

Equality Impact Assessments (EIA)

1.0 Purpose of the report

To inform the Board of the following:

- Explain what Equality Impact Assessments are;
- Provide information on Legal requirements to carry out EIAs;
- To make proposals to adopt a standard approach to Equality Impact Assessments, and highlight further considerations.

2.0 What is an Equality Impact Assessment (EIA)?

The purpose of an Equality Impact Assessment (EIA) is to improve the work of the Northwards Housing by making sure it does not discriminate and that, wherever possible, promotes equality.

It is a way to make sure individuals and teams think carefully about the likely impact of their work on residents and take action to improve services, policies, and projects, where appropriate.

The EIA focuses on systematically assessing and recording the likely equality impact of a service, policy or project. There is a focus on assessing the impact on certain groups of people known as equality target groups (BME, disabled, age, sexuality, gender and religious belief.) This involves anticipating the consequences of policies and projects on these groups and making sure that, as far as possible, any negative consequences are eliminated or minimised and opportunities for promoting equality are maximised.

3.0 Race Relations (Amendment) Act, 2000

Northwards Housing has a legal responsibility to assess its policies and functions, and to set out how it will monitor any possible negative impact on race equality. Northwards is required to consult on proposed policies and train staff about this law and has a positive duty to promote good relationships among communities it serves.

It is important to first assess and consult before taking action as it helps the organisation to become more culturally sensitive and to

better understand the needs of different groups. EIAs will also help Northwards Housing find ways in which we harness the vast cultural and economic contribution people from a diverse range of communities can make.

3.1 Performance Review- Equality Standards

Northwards Housing's performance will, in due course, be assessed in accordance with the Equality Standards for Local Government, which is a Best Value Performance Indicator. The gender, disability, age and sexuality strands are also included as part of the Equality Standard. Undertaking a full range of EIAs will enable Northwards Housing to reach Level 2 of the Equality standard by August 2006 and Level 3 by March 2007.

3.2 Business case

- It increases user/public/staff trust
- It enhances value for money
- It informs business plans
- It increases social inclusion
- It promotes understanding and sensitivity
- It has a user focus

4.0 Northwards Housing Proposed method to carry out EIAs

As Equality and Diversity is not solely the role of one Officer, it is suggested that all managers undertake out EIAs relating their own area of work. This will ensure all managers will consider Equality & Diversity issues within their own operational areas, ensuring that Equality and Diversity is embedded throughout the organisation.

Attached is a proposed toolkit (adapted from Sheffield Homes ALMO) that provides managers at Northwards Housing with a standardised method to carry out EIAs. The toolkit provides information and a step-by-step guide on how to carry out Equality Impact Assessments against project proposals and review existing policies and procedures.

5.0 Other considerations

- Workshops will need to be provided to managers so that they know how to use the toolkit;

- It is proposed that we pilot the tool kit for a period of six months to identify any improvements that can be made;
- It is proposed that Equality Impact Assessments commence in August 06 and aim to complete a review of all policies and procedures by August 08;
- Decisions to prioritise policies and procedures will be planned in an Equality Impact Assessment Action Plan, proposed to be drawn up by the new Equality & Diversity Officer.
- It is proposed that BME groups, Disabled groups, Women, Lesbian Gay Transgender Bisexual and Young/Elderly groups will be part of the consultation exercise. The decision to consult with specific groups,(such as Community Consultation Forum), will be devised as part of a strategy by the new Equality & Diversity Officer.
- Where there are large scale policies, procedures or projects, it is proposed that the Equality & Diversity Officer carry out the Equality Impact Assessment in partnership with team managers.
- It is suggested that all reports requiring approval by Sub-Committees and the Board require a summary of the Equality Impact Assessment carried out, attached to the relevant documents.

