Ada. National College for Digital Skills.

Equality Impact Assessment Policy



This is a practical guide for Ada management to assess the impact its functions, policies and procedures have on different groups of people. This guide has been developed for use by any member of the college staff wishing to carry out an Equality Impact Assessment. (EIA)

Whilst it focuses specifically on race, disability and gender and the requirements of the Race Relations (amendment) Act 2000, the Disability Discrimination Act 2005 and the Equality Act 2006, it is a useful for ensuring that all policies and services achieve their intended outcomes and that equality and diversity are integral to their implementation in relation to all 6 equality strands (Race, Disability, Gender, Age, Religion and Sexual Orientation.) This guide includes a model and template for conducting Equality Impact Assessments.

Whilst the Ada senior management team provide this guide on Equality Impact Assessments, it will be the responsibility of policy owners to carry out EIAs in relation to their policies, practices and services. Those assessments must aim to cover the following activities

- Screen for equality relevance and carry out full assessments where agreed
- Provide guidance, support and quality assurance
- Verify that equality relevance has been considered for existing and new policies

What is equality impact assessment and why is it important for Ada?

An EIA is simply an assessment of the impact that policies, practices, procedures and services have on those who are affected by them. Assessing impact of policies and procedures is not something unique to equalities; many organisations carry out some form of assessment of their outputs for commercial and other reasons.

For the purpose of this guide, activity in scope for an EIA is defined as any: Policy, Decision (with large impact), Process, Practice or Service that connects to any Strategic/Business Plan, Objective or Target across all areas of the College.

An Equality Impact Assessment is a thorough and systematic analysis of a policy or procedure, whether that policy is written or unwritten, formal or informal and irrespective of its scale. The analysis looks at one or more equality groups. An equality group is a group that is protected by legislation and/or is being targeted by the College as a group that requires special consideration because of historical disadvantage, discrimination or because there is evidence that people in that

group are doing less well than people in other groups. An equality group may be based on age, gender, race, religion, sexual orientation or disability.

Carrying out an assessment will enable the College to predict or anticipate possible barriers faced by particular equality groups. If the outcome of a policy or the way a service is delivered disadvantages certain groups of people, we have a legal duty to remove or reduce the negative impact. This may involve, for example, a small modification to an existing policy or service, or a new approach might need to be found to help meet the same policy or service objectives.

Where does it come from?

In the field of equalities the requirement to undertake equality impact assessment was first formally introduced in England, Wales and Scotland as a 'specific duty' under the Race Relations (Amendment) Act 2000.

What are the issues we are trying to address?

Across society, there are widespread and entrenched inequalities in relation to ethnicity, disability and gender. The following are some of the key ones in relation to employment and education. Fewer minority ethnic students gain first or upper second class degrees than White students, especially Black students who are much more likely to get a lower second or third class degree. Minority ethnic graduates continue to be underrepresented in the graduate intake of large firms.

Disabled people are still twice as likely as non-disabled people to have no qualifications and half of disabled people of working age are not in employment.

Thirty years after the Sex Discrimination Act 1975, gender discrimination is still widespread in employment with a 17% pay gap between the hourly earnings of full-time women and full- time men and a 38% pay gap between the earnings of part time women and full time men. In both education and employment, there is considerable gender segregation, reflecting the opportunities and choices that may or may not be available to men and women.

Ethnicity, disability, gender and age.

Whilst it is good practice to consider the impact of policies and procedures for other equality groups, the focus for systematic impact assessment for the College should be in the areas of ethnicity, disability and gender in order to meet our statutory duties. Within Ada we will also include age in full impact assessments, and sexual orientation and religion or belief when screening.

Screening helps to identify if policies and procedures are equality relevant and whether they are having a disproportionate effect on different groups which results in exclusion or unfair discrimination. The outcomes of screening determine which policy areas require a full equality impact assessment.

Conducting and being seen to conduct EIA's may provide a defence in cases brought to employment tribunal or complaints made to the Commission for Equality and Human Rights (CEHR). More importantly, the process can have significant business benefits; contributing to improving staff morale, reducing staff turnover, widening the talent base of the organisation, stimulating a healthy and productive working environment, increasing student retention and improving the image and reputation of the College. The process is especially valuable to Ada in that it supports our strategic interest in countering prevailing attitudes in the technology field especially towards employing and training women.

