EQUALITY IMPACT ASSESSMENT

GUIDANCE AND TEMPLATE

UPDATED FOR 2005/6

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.

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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. EQUALITY IMPACT ASSESSMENT TEMPLATE

UPDATED FOR 2005/06

EQUALITY IMPACT ASSESSMENT

Name of the policy or function being assessed: Partnership Support Team

Directorate   Chief Execs

Date Impact Assessment completed   20th January 2006

Is this a policy or function?   Policy ☐   Function   x

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

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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.   Rachel Salmon: Partnership Support Officer

2.   Masoom Chowdhury: Partnership Support Officer

3.   Abdirahman Adan: Partnership Support Officer

4.   Maryam Parveen: Partnership Support Officer

5.   Edwin Chan: Neighbourhood Renewal Officer

6*. Jim Henderson: Communications Officer*

The members of the team were chosen for their breadth and depth of experience. A combination of newer and more experienced staff were chosen, originating from a variety of backgrounds including housing, crime and disorder, health and the media

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Service Head	Ian Lewis
Signature	
Date	27th January 2006

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

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Identifying the aims of the function[1]

What is the function?

Tower Hamlets Partnership Support Team

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

To improve the quality of life for those living and working in the borough by championing and supporting the work of the Tower Hamlets Partnership to enable it to achieve its goals and accelerate progress towards Government floor targets and local community plan targets

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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).

This function is guided by a range of policies and strategies, chiefly:

- The Tower Hamlets Community Plan
- The Neighbourhood Renewal Strategy to 2010
- The Local Area Agreement for Tower Hamlets
- The London Borough of Tower Hamlets' Corporate Plan and those of partner agencies such as the NHS, Police, Jobcentre Plus etc.

Are there associated objectives of the policy? If so, what are they?

- Improving local service delivery and accelerating performance through the establishment and implementation of an effective Partnership
- Enabling local organisations, individuals and service providers to work together in terms of shared community planning and neighbourhood renewal within the framework of the neighbourhood renewal strategy
- Ensuring that the Partnership is vibrant, dynamic, effective and professional.
- Supporting the effective development of the Partnership ensuring both strategic and operational integration with the work of the Council
- Supporting democratic engagement, i.e. the involvement of the local community in the Partnership

What outcomes do we want to achieve from this policy?

Outcomes specific to this function are:

· LAPs - Arrange and facilitate four LAP events a year and arrange and support up to six LAP steering group full meetings per year
· CPAGs – Arrange and support all CPAG and PMG meetings

Basic service standards are as follows:
- Agendas and relevant papers for PMG, CPAGs and LAP Steering groups will be sent out at least 8 days before a meeting
- Publicity and details of LAP events will be sent out at least 8 days in advance (including adverts in East End Life)
- Full risk assessments will be undertaken for full LAP and other Partnership events (this does not apply to normal steering group, CPAG and PMG meetings)
- During LAP events Partnership Support Officers will ensure that registration forms are available and that evaluation forms are distributed and collected once completed. They will report back at the next steering group on the numbers attending with a breakdown by ethnicity, age, gender etc and feedback on the evaluation.
- Notes of LAP steering groups, CPAGs (where notes are taken by the Partnership Support Team) and PMG will be sent to the chair for approval within 10 working days of any meeting. Once the chair has agreed notes these will be sent to all members of the LAP steering group, CPAG and PMG immediately.

What factors could contribute/detract from the outcomes?

Attainment of these outcomes depends on the capacity of the team and its partner agencies to work together, towards an agreed set of objectives, particularly those set out in the Community Plan

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?

All those living and working in Tower Hamlets

What outcomes would other stakeholders want from this policy?

The aims, objectives and outcomes of the Tower Hamlets Partnership are agreed annually by the Partnership as a whole

Are there any groups, which might be expected to benefit from the intended outcomes but which do not?