APPENDIX 1

Northwards Housing Equality Toolkit

Introduction

Northwards Housing is committed to equality of opportunity for all people regardless of age, colour, ethnic or national origin, class, religious belief, race, gender, disability, marital status, sexuality, or trade union membership. The Action Plan outlines tasks for our organisation, which include consultation with communities, equality monitoring and improving access to Northwards Housing's services and information to all communities. Diversity is not a "one off" programme, but should be at the heart of the organisation and should be integrated into all daily business.

The Race Relations Amendment Act 2000 (RRAA2000) requires organisations to examine all their functions and policies to ensure that they meet the general duty to promote race, gender, disability, sexuality and age equality.

The general duty as set out in the RRAA 2000 is:

- To eliminate unlawful discrimination
- To promote equality of opportunity
- To promote good Race Relations between people of different ethnic groups

This process will include;

- Reviewing current functions and policies (including unwritten custom and practice)
- Assessing the potential impact of proposed policies and functions at the planning stage and consulting on this.

The process is planned for a two year period from August 2005 – August 2007.

All our policies and functions have been prioritised for examination, according to their potential impact on race, disability, gender, sexuality, and age equality.

Our arrangement for meeting the requirements of the RRAA2000 are also set out in Northwards Housing Equality Scheme.

This tool kit has been produced to assist managers in this process. The outcomes of undertaking this work should be:

- Functions and policies which met the requirements of the RRAA.
- Functions and policies which meet the needs of all our customers
- Accurate information and data on the needs of our customers
- Comprehensive monitoring data on the effectiveness of our functions and policies.

Appropriate changes to policies will need to refer back to EMT, Sub-Committees and the Board. Minor or procedural changes should be reported to HR & Equality Sub-Committee.

Managers will be expected to submit an Impact assessment summary report setting out the outcomes of working through the framework for developing proposals (see below) with any future proposals for projects.

The Process will be audited;

- Internally through an annual review and progress check of the equality scheme- including random spot checks of the reviews
- Externally through reports and presentations to the Community Consultation Forum, Disabled Access Review Forums etc, as part of the consultation structure to oversee the implementation of the BME and Disabled Housing strategies.

Our Equality Action Plan contains our plans and targets for all equality groups and addresses gender, disability, race, sexuality and age.

The Equality Scheme sets out how Northwards Housing will meet the commitments made in its Equality Policy. It sets out our approach to equality and diversity for service, workforce and community involvement including our key equality targets.

We must ensure that our services are accessible to everyone. The Disability Discrimination Act (DDA) requires us to provide

an equal standard of service to all our customers. Equality concentrates on the areas covered by law, such a race, gender, disability, sexuality and age. More recently European employment laws have made it unlawful to discriminate against someone because of their religion, belief, sexuality, age, gender, race disability. The principle of Equality Policy should underpin everything we do.

HELP AND ADVICE IN COMPLETING AN EQUALITY IMPACT ASSESSMENT IS AVAILABLE FROM THE SERVICE IMPROVEMENT TEAM.

How to use this tool

This Equality Toolkit should be used to assess the impact of policies and projects on the following groups of people:

- Black and Minority Ethnic (BME) people
- Disabled people
- Women
- Lesbian, gay, Bi-sexual and transgender (LGBT) people
- The young and older people
- Victims of Domestic Violence

Don't Get Bugged Down!

It would be easy to see the task of reviewing all our policies, procedures and practices as daunting, and to get 'bugged down' in the detail. However, the Commission of Racial Equality advises that we shouldn't make an industry out of this. We need to focus on the outcome which we are aiming for- to identify any negative impact and provide equality of equal opportunity for all people regardless of age, colour, ethnic or national origin, class, sexuality, religious belief, race, gender, disability or marital status etc. Focusing on this it is easier to see the level of detail needed in the reviews carried out. Often we will be able to build on existing processes. Remember when using this toolkit, it is important that you look from a customer's perspective.

Don't bite off more than you can chew!

When you are looking to review a large policy or strategy, break it down into manageable chunk and review them separately. For example, if you are reviewing a complex area strategy look at each key proposal in turn.

