TOWER HAMLETS

EQUALITY IMPACT ASSESSMENT

GUIDANCE AND TEMPLATE

UPDATED FOR 2003/04

Incorporates the requirement to impact assess all new functions and policies and those that have a
high relevance to the General Duty of the Race Relations Amendment Act (2000). This requirement
is set out in the Council's Race Equality Scheme.

CONTENTS

1.   INTRODUCTION

Tower Hamlets has a clear and inclusive vision of what it wants to achieve, which is to improve the quality of life for everyone living and working in the borough. This vision is set out in the Community Plan and the Council's Strategic Plan. Both these documents also identify the delivery of **excellent public services** as a central theme in securing this vision. The Council has placed equalities at the centre of its decision making, service delivery, employment and future planning. Equalities are at the very heart of what it means to deliver excellent public services and the overall vision for Tower Hamlets.

The Race Relations (Amendment) Act 2000 (RR(A)A) places additional and far reaching duties on all public sector organisations in relation to race equality. The three key elements to promoting race equality that are set out in the Act are:

- Eliminating discrimination
- Promoting equality of opportunity
- Promoting good race relations

The RR(A)A requires that all policies and functions are tested for relevance against the Act at least once every three years. For policies and functions identified as having a **high relevance** to the Act, an **impact assessment (IA)** of those policies and functions must be carried out. An impact assessment must also be carried out for all new Policies and Functions.

The Equality Standard for Local Government also requires Equalities Impact Assessments to be evidenced in order to achieve progress against the five levels of the Standard across three key areas. Currently the Standard requires assessments across the areas of race, gender and disability to comply with current legislation but the London Borough of Tower Hamlets has extended this to cover faith/belief, sexuality and age in line with forthcoming legislation in these areas.

Key Stages of an Equality Impact Assessment

The key stages are:

1) Identifying the aims of the policy or function and how it is implemented
2) Consideration of available data and research
3) Assessment of impact across the different equality strands
4) Consideration of measures that might mitigate any adverse impact as well as alternative policies that might better achieve the promotion of equality of opportunity
5) Making a decision in the light of the data, alternatives and consultation
6) Monitoring for adverse impact in the future and publication of the results of such monitoring
7) Formal consultation
8) Publication of results of IAs

Template

The Equality Impact Assessment Template has been prepared to assist each Directorate with completing a thorough and robust impact assessment that tackles the relevant issues in a logical and systematic way. It draws on the lessons from the 20 impact assessments that were completed in the first year of the scheme and reflects best practice in this area. It uses the basic framework, outlined above, to support staff to work through the impact assessments in a systematic way and lists a series of questions to enable proper consideration at each stage of the process.

Communicating Results

The results of impact assessments will be published annually as a report containing details of progress for the year, action plans for the coming year, impact assessments which have been undertaken and those planned for the coming year. This report will be reviewed by the Excellent Public Services Scrutiny Panel and the Corporate Equalities Steering Group. It will also be published on the web, shared with key partners, e.g. local Race Equality Council and copies will be placed at one stop shops, reception areas and in libraries. The availability of the reports will be advertised in East End Life.

Audit

The equality impact assessments will be subject to audit and inspections. Therefore relevant supporting documentation, used in conducting the assessment, needs to be retained locally.

2. DEFINITIONS

EQUALITY IMPACT ASSESSMENT

In Tower Hamlets, Equality Impact Assessments (often described as Impact Assessments (IAs)) are a process of systematically exploring the potential for a policy or function to have unequal impact on a particular group or community. This includes the impact of a policy or function on employees, existing and potential service users, the wider community and where relevant, staff employed in contracted-out services.

Impact assessments in Tower Hamlets consider the potential for the policy or function to have unequal impact or a detriment on any group likely to face disadvantage. This includes groups defined by their ethnicity, gender, disability, religious belief, sexuality, and age.

Where a policy or function has been identified (through the "test of relevance" – see below) as having a relatively high potential for unequal impact to occur, then an impact assessment of that policy or function must be undertaken.

As a matter of course, all new policies and functions must be impact assessed before introduction.

POLICY

A policy is generally a written Council document setting out the basis on which future decisions should be taken. However, the definition of a policy is wide under the RR(A)A. The CRE guidance states "Ideally, your policies should be clearly and plainly written. However, in reality, some policies are built into everyday procedures and customs". The Guidance goes on to advise, "you should take 'polices' to mean the full range of formal and informal decisions you make in carrying out your duties, and all the ways in which you use your powers – or decide not to. You should therefore include in any assessment of a policy an examination of long-standing 'custom and practice' and management decisions, as well as your formal written policy". This reflects the need for the General Duty to be adhered to throughout all activities within an Authority.

FUNCTION

This represents a collection of Council activities that have a common and clearly defined purpose. This can be defined in terms of its statutory duties and powers, or the organisational structures that the Council has chosen to adopt. The term includes functions which are directed internally such as Human Resources and Accountancy, as well as front-line functions, such as the Youth Service Function, and Council Tax Collection. In many cases, the functions may equate to the same organisational structures defined by team or service plans.

EQUALITY TARGET GROUPS

The Council has identified six equality target groups that are central to its equalities agenda. These also reflect national priorities and build on the focus given by the national Equality Standard. Consideration of these different groups is included in the Impact Assessment Template. The equality target groups are: race; gender; disability; sexual orientation; age and religion.

TEST OF RELEVANCE

Once the Council has identified all its policies and functions, it is required to determine which policies and functions have the most potential to create unequal impact, and those which are less likely to do so. This is defined as the "test of relevance".   Policies or functions which are likely to have a higher relevance, are those which involve face to face contact, involve making decisions based on someone's individual characteristics or circumstances, are likely to have a significant impact on someone's life or wellbeing, or where there is a history or long-established pattern of unequal outcomes. Separate guidance is available to assist with completing the test of relevance.

In Tower Hamlets, policies and functions receive one of three ratings for relevance - high, medium and low. Those policies and functions that are assessed as being of high relevance need to be impact assessed. The impact assessment needs to take place by May 2005 at the latest.

Examples of policies or functions which are seen as "high relevance" include: the Council's complaints handling function, housing lettings policy, and the recruitment and retention policy.

Examples of policies or functions which are seen as "low relevance" include the Council's financial regulations, policy on the control of substances hazardous to health, and the IT support function.

NEW POLICIES AND FUNCTIONS

In addition, all new policies and functions, including those that are being significantly reviewed, need to be impact assessed. This should be done as part of the development/review process.

An impact assessment should be undertaken as part of the natural development of new policies and functions.   Often the need for a new policy or function is flagged up in service or team plans. It is at this stage that a decision should be made as to the best time for the impact assessment to be carried out.

When impact assessing new policies and functions, it is inevitable that there will be less local data available about the impact on service users or employees. Because of this, it may not be possible to address in detail all the issues included in the attached template. In some cases however, it may be possible to draw on information from other organisations who have adopted similar policies or functions in the past.

New policies and functions are usually consulted upon as part of the development process. Where this is the case, there would be value in including a draft copy of the impact assessment as part of any consultation that takes place. This could include consultations with service users, partners, or staff representatives.

As part of the decision making process for new policies and functions, it is good practice to include a copy of the impact assessment as an appendix to the main report. This will enable those taking the decisions to satisfy themselves that proper consideration has been given to the potential impact on different service users, staff and the community at large.

3. OVERVIEW OF THE PROCESS

The following sets out the key stages in the overall process:

1.   Once every three years a "test of relevance" is undertaken of all policies and functions with the completion of the attached template.

2.   An impact assessment is carried out for each policy and function that is rated as "high" in the test of relevance above, and for any new policies and functions (including those that are subject to significant revision). This must be completed by May 2005.

3.   Each completed impact assessment will be made available for formal audit or inspection. The outcome of impact assessments will also be reported within the Council's six monthly equalities monitoring reports to the Corporate Equalities Steering Group and considered by Scrutiny.

4.   The actions arising from the impact assessments will also feed into team and service plans, ensuring the impact assessment process is integral to service planning and improvement.

This guidance and template focuses on the second stage of this process.

4. **PREPARATION – GETTING STARTED**

The Equality Impact Assessment Template has been designed to guide and support you through the process of completing an impact assessment. As with most things, good preparation is also important. The following checklist, identifies key stages in the preparation process.

1. Agree a target date for completing an impact assessment.

2. Work through the Further Guidance for Completing Each Section of the Impact Assessment Template (provided at the back of this document - Contents 6) for each stage of the process.