Everyone living and working in Tower Hamlets

Promotion of good relations between different communities

How does the policy or function contribute to better Community Cohesion?)

Local Area Partnerships and the Community Empowerment Network in particular bring together local people and voluntary and community organisations to agree priorities and goals for their geographic area or community of interest.

How do you promote good relations between different communities you serve based on mutual understanding and respect?

Through the development of Local Area Partnerships, ensuring that as large and broad a cross section of local residents as possible, attend the four LAP events a year, organised around issues of particular concern locally, as well as ensuring that the LAP steering groups are reflective of the local population.

Partnership Management Group has also reviewed its membership, to ensure that it is reflective of the full range of community interests locally.

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?

This takes place through Local Area Partnership events, for example a Local Area Partnership 6 event was held at a local school and facilitated by members of the school Council, councillors and more established community leaders from the LAP steering group, attended the event to hear the young peoples' views.

The Community Organisations Forum has organised a series of "network" events, which have brought together community groups covering a range of sectors and interest groups.

Five Partnership Development days have now been organised, to bring together all of the component parts of the Partnership.

(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).

The Tower Hamlets Partnership exists to improve the quality of life for all those living and working in the borough. The Partnership and its component organisations are required to work towards the achievement of the Governments Floor targets, which aim to reduce the effects of deprivation in the fields of crime, education, housing, health and employment.

The equality target groups: young people, black and ethnic minority communities, disabled people, women and lesbian, gay, bisexual and transgender communities are often disproportionately affected by poverty and deprivation, the elimination of this will therefore have a disproportionately positive impact on these communities.

Policy Priorities:

(How does the policy fit in with the council's wider aims? Include Corporate and Local Strategic Partnership Priorities)

The function is the Local Strategic Partnership in Tower Hamlets

How does the policy relate to other policies and practices within the council?

The function is the Local Strategic Partnership, its aims, objectives and targets inform the Corporate plan of the Local Authority as well as those of other major partner organisations

What factors/forces could contribute/detract from the outcomes?

The extent to which the Partnership achieves its aims and targets, will depend on the degree to which they are supported and implemented by local organisations, including the Council. The role of the Tower Hamlets Partnership Support Team is to ensure that the Partnership runs smoothly, is increasingly inclusive to maintain its credibility with its member organisations and to ensure their on-going support and involvement.

How do these outcomes meet or hinder other policies, values or objectives of the council?

These outcomes help shape and inform policies, values and objectives of the council.

How the policy is implemented
(How is, or will, the policy be put into practice and who is, or will be, responsible for it?)

The role of the Tower Hamlets Partnership Support Team is to ensure the full involvement of local residents and partner agencies in the development and implementation of the aims, objectives and targets set by the Partnership.

Who defines or defined the policy?

The function is defined and overseen by the Tower Hamlets Partnership, through its constituent components of Local Area Partnerships, Community Plan Action Groups and the Partnership Management group.

Who implements the policy?

The Tower Hamlets Partnership Support Team, overseen by the Tower Hamlets Partnership, in particular Partnership Management Group and the Excellent Public Services Community Plan Action Group.

How does the council interface with other bodies in relation to the implementation of this policy?

The purpose of the Tower Hamlets Partnership is to bring together the widest possible range of stakeholders.

Is the service provided solely by the Department or in conjunction with another department, agency or contractor?

The service is provided in conjunction with other agencies, such as the Tower Hamlets Partnership Local Management Team and the Partnership Development Unit at Tower Hamlets Primary Care Trust.

If external parties are involved then what are the measures in place to ensure that they comply with the Council's Equal Opportunities policy?

All members of Local Area Partnership steering groups, Community Plan Action Groups and the Tower Hamlets Partnership Management Group are required to sign a Charter, which specifically outlaws any discriminatory activity.

All Service Level Agreements, for services funded through the Neighbourhood Renewal Fund, stipulate that provider organisations have equal opportunities policies in place, applicants for Neighbourhood Renewal funding as asked to specify which groups their service will cater for.