Monitoring Data

Some areas of service already have monitoring data available. A lot of the work is currently underway to put systems in place to provide equalities monitoring data for all parts of the service. This will involve collecting information for many of our customers where we do not as yet hold it, as well as devising reports to produce useful information. More details are in the Equality Scheme.

“Reason to believe”

Sometimes we have hunch- a “Reason to believe” that a policy or practice is disadvantaging a certain group. However we may not have monitoring data to support this. In which case we can look at other evidence such as results of consultation, complaints, and anecdotal evidence (for example evidence for staff) or observation to check whether ‘hunch’ is correct. We also need to set up monitoring systems so that in future there will be hard evidence to hand.

What sort of Impacts might there be

Policies can impact on different customers in different ways. Each policy may not affect all groups- but consideration should be given to the possible impact on each group. If there are any impacts they should be recorded.

The following are example of possible impacts and questions that could be considered:

BME Tenants and Customers

- Will the policy affect people in one area more than in another?
- What are the demographics of that area?
- Could the policy increase segregation or have a negative impact on bringing communities together?
- How will you ensure that the different ethnic groups are aware of this policy?
- Is there currently a low take up of services from any groups?
- Has your consultation involved representative from different communities?
- Are you aware of any perceptions from BME tenants and customers about how the policy or service is viewed?
- Could there be a negative impact by not communicating information in a range of languages/media?
- Have you considered the needs of less obvious BME groups, for example, gypsies/ travellers or asylum seekers?

Disabled Tenants and Customers

- Will the project or policy cause any access issues (physical access to buildings and different methods of accessing a service e.g. face to face, telephone)?
- Could you be adversely impacting on disabled people by not providing information in accessible formats such as Braille, audio tapes etc?
- Will disabled people have to pay more for the service so it meets their needs? Can you provide alternatives?
- Have disabled people raised any issues with you?
- Will people with hearing or visual impairments be affected negatively by the policy? Will they be able to access the service?
- Will the policy encourage disabled people to be independent?
- Are you making assumptions about disabled people (i.e. not working and being available at home during the day)?

Women Tenants and Customers

- Will the policy enable women who work or have child care responsibilities to access the service or opportunity?
- Will the location be safe, have good access and provide adequate facilities for children?
- Where there are issues of sensitivity, will women service users have the option of being dealt with by female only staff?
- Will the policy encourage women to use the service?
- Are you making assumptions that women will be available during the day- what about part-time workers?

Lesbian, Gay, Bi-Sexual and Transgender (LGTB) Tenants and Customers

- Will the policy discriminate against those in the same sex couples?
- Will the policy allow LGTB people to be open about themselves and be in a supportive environment?
- Will LGTB people feel safe?

Age- Young and Elderly Tenants and Customers

- Does the lettings policy discriminate against young people obtaining housing?
- Is there an age limit on the recruitment policy?
- Will the policy encourage older people to use and access the service?
- Will older people feel safe?

Framework for Reviewing Current Functions/Policies

Function:	Aims/Objectives
Policies used to carry out function:	
Groups who the function should benefit:	
Are all groups affected equally by this function/policy?	

Step 1	<p>Who should be served by the function/policy? Baseline information on the general population and the groups the function should benefit e.g.</p> <ul style="list-style-type: none"> ➤ Census data (or more up to date population projections) ➤ Housing survey data ➤ Information of social and economic factors, such as age, income levels, health etc which are indicators of need. 		
Step 2	<p>Do you have monitoring data? E.g.</p> <ul style="list-style-type: none"> ➤ House90 ➤ DLO ➤ Service charges ➤ CRSMS ➤ GPA 	Yes (go to 3)	No (go to 4)
Step 3	<p>Who is using the function/policy? What does your monitoring data on users tell you? Are there any groups who are under-or over-represented compared to what you would expect to see from the</p>		