3. Identify the people who need to be involved in conducting the assessment, and if they have not already undertaken training, make arrangements for them to be trained.

    When undertaking an impact assessment it is useful to draw on a range of experiences, knowledge and expertise.

    A senior manager (Service Head) should be appointed to take responsibility for overseeing the impact assessment and ensuring that it is completed appropriately.

    The group carrying out the impact assessment should comprise a balanced mix of employees, e.g. not all of the same gender, with relevant and appropriate knowledge and skills. It is also important that it includes someone with an external perspective/independent view, and someone with expertise in the function.

    When considering who should be involved thought should be given to the following:

    • Who is able to contribute experience of the delivery of the policy or function on the ground?

    • Who is able to provide a service user or staff perspective?

    • Who is best placed to know about the impact of the policy or function on different groups, including potential users?

    • Who is able to access or interpret relevant service or employment data including the results of previous consultation, or data on service take-up, usage, complaints or satisfaction

    This information should be included on the front page of the Equality Impact Assessment Template.

4. Start by reading through the whole template and noting down all the information you are likely to need to complete the impact assessment. This may include consultation reports, complaints monitoring data, information on service take-up etc. Make arrangements to get hold of this information so that it can be available to those undertaking the impact assessment.

5. If there is anything in the template that you are unclear about seek clarification well in advance from the Corporate Equalities team. Alternatively, seek feedback from a colleague who has already completed an impact assessment.

6. Arrange a date for the people involved in conducting the impact assessment to meet to work through the template.   Allow enough time for the meeting – between two hours and half a day.   If it is likely that more time will be required, arrange a second date as a reserve. Any outstanding issues from the meeting can then be picked up relatively quickly while still fresh in people's minds.

7. It will be useful if section 1 and most of section 2 of the template is completed in draft before the meeting. This is because these sections deal with basic facts which are needed to complete the other sections in the template.

8. At the meeting, it is useful to work through the template section by section, completing it as you go along, referring to the Guidance as you do so.   You may find it useful to work from a laptop and type directly into the template.   Electronic copies of the template are available from the Corporate Equalities Team on X4436.

What Training is Available?

The Council has a well established one day training programme covering all aspects of impact assessments. A large number of managers have already been trained in each Directorate. The training takes the participants both through the principles of impact assessments, as well as the practical steps involved in completing one.

For further details please contact Steve Wiggett in Corporate HR X4374, or Isabelle Colombeau from the Equalities Team X4723.

5.   EXTERNAL FUNDING
EQUALITY IMPACT ASSESSMENT TEMPLATE

UPDATED FOR 2006/07

EQUALITY IMPACT ASSESSMENT

Name of the policy or function being assessed: External Funding and Accountability

Directorate   Development and Renewal

Date Impact Assessment completed   _____

Is this a policy or function?   Policy ☐   Function ☐

Is this a new or existing policy or function?   New ☐   Existing ☐

Names and roles of the people carrying out the Impact Assessment:

(Explain why the members of the impact assessment team were selected i.e. the knowledge and experience they bring to the process).

1. **Everett Haughton –** Lead Officer: availability and the necessary skills and experience
   a. to undertake the required work.

2. **Taki Suderuddin –** Support Officer: availability and in-depth knowledge of the
   1. organisation/function.

3. **Dave Clark –** Quality Assurance Manager: function manager.

4. **Hugh Chambers –** Equality and Inclusion Officer

Service Head	Chris Holme
Signature	
Date	

Once you have filled in this document please send a copy to the Equalities Team.

If you have any questions regarding this form please call the Equalities Team on 020 7364 4723.

SECTION 1

AIMS AND IMPLEMENTATION OF THE POLICY

Identifying the aims of the policy[1]

What is the policy?
What is the aim, objective, or purpose of the policy?

The Policy/Function:
External Funding and Accountability

The Aim/Objective/Purpose
- To ensure effective management, monitoring and control of externally funded programmes and projects
- To support the delivery of corporate and directorate priorities through effective resource allocation
- To maximise benefits to the local community from externally funded programmes, projects and other associated initiatives
- To ensure openness and transparency in the in the provision of information and decision making with regard to Corporate Match Funding

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[1] Please note the term 'Policy' is used for simplicity. The broad term can also refer to a function or a service.

Rationale behind the policy and its delivery
(Please state the underlying policy objectives which underpin this service and what they are trying to achieve).
Are there associated objectives of the policy? If so, what are they?
What outcomes do we want to achieve from this policy?
What factors could contribute/detract from the outcomes?

Underlying policy objectives:
- Delivery of the Community Plan priorities for Creating and Sharing Prosperity

Associated objectives:
- Implementation of the Council's Regeneration Strategy

Desired outcomes:
- Job creation / new jobs, Safeguarding current jobs,
- Job Training and placement opportunities,
- Support for social enterprises,
- New /improved business/training premises,
- Improved organisational capacity within third sector
- Increased efficiency, productivity and competitiveness in local SMEs through training & support
- Specialist advice and support including fundraising

Possible detracting factors:
- Reduced budget for project match funding
- Reduced staff resources

Who is affected by the policy? Who is intended to benefit from it and how?

Who are the main stakeholders in relation to this policy?
What outcomes would other stakeholders want from this policy?
Are there any groups, which might be expected to benefit from the intended outcomes but which do not?

The main external stakeholders *(beneficiaries)* are local organisations or individuals within the following broad categories:
1) Voluntary/community sector organisations
2) Social enterprises
3) Not-for-profit business support agencies
4) Education, training and job support agencies/establishments
5) Unemployed individuals
6) Disabled individuals
7) Members of BME communities
8) Women
9) Low skilled individuals
10) Other disadvantaged sections of the community facing social or economic exclusion

There are also internal stakeholders *(non-beneficiaries)* including the following:

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1) Local Councillors
2) Local Area Partnership Managers
3) Local Employment Consortium partnership Members
4) Key Council services/departments including Education, Youth Service, Social Services,

Outcomes wanted by stakeholders (beneficiaries):
Individuals:
▪ Improved skills
▪ Improved employability
▪ Increased personal wealth
▪ Improved long-term prospects
▪ Improved quality of life

Organisations:
▪ Increased effectiveness
▪ Improved service quality
▪ Increased clientele
▪ Broader funding base
▪ Improved security

Groups not benefiting from intended outcomes:
The main groups/individuals not currently benefiting from the intended outcomes to the expected extent are, in general terms:
▪ Disabled people
▪ Some specific BME sectors including the Somali community

Promotion of good relations between different communities
(How does the policy or function contribute to better Community Cohesion?)
How do you promote good relations between different communities you serve based on mutual understanding and respect?
What opportunities are there for positive cross cultural contact between these communities to take place e.g. between younger and older people, or between people of different religious faiths?

How function contributes to better community cohesion
By providing funding and practical support for a range of services and activities including:
- Listening to the needs of local people and helping to deliver their aspirations
- Developing basic skills and confidence of excluded individuals and groups
- Building the capacity of local voluntary sector organisations
- Getting local people involved in community regeneration activity in their local area
- Brokering and supporting local partnerships for delivering regeneration activity
- Helping local organisations to access external regeneration funding streams

How we promote good relations
- Attendance at networking events
- Written communication to clients and potential clients
- Personal communication during monitoring/support visits to projects/clients

Opportunities for positive cross cultural contact
- LBTH is match funding 3 large Objective 2 projects on the basis of partnerships between organisations from different communities like Somalis, Bangladeshis, Afro-Caribbean and women's organisations which fosters cross cultural contact at various levels

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(Specifically identify the relevance of the aims of the policy to the equality target groups and the Council's duty to eliminate unlawful racial discrimination, promote equality of opportunity and good relations between people of different racial groups).

Aim 1:
To ensure effective management, monitoring and control of externally funded
Programmes and projects
- The External Funding and Accountability Team have recently launched an initiative to monitor and track awards of Corporate Match Funding and other regeneration funding to the borough in order to be able to analyse such funding to key geographical areas and communities

Aim 2:
To support the delivery of corporate and directorate priorities through effective resource allocation.
- Considerable effort is being made by the External Funding and Accountability Team to ensure the capacity building of key local organisations and sectors.

- The capacity building work is intended to enable such organisations to better represent their communities/clientele, which, in turn, will lead to these disadvantaged communities benefiting from the wider outcomes and benefits sought by individual beneficiaries as referred to in previous sections.
- In the context of the activities and functions of the Team, work is mainly, but not exclusively, focused on 3 of the 6 equality target groups identified by the Council – race, gender and disability.

