



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:	Short Scottish Secure Tenancies Policy
Service:	Housing Services
What is the purpose of the proposed policy or changes to established policy?	
<i>To provide to local authorities and Registered Social Landlords with a range of new powers and duties towards tenants in the granting of Short Scottish Secure Tenancies.</i>	
Who is affected by the policy or who is intended to benefit from the proposed policy and how?	
<i>Tenants to whom housing duty is owed, but for whom, given their present circumstances or past history, a secure tenancy may not be the most appropriate and for whom legislation takes these circumstances into consideration in the manner in which housing duties may be discharged.</i>	
How have you, or will you, put the policy into practice? Who will be responsible for delivering it?	
<i>The policy will be delivered by Clackmannanshire Council and Registered Social Landlords.</i>	

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.

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 asses what it is telling you about the needs of different groups of people.

Key Questions:

- Will the impact of the proposes policy/function be the same or different for each group
- Is there any indication or evidence of higher or lower participation or uptake of services by different groups?
- Are there any groups of people who are not taking up services?

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	<i>Neutral Impact</i>
Disability	<i>Neutral Impact</i>
Gender	<i>Neutral Impact</i>
Lesbian, Gay, Bisexual and Transgender	<i>Neutral Impact</i>
Race	<i>Neutral Impact</i>
Religion and Belief	<i>Neutral Impact</i>

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	Yes/No	No
Gender	Yes/No	No
Lesbian, Gay, Bisexual and Transgender	Yes/No	No
Race	Yes/No	No
Religion and Belief	Yes/No	No
Age	Yes/No	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?
- How can this policy encourage participation in public life?
- 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
<p>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</p>						
<p>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</p>						
<p>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.</p>	√	√	√	√	√	√
<p>Unknown No evidence or data has been collected therefore an assessment cannot be made.</p>						

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	Yes/No	No
Gender	Yes/No	No
Lesbian, Gay, Bisexual and Transgender	Yes/No	No
Race	Yes/No	No
Religion and Belief	Yes/No	No
Age	Yes/No	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.

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	√	
2. Identified what we already know what does the existing evidence tell us?	√	
3. Identified what more we need to know – what gaps have we identified?	√	
4. Analysed the evidence – what does all this mean in relation to our policies?	√	
5. Considered any necessary changes and identified action – will you be taking action? If yes What? When? Who? If not Why not?	√	
6. Identified opportunities to promote equality	√	
7. Measured differential impact?	√	
8. Outlined how you will monitor and evaluate the process	√	
9. Signed off and published the Impact Assessment	√	

Policy Title:	Short Scottish Secure Tenancies Policy	
Service:	Housing Services	
Team:	Housing Management Operations	
<i>This policy/function will have no impact on people from any of the equality groups and an EQIA is not required</i>		
Name:		
Position:		
Title:		
AUTHORISATION		
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