The Tower Hamlets Partnership Support Team is bound by the London Borough of Tower Hamlets equal opportunities policy, in relation to the recruitment and retention of staff.

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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 Tower Hamlets Partnership produces a Ward Data report annually, including statistics on all key subject areas, as well as population data. An on-line Local Information System is under development, this will enable the Partnership and its constituents to monitor performance, particularly in relation to key equalities groups.

Tower Hamlets Council also conducts an annual resident's survey, which tests resident's recognition of the partnership. This can be analysed by gender, ethnicity, geographical area and age.

The membership of all each component part of the Tower Hamlets Partnership is reviewed annually; this is in part to ensure that it accurately reflects the composition of the local population.

Attendance at Local Area Partnership events is recorded by age, ethnicity and gender.

Targets in relation to the proportion of attendees under 25 and those from black and ethnic minority communities are set annually and monitored via the Tower Hamlets Index.

Member organisations publish their own research, e.g. the Tower Hamlets Primary Care Trust publishes an annual Public Health report, the Metropolitan Police publish a Fear of Crime survey. All of these documents are fed into the development of the Tower Hamlets Community Plan, which determines the objectives of the Partnership over the coming year.

Equalities profile of users or beneficiaries

Over 40% of attendees at LAP events are from Black and Ethnic minorities
Over 25% are under 25 years of age

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).

Of the eight members of the Tower Hamlets Partnership Support Team:

4 are women
4 are men

1 is of Somali origin
4 are of Bangladeshi origin
3 are white

1 is a gay man

1 is a disabled person

1 is under 25
2 are 25-30
3 are 35-40
2 are over 40

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 was one alleged racist incident in 2004, this was resolved swiftly

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

PMG have agreed guidance re membership and as part of this have set inclusivity targets. PMG membership has strong BME representation but still has a disproportionate number of men compared to women.

Each LAP steering group have signed up to the LAP protocol which states clearly that the group will need to actively demonstrate that, as far as possible, membership reflects the make up of people living and working in the area. Each LAP is required to review its membership annually and the extent to which the steering group reflects the make-up of the local population, is a factor in determining future membership.

Attendance at LAP events has been steadily increasing with a number of events now attracting over 100 local people, there were over 4,000 attendees in 2004-2006. From May 2003 the ethnicity and gender of all participants have been requested on attendance sheets.

CPAGs review membership based on guidance agreed by PMG. Again this guidance is clear that each CPAG must consider the issue of inclusivity in their make-up. Evidence to date suggests that CPAGs are not as yet as inclusive as they should be

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)

Each Local Area Partnership holds 4 events per annum, which are open to all members of the local community. These attracted over 4,000 people in 2004-5, these are evaluated, with a target of at least 90% of participants rating them as good or very good.

The Tower Hamlets Partnership has held 5 development days, bringing together representatives from all strands of the partnership, these have received good evaluations each time.

The annual residents survey, tests recognition of the Tower Hamlets Partnership and Local Area Partnerships.

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:

At the moment, data in relation to LAP attendances, is collected by gender, age, ethnicity and disability, specific targets are set and monitored in relation to age (under 25s) and attendances from members of black and ethnic minority communities.

Although we are generally reaching our target in relation to attendances by ethnicity, we know from observation that we are not effectively reaching communities such as the Somali, Eastern European, Chinese and Vietnamese communities.

We also observe that younger women are also not attending our events in sufficient numbers, disabled people are also under-represented.

Some LAPs lack faith representation, particularly from non-Christian faiths

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

LAP attendance should be reported by gender and disability with a view to target setting in the event of continuing under-representation

Ethnicity should be recorded by specific group (this could be broken down by means of census category, and respondents asked to tick a box), rather than recorded by self-definition, as now. This would facilitate more detailed monitoring and recording.