	<p>baseline data? What does your monitoring data on outcomes tell you? E.g. are some groups more likely to be unsuccessful in their applications, compared to what you would expect to see from the baseline data on needs etc.?</p>	
Step 4	<p>Is there any other evidence?</p> <ul style="list-style-type: none"> ➤ Customer satisfaction surveys ➤ Complaints ➤ Local and national research ➤ Consultation ➤ Experience and local knowledge ➤ Anecdotal evidence/observation 	
Step 5	<p>Are there differences between individual groups?</p> <ul style="list-style-type: none"> ➤ Are all BME communities disadvantaged, or only one particular community, male or female, disabled or not, the young or the older person? 	
<p>If you have found that some/ all groups are disadvantaged, go to step 7 over page)</p>		
Step 6	<p>If you cannot establish that any group is disadvantaged by the policy/function, is this because:</p> <ul style="list-style-type: none"> ➤ You lack monitoring data Action: Set up monitoring systems and repeat process ➤ No disadvantage exists Action: Regularly review other evidence available 	
<p>Go back and regularly repeat the review cycle</p>		

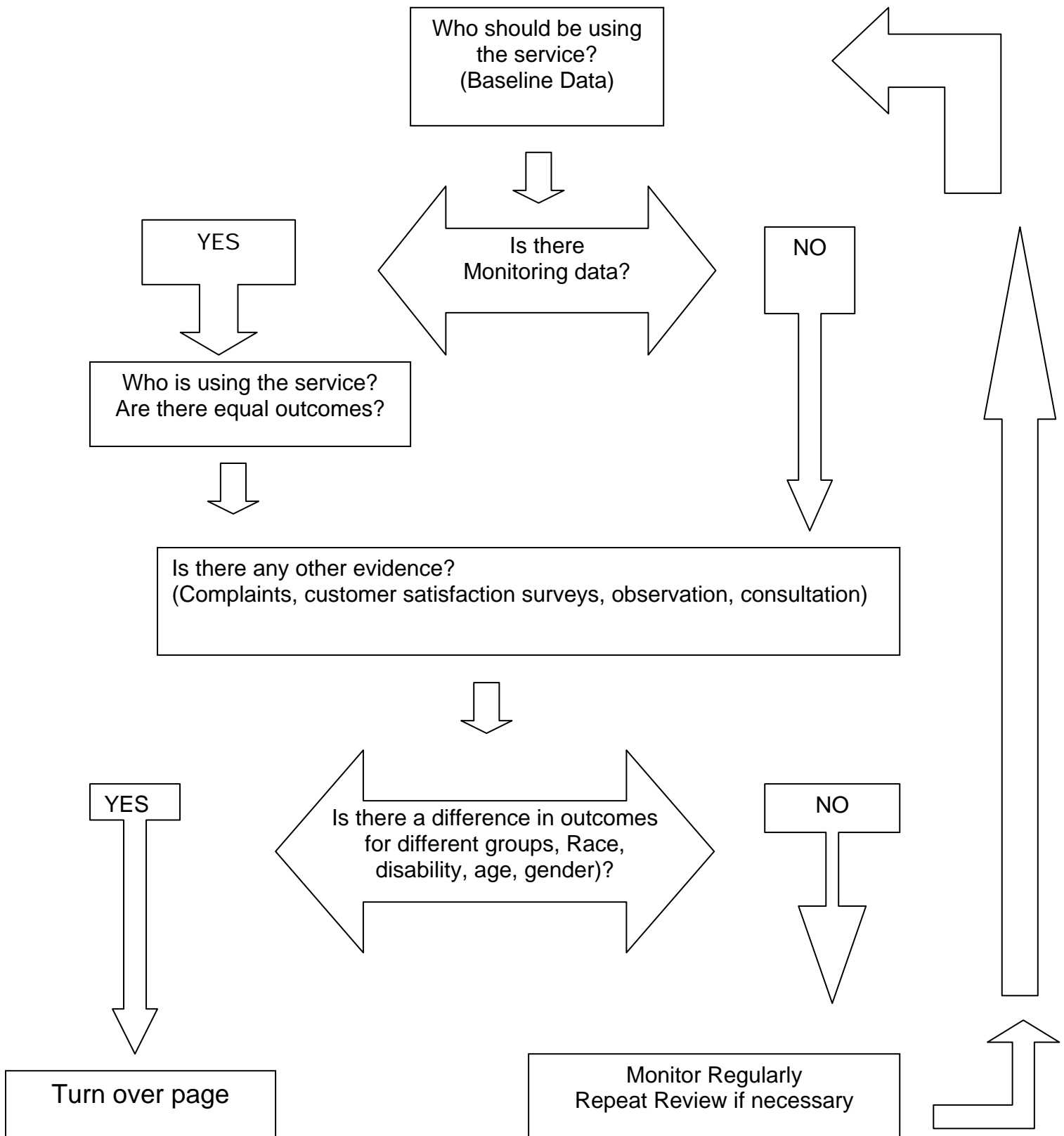
Framework for Reviewing Current Functions/Policies