What happens if we don't carry out EIAs

The Commission for Equality and Human Rights (CEHR) came into power from 1st October 2007, amalgamating the Disability Rights Commission, Equal Opportunities Commission and the Commission for Racial Equality into one body.

The CEHR have a range of enforcement powers including the power to apply for a judicial review in the High Court if an organisation is not complying with the relevant duties. An individual or group of people can also raise a judicial review. Enforcement action may be undertaken via an Employment Tribunal by internal customers of the College.

The CEHR will undertake any required monitoring and enforcement action against public authorities (including HEIs) for breach of their specific equality duties

In summary:

- Equality Impact Assessment is a systematic assessment of the impact of policies and procedures on different equality target groups.
- There is a legal requirement to undertake *ethnicity, gender and disability* equality impact assessment for all of the College's policies and procedures which is enforceable through legislation.
- Whilst it is good practice to conduct impact assessment for other equality groups, you should focus initially on undertaking ethnicity, gender, disability and age equality impact assessments.
- There is a real benefit to the College in doing this as it will help us to promote a culture whereby everyone considers the impact of their actions and decisions on others, and ultimately helps us to achieve our strategic priorities.

Carrying out an Equality Impact Assessment

An overview of the process

This section provides an overview of the different stages and a detailed flowchart to capture the College's approach.

It is important to remember that an Equality Impact Assessment may need to be conducted over a lengthy time period. It can be stopped at any time and taken up again at a later date. This may be because of the need to gather more evidence, or because the policy is in development and data doesn't exist at the present time.

Stage 1: Identifying policies

The Operations Manager will start by listing or reviewing Ada's list of policies, procedures, projects, written or commonly adopted frameworks that guide decision making and action. Once they have done this, the Operations Manager will decide or review how they will approach the task.

Stage 2: Undertaking screening

(This stage should be carried out for every policy, procedure or project and helps the College decide if the item is equality relevant and if there is any evidence of adverse impact)

Having produced a list of policies that identifies what is you want to screen, you then need to decide for each policy whether it is relevant to the area(s) of equality you are looking at. A policy might be relevant to one area of equality, such as disability, and not relevant to another, such as gender. If the policy is not equality relevant, then you end the process. Where a policy is considered to be equality relevant, the next step is to gather relevant data that tells you how the policy is impacting on different groups. This could be monitoring data, complaints, feedback from people implementing or affected by the policy or research. Having gathered the data you determine whether there is any evidence that the policy could have any adverse or negative impact on people of different groups and if it could be used to promote equality. The screening process is carried out using the screening template accompanying this policy and as a rough guide, any policy or procedure that has an impact on students or staff generally is likely to be equality relevant.

Stage 3: Prioritising and pl

(This stage is undertaken order to record findings, plan

Produce a list of all policies and procedures and decide on the approach

ff in Impact

assessments required.) Having completed the screening process the Operations Manager will prioritise and plan the next steps. If a policy is not equality relevant they will record why this is the case. If a policy is equality relevant but there is no evidence of adverse impact, they will ensure they have adequate monitoring in place and review the data annually. Where they decide that the policy is equality relevant and there is evidence of adverse impact, they will undertake a full assessment and produce an Action Plan based on the results of their screening.

Stage 4: Undertaking full impact assessment

(This stage is a full impact assessment and is sub-divided into a number of activities. The Operations Manager will undertake this stage for all policies where they have identified there is adverse impact)

Having drawn up an action plan, you may need to embark on one or more full equality impact assessments and progress (See Appendix) Is there evidence of adverse impact? Record Findings Ks or

months to complete an assessment depending on the nature of the policy, how much data you need and the extent of consultation required. It is therefore important to plan each stage of the process in advance. Having completed the full assessment, you will produce a report and publish your work.

Equality Impact Assessment – Process Flow Chart





Stage One Identifying Policies

This section sets out how you can map out the policies and procedures that you need to screen for equality relevance, which are relevant to your function within the College, and provides some ideas for how you might approach this work. You may already have a list of policies and may simply review this list. Following this step-by-step guide is not essential but will help you to ensure that you have not missed anything.

The first stage of the process requires you to list your key policies, procedures, strategies and major projects. It is useful to consider all of the types of work the College performs and then identify the policies, procedures, strategies and working practices that apply to each of them.

Some of the College's services and/or objectives will be more relevant than others. However, don't be tempted to leave any out even if you think they are not relevant to equality. The screening process will help you to identify what is and is not relevant.