Aim 3
To maximise benefits to the local community from externally funded programmes, projects and other associated initiatives.
▪ Funded programmes and projects are required to target key sections of the community including the Council's equality target groups and to deliver agreed, outcomes and longer-term impacts.
▪ In the context of the activities and functions of the Team, work is mainly, but not exclusively, focused on 3 of the 6 equality target groups identified by the Council – race, gender and disability.

Aim 4:
To ensure openness and transparency in the in the provision of information and decision making with regard to Corporate Match Funding.
▪ The Corporate Match Funding bidding round is open to all provided they meet the bidding criteria. The section is piloting a new project application appraisal process that ensures objectivity in scoring procedures and awards

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Policy Priorities:
(How does the policy fit in with the council's wider aims? Include Corporate and Local Strategic Partnership Priorities)
How does the policy relate to other policies and practices within the council?
What factors/forces could contribute/detract from the outcomes?
How do these outcomes meet or hinder other policies, values or objectives of the council?

Fit with Council's wider aims
The External Funding and Accountability function/policy fits with the wider aims of the Council by its front-line delivery of service to:
▪ Black and Minority Ethnic (BME) Led organisations
▪ Organisations specifically providing services targeted to BME groups and individuals
▪ Women led organisations
▪ Organisations specifically providing services targeted to women/women's groups
▪ Disabled led organisations
▪ Organisations specifically providing services targeted to disabled people

Relationship with other Council Policies and Practices
The External Funding and Accountability function has a close relationship with the following other Council policies and practices:
▪ Supporting the 3rd Sector
▪ Targeting support to disadvantaged and under-supported sections of the community
▪ Targeting resources to agreed Community Plan Priorities for Creating and Sharing Prosperity

Factors that could Contribute or detract from outcomes
The following factors could contribute of detract from positive outcomes of the External Funding Team:
▪ Reduction in the allocation of Corporate Match Funding budget

How these outcomes meet or hinder other Council policies, values or objectives
▪ Any reduction to the current level of CMF would have a direct effect on the levels of success

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that could be achieved in relation to the above aims, outcomes, plans or priorities.

How the policy is implemented
(How is, or will, the policy be put into practice and who is, or will be, responsible for it?)
Who defines or defined the policy?
Who implements the policy?
How does the council interface with other bodies in relation to the implementation of this policy?
Is the service provided solely by the Department or in conjunction with another department, agency or contractor?
If external parties are involved then what are the measures in place to ensure that they comply with the Council's Equal Opportunities policy?

Who defines/defined the policy/function
The policy/function has been defined by the Service Head Resources in conjunction with the Corporate Director of Development and Renewal

Who Implements
The policy/function is implemented by the External Funding and Accountability Manager together with the other members of the Team.

How the Council interfaces
The council interfaces with other bodies – including strategic funding organisations such as LDA, GOL; and local delivery agencies/bodies – through formal partnership agreements, service level agreements as well as through a variety of agreed but un-written roles. Such roles include undertaking formal Accountable Body Functions and responsibilities to disseminate information and to encourage and support as appropriate.

How service is provided
Services are provided in a number of ways dependent on the relevant key roles and responsibilities – for example:
- Organisations are supported as a result of an open application and appraisal process after which a legally binding SLA is entered into/signed by both parties
- Organisations are provided with professional support, advice, information and assistance to assist in the funding, marketing and delivery of their projects, activities or services
- Members of the External Funding Team undertake representation functions on partnership/programme/project boards/steering groups as appropriate
- The External Funding Team either hold or are represented at workshops, seminars and information gatherings as appropriate
- Meetings are organised with key service providers, local organisations and potential service users to enable the External Funding Team to be abreast of local needs, aspirations and issues

Measures to ensure compliance
- External parties are required to have appropriate demonstrable policies and practises in place
- Any application appraisal process assesses compliance with required policy and practice
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SECTION 2

CONSIDERATION OF DATA AND RESEARCH

List all examples of quantitative and qualitative data available that will enable the impact assessment to be undertaken *(include information where appropriate from other directorates, Census 2001 etc.)*

The key sources of information that were used to help set priorities with the Economic Regeneration Strategy and to define the broad actions within it are relevant to the provision of the External Funding Service and have been evaluated in order to complete this assessment. The data included:

- London wide data used by the Greater London Authority (GLA) and London Development Agency (LDA) in preparing the London Development Plan and Economic Development Strategy.
- Census data and projections at borough wide ward and super area levels.
- A competitiveness audit of the Tower Hamlets economy that assess a range of indicators related to economic development, social profile and environment to benchmark the borough against other areas and wider economic trends associated with a developed economy.
- An assessment of patterns of recurrent unemployment trends within the borough.
- Assessments of sectors in relation to employment within the borough focused on health, construction, hospitality, leisure, travel and tourism and childcare.
- Development, population and impact forecasting undertaken as part of the ongoing development of the Local Development Framework (LDF) Area Action Plans.
- A pilot study to assess and link the provision of health related social infrastructure with the wider development agenda in the borough.
- Tower Hamlets Community Plan and Local Area Action Plans.
- Service Level Agreements with beneficiary/delivery organisations
- Attendance list at meetings and workshops
- Project output/outcome records ('second line beneficiaries' - see below)
- LBTH Regeneration Strategy

Equalities profile of users or beneficiaries
(Use the Council's approved diversity monitoring categories and provide data by target group of users or beneficiaries to determine whether the service user profile reflects the local population or relevant target group or if there is over or under representation of these groups)

Introduction
It should be noted that the 'first line beneficiaries' with which we do business are local voluntary/community organisations, social enterprises and business support agencies.

These organisations do not all necessarily fit well within the Council's approved diversity monitoring categories. Additionally, as the organisations are project delivery agents engaged to work with individuals, perhaps it is the details of these 'second line beneficiaries' that primarily need to be captured.

First-Line Beneficiaries
Although it is assumed that a number of beneficiary/delivery organisations would, if given the opportunity, categorise themselves for example as being "women's-led organisation, or a "Bangladeshi-led" organisation, we do not currently request such information.

Second-Line Beneficiaries
Records are produced for these beneficiaries in some of the Council's equality categories, appropriate project user profiles for the 2005-06 as set are being sought:

Thematic Objective	Race	Gender	Disability	Sexual Orientation	Faith	Age
Delivery of the Community Plan priorities for Creating and Sharing Prosperity	Direct Impact	Direct Impact	Direct Impact	Indirect Impact	Indirect Impact	Direct Impact
Implementation of the Council's Regeneration Strategy	Direct Impact	Direct Impact	Direct Impact	Indirect Impact	Indirect Impact	Direct Impact
Job Creation / new jobs, safeguarding current jobs	Direct Impact	Direct Impact	Direct Impact	Indirect Impact	Indirect Impact	Direct Impact
Job Training and placement opportunities	Direct Impact	Direct Impact	Direct Impact	Indirect Impact	Indirect Impact	Direct Impact
Support for social enterprises	Direct Impact	Direct Impact	Direct Impact	Indirect Impact	Indirect Impact	Indirect Impact
Improved organisational capacity within the third sector	Direct Impact	Direct Impact	Direct Impact	Indirect impact	Direct Likely Impact	Direct Impact
Increased efficiency, productivity and competitiveness in local SMEs through training and support	Direct Likely Impact	Direct Likely Impact	Direct Likely Impact	No evidence of specific impact	No evidence of specific impact	Direct Likely Impact

Equalities profile of staff
(Indicate profile by target groups and assess relevance to policy aims and objectives e.g. Workforce to Reflect the Community. Identify staff responsible for delivering the service including where they are not directly employed by the council).

Profile of the current staff team are as set out below:

Female   2
Male   4
White – English 3
Asian – Bangladeshi 2
Black British – Caribbean 1

Evidence of Complaints against the service on grounds of discrimination (*Is there any evidence of complaints either from customers or staff (Grievance) as to the delivery of the service, or its operation, on the equality target groups?)*

There have been no complaints on such grounds.

Barriers (What are the potential or known barriers to participation for the different equality target groups?)