Making changes to meet the General Duty		
Step 7	<p>What are the possible reasons for the disadvantage?</p> <ul style="list-style-type: none"> ➤ Lack of awareness ➤ Lack of information ➤ Discrimination (direct or indirect) 	
Step 8	<p>Are the disadvantages caused by unlawful discrimination? E.g.</p> <ul style="list-style-type: none"> ➤ Direct discrimination: (e.g. routinely asking BME applicants for their passports, based solely on their name, accent or appearance.) Indirect discrimination: (e.g. having a lengthy residency requirement for rehousing applicants.) ➤ Age restrictions, victimisation due to sexuality, religion, gender or disability. 	
Step 9	<p>Is the function/ policy acting as a barrier to opportunities or access for some groups?</p> <ul style="list-style-type: none"> ➤ Are some groups less likely to meet its requirements? ➤ Does it discourage some groups from accessing the service? ➤ Is the function/policy insensitive to the needs and circumstances of some groups? ➤ Are some groups less likely to know about the policy or how to access the service? 	
Step 10	<p>Is the function/policy damaging relations between different groups within the areas? e.g. Area regeneration funding is targeted at areas of poor quality owner occupied housing. The results in an areas getting more funding than other areas. This could cause resentment.</p>	

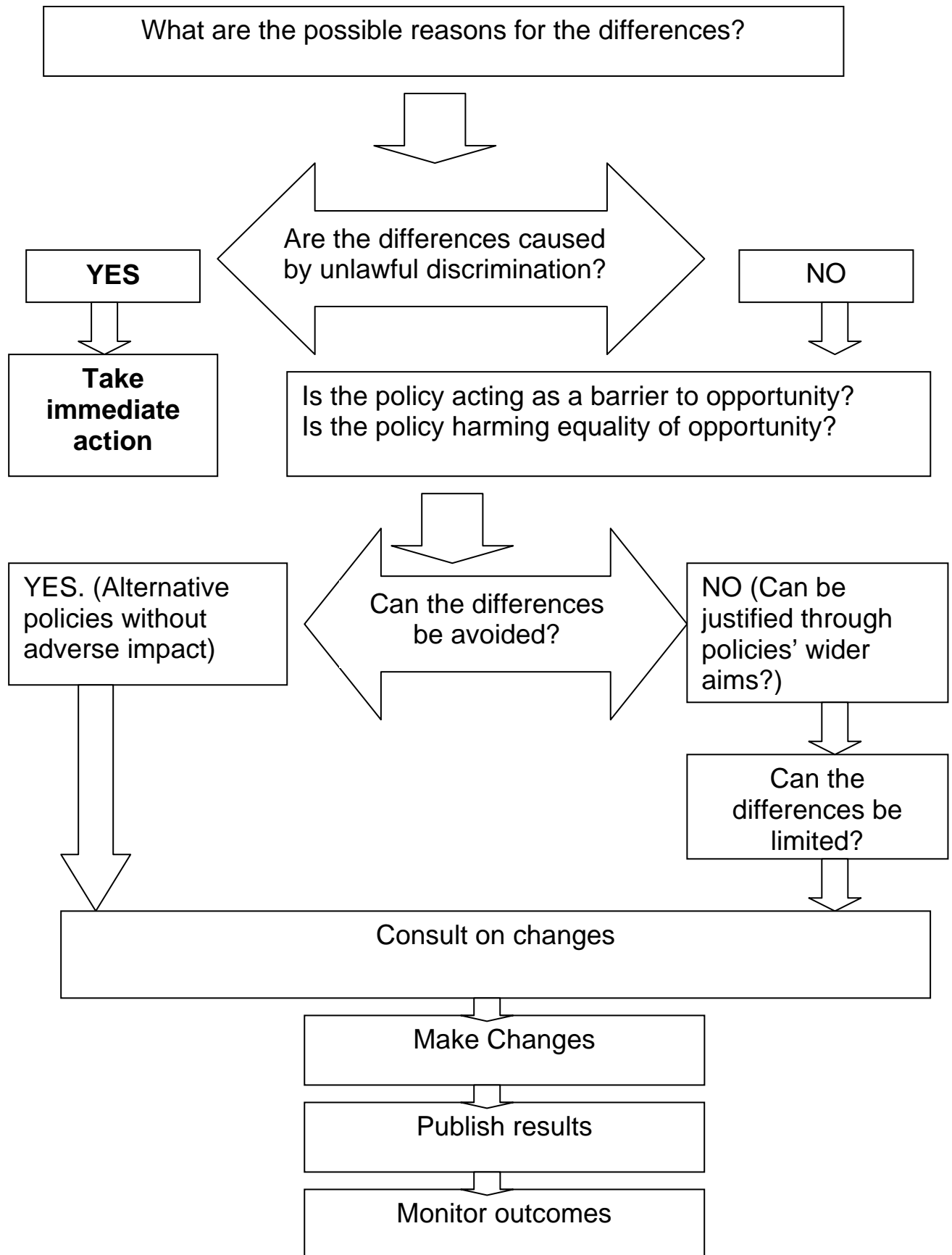
Framework for Reviewing Current Functions/Policies

Step 11	Can the underlying reason for the disadvantage be avoided?	Yes (go to 13) E.g. Alternative policies can be developed that do not affect groups differently.	No(go to 12) Differences can be justified through the function/policies' wider aims.
Step 12	Can the disadvantage be limited? <ul style="list-style-type: none"> ➤ Provide more information and explanation ➤ Provide advice and assistance 		