You should satisfy yourself that you have identified all current policies, procedures and working practices under your area of responsibility. Once you have an accurate and up-to-date list, you should be in a position to consider how you will approach the task. The scale of activity and number of policies and procedures will help you determine the initial effort required for screening. You won't be able to determine accurately how much resource is needed for full impact assessment until you have undertaken screening.

At the end of Stage 1 you will have:

• An up to date list of policies and procedures that you will screen for equality relevance

- An understanding of how you will approach this work
- Decided who will be responsible for the screening work

Stage Two Screening

This section tells you how to screen individual policies, practices and projects to determine if they are equality relevant. There is a template to accompany this policy.

Having produced or reviewed a list of policies and procedures, you now proceed to the screening stage. Whilst the template can be used for any equality group, you should keep in mind which groups the College has asked you to prioritise; disability, ethnicity, gender and age.

Remember that all policies and procedures must be screened and the findings recorded. If you have found that a policy or procedure is not equality relevant, you can end the process and take no further action however you must document how you have come to that conclusion. A policy might be highly relevant to one aspect of equality and not very relevant to another. An example of this might be an I.T. policy which, following screening, you might identify is much more relevant to disability than to gender equality. Where the policy is equality relevant you will need to categorise it according to high, medium or low overall impact on equality. This will help you prioritise in stage 3 and decide how soon and how much effort you need to undertake a full assessment.

It is useful to keep in mind that an overview of the College's data relating to the current composition and outcomes of students and employees may indicate that some ethnic groups, some people with disabilities and men and women are under represented or underachieving in various ways in different circumstances. Whilst we cannot draw any definite conclusions from this data, as a general guide, a policy, procedure or strategy that has consequences for staff or students is likely to be equality relevant. This is because you cannot know whether or not a policy is having a disproportionate effect on some groups unless you compare the outcomes for different groups. It is not enough to say that because this policy is applied uniformly to all groups that it is fair and equal. Applying a policy or procedure consistently may result in differential outcomes for different groups. Using monitoring data is the only way to assess what the outcomes really are and we consider this data during the screening stage.

The actual data that you use will be determined by the policy or procedure you are considering. The important thing to remember is that you must break the data down by individual groups. So if you are screening for ethnicity, then you should look at individual ethnic groups to identify any differences in outcomes between different groups. If you are screening for gender, you will look at the data for gender i.e. the proportion of men and women who are affected by different policies and procedures. If you are screening for disability, you will consider the effect of the policy on people with different kinds of disability and those without a disability and in this case, the nature of the disability will determine the likely impact.

The Disability Discrimination Act creates a new positive duty allowing disabled people to be treated 'more' favourably than others in order to meet the needs of their disability. See below for the duties.

It is important to seek and consider any evidence that particular groups of women or men or transsexual people, or particular ethnic groups or people with different disabilities might have particular needs in relation to this policy or practice.

Positive Equality Duties

Screening will also help you to identify whether there are opportunities for promoting equality. Even if there are no adverse impacts, this part of the process is essential as it will ensure that the College meets its positive equality duties.

These positive equality duties are set out in a number of pieces of legislation but can be summarised as follows.

The need to:-

- promote equality of opportunity between different groups (men and women, people with and without disabilities, people of different ethnic groups)
- promote good relations between people of different ethnic groups
- promote positive attitudes towards disabled people
- encourage the participation by disabled people in public life
- take account of disabled persons' disabilities, even where that involves treating disabled persons more favourably than other persons

Defining Disability

The Disability Discrimination Act says that you are disabled if you have:

- o a mental or physical impairment
- this has an adverse effect on your ability to carry out 'normal day-to-day activities'
- the adverse effect is substantial
- the adverse effect is long-term (meaning it has lasted for 12 months, or is likely to

last for more than 12 months or for the rest of your life).

Normal day-to-day activities can include; mobility, manual dexterity, physical co-ordination, continence, ability to lift, carry or move everyday objects, speech, hearing or eyesight, memory or ability to concentrate, learn or understand, understanding of the risk of physical danger.

Once you have screened the policy you will need to categorise its equality relevance as high, medium or low and determine which aspect of equality it will need to be assessed against.

At the end of Stage 2 you will have:

- Decided whether the policy is equality relevant
- If equality relevant, gathered and briefly analysed relevant data
- Identified gaps in your data and knowledge and what you might need to do about it
- Identified if there is evidence of adverse impact (providing you have sufficient data to judge this)
- Completed a screening template and noted further actions required
- Categorise its equality relevance as high, medium or low and determine which aspect of equality it will need to be assessed against

• Made plans to update your policies with a progress statement

Stage Three Prioritising and Planning

This section indicates the actions you might take depending on the findings of your screening.