The following relates in part to both First and Second Line beneficiaries.
- Language barriers
- Poor communication and dissemination of information
- Lack of Individual or organisational capacity
- Lack of access to other funding streams as leverage for LBTH Corporate Match Funding
- Unavailability of 100% funding
- Complexity of funding application process

Recent consultation exercises carried out *(Detail consultation with relevant interest groups, other public bodies, voluntary organisations, community groups, trade unions, focus groups and other groups, surveys and questionnaires undertaken etc. Focus in particular on the findings of views expressed by the equality target groups)*

Somali Community / Organisations - Needs Assessment Meeting – this took place in January 2006 with a broad selection of local organisations, the key outcomes of which are summarised below:

1. Lack of LBTH funding support for work specifically with/on behalf of Somali Community

2. Large number of Somali led organisations within the borough competing for resources

3. Consensus reached that continued approach was not beneficial to the Somali community in general of

4. Agreed that a consortium would come together for future bidding

5. Organisations requested capacity building support for LBTH to enable them to overcome current difficulties and barriers

Identify areas where more information may be needed and the action taken to obtain this data. *(You will need to consider data that is monitored but not reported, data that could be monitored but is not currently collected and data that is not currently monitored and would be impossibly/extremely difficult to collect).*

Gaps in information:

1. Levels and details of funding and support provided through other sections/department of the council

2. Thorough and up-to-date information on available funding streams in order to assess market potential for support to local organisations and projects

3. Lack of clarity as to the 'density/geographical spread' of Corporate Match Funding

Action needed:
(Include short-term measures to be taken to provide a baseline where no or little information is available)

1. External Funding Group established as a cross-departmental initiative - Actioned

2. Invested in Grant Finder and Grant Net – Actioned but yet to be rolled out

3. GIS mapping system being developed – work in progress

SECTION 3

ASSESSMENT OF IMPACT

Race – testing of disproportionate or adverse impact

Identify the effect of the policy on different **race** groups from information available above**.**

Thematic Objective	Race
Delivery of the Community Plan priorities for Creating and Sharing Prosperity	Direct Impact
Implementation of the Council's Regeneration Strategy	Direct Impact
Job Creation / new jobs, safeguarding current jobs	Direct Impact
Job Training and placement opportunities	Direct Impact
Support for social enterprises	Direct Impact
Improved organisational capacity within the third sector	Direct Impact
Increased efficiency, productivity and competitiveness in local SMEs through training and support	Direct Impact

How is the race target group reflected in the take up of the service?
This is a key strategy and although precise detailed data has yet to be recorded, It is clear the service is used by a wide cross-section of the community in terms of racial backgrounds and that several key measurements can be gleaned from the detailed recording of such data.

It is equally clear that there are a number of the above thematic objectives outline above that are relevant to the service and its impact.

It is suggested that the themes identified in the strategy and its action plan are monitored to review the specific impacts on the borough's diverse communities. The above table will be used as a guide for any adopted monitoring process

From the evidence above does the policy affect, or have the potential to affect, racial groups differently and if so do any of the differences amount to adverse impact or unlawful discrimination?
The External Funding and Accountability function operates at both strategic and operational levels. At an operational level there are specific priorities and targets for race equality and these have been identified in the action plan. Because of the current baseline position, there is good reason for differential impact targets for the various ethnic communities and where these actions are monitored we will be looking to ensure that targets are met in order to address current disproportionate impact.

We will ensure that any action taken will not amount to unlawful discrimination but be positive action.

If there is an adverse impact, can it be justified on the grounds of promoting equality of opportunity for one racial group or for another legitimate reason?
In specific cases it is possible to justify specific initiatives target need where this is not currently being addressed in the mainstream. In this case specific positive action should be identified and this should be explained to all so that it is understood why specific groups are being targeted

Could the policy discriminate, directly or indirectly and if so is it justifiable under legislation?
Where positive action is identified against need it is likely that this, if delivered properly, is justified under legislation. If however there is no defined rationale/justification for specific targeting of services to specific ethnic groups then this would be wholly outside any positive action activity and should be seen as discriminatory and reviewed immediately.

Gender – testing of disproportionate or adverse impact

Identify the effect of the policy on gender groups from information available above.

Thematic Objective	Gender
Delivery of the Community Plan priorities for Creating and Sharing Prosperity	Direct Impact
Implementation of the Council's Regeneration Strategy	Direct Impact
Job Creation / new jobs, safeguarding current jobs	Direct Impact
Job Training and placement opportunities	Direct Impact
Support for social enterprises	Direct Impact
Improved organisational capacity within the third sector	Direct Impact
Increased efficiency, productivity and competitiveness in local SMEs through training and support	Direct Impact

How are the gender groups reflected in the take up of the service?
This information is currently unavailable however the monitoring of the outcomes of the External Funding function should where feasible seek to achieve a clear break down of impact and or take up by gender.

From the evidence above does the policy affect, or have the potential to affect, gender groups differently and if so do any of the differences amount to adverse impact or unlawful discrimination?
It is clear that there is a likelihood of differential impact and, in some cases disproportionate impact. Especially in the area of training and employment support in terms of support for businesses in the borough, this is in part, a reflection of under-representation of women in the labour market and in business.

If there an adverse impact, can it be justified on the grounds of promoting equality of opportunity for one gender group or for another legitimate reason?
In specific cases it is possible to justify specific initiatives target need where this is not currently being addressed in the mainstream. In this case specific positive action should be identified and this should be explained to all so that it is understood why specific groups are being targeted.

Could the policy discriminate, directly or indirectly and if so is it justifiable under legislation?
Where positive action is identified against need it is likely that this, if delivered properly, is justified under legislation. If however there is no defined rationale/justification for discriminatory practice then this would be wholly outside any positive action activity and should be seen as discriminatory and reviewed immediately.

Disability – testing of disproportionate or adverse impact

Identify the effect of the policy on the disability strand from information available above.

Thematic Objective	Disability
Delivery of the Community Plan priorities for Creating and Sharing Prosperity	Direct Impact
Implementation of the Council's Regeneration Strategy	Direct Impact
Job Creation / new jobs, safeguarding current jobs	Direct Impact
Job Training and placement opportunities	Direct Impact
Support for social enterprises	Direct Impact
Improved organisational capacity within the third sector	Direct Impact
Increased efficiency, productivity and competitiveness in local SMEs through training and support	Direct Impact

It is clear from the table above that there are certain thematic objectives of the strategy that may have greater impact disabled people than other. In this case there is an equal likelihood of differential impacts between disabled bodies people and disabled people.

How are disabled people reflected in the take up of the service?
This information is currently not available however it is essential that it is gathered to ensure that and forms of disproportionate and or adverse impact is addressed. However it is clear from the thrust of both European an UK funding regimes that specific consideration needs to be given to needs of disabled people when preparing bids.

From the evidence above does the policy affect, or have the potential to affect, disability groups differently and if so do any of the differences amount to adverse impact or unlawful discrimination?
This evidence is currently not available however it is vital that in the review of the External Funding function this information is gathered to assess adverse impact and/or unlawful discrimination.

If there is an adverse impact, can it be justified on the grounds of promoting equality of opportunity for one group or for another legitimate reason?
In specific cases it is possible to justify specific initiatives target need where this is not currently being addressed in the mainstream. In this case specific positive action should be identified and this should be explained to all so that it is understood why specific groups are being targeted.

Could the policy discriminate, directly or indirectly and if so is it justifiable under legislation?
Where positive action is identified against need it is likely that this, if delivered properly, is justified under legislation. If however there is no defined rationale/justification for discriminatory practice then this would be wholly outside any positive action activity and should be seen as discriminatory and reviewed immediately.

Age – testing of disproportionate or adverse impact

Identify the effect of the policy on different age groups from information available above.	

Thematic Objective	Age
Delivery of the Community Plan priorities for Creating and Sharing Prosperity	Direct Impact
Implementation of the Council's Regeneration Strategy	Direct Impact
Job Creation / new jobs, safeguarding current jobs	Direct Impact
Job Training and placement opportunities	Direct Impact
Support for social enterprises	Indirect Impact
Improved organisational capacity within the third sector	Indirect Impact
Increased efficiency, productivity and competitiveness in local SMEs through training and support	Indirect Impact

How are young and old people reflected in the take up of the service?
This information is currently unavailable but should be recorded to ensure that effected impact is addressed.

From the evidence above does the policy affect, or have the potential to affect, age groups differently and if so do any of the differences amount to adverse impact or unlawful discrimination?
Age discrimination is a significant issue in the labour market and EU directives have been employed to address any potential discrimination.

If there is an adverse impact, can it be justified on the grounds of promoting equality of opportunity for one group or for another legitimate reason?
In specific cases it is possible to justify specific initiatives that target need where this is not being addressed in the mainstream. In such a case positive action could be identified and should be explained to all so that it is understood why specific groups are being targeted.

