers for change?	Yes. The Golden Lane Estate is a Heritage Asset with numerous stakeholders, occupiers and users. It is subject to development pressure from residents and leaseholders wishing to alter their apartments and other stakeholders carrying out a mixed range of activities on the estate.
3.	List the main activities of the policy?	To summarise the special interest of the Golden Lane Estate, to describe its historical development, spatial and architectural character; to set out existing policies and guidance relating to the management of the area. To provide direct guidance to residents and stakeholders on the kind of work that can be carried out without the need for consent, and where advice or consent may be required.
4.	Who implements the policy?	Officers in Department of the Built Environment, and the Department of Community and Children's Services
5.	Who will be affected by the policy?	Residents, leaseholders, the freeholder, and other occupier/users of Golden Lane Estate.

6.	What outcome do you want to achieve, why and for whom?	To provide a better understanding of the special interest of the Golden Lane Estate. To preserve and enhance the area in line with statutory duties. To provide clarity and guidance for residents, leaseholders, the freeholder and other stakeholders when planning to carry out alterations on the estate.
7.	Are any other organisations involved?	English Heritage. Twentieth Century Society
8.	Are there any existing assessments or inspections?	No
9.	Who have you consulted on the policy/?	A Working Party formed of residents representatives, English Heritage and the Twentieth Century Society. Officers in the Department of the Built Environment, City Surveyors, Comptroller and City Solicitors, Town Clerk, Open Spaces. Department of Community and Children's Services. Non-Residential Stakeholders. External stakeholders to be consulted formally in July 2013.
10.	Who are the main beneficiaries of the policy?	People involved with maintaining and carrying out works on Golden Lane. People who live, work and spend time in the Golden Lane Estate.

The Impact:	Tick the boxes which apply for each 'target group'					
Equality Target Group	Positive Impact		Neutral Impact	Negative Impact		Reason/Comment
	High	Low		High	Low	
Gender						
Women			X			
Men			X			
Transgender			X			
Race						
Asian – Asian Bangladeshi; Asian British; Asian Indian; Asian Pakistani; Asian Other			X			
Black – Black African; Black British; Black Caribbean; Black Other			X			
Chinese			X			
Irish			X			
Mixed – Asian & White; Black & White; Mixed Other			X			
White – White British; White European Union; White Other			X			
Disabled people			X			
Lesbians, gay men and bisexuals			X			
Older people			X			
Younger people and children			X			
Faith groups			X			

Further Action	
Does the policy have a negative impact on any of the equality target groups? If so, you will need to proceed to Stage 2	No
Is the negative impact assessed as being of high significance? If so, you will need to proceed to Stage 2	No
Is progression to Stage 2: Full Assessment required?	Yes_____ No_____

Signed (Completing Officer): Petra Sprowson_____ Date: 23rd May 2013_____

Signed (Departmental Equality Champion): _____ Date: _____

Actions Arising from Initial Screening

Issue	Action Required	Lead Officer	Timescale	Resource Implications	Comments

Appendix 4 - EQIA Stage Two: Full Assessment

Name of strategy, project, policy: _____

Department: _____

Officer/s completing assessment: _____

Part 1		
1.	In what areas are there concerns that the policy could have a negative impact? Please tick the relevant group/s opposite	Gender Race Disability Sexual Orientation (including transgender) Age Faith
2.	Summarise the likely negative effect	
3.	As a result of this assessment and available evidence, should the City commission research on this issue or carry out further monitoring/data collection?	
4.	What consultation has taken place/or is planned with affected equality target groups?	
5.	What consultation/communication has taken place/or is planned with staff?	

Part 2 (to be completed once further consultation and research has been carried out)		
6.	As a result of this assessment and available evidence collected, state what changes are proposed to your policy?	
7.	Will the changes planned ensure that the negative impact is legal and of low impact?	
8.	What monitoring and evaluation will you introduce to further assess the impact of the policy on the equality target groups?	

Signed (Completing Officer): _____ Date: _____

Signed (Departmental Equality Champion): _____ Date: _____