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**.**

More needs to be done to improve representation and participation from the Somali, Chinese, Vietnamese (especially in LAPs 7 & 8) and Eastern European communities.

How is the race target group reflected in the take up of the service?

Attendance at LAP events needs to be broken down by specific ethnic group, to allow for closer monitoring

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?

If information and outreach is not targeted at specific communities, this can lead to under-representation. Whist this would not constitute unlawful discrimination, failure to engage with these communities could mean that their specific needs are overlooked.

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?

No

Could the policy discriminate, directly or indirectly and if so is it justifiable under legislation?

No

(Include information on adverse impact between different racial groups)

Gender – testing of disproportionate or adverse impact

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

Participation by women (particularly younger women) throughout the Partnership needs to be reported as well as recorded, possibly with a view to setting a target to increase participation, in the event of persistent under-representation

How are the gender groups reflected in the take up of the service?

Younger women are under-represented in LAP steering groups and in attendances at LAPs, the gender make up of LAP steering groups and at LAP events needs to be monitored and if necessary, action taken to address this.

Focus group of younger women could be organised in each LAP to find out what can be done to help them engage

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?

More needs to be done to attract younger women to LAP events and to encourage them to join steering groups. Measures could include holding more LAP events during the daytime (tying them in with existing activities such as Surestart)

Childcare facilities should also be available at all LAP events

This would not constitute unlawful discrimination.

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?

No

Could the policy discriminate, directly or indirectly and if so is it justifiable under legislation?

No

Disability – testing of disproportionate or adverse impact

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

Numbers of disabled people attending LAP events/members of steering groups could be reported as well as recorded

How are disabled people reflected in the take up of the service?

Numbers of disabled people attending LAP events is recorded but not reported, however it is likely that they are underrepresented.

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?

If information about the partnership is not effectively pitched to disabled people they will be unaware of the Partnership and will be unable to participate

More outreach to disability groups is needed, to boost awareness and attendance. Information needs to be more accessible, e.g. ensuring that LAP events are advertised in the "Taking East End Life".

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?

No

Could the policy discriminate, directly or indirectly and if so is it justifiable under legislation?

No

Age – testing of disproportionate or adverse impact

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

The Tower Hamlets Youth Partnership has recently been established, to promote the involvement of young people in decision-making in Tower Hamlets.

Further links need to be built between the THP and the THYP, to ensure information flows effectively between them and that the concerns of young people are acted on.

How are young and old people reflected in the take up of the service?

Younger people are currently under-represented, particularly on CPAGs and LAP steering groups. Effective links need to be built with paired-LAP based Youth Forums.

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?

A number of measures could be taken to make the Partnership and its activities more appealing to young people

- Work with Youth Participation team to increase awareness, involvement and attendance
- Establish formal links between LAP Steering groups and youth forums, this may take the form of formal representation/short slots/tabling minutes, visits by representatives of the LAPs to youth forum meetings
- Explore the introduction of text messaging for events
- Work with schools and school councils
- Ensure meetings finish early in the evening

If there is an adverse impact, can be justified on the grounds of promoting equality of opportunity for one group or for another legitimate reason?

No

Could the policy discriminate, directly or indirectly, and if so is it justifiable under legislation?

No, not if measures are taken to include young people

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.*

Lesbians, gay men, bisexuals and those who are trans-gender, are probably under-represented in the Partnership, although collection of information is difficult due to the culturally sensitive nature of these issues.

However, more contact needs to be made with Lesbian, gay, bisexual and trans-gender groups, to find out what measures may be needed to engage them more effectively

How are LBG groups reflected in the take up of the service?

This is not currently measured or recorded

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?

Failure to engage with these communities means that their needs may not be reflected in our priorities and therefore not acted upon.

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?

No

Could the policy discriminate, directly or indirectly and if so is it justifiable under legislation?