Could the policy discriminate, directly or indirectly, and if so is it justifiable under legislation?
Where positive action is identified against need it is likely that such action, if delivered properly can be justified under legislation. If however there is no defined rationale/justification for discriminatory practice then this would be wholly outside any 'positive action' activity and should be seen as discriminatory and reviewed immediately.

Lesbian, gay bisexual – testing of disproportionate or adverse impact

Identify the effect of the policy on lesbian, gay and bisexual (LBG) groups from information available above.

Thematic Objective	Sexual Orientation
Delivery of the Community Plan priorities for Creating and Sharing Prosperity	Indirect Impact
Implementation of the Council's Regeneration Strategy	Indirect Impact
Job Creation / new jobs, safeguarding current jobs	Indirect Impact
Job Training and placement opportunities	Indirect Impact
Support for social enterprises	No evidence of specific impact
Improved organisational capacity within the third sector	No evidence of specific impact
Increased efficiency, productivity and competitiveness in local SMEs through training and support	No evidence of specific impact

How are LBG groups reflected in the take up of the service?
This information is currently not recorded and may be seen as invasive to record by many beneficiaries of this strategy

From the evidence above does the policy affect, or have the potential to affect LBG groups differently and if so do any of the differences amount to adverse impact or unlawful discrimination?
There is little available information in both the labour market and businesses that distinguishes a specific difference between the treatment of LBG groups and heterosexual members of the community. There is however a strong awareness of the impact of the pink pound on the local economy and where this is known agencies should seek to draw reference to the impact of the strategy

If there is an adverse impact which, can it be justified on the grounds of promoting equality of opportunity for one group or for another legitimate reason?
In specific cases it is possible to justify specific initiatives target need where this is not currently being addressed in the mainstream. In this case specific positive action should be identified and this should be explained to all so that it is understood why specific groups are being targeted.
Could the policy discriminate, directly or indirectly and if so is it justifiable under legislation?

Religion/Belief – testing of disproportionate or adverse impact

Identify the effect of the policy on different religious/belief groups from information available above.

Thematic Objective	Religion Belief
Delivery of the Community Plan priorities for Creating and Sharing Prosperity	Indirect Impact
Implementation of the Council's Regeneration Strategy	Indirect Impact
Job Creation / new jobs, safeguarding current jobs	Indirect Impact
Job Training and placement opportunities	Indirect Impact
Support for social enterprises	Indirect Impact
Improved organisational capacity within the third sector	Direct Likely Impact
Increased efficiency, productivity and competitiveness in local SMEs through training and support	No evidence of specific impact

How are the religious/belief groups reflected in the take up of the service?
This information is currently not recorded and may be seen as invasive to record by many beneficiaries of this strategy.

From the evidence above does the policy affect, or have the potential to affect, religious or belief groups differently and if so do any of the differences amount to adverse impact or unlawful discrimination?
This information is not available however agencies will need to be mindful to address religious discrimination in the labour market especially with heightened levels of Islamophobia post 9/11 and 7/7

If there is an adverse impact, can it be justified on the grounds of promoting equality of opportunity for one group or for another legitimate reason?
In specific cases it is possible to justify initiatives taken to target identified groups where need is not being adequately addressed by mainstream service delivery. In relation to External Funding, positive action will be taken where the need is identified by virtue of such groups not having appropriate levels of access to the service and; it will be fully explained to all concerned so that it is clearly understood why the targeting is being undertaken.

Could the policy discriminate, directly or indirectly, and if so is it justifiable under legislation?
Where positive action is identified against need it is likely that this, if delivered properly, is justified under legislation. If however there is no defined rationale/justification for discriminatory practice then this would be wholly outside any positive action activity and should be seen as discriminatory and reviewed immediately.

Health Impact – testing of disproportionate or adverse impact

Identify the effect of the policy on physical or mental health of service users and the wider community from any information that is available. (This might include an increased risk to health for some groups in the community, which although not intended, may have still occurred. The impact on health might include: increased mental stress, greater risk of accident or injury, reduced opportunities to have a quality diet, reduced opportunity for physical exercise, or greater incidence of diseases such as heart disease and diabetes).

The funding for certain types of regeneration activity will, by its very nature have significant impact on the health of local communities. In some cases physical regeneration has adverse impacts and in many cases specific health impact assessments ate undertaken in order to identify and address the needs of particular clients or the community at large. In some regeneration initiatives health is seen as a key priority and as a result specific regeneration activity is supplemented to improve primary and community health provision, education and practice.

From the evidence above does the policy affect, or have the potential to affect the health of groups differently? If so, which groups and how does the impact occur?
It is likely that there will be some differential impact on the health of particular communities as a consequence of particular regeneration initiatives.

Additionally it has been evidenced by the Social Exclusion unit that the health impact of inequality and unemployment of poor housing and poor social conditions gives rise both to health and mental health inequalities. Indeed the relationship between mortality rates and urban deprivation is high and given the high level of deprivation in the borough this is something that should be reviewed in the case of all regeneration development both physical and or support based

Additional groups which may experience a disproportionate or adverse impact

Identify if there are groups, other than those already considered, that may be adversely affected by the policy? *For example those in poverty may be adversely impacted by the policy and it might be useful to consider them as a separate group in the light of the Council's overall policy objectives.*

Poverty and inequality is at the centre of the strategy and is a driving force for its delivery. Particular groups prioritised in the strategy will include single parents, people from specific deprived areas in the borough, businesses, ex offenders, the unemployed and even specific ethnic groups like Travellers, asylum seekers and refugees. It is possible that all these groups will not be sufficiently targeted by delivery agencies.

Additional factors which may influence disproportionate or adverse impact

Management Arrangements *(How is the Service managed, are there any management arrangements which may have a disproportionate impact on the equality target groups?)*

The Service is managed in line with agreed corporate and departmental arrangements and procedures. It is clear that specific equality performance targets are set for specific themes of the strategy upon which it should be judged and that the beneficiaries of the strategy are monitored in the context of ethnicity, gender, age, disability as a bare minimum and with the potential of including faith and sexual orientation is this data is deemed collectable and is not seen as invasive by the strategies actual beneficiaries.

What is the custom and practice in the provision or allocation of this service? *(Could these have a disproportionate impact on the equality target groups?)*

The service is managed in line with agreed corporate and departmental arrangements and procedures. However there is adopted 'custom and practice' which may well need to be reviewed in order to assess and address equality needs of the borough's diverse communities.

The Process of Service Delivery *(In particular look at the arrangements for the service being provided).*

The process of Service delivery is consistent with contemporary local authority 'front-line' service delivery in that it is made up of a combination of traditional service-based management and administration together with extensive outreach/face-to-face work with customers and potential customers.

Operation Times *(When is the service provided; are there seasonal issues; are there barriers to the service based on the time and delivery of the service which may affect the target groups?)*

In line with the contemporary service delivery as outlined above, operational times are designed to meet the needs of customers and potential customers, which, is reflected by the flexible working arrangements of all members of the External Funding Team.

Methods of communication to the public and internally *(What methods do you use to communicate this service? Include review and assessment of methods, media, translations, interpretation etc. bearing in mind the extent to which these media forms are accessible to all sections of the community)*

Externally
Council's web-site
E-mail general communication and information bulletins
Local Media including press releases and adverts – East End Life

Information workshops and public meetings Distribution of information via key partner community organisations with umbrella responsibility
Key sector partners such as the Inner East Area Partnership and LVSTC

<u>Internally</u>
E-mail general communication
Information bulletins, briefing notes and reports
Word of mouth – meetings etc

Awareness of Service by Local People *(Assessment of the extent to which local people are aware of the service based on available data. What measures do you undertake to reach traditionally excluded communities?)*

Refer to external communication above.

Evidence of disproportionate or adverse impact *(Is there any evidence or view that suggests that different equality, or other, target groups in the community have either a disproportionately high or low take up/impact of/from this service/function?)*

yes ☐   no ☐

If yes, what and why (*State below*)

SECTION 4

MEASURES TO MITIGATE DISPROPORTIONATE OR ADVERSE IMPACT

Specify measures that can be taken to remove or minimise the disproportionate impact or adverse effect identified at the end of Section 3.   If none were identified in Section 3, identify how disproportionate impact or adverse effect could be avoided in the future.
(Consider measures to mitigate any adverse impact and better achieve the promotion of equality of opportunity).