It is likely to be more efficient if you have screened a number of policies before moving onto this stage, however, if waiting for all screening to be completed is likely to delay your progress significantly, you should move on to this stage.

Your screening exercises will have identified one or a number of main findings for each of your policies and start to highlight the actions that you need to take to address these. The most common findings and associated actions are:

A) Not equality relevant

If you are satisfied that the policy or procedure is not equality relevant, then your action is to record the evidence you have used to reach that conclusion and to end the process for that policy. When creating your action plan you should include the need to review the policy and conduct a further screening assessment in no later than three years time.

B) Equality relevant but no data, insufficient or inconclusive data to identify impacts

If you have reached this conclusion, then you need to state in your action plan how you are going to proactively improve the data available in order to make accurate judgements. There are a range of actions you might take including; identifying what data you can obtain from within the College, identifying what data you can generate from information you hold in other formats or for other purposes, considering external data, data available through consultation, etc. Having insufficient data or inconclusive data may make a full impact assessment difficult but not impossible – **it is better to progress with the data you have than to do nothing at all.**

C) Equality relevant and adverse impact identified

Where you are aware of adverse impact, you should conduct a full equality impact assessment in order of its level of priority.

D) Potential to promote equality, diversity or good relations

It is important to remember that the College has a public duty to identify the opportunities it has to promote race, disability and gender equality. It is good practice to identify opportunities to promote other aspects of equality; age, religion and sexual orientation. Even if the policy does not create adverse impact, it may be possible to promote equality using the policy. Action may include making changes to the policy or implementing positive actions that can help to promote equal opportunity or good relations between groups.

At the end of Stage Three you will have:

- Determined if a full equality impact assessment is required
- Using your screening templates, created an action plan, added dates and assigned responsibilities. Including setting review dates for policies that are not equality relevant
- Retained copies of the planning template and screening templates for quality and compliance monitoring
- Ensured that the work and actions planned have been flagged for inclusion in your plans so that it is resourced, monitored and reviewed

• Made arrangements to update your policies and websites with reviewed progress statements

Stage Four Undertaking Full Impact Assessment

This section sets out what you need to do to undertake a full equality impact assessment. A template accompanies this policy for you to record your progress.

Conducting an equality impact assessment is a task that requires a level of awareness of difference, discrimination and prejudice and how these impact on groups. It is important to keep in mind that it could take several months to complete a full assessment and you might not work through the steps in the exact order suggested here.

The template provided at the end of this document can be used to record progress for any equality group. Note that at present there is a legal requirement to screen for race, disability and gender and a full assessment must be undertaken if adverse impact is identified. The College does this as a minimum and may require you to impact assess for other groups in the future.

There are 7 stages outlined in the Process Flow Chart but the four key activities that will need further focus on are;

- Further evidence gathering and data analysis
- Consultation
- Introducing the changes that arise from the consultation and analysis
- Monitoring the impact of the changes

Data provides you with the evidence that you need to determine the impact of your policies on different groups. Think carefully about the data you have, consider what additional data is required and in particular think about the monitoring categories and comparators you will use. For example, when considering the ethnicity of Black or Asian students or staff in an specific geographical area, use the census data for that area and other educational institutions as comparators.

Where your analysis highlights adverse impact or when developing a new policy, consultation will help you to determine how you might address or avoid any adverse impact. Once you have set out your plans for a full assessment, it is recommended that you discuss these with the senior management team before embarking on it.

At the end of Stage 4 you will have:

- Analysed your data in more detail to identify where and how adverse impacts are occurring Consulted with the equality groups that you are assessing the policy for
- Considered any changes that you might need to make to the policy or other actions you can take to mitigate adverse impact or promote equality
- Made monitoring arrangements to ensure you can check future impact
- Produced an equality impact assessment report setting out the process you went through, your findings, and further actions and retained a copy for quality checking and publishing

• Transferred any actions proposed into your plans so that it can be resourced, monitored and reviewed

Glossary of Key Definitions

Policy

A policy is any decision, principle, plan or set of procedures that influences and determines the way an institution carries out its business.

This will include, for example, strategic plans, guidance material, codes of practice, protocols, frameworks and regulations.

