



FULL EQUALITY IMPACT ASSESSMENT PROCESS - Part 2

If you do need to carry out an EQIA this is the process:

You should aim to carry out the Impact Assessment at the beginning of the planning of a new policy or the review of an existing policy. However, it is recognised that it is not always possible to do this and you should therefore do it as soon as is practicable.

A successful EQIA will look at 4 key areas.

Policy – a clear definition of your policy and its aims.

Collecting Evidence – this should involve engagement with equality groups.

Differential Impact – reaching an informed decision on whether or not there is a differential impact on equality groups, at what level and what will be done to address any adverse impact.

Measuring Outcomes – stating how you will be monitoring and evaluating the policy to ensure that you are continuing to achieve the expected outcomes for all groups.

An EQIA should be considered for the full range of Council activities, strategies, functions, policies and processes. The term ‘Policy’ will be used throughout this document to mean all of the above.

This 9 step process has been developed to help you:

Step 1	Define the aims of your policy
Step 2	What do you already know about the diverse needs of your target audience?
Step 3	What does the information you have tell you about how this policy might impact positively or negatively on the different groups within the target audience?
Step 4	Will you be making any changes to your policy?
Step 5	Does your policy provide the opportunity to promote equality of opportunity or good relations?
Step 6	Based on the work you have done – rate the level of relevance to your policy – High Medium or Low
Step 7	Do you need to carry out a further Impact Assessment
Step 8	Outline how you will monitor and evaluate this policy to measure progress
Step 9	Sign off and publish Impact Assessment

Step 1 - Define the Aims of the Policy

The first step of the Impact Assessment process is to identify what the policy is designed to achieve. This helps you to think about how the needs of different groups of people are integrated into the policy aims and objectives. It helps you to think about who is intended to benefit from the policy and how.

When you are defining the aims of your policy, you should also be giving some thought to the resources that will be (or have been) allocated to deliver that work.

Have the potential costs of this work been set in a way which will help you to achieve the best outcomes for the diverse communities that your policy will engage with?

Title of Policy:	Private Sector Housing Assistance Scheme
Service:	Housing Service
<p>What is the purpose of the proposed policy or changes to established policy? The Housing (Scotland) Act 2006 requires local authorities to provide a statement of how it will implement provided assistance to disabled people in private homes and provide assistance to homeowners. The original scheme of assistance was implemented in April 2010 and focused on two main areas: 1) Promoting greater responsibility among homeowners for the repair and maintenance of their property and 2) Helping homeowners and private tenants to remain in their homes. The "Private Sector Housing Assistance Scheme" has been revised after three years of implementation. It has been modified to accommodate the new Clackmannanshire Housing Strategy which was approved in December 2012 and other various policy changes within the Council. Input from customers has also led to changes within the scheme of assistance. The major changes evolved around the increasing demand of providing support to elderly and disabled people living in private houses. Some of the key changes were to devote more resources to disabled adaptations, providing housing support to vulnerable people, an increasing demand for more affordable housing, and the need to improve the repair and maintenance of private homes, particularly those in common ownership.</p>	
<p>Who is affected by the policy or who is intended to benefit from the proposed policy and how? Those affected by the policy are private sector homeowners, and disabled and older persons living in the private sector. People with disabilities will continue to be supported with financial assistance for mandatory adaptations, but will be required to contribute to non eligible costs and may be required to contribute to adaptations classified as discretionary. Older and disabled people living in houses requiring repairs will be supported by a supported owners' service, increasing their quality of life. The focus for private homeowners relates to activities encouraging individuals to repair and maintain their homes. The Council provides a wide range of information and advice on housing repair and maintenance for private homeowners. Practical assistance and limited financial assistance will be provided on a priority basis to improve below tolerable standard housing, encourage improvements for energy efficiency and reducing fuel poverty. Revisions to the policy also supports the repair of long term empty homes and getting them into the private housing stock. The Council will concentrate resources in areas designated, from time to time, for targeted funding, to allow flexibility to respond to individual Council initiatives. The limited funding available for this programme means that many homeowners will be required to fund any repairs or maintenance on their homes. But there will be a wider range of information and advice specifically developed to help these individuals.</p>	

How have you, or will you, put the policy into practice? Who will be responsible for delivering it?

The new scheme will be delivered by the Private Sector Housing Team in partnership with other Council offices, voluntary organisations and Scottish Government initiatives. With limited funding available, a greater contribution to the scheme will be made by accessing Scottish Government initiatives and working with the voluntary sector.

Step 2 - What do you already know about the diverse needs and/or experiences of your target audience?

To understand the different needs and experiences of the people you are making policy for, you will need to gather the facts and figures about the target audience for your policy. It is important to know **who** will be affected by the proposed changes and **how**.