No

Religion/Belief – testing of disproportionate or adverse impact

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

People from all religions need to be involved in the Partnership, it is important that we understand their needs, so that they can be reflected in our priorities, and subsequently acted upon by partner agencies.

How are the religious/belief groups reflected in the take up of the service?

The protocol documents for the Local Area Partnerships and for the Partnership Management Group allow for faith representation.

There are two faith reps on the Partnership Management Group, some LAP steering groups have faith reps, but they are mainly from the Christian faith. More work needs to be done to ensure representation from other faiths.

Capacity building and training is also needed, to increase the confidence and effectiveness of some faith groups in engaging in Partnership activities.

Courses and seminars could be run, to explain the Partnership and its work to these groups.

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?

If faith groups are not involved in the Partnership, their views and needs will not be taken into account when determining priorities for the area.

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?

No

Could the policy discriminate, directly or indirectly, and if so is it justifiable under legislation?

No

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.)*

Risk assessments are carried out for all LAP events, to minimise the risk of accident and injury to all participants.

All tastes in food, including vegetarian and helal are catered for at LAP events and meetings

Events, promoting good health, exercise and well being, have been held by all LAPs.

The PCT is now fully engaged in LAPs and relevant CPAGs

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?

The Tower Hamlets Partnership is working with a diverse range of people and should always consider the way in which its actions may impact on the health of local people.

Closer links need to be made with people with mental health needs and their service providers including the East London and the City Mental Health Trust and Locality Mental Health teams.

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

Local events minimise the cost of transport, enabling those on low incomes to become involved more easily.

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 heavy workload of the service sometimes places stress on our admin support function.

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 operates within a fast moving policy area and is politically sensitive there is no reason why this should have a disproportionate impact on target groups

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

The service standards help ensure that all events and meetings are publicised well in advance. LAP events are widely publicised and this is generally undertaken well in advance.

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?)

Meetings and events are not held during religious holidays, evening meetings normally take place during early evening, LAP events usually take place over the weekend.

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

A range of methods are used including local press, radio, leaflets delivered to homes/via local organisations, posters, word of mouth

Internally

Members Bulletin, Partnership e-bulletin

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?)

The awareness of the Tower Hamlets Partnership is growing year on year, with 38% of local people being aware of the TH Partnership and 25% being aware of LAPs in 2005.

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?)

Awareness amongst residents from BME communities is actually higher than that of white people

Team plan reviewed annually
yes x   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).*

Race:

Improved targeting of Somali, Chinese and Vietnamese groups

Gender:

Improved representation from younger women, improved links with initiatives such as Surestart, Childcare facilities at all LAP events.

Disability:

Target disability groups and conduct focus groups to see how they can be more effectively engaged

Ensure THP activities covered in "Talking East End Life"

Lesbian, Gay, Bisexual and Trans-gender

Target relevant organisations and conduct focus groups to see how they can be more effectively engaged

Youth

- Work with Youth Participation team to increase awareness, involvement and attendance
- Establish formal links between LAP Steering groups and youth forums, this may take the form of formal representation/short slots/tabling minutes, visits by representatives of the LAPs to youth forum meetings
- Explore the introduction of text messaging for events
- Work with schools and school councils
- Ensure meetings finish early in the evening

Faith groups:

Ensure at least one Christian and one non-Christian rep on each LAP steering group
Conduct outreach and discussion with faith groups in each LAP, to identify what

Mental health

Improve links with mental health service users and their organisations, including locality mental health teams

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   x   no ☐

What are the main areas requiring further attention?

Gender, esp. younger women, outreach, surestart, targets

Ethnicity, Somali, Chinese, Vietnamese, continue outreach and improve reporting, make more specific

Disability, increases outreach, improve information to visually impaired people, improve reporting and monitoring of take up

LGBT, Outreach and discussion

Youth, improved links with youth forums, table notes at LAP SG, look at representation, visit, monitor attendance at events, joint work with schools/colleges, different communication e.g. texting,

Look at specialist press and media, e.g. disability, LGBT,

Ethnicity: Faith groups outreach, focus groups, and representation at LAP steering groups

Summary of recommendations for improvement

See above

How will the results of the IA feed into the performance planning process?