Capacity building: targeting specific sections of the community that currently have a lack of individual or group capacity such a Somali community/organisations – this includes organisation of meetings to establish their position and need and then to agree appropriate courses of actions to help mitigate disproportionate impact. It might be helpful to seek funding for this sort of activity, either top sliced from existing packages of funding or to submit specific applications to address this need.
.
Monitoring of processes, applications etc: Ensure that data from first line beneficiaries is collected. Steps should also be taken to ensure that second-line data is collected in formats that are compatible to the council's own monitoring data.

Customer Satisfaction: information is currently only anecdotal a system for addressing this needs to be implemented. There is also little or no benchmarking. It is important that the service makes a regular comparison against authorities that have a similar demographic make up, to ensure the service provided is in the top quartile. This is also a way to ensure that the unit is able to benefit from current best practice. This should also be used to underpin all funding exercises

Lack of access to other sources of funding (match): Actions are required to raise awareness of other sources of funding and to support applications for this funding.

Complexity of funding process: Produce guidance as and when required in plain English with translations available as and when required.

Access to funding information: Provide greater access to the support packages Grant Finder and Grant Net

Provide more accurate data on the provision of funding on an area basis: Develop timetable for the linking of the GIS mapping system to grants data

SECTION 5

CONCLUSIONS AND RECOMMENDATIONS

Does the policy comply with equalities legislation, including the duty to promote race equality? *Take into account your findings from the impact assessment and consultations and explain how the policy was decided upon its intended effects and its benefits.)*

yes ☐   no ☐

What are the main areas requiring further attention?
Continued work in the area of Capacity Building to help mitigate disproportionate or adverse impact on specific sectors/sections of the community/organisations.

Implement Customer Satisfaction Surveys.

Summary of recommendations for improvement
Improved marketing and communication to promote service and support available
Development of business case for increased resources for the Service
Rollout and promote Grant finder and Grant Net
Service Level Agreement to be amended to take on board need for increased monitoring re equalities impact

How will the results of the IA feed into the performance planning process?
Appropriate action will be fed into the overall Team Planning
Specific tasks and objectives will be built into work planning of staff

Future Monitoring and Consultation

How and when will the policy be monitored? On-going in line with Team Plan and tasks and responsibilities relating to the role of Monitoring Officers

Suggested consultation for the future. (Identify areas for future consultation and any barriers to participation in consultation with proposals to overcome these). - Contact existing unsuccessful applicants and grant recipients to ascertain satisfaction with service and carryout surveys of all future exercises - Undertake benchmarking survey among other London boroughs to assess LBTH ranking in relation to levels of regeneration funding, activity, equalities and related issues

SECTION 6 – ACTION PLAN

Recommendation	Key activity	Progress milestones	Lead	Progress
Implement Customer Satisfaction Survey	1. Prepare and distribute survey questionnaire 2. Monitor and act on results as appropriate	1.1 Design questionnaire – Jan 07? 1.2 Questionnaire approved / signed off – Jan 07? 1.3 Agree distribution list and disseminate - Feb 07? 2.1 Questionnaires returned - Feb 07? 2.2 Returns analysed, lessons learned formulated and agreed and appropriate action taken - Mar 07?	TBA	
Undertake Benchmarking Survey	1. Prepare and distribute survey questionnaire 2. Monitor and act on results as appropriate	1.1 Design questionnaire 1.2 Questionnaire approved / signed off – Oct 06? 1.3 Agree distribution list and disseminate – Oct 06? 2.1 Questionnaires returned – Nov 06? 2.2 Returns analysed, lessons learned formulated and agreed and appropriate action taken – Dec 06?	TBA	
Improve Marketing and Communications to Promote the Service and the support available	1. Develop and implement simple but comprehensive marketing and communication strategy	1.1 Strategy - agree the following and implement accordingly: (i) Budget (ii) What – results, actions and approaches (iii) Who – develops and implements (iv) How – best to make it happen 1.2 Amend design of departmental folder – Aug 06 1.3 Design and order promotional banners – Aug 06 1.4 Prepare information for inclusion in LBTH funding	TBA EH EH EH	

		information booklet – Jul 06		
		1.5 Organise programme of regular visits to local voluntary and community groups – Sep 06	DC	
		1.6 Arrange for representation at Annual Funders Fair – Aug/Sep 06	EH	
Roll-out GrantFinder and GrantNet Programmes as major elements of available Support	1. Develop and utilise the GrantFinder product as an internal tool for supporting, advising and assisting both internal services and external organisations with regard to available opportunities.	1.1 Set up internal working / consultation group -Jun 06	EH	
		1.2 Organise training and information sessions as required – ongoing	EH	
		1.3 Issue passwords as required – ongoing	EH	
		1.4 Prepare 'aid memoir' staff handouts - Sep 06	EH	
	2. Establish and promote the GrantNet product for use by local voluntary and community organisations as a 'self-help' tool for accessing information on local, regional, national EU funding streams	2.1 Develop access link on LBTH web-site – Aug 06	EH	
		2.2 Prepare press release – Sep 06	EH	
		2.3 Design publicity material and distribute to local organisations – Sep 06	EH	
		2.4 Establish public Access Points in prime locations – Sep 06	DC	
		2.5 Develop promotional literature for Annual Funders Fair Aug/Sep -6	EH	
			EH	
Amend Service Level Agreement to include increased Equalities Monitoring Requirements	1. Prepare and agree revised SLA	1.1 Prepare revised draft SLA – June 2006	EH	Complete
		1.2 Obtain Audit approval – end June	EH	Complete
		1.3 Sign off new SLA - end June	DC	Complete
	2. Issue revised SLA	2.1 Set up workshops to discuss SLA requirements with	EH	Complete

		organisations – Mid July		
		2.2 Issue New SLA's - August	DC	In progress
	3. Monitor information feedback	3.1 Monitor and make recommendation for future action as appropriate - from September	NA TS	Ongoing
	4. Utilise monitoring information as service development tool	4.1 Build agreed actions into Team Plan	DC	
Review management arrangements and operational matters to ensure that established custom and practice does not disproportionately impact on equality target groups.	1. Review management arrangements and operational procedures and implement changes to ensure sound processes are in place with particular reference to impact on LBTH equality target groups	1.1 Review - not restricted to but to include: (i) advertising / commissioning process (ii) allocation of CMF funds (iii) application and appraisal process (iv) monitoring arrangements	EH DC EH EH	 In progress In progress In progress

6. FURTHER GUIDANCE FOR COMPLETING EACH SECTION OF THE IMPACT ASSESSMENT TEMPLATE

I) SECTION 1 – AIMS AND IMPLEMENTATION OF THE POLICY

It is critical, at the outset, to determine the aims of the policy, as this will guide the subsequent development of an IA. The following questions may help to provide an early steer for an IA:

This may have already been considered but it is really important to be clear about the policy aims. The following are some of the key questions to address at this stage:

- What is the purpose of the policy
- Who is affected by it?
- Who is the policy intended to benefit and how?
- How will we put the policy into practice, and who will be responsible for it?
- How does the policy fit in with the Authority's wider aims?
- How does the policy relate to other polices and practices within the Authority?

As should be clear from the answers to these questions, at this stage it is essential to identify:

i) the responsibilities that the public authority holds in relation to this
policy; and
ii) the responsibilities held by other bodies (including other public
authorities).

Thus, for example, a procurement policy may be imposed on a public authority but when the policy is then implemented by that public authority it must be subjected to assessment.

II) SECTION 2 – CONSIDERATION OF DATA AND RESEARCH

Public authorities will need to consider how they will collect the information that will enable them to make a judgment of the extent of impact on the different equality strands. There is a case to be made for public authorities to work collectively on this particularly where authorities are operating within the education or health and social services sectors. They may wish to work together both to ensure the most effective and efficient use of public resources and to access the optimum information.

Relevant, reliable and up-to-date information is essential. Statistics alone do not provide reasons or explanations for differences. Public authorities must therefore institute a system of information gathering to supplement available statistical and qualitative research. There is a need to collect and analyse existing quantitative data by relevant characteristics as a minimum base from which to judge outcomes but also use qualitative or evaluative research or information gathered by other bodies such as voluntary, community and trade union organisations. Thus both types of data should be regarded as equally relevant as no one type of data is inherently more valuable than the other.

Before beginning an IA a thorough audit of available data should be carried out, paying particular attention to in-house data sets that can be used or adapted for the purposes of IAs. There may be a temptation routinely to employ one-off data gathering exercises in order to address perceived shortfalls in available information. While this may be necessary in response to significant contemporary issues, it is not a substitute for putting in place procedures, which allow data to be gathered at regular intervals to inform current and future IAs.