The evidence (or information) you require may come from a variety of sources – it may be statistical information, research projects which have collected information through discussions, focus groups and interviews with a range of people including those from recognised equality groups. It is also important to identify any information or evidence gaps you may have and which may need to be addressed in order to successfully complete the assessment process.

Evidence may include data (facts, figures, research findings etc) from our own information management systems or research surveys and consultation exercises.

In the absence of research there may be anecdotal evidence, feedback from service users and affected groups which may indicate positive or negative impact.

Points to remember:

- Evidence may indicate that there may or may not be an equality impact associated with a policy.
- The absence of evidence or indicators does not necessarily mean that there is no impact on equality.
- Arrangements should be made to obtain the relevant information (i.e. there is a need for us to conduct our own survey) to help in the process of deciding whether or not a policy has a differential adverse impact or whether the policy requires further, in-depth equality impact assessment.
- That an issue may only impact on small numbers of people from the different equality groups does not mean that there is not an issue or a problem. For example, it may be necessary to consider the needs of minority ethnic communities in rural areas, or lesbian, gay bisexual or transgendered people who may choose not to identify themselves as such due to fear of abuse or discrimination.
- You have a statutory duty to involve the community and you should keep a record of how you have done this.

The Private Sector Housing Team has monitored the scheme over the last three years and has a wealth of information from implementation experience. Additionally, there has been major activity on the adaptation area and a large review of the adaptations both in the public and private sectors is currently underway. Previous information was gathered through consultation with customers for the recently approved Clackmannanshire Housing Strategy. Other information sources include the Private Sector House Condition Survey in 2009 and the Housing Needs and Demand Assessment.

Consultation is a key part of the process. The public sector equality duties require us to involve, consult and engage with our communities as widely as possible.

There are a variety of ways you can consult with people but it is important that you take account of the different needs of people from different communities.

Step 3 - What does the Information you have tell you about how this policy might impact positively or negatively on the different groups within the target audience?

In this section you should be looking at the information you have collected to assess what it is telling you about the needs of different groups of people.

Key Questions:

- Will the impact of the proposed policy/function be the same or different for each group

This revised scheme will cover the increasing budget needed to finance mandatory adaptations for the disabled (which is set down in statute),.. The maximum grant threshold for mandatory adaptations has been removed, but there is little funding for grants for discretionary adaptations and grants for repairs and maintenance for private houses. The limited funding for grants to homeowners is very much focused on the defined priority areas, which includes older and disabled people and works to improve home energy and fuel poverty, which has a disproportionate impact on vulnerable people.

- Is there any indication or evidence of higher or lower participation or uptake of services by different groups?

We have no indication that uptake of services varies by group.

- Are there any groups of people who are not taking up services?

Knowledge about the scheme has been widely available on the Clackmannanshire website and initiatives are often publicised in local press. Social services are aware of the programme and direct people requiring adaptations to their private accommodations to the Private Sector Housing Team. The restrictive conditions placed on the availability of grant for house condition works has had an impact on the numbers accessing this service. The conditions have been relaxed in the amended policy, but the likelihood is that uptake will still be low because of lack of funding available generally.

What does the information you have tell you about how this policy might impact positively or negatively on the different groups within the target audience?

Age	The revisions will have a positive effect on the ageing population in assisting with repairs on their homes.
Disability	The scheme positively effects people living in private homes who require adaptations and repairs.
Gender	Neutral
Lesbian, Gay, Bisexual	Neutral
Transgender	Neutral
Race	Neutral
Religion and Belief	Neutral

Step 4 - Does the policy need to be changed?

If the policy is likely to have an adverse impact on a group of people, the presumption should be that the policy will be changed or amended to lessen or remove this adverse impact. However, when considering making changes to our policies the actions we take should be proportionate.

It may be possible to make a change that may remove a barrier or have a lasting effect on one or all of the equality groups this will also be essential to avoid illegal discrimination. The EQIA process is a policy making tool which allows us to identify ways in which we can improve our policies and make them better suited for their purpose. You should also consider the resource implications of any changes you make i.e. will it cost more or should your resources be focussed on ensuring that your policy delivers effectively across different groups?

Will you be making any changes to your policy?

Are there any changes?		
<i>Description</i>		
Disability	No	
Gender	No	
Lesbian, Gay, Bisexual	No	
Transgender	No	
Race	No	
Religion and Belief	No	
Age	No	

Please Identify:

- what action you will take
- who will take that action
- when that action will be taken

Step 5 - Does your policy provide the opportunity to promote equality of opportunity or good relations?

The main purpose of the EQIA is to identify any potential adverse impact, it also offers the opportunity to consider how your work can better promote equality of opportunity and good relations.