Revised targets re recognition and TH index
Recommendations (above) included in Team Plan 2006-7, review annually

Future Monitoring and Consultation

How and when will the policy be monitored?

Quarterly, via team plan

Suggested consultation for the future.
(Identify areas for future consultation and any barriers to participation in consultation with
proposals to overcome these).

Eastern European communities could be targeted in future years

SECTION 6 – ACTION PLAN

Recommendation	Key activity	Progress milestones	Officer Responsible	Progress
Appoint lead PSO to take forward work with each of: race, gender, disability and Lesbian, gay, bisexual and trans-gender communities		April 2006		
Race: Increase participation of Somali, Chinese and Vietnamese Communities	Continue advertising LAP events on Somali Voice Radio and in the Somali press. Conduct outreach with Somali community (in conjunction with CEN) Conduct outreach with Chinese and Vietnamese communities (especially in LAPs 7 and 8), in conjunction with CEN and relevant Neighbourhood Managers Record attendance at LAP events by ethnic group (using census categories)	On-going to March 2007 March 2006 March 2006 April 2006		
Gender: Increase the involvement of younger women and those with young children	Record attendance at LAP events by gender Conduct focus groups of younger women (under 35) and those with	On-going June 2006		

	young children, in each LAP area, to find out what measures need to be taken to facilitate their involvement			
	Provide childcare at all LAP events	April 2006		
	Consider holding LAP events in conjunction with Surestart/Children's Centre activities			
Age: Increase the involvement of young people in the Local Area Partnerships and steering groups	Work with the Youth Participation team to increase awareness, involvement and attendance at LAP events:	On-going		
	Establish formal links between LAP Steering groups and youth forums, this may take the form of formal representation on LAP steering groups, short slots at each meeting, tabling minutes of youth forums at LAP steering group meetings, visits by representatives of the LAPs to youth forum meetings	June 2006		
	Explore the introduction of text messaging to publicise LAP events			
	Work with schools and school councils, organise joint events with them if appropriate			
	Ensure meetings finish early in the evening			
Faith groups:	Ensure all Faith groups are included	December 2006		

Ensure that each LAP steering group has 2 faith reps., at least one of which should be non Christian	on LAP mailing lists Conduct outreach, training and focus group discussions with faith groups in each LAP, in conjunction with CEN, to explain the role of the Tower Hamlets Partnership and establish what actions need to be taken to facilitate their involvement			
Lesbian, gay, bi-sexual and trans-gender Increase the involvement of these groups in the Local Area Partnerships	Identify and conduct outreach to groups within these communities in conjunction with CEN, to establish actions which need to be taken to facilitate their increased involvement Explore coverage for the Partnership in specialist press/media	March 2007		
Disabled people: Increase the participation of disabled people in the Tower Hamlets Partnership	Conduct outreach to relevant organisations in conjunction with CEN, discuss actions which need to be taken to facilitate greater involvement e.g. representation on LAP steering groups by relevant organisations Ensure THP and its activities covered in specialist press/media, in particular, ensure THP activities and LAP events covered in "Taking East End Life" Ensure that the THP website meets accessibility standards	September 2006		

	Develop links with East London and the City Mental Health Trust and its service users, particularly via the 4 Locality Mental Health Teams			

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 DISPROPORTIONATE 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 favorable 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 RECOMMENDATIONS

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
Bangladeshi ☐
Chinese ☐
Indian ☐
Pakistani ☐
Vietnamese ☐
Other Asian background
(Specify) _____

Mixed Dual Heritage
White & Asian ☐
White & Black African ☐
White & Black Caribbean ☐

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) _____

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

For further information please contact the Corporate Equalities Team on 020 7364 4723   **50**