With this in mind it may be important to identify in-house sources of data as a first stage in the data gathering process. For example, existing administrative databases may be potentially useful sources of information. There may be a need to consider how these sources of data may be adapted to include new fields so as to capture relevant information, or to consider alternative sources of information if adding new fields is not a practical option within the required timescales. Also comments, which have been gathered during all previous consultations, including the preparation of the Community Plan and Equal Opportunities policy, should continue to inform decision-making and be regarded as a valuable source of information.

Note of caution: While the collection of relevant data is important, there is a need to be aware that particular issues of sensitivity and confidentiality may arise in relation to disability and sexual orientation. It is important to recognise the particular benefit of discussion and information gathering with groups representing people with disabilities and of different sexual orientations, in the absence of extensive data on these matters among their employees and recipients of services.

Also before in-house databases and other systems of data collection have become well established, the gathering of data to inform an IA is likely to be time consuming and in areas such as sexual orientation only limited information is likely to be available. In all cases, lack of data should not be an excuse for doing nothing. There is a need for

flexibility and to continue to monitor the impact of the policy after the completion of the IA.

Key questions to guide the sources of data are:

- *What do we need to know about this policy?*
- *What information is needed to ensure that all perspectives are taken into account?*
- *Who should be involved in determining what information is needed?*
- *What existing quantitative data is available, in-house and externally?*
- *What existing qualitative or evaluative research is available, in-house and externally?*
- *What additional data are needed?*
- *Is there a need to generate primary data?*
- *Is there a need for secondary analyses of existing data?*
- *Who will be partners in information gathering/provision?*
- *What processes are required to consult effectively with these partners?*

Equalities profile of staff

For IA's relating to HR policies and procedures it is necessary to gather data on experiences of staff in relation to the operation of that policy e.g. during an assessment of the Recruitment and Selection policy there will be need to gather data to be able to assess the experiences of different equality groups at the different stages of the process to determine whether there is a differential and/or an adverse impact

Evidence of complaints against the service on grounds of discrimination

A simple count of the number and nature of complaints received will provide quantitative information on those policies that spontaneously elicit the highest number of complaints. The authority's response to complaints may also be examined more thoroughly using qualitative methods of data analysis. It should be remembered however when using reviews as a source of data, that people who have failed to access a particular service are unlikely to be complainants and that certain groups may be less willing to voice their concerns than others.

III) SECTION 3 – ASSESSMENT OF IMPACT

The next stage is to use the information gathered to decide whether there is, or is likely to be, a differential impact, whether direct or indirect, upon the relevant group(s).

If an adverse impact on any of these groups can be identified then there is a need to assess whether the policy is unlawfully discriminatory taking into account that some polices are intended to increase equality of opportunity by taking positive action to redress disadvantages. A decision will then have to be made to ensure that the Council is acting lawfully. Even if the policy is not unlawful, there is a need to consider what to do in the light of the adverse impact identified. Thus for example if the policy is intended specifically to address the needs of a particular group, it may well be justifiable, indeed necessary in order to promote the equality of opportunity of that group. If this is not the case then there is a need to consider whether there is any alternative measure, which would achieve the aim desired without the differential impact identified.

Evidence of disproportionate impact of services – Key questions to guide assessment of impact are:

- *Is there differential impact on any of the groups in respect of the quantitative data?*
- *Is there differential impact on any of the groups in respect of the qualitative or evaluative data?*
- *Is there a difference in the conclusions reached using quantitative and qualitative methods? How can the difference be reconciled?*
- *Is the differential impact an adverse one?*
- *Is the policy directly or indirectly discriminatory? If the policy is not directly or indirectly discriminatory, does it still have an adverse impact?*
- *Is the policy intended to increase equality of opportunity by permitting or requiring affirmative or positive action or action to redress disadvantages? Is it lawful?*
- *Is there any alternative measure, which would achieve the desired aim without the adverse impact identified?*
- *Is there any mitigation, which would alleviate the adverse impact identified?*
- *Are there additional measures which can be adopted which would further equality of opportunity in the context of this policy?*

Additional factors influencing impact

Consideration of additional factors which may influence disproportionate or adverse impact Including the Process of Service Delivery

- *Is there an assessment of need undertaken?*
- *Are there eligibility criteria?*
- *Is the service targeted to local residents, businesses & visitors?*
- *Is the service regulatory, advisory and/or, care based?*
- *Is the service free, fee based or commercially driven?*
- *What are the likely impacts of all of these elements on the different equality target groups in the community?)*

IV) SECTION 4 – MEASURES TO MITIGATE DISPORPORTIONATE OR ADVERSE IMPACT

The consideration of mitigation and alternatives are crucial elements of the process. Options must be developed which reflect different ways of delivering the policy outcome. The consideration of mitigation of adverse impacts is intertwined with the consideration of alternatives. Mitigation can take the form of lessening the severity of the impact or providing some other remedy, where the adverse impact cannot reasonably be reduced. The mitigation of adverse impacts must be considered at the various stages of the policy-making process. Clear evidence of the mitigation of impacts must be apparent in the policy assessments and details of mitigation and its implementation must be included in the final recommendations. Evidence of the consideration of mitigation must be presented during decision-making.

Consideration must be given to whether separate implementation strategies are necessary for the policy to be effective for the relevant group. The following must be considered:

- *How does each option further or hinder equality of opportunity?*
- *How does each option reinforce or challenge stereotypes which constitute or influence equality of opportunity?*
- *What are the consequences for the group concerned and for the Council of not adopting an option more favourable to equality of opportunity?*
- *How will the relevant group be advised of the new or changed policy or service?*
- *What are the costs of implementing each option? Will the social and economic costs and benefits to the relevant group of implementing the option outweigh the costs to the Council or other groups? An evaluation of net social benefits achieved by adopting each option must be considered.*

V) SECTION 5 – CONCLUSIONS AND RECOMMENATIONS

The General Duty placed on public bodies by the RR(A)A requires them to combat racial discrimination and promote equality of opportunity and good race relations. The General Duty requires not only that equality to be taken into account but for it to be accorded considerable weight. This does not necessarily mean that the General Duty overrides other clearly conflicting statutory duties with which the Council must comply but to act in a proportionate manner and accord weight not only to administrative considerations but also to the General Duty.

It would be necessary to explain conclusions reached on the validity and reliability of quantitative and qualitative data. In particular, where different types of data differ in relation to the determination of whether or not there is an adverse impact e.g. quantitative data may not indicate adverse impact on a particular group but the qualitative data may do so. In such circumstances the decision as to the weight attached to particular data must be explained.

The following questions may help guide decision-making:
- *Who will play a role in the decision-making process?*
- *What authority do the decision-makers hold in the Council?*
- *What information will inform the decision-making process?*
- *What weights will be assigned to various pieces of information? How will these weights be determined?*
- *How is the decision-making process to be structured?*
- *Will the process involve face-to-face meetings? How many?*
- *How will the decision-making process be recorded?*

FUTURE MONITORING AND CONSULTATION

IAs are not one-off exercises but represent a consideration by the Council, at a point in time, of the impact of their policies on different equality strands. In order, therefore to ensure that there is no adverse impact in the future there is a need to establish robust systems to monitor the impact of the policy in order to find out its effect on the relevant group(s) in the future. This must be reviewed on an annual basis. It is essential that monitoring is carried out in a systematic manner and that the results are widely and openly published. If the monitoring and evaluation show that the policy results in greater adverse impact than predicted, or if opportunities arise which would allow for greater equality of opportunity to be promoted, the Council must ensure that the policy is revised.

The following questions may help guide future monitoring:
- *Who will be responsible for monitoring?*
- *What has to be monitored?*
- *Are there monitoring procedures already in place which will generate this information?*
- *How could monitoring procedures already in place be adapted to better reflect IA needs?*

- *Can existing monitoring procedures be adapted to collect the additional information required in relation to this policy?*
- *What monitoring techniques and tools will be the most effective?*
- *Will arrangements need to be put into place for others to collect monitoring and evaluation information (for example where the Council is not responsible for the implementation of the policy)?*
- *What indicators or targets will be used to evaluate the effectiveness of the policy?*
- *In what format will monitoring, information be published?*
- *Does the monitoring information identify opportunities for greater equality of opportunity to be promoted?*

Monitoring, therefore, consists of continuous scrutinising, follow-up and evaluation of policies. It is not solely about the collection of data, it can also take the form of regular meetings and reporting of research undertaken. Monitoring is not an end in itself but provides the data for the next cycle of policy review.