Step 13	Prepare for the changes which you have established are needed <ul style="list-style-type: none"> ➤ Provide information on changes proposed ➤ Consult on changes proposed ➤ Revise changes to take account of comments 		
Step 14	Introduce changes <ul style="list-style-type: none"> ➤ Provide training for staff to support change 		
Step 15	Publish results <ul style="list-style-type: none"> ➤ Results of outcome of review ➤ Change to take place as a result ➤ The website ➤ Community newspapers 		
Regularly repeat the review cycle to monitor effects of measures			

Review Flowchart



Review Flow Chart



Framework for Developing Proposals

Function/ policy Proposed:		
Step 1	<p>Where did the proposal come from? E.g</p> <ul style="list-style-type: none"> ➤ An idea from an individual officer ➤ From consultation with community ➤ From a government initiative 	
Step 2	<p>What is the thinking behind it? (aims and objectives)</p>	
Step 3	<p>Who should benefit from the proposal (target audience) e.g.</p> <ul style="list-style-type: none"> ➤ Older people, disabled, race, ➤ People living in a certain area, ➤ Owner occupiers etc <p>What data is available about this group? E.g. Census data, Social/ economic data, Local and national research findings</p>	
Step 4	<p>What are the wider benefits? E.g.</p> <ul style="list-style-type: none"> ➤ Government / council priority ➤ Resource saving 	
Step 5	<p>What are the implications of the proposal?</p> <ul style="list-style-type: none"> ➤ Financial ➤ Human ➤ Other 	
Step 6	<p>How does the proposal differ from existing arrangements?</p>	
Step 7	<p>How will users and potential users be affected by the change? E.g.</p> <ul style="list-style-type: none"> ➤ No longer eligible for assistance 	