Practice

More informal than a policy, a practice refers to customs or behaviour, perhaps built up over a number of years. A practice can be routinely performed locally, regardless of any formal policy requirements.

As well as 'policies and practices', the University will need to impact assess its services, provision and contracted services and activities. For example, this will include the library services, student placement providers and catering.

Criterion

This is the basis by which comparisons or judgements are made, often against particular reference points.

Provision

This is an action which serves to provide for, or meet the requirements or particular needs of people.

Function

This could be a Division, Department, Unit, Office, Team Faculty, Service Area or any other organisation within the University

Equality groups

Equality groups can face discrimination and disadvantage on the basis of, for example, their age, race, gender, disability, sexual orientation, religion or belief. It is important to be aware of the particular needs of equality groups to ensure equal access and delivery of teaching, learning, assessment, services, support, achievement and employment.

People can also belong to several equality groups at the same time and have multiple identities, for example, women with learning difficulties.

Positive Discrimination

This is unlawful preferential treatment.

Direct discrimination

This means treating a person less favourably than another in the same or similar circumstances.

An example of direct discrimination would be to apply harsher discipline to a student or member of staff because they are disabled.

Indirect discrimination

This is where a **policy, provision, practice or criterion** is applied equally to everyone, but

it can only be met by a considerably smaller proportion of people from particular equality groups

is to their detriment and results in disadvantage and / or exclusion and cannot be objectively justified

An example of indirect discrimination might be where a University's rules or practices do not allow for a particular racial group's customs and these cannot be justified in terms of the institution's needs.

Positive Action

This allows training and encouragement to redress the effects of past inequalities, for example, training men or women to work in areas traditionally the preserve of the other sex. For women, this could include specific training in skilled manual or technical work.

Differential impact

This is where a particular group has or will be affected differently by the policy, service or practice under consideration in either a positive, negative or neutral way.

Race / Racial groups

The word 'race' is best considered as an 'umbrella' term that embraces a number of diverse and overlapping elements such as culture, history and language. It is worth noting that the European Union has rejected theories which attempt to determine the existence of separate human races.

The term 'racial groups' includes: ethnic origin, national origin, colour, nationality and race as defined above.

Impact Assessment

This is a thorough and systematic analysis of a policy or practice, whether that policy or practice is written or unwritten, formal or informal and irrespective of the scope of the policy or practice.

Negative / adverse impact

This is the point at which the differential impact of a policy, service or practice becomes detrimental to a particular group of people. Adverse impact is broader in scope than 'discrimination'.

Mitigation

Mitigating negative impact is intertwined with considering alternative policies and approaches. Mitigation can take the form of lessening the severity of any negative impact.

Equality Impact Assessment: Prioritising Tool

This tool is particularly useful when you are screening and identified that you have lots of equality relevant policies.

If you have identified that a policy is equality relevant, the descriptions below may help you determine whether equality relevant policies have high, medium or low overall impact on equality.

This is a simple tool and it is very unlikely that you will agree with all the statements – what you are looking for is a 'best fit'. If you can't decide between two categories, it is advisable to opt for the higher category to ensure that you don't give a policy a low priority and later find out that it was more relevant and you have done nothing about it. Moving the impact category down later if it is found to be incorrect is a less risky option. It is important to remember that a policy may have a high impact on equality and not on another.

High Impact

- (The policy or process has a major impact on equality)
- There is significant potential for or evidence of adverse impact
- The policy is institution wide or public facing

- The policy has consequences for or affects significant numbers of people
- The policy has the potential to make a significant contribution to promoting equality

Medium Impact

- (The policy or process has an impact on equality)
- There is some evidence to suggest potential for or evidence of adverse impact
- The policy is institution wide but mainly internal
- The policy has consequences for or affects some people
- The policy has the potential to make a contribution to promoting equality

Low Impact

- (The policy or process might have an impact on equality)
- There is little evidence to suggest that the policy could result in adverse impact
- The policy operates mainly within a faculty or one specific area
- The policy has consequences for or affects few people
- The policy may have the potential to contribute to promoting equality

EQUALITY SCREENING TEMPLATE

Name of Policy/Service/Programme or Practice:

Date:

Screened by:

In order to screen for equality effectively, it is good practice to involve where relevant, different equality groups to ensure that screening adequately reflects views from all equality strands. Please identify who you have involved in this screening process and how:

Question 1	Response
What are the main aims	
and objectives of the	
policy?	