VI) SECTION 6 – ACTION PLAN

Section 6 of the Equality Impact Assessment Template is an Action Plan with a timetable for implementation. It is very important that this is completed as it details what actions are to be taken, to tackle issues which have been identified in the assessment, and when they will be carried out.

These Action Plans are then incorporated into the corporate Equalities Action Plan for all directorates which is up-dated with progress every six months.

GUIDANCE ON CONSULTATION

An IA requires consultation, which must be carried out with relevant interest groups other public bodies (including health), voluntary, community, trade union and other groups with a legitimate interest in the matter. This should include those directly affected by the policy to be assessed, whether or not they have a direct economic or personal interest.

The method by which the Council chooses to conduct consultations at this stage must ensure a fair opportunity to present pertinent information and to provide the Council with a sound basis for decision, without rendering decision-making unmanageable. It will be important to ensure that sufficient time and resources are dedicated to the consultation process to encourage full participation particularly by marginalised groups. Wide publication of the consultation exercise is essential to inform the public and relevant groups about the policy being assessed, and to invite comments on it.

This may include press releases, prominent advertisements in the press, the Internet and direct invitations to groups, which are likely to be interested in and able to represent interests and views, which would otherwise be inadequately represented. The information used by the Council in assessing the impact of the policy must be made available on request to those consulted. This will include any quantitative and qualitative data and other documentation such as consultants' reports.

CONSULTATION AND INVOLVEMENT FRAMEWORK

The Council's Consultation and Involvement Framework consists of the Compact supported by the Inter-agency Protocol, which provides guidelines on sharing information between agencies, including information for the forward calendar and a Step by Step Guidance for staff, which provides consistent guidance for use across agencies.

The Purpose of the Compact

The compact sets out standards of consultation and involvement practice that will be followed by those statutory organisations signing up to it.

1. **Consultation and involvement processes will be co-ordinated**
    Liaising with other organisations over the timing and scope of the proposed consultation and ensuring that it is listed in the forward calendar on the Web.

2. **Clear information will be provided**
    Information on each consultation process will be made available as early as possible and will use plain language (and, where relevant, community languages).

3. **Consultation and involvement processes will have an adequate time-scale**
    One month will be given to individuals and organisations to respond to consultation documents and three months when dealing with complex issues.

4. **The purpose of each consultation and involvement process will be set out**
    The purpose of every involvement process will be stated clearly from the start, including the time scale, what decisions will be taken and by whom.

5. **A variety of methods will be used**

A variety of methods and approaches will be used to ensure maximum levels of involvement including those groups that we may find difficult to reach.

6. **Accurate records of responses will be kept**
   Responses will be recorded accurately.

7. **A summary of consultation and involvement findings will be made public**
   A summary of the findings of consultation and involvement processes will be made available to all who took part (respecting any issues of confidentiality).

8. **Participants will be given feedback about the outcomes of consultation and involvement processes.**

9. **Where appropriate, local third sector organisations will be supported in delivering or contributing to the delivery of consultation and involvement.**

10. **Consultation and Involvement processes will be reviewed and monitored.**

11. **Training and guidance will be provided to those undertaking consultation and involvement.**

Further details of the Consultation and Involvement Framework, including guidance for staff may be obtained from the Council's Intranet or by contacting Robert Johnson in Policy and Strategic Planning, Ext. 4933.

The following questions may be of assistance in guiding consultation:
- *Who is directly affected by the policy?*
- *What relevant groups have a legitimate interest in the policy?*
- *How do we ensure that those affected or with a legitimate interest in the policy are consulted?*
- *What methods of consultation will be used and at which stages of the IA?*
- *How will information be made available to those consulted?*
- *Will the information be accessible to minority groups such as those with disabilities and ethnic minorities?*
- *What barriers exist to effective consultation with each of the groups/bodies/persons identified above?*
- *What measures can be taken to facilitate effective consultation in light of any barriers?*
- *Have previous attempts at consultation with particular groups been unsuccessful? If so, why, and what can be done to overcome any obstacles?*
- *What resources are available to encourage full participation by marginalised groups?*
- *If meetings are to be held, where will they be held and at what time of the day?*

It is important to remember before proceeding with consultation to ascertain what other consultation has already been undertaken by the Council before proceeding with another exercise. The issue of consultation fatigue needs to be taken account of. Groups/individuals see the whole Council as one organisation and can become perplexed why there may be similar consultation exercises may be taking place within very short time spans. It is important to have a co-ordinated and consistent approach.

GUIDANCE ON THE PUBLICATION OF RESULTS

An important part of the process of IA is to publish the results in a comprehensive and readily accessible form, paying particular attention to special needs of particular groups within each equality category. This is probably best achieved by presenting the IA as a report, which incorporates all the elements along with measures to mitigate adverse impact. The NI Guide to Statutory Duties states that the "*mitigation of adverse impacts must be considered at the various stages of the policy-making process. Clear evidence of the mitigation of impacts must be apparent in the policy assessments, and details of mitigation and its implementation must be included in the final recommendations. Evidence of the consideration of mitigation must be presented during decision making*".

The report should begin with an **Executive Summary** of the results of the IA, in particular focusing on any decisions, which have been reached. The report should contain a description of the policy aim, the context within which the policy operates, the scope of the policy and any existing data which are available and which may have informed policy development in the past (**Background**).

The first section, **Data Collection & Consultation**, should outline how data were collected for the IA, and will also include reference to consultees along with any other procedures, which have been used to draw together pertinent information. Sufficient detail should be provided so that the research procedures could be replicated and the validity of the data confirmed. It should be made clear to all those providing information in relation to an IA how that information will be made available subsequently. For example, sensitive monitoring information, focus group interviews and individual interviews may be anonymous but responses to consultation with representatives will be attributable. More generally it is important to be wary of the possibility of allowing individuals to be identified where inappropriate.

The next section, **Key Findings**, should highlight results that have emerged and should ensure that due consideration is afforded to the equality categories under consideration.

The final section, **Conclusions**, will then draw conclusions from the results in terms of the policy impact and will outline the decision-making process concerning policy review. This section should state the decisions made by the Council on the basis of the IA, for example, by way of an action plan with associated timescales. If a decision is made to introduce measures to mitigate adverse impact or alternative policies then it would be appropriate to address each of the following six questions:

- *How does each option further or hinder equality of opportunity?*
- *How does each option reinforce or challenge stereotypes, which constitute or influence equality of opportunity?*
- *What are the consequences for the group concerned and for the Council of not adopting an option more favourable to equality of opportunity?*
- *How will the relevant group be advised of the new or changed policy or service?*
- *What are the costs of implementing each option? Will the social and economic costs and benefits to the relevant group of implementing the option outweigh the costs to the Council or other groups? An evaluation of net social benefits achieved by adopting each option must be considered.*

This section should also outline systems that will be put in place to monitor for adverse impact in the future and should include all relevant timetables.

APPENDIX A
Diversity Monitoring Categories (based on the 2001 census)

Gender

Are you:

Female ☐   Male ☐

Other description _____

Ethnicity

Are you:

Asian		**Mixed Dual Heritage**	
Bangladeshi	☐	White & Asian	☐
Chinese		White & Black African	☐
Indian		White & Black Caribbean	☐
Pakistani			
Vietnamese			

Other Asian background
(Specify) _____

Other Mixed background
(Specify) _____

Black

Caribbean ☐

African
    Somali ☐
    Other African

Other black background
(Specify) _____

White

English ☐
Irish ☐
Scottish ☐
Welsh ☐

Other White background
(Specify) _____

Other
Any other ethnic background
(Specify) _____

The information which you provide on this form will be kept in accordance with the Data Protection Act 1998 and used for the purpose of monitoring

Disability

Do you consider yourself to be a disabled person?

Under the Disability Discrimination Act 1995 a person is considered to have a disability if he/she has a physical or mental impairment which has a sustained and long-term adverse effect on his/her ability to carry out normal day to day activities.

No ☐   **Yes** ☐

Sexual Orientation
How would you define your sexual orientation?

Bisexual ☐   Heterosexual ☐
Gay   Lesbian ☐

Age
Date of Birth _____

Or alternatively, the following age banding

0-4	☐	44-52	☐
5-11	☐	53-59	☐
12-19	☐	60-64	☐
20-25	☐	65+	☐
26-34	☐		
35-43	☐		

Religion/Belief
What is your religious belief?

Buddhist	☐	Muslim	☐
Christian	☐	Sikh	☐
Hindu	☐	No Religion	☐
Jewish	☐		

Other religious beliefs (specify) _____

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