The public sector equality duties require that the Council, in carrying out its functions, has due regard to the need to promote equality of opportunity and /or outcomes.

The public sector equality duties and the Council's own policies require that the Council, in carrying out its functions, has due regard to the need to promote equality of opportunity between:

- persons of a different race
- men and women
- persons with a disability and without
- persons of a different religion or belief
- persons of different ages
- persons of different sexual orientation

The public sector duties also require the Council to:

- promote good relations between people of different racial groups
- promote positive attitudes towards people with disabilities
- encourage participation by people with disabilities in public life

It must not be assumed that areas which have been immune to challenge or question in the past, do not have implications for equality of opportunity. All existing areas of policy must be looked at with a fresh eye.

Key Questions:

- How does this policy promote equality of opportunity?
- what is being done to ensure equal outcomes for people from different groups or communities? [One purpose of this programme is to improve the quality of life for people with a disability and supports the ability of people to receive helpful adaptations and repairs.](#)
- How can this policy encourage participation in public life?
- People will may able to live in their own home, safely and independently, for longer
- How does this promote good relations?

Step 6 – Based on the work you have done – rate the level of relevance to your policy.

You should now have enough information to decide whether or not there is an impact for any or all of the equality groups and whether the level of impact is in proportion to the policy. You will now have to decide whether the impact is high, medium or low for any of the strands.

Based on the work you have done rate the impact of your policy on equality groups:

Tick one box for each strand	Age	Disability	Gender	LGBT	Religion and Belief	Race
High There is substantial evidence that people from different communities or groups are or could be differently affected by the policy. There is substantial public concern about the policy or concerns have been raised about the policy's potential impact by relevant bodies. This policy is relevant to all or part of the respective duty in the case of race, disability or gender	X	X				
Medium There is some evidence that people from different groups or communities are or could be differently affected. There is some public concern about the policy. The policy is relevant to parts of the respective general duty						
Low There is little or no evidence that some people from different groups or communities are or could be differently affected. There is little or no public concern about the policy. The policy has little or no relevance to the respective general duty.			X	X	X	X
Unknown No evidence or data has been collected therefore an assessment cannot be made.						

Step 7 - Carrying out a Further Impact Assessment

If you haven't got enough information gather more and go through the process again. A further assessment should be undertaken if more detailed investigation is required. There will be some policies where, as a result of undertaking this EQIA, you may decide a further impact assessment is required although it may not be necessary for all equality groups depending on the nature and the focus of the policy in question.

Further impact assessment could include:

- collecting further data, commissioning research and analysis
- considering alternative ways to collect information
- consulting further with people affected by the policy

Having undertaken further work, you should then revisit the impact assessment toolkit as you should now be in a position to complete the EQIA more fully.

Is a further EQIA required?		
<i>Description</i>		
Disability	No	
Gender	No	
Lesbian, Gay, Bisexual	No	
Transgender	No	
Race	No	
Religion and Belief	No	
Age	No	

If you have answered **yes** please explain **why**

If you have answered **no** but have identified a high impact on policy, please explain your decision.

Step 8 – Monitoring and Evaluating the Policy to Measure Progress

To ensure that the policy remains focused and is not affected by changing circumstances, it is important to keep it under review against its original aims. Monitoring and evaluation processes should be established to periodically assess the impact of the policy on the diverse needs of the target audience. This should reveal any unexpected adverse effect or unintentional discrimination.

All policies in the Council are due 3 yearly reviews, which occurred for this policy. This policy will continue to be monitored closely. The Private Sector Housing Team maintains records of all grants and will monitor the uptake of advice, information, financial assistance and practical assistance.

The key to evaluating policy is good management information which may be collected as part of the ongoing monitoring process or conducted as a separate exercise.

Step 9 – Signing off

You should have completed the following steps:

Impact Assessment Steps 1-8	Yes	No
1. Defined the aims of your policy	v	
2. Identified what we already know what does the existing evidence tell us?	v	
3. Identified what more we need to know – what gaps have we identified?	v	
4. Analysed the evidence – what does all this mean in relation to our policies?	v	
5. Considered any necessary changes and identified action – will you be taking action? If yes What? When? Who? If not Why not?		v
6. Identified opportunities to promote equality	v	
7. Measured differential impact?	v	
8. Outlined how you will monitor and evaluate the process	v	
9. Signed off and published the Impact Assessment	v	

Policy Title:	Private Sector Housing Assistance Scheme
Service:	Housing Service
Team:	Private Sector Housing Team
This policy will/could impact upon people from the any of the identified equality groups and this EQIA indicates which groups and how to the Council will avoid/minimise the impact	
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