Framework for Developing Proposals

	<ul style="list-style-type: none"> ➤ Service withdrawn ➤ Resources reallocated <p>What supporting data is available about this impact?</p> <p>E.g</p> <ul style="list-style-type: none"> ➤ Census data ➤ Social/ economic data ➤ Local and national research findings ➤ Consultation Findings 	
Step 8	<p>What do stakeholders think will be the potential impact of the proposal?</p> <ul style="list-style-type: none"> ➤ Include this in your consultation at each stage of the development of the proposal ➤ Ensure wide range of stakeholders are consulted (including staff) ➤ Use appropriate methods of consultation ➤ Monitor effectiveness of the consultation 	

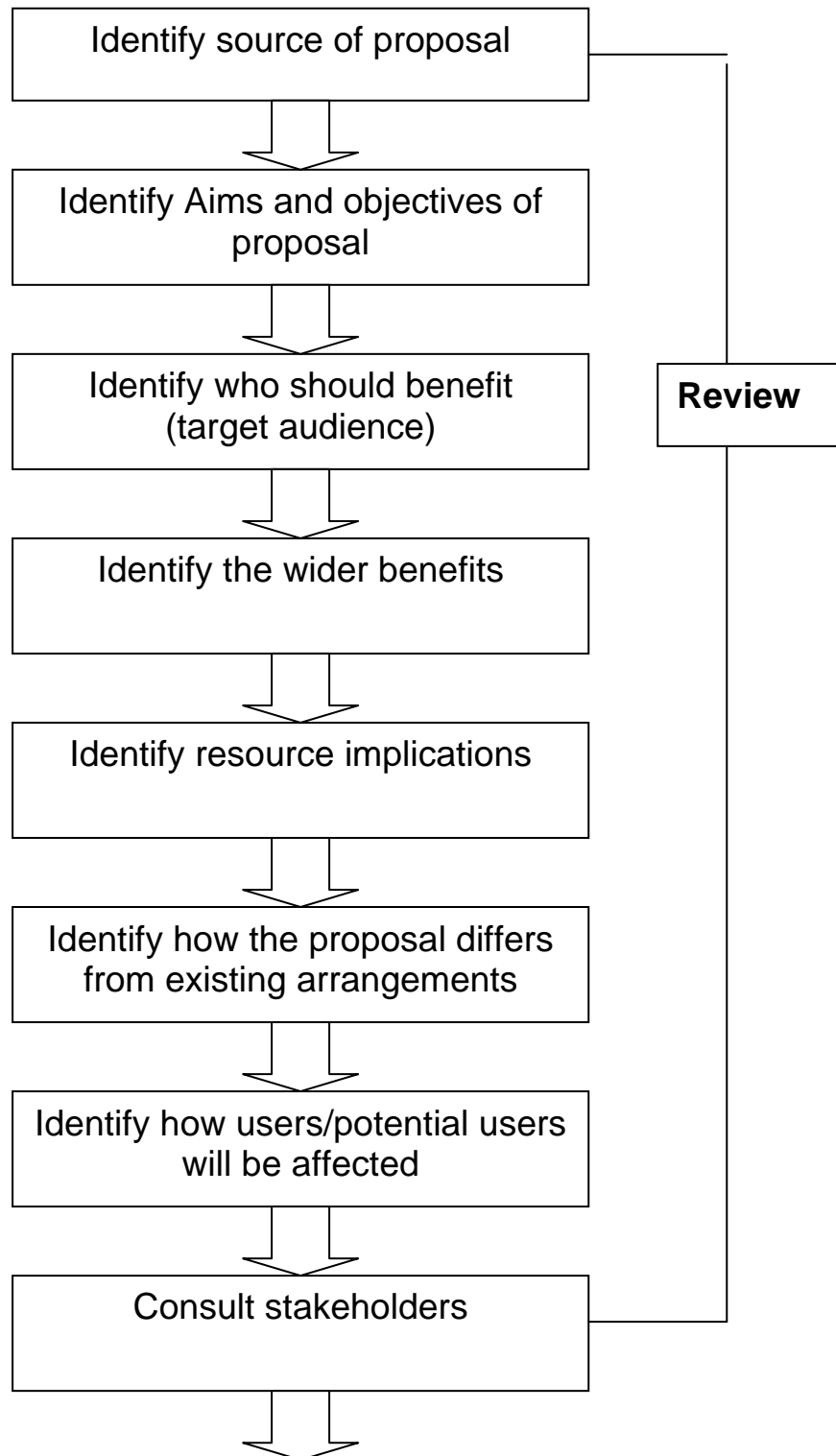
Framework for Developing Proposals

Step 9	Have you identified that the proposal as it currently stands could disadvantage any group?	Yes Go to 10	No Go to 14
Step 10	<p>Are the disadvantages caused by unlawful discrimination?</p> <p>E.g.</p> <ul style="list-style-type: none"> ➤ Direct discrimination: e.g. routinely asking BME applicants for their passports based solely on their name, accent or appearance. ➤ Indirect discrimination: e.g. having a lengthy residency requirement for rehousing applicants ➤ Age restrictions, victimisation due to sexuality, religion, gender or disability. 	<p>Yes IMMEDIATE ACTION (e.g. makes necessary changes to procedure/ policy and train staff on this.)</p>	<p>No (Go to 11)</p>
Step 11	<p>Is the disadvantage due to the proposal potentially acting as a barrier to opportunities or access for some groups?</p> <ul style="list-style-type: none"> ➤ Are some groups less likely to meet its requirements? ➤ Could it discourage some groups from accessing the service? ➤ Is the proposal insensitive to the needs and circumstances of some groups? ➤ Are some groups less likely to know about the proposal / how to access the service? 		
Step 12	<p>Could the proposal damage relations between different groups?</p> <ul style="list-style-type: none"> ➤ E.g. Area regeneration funding is targeted at areas of poor quality owner occupied housing. This results in an area mainly occupied by Asian people getting more funding than other areas. This could cause resentment. 		

Framework for Developing Proposals

Step 13	Can /should the disadvantage be avoided?	Yes (go to 15) e.g. Alternative proposal can be developed that does not affect groups differently.	No (go to 14) Differences can be justified through the proposals' wider aims.
Step 14	Can the disadvantage be limited? <ul style="list-style-type: none"> ➤ Provide more information and explanation ➤ Provide advice and assistance 		
Step 15	Make the changes that you have identified are needed		
Step 16	Write up the findings as an "Impact Assessment Report" and include this with your proposal, to include: <ul style="list-style-type: none"> ➤ What has the process told me? ➤ What changes have I made as a result to address the disadvantage? 		
Step 17	How will you monitor your proposal once it is implemented, to ensure that it does not disadvantage any group? <ul style="list-style-type: none"> ➤ Set up appropriate monitoring systems ➤ Agree on frequency of reporting of findings, to who etc. 		
Step 18	Publish the results of your assessment and consultation <ul style="list-style-type: none"> ➤ Results of outcome of review ➤ Change to take place as a result ➤ The website ➤ Community newspapers 		
Finish, but regularly review proposal in practice (see review tool)			

Proposal Development Flowchart



Proposal Development Flowchart