Who are the main stakeholders of the policy?	
What data is available	
and being used to	
support this initial	
screening of the policy?	

Question 2	Response
Who created and who has responsibility for monitoring and keeping the policy, service, programme or practice	
under review?	
Question 3	
Who has the responsibility for implementing the policy, service, programme or practice?	

Question 4	Equality Strand	Yes	No	Don't Know	Rationale
Is there a reason to believe that different groups have different needs, experiences, issues and priorities in this policy area?	Race Disability				
	Gender				

An example of this			
could be the			
Catering Provision			
within the College.	Age	 	
You may find that			
different religions			
or beliefs will have			
different dietary	Religion or	 	
requirements that	Belief		
need to be			
addressed.			
	Sexual	 	
	Orientation		

Question 5	Equality Strand	Yes	No	Don't Know	Rationale
How are different equality groups affected by the policy?	Race				
Eg. Are there any indications of higher or lower	Disability				
participation or lower success rates in this policy area for people on the	Gender				
following grounds?	Age				
Eg. Where relevant, are there any uptake of a service or benefits by different groups?	Religion or Belief				
(Please tick appropriate box)	Sexual Orientation				

Question 6	Equality Strand	Yes	No	Don't Know	Rationale
Considering your responses in 1-5, is this policy equality relevant and to	Race				
which equality groups?	Disability				
	Gender				
	Age				
	Religion or Belief				
	Sexual Orientation				

General Information	

Do you need to start consulting with staff and	
students?	
Do we need to gather any further data, if so	
how and when?	
Can this policy promote positive equality of	
opportunity?	

Is a full impact Assessment Needed?	Yes	No
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Completed by (print name):		

Signature:

Date:			

Overall Level of					
Impact	High		Medium	Low	

Please retain a copy of this form and any data you used to undertake the exercise as it may be required for quality control and compliance monitoring purposes. The information will help you to write up your Policy Screening Report for publishing.

ACTION	WHO	BY WHEN

This template can be used to record your progress in completing a full equality impact assessment of a policy, procedure or project for one equality group and will be useful when you come to write your report.

Name of Policy/Service/Programme or Practice:	

What equality group(s) is this full i	impact assessme	nt for? (Please	tick)	
Age Disability	Gender	Race	Religion	
Sexual Orientation				

Please analyse the evidence and data gathered in the screening process in greater depth to assist with your decisions: (if yes, please tick box)

Is the available information sufficiently detailed to permit analysis of disparities between individual categories?

Is the information up to date, relevant and reliable?

Do you need to hold an informal consultation exercise internally or externally at this stage?

Are there other units or organisations that might want to join you in commissioning new data or research or consultation exercises?

Please retain a copy of this form and any data you used to undertake the exercise as it may be required for quality control and compliance monitoring purposes. The information will help you to write up your impact assessment report for publishing.

Completed impact assessment reports should be published internally in your intranet sit in the same place as the published policy or procedure.

Question 7	Stage of the	Policy:
ASSESS THE LIKELY IMPACT	Race	
EXAMPLES:		

 Does your analysis of the policy indicate possible adverse impact on some 	Disability	
groups?	Gender	
 Are any disparities in 		
the data statistically		
significant, and not		
due to chance?	Age	
Could the policy be		
amended to better		
promote equality of		
opportunity or meet	Religion or	
the positive duties?	Belief	
(please answer each of		
these questions for each		
equality strand)		
	Sexual	
(please complete question	Orientation	
10 for each stage of the		
policy)		

Question 8 CONSIDER THE ALTERNATIVES Examples: ٠ Would changes to the policy, or the way it is put into practice, remove or substantially reduce the impact? What changes could be introduced to ٠ reduce the adverse impact identified above? • What changes could you introduce to promote equality of opportunity? • Are there any aspects to your proposals that could be changed, or could you take additional measures, to reduce or remove adverse impact on a particular group, without affecting the policy's overall aims? • Could this unintentionally result in disadvantaging another group? • Would you be able to justify this, on balance?

Question 9

CONSULT FORMALLY

Examples:

- Have you identified all the groups affected by the policy, directly and indirectly?
- Which organisations and individuals are likely to have a legitimate interest in the policy?
- What methods of consultation are most likely to succeed in attracting the people you want to reach?
- Have previous attempts to consult particular communities been successful? If so, why, and what can you do to overcome any obstacles?
- Have you made resources available to encourage full participation by groups that have proved hard to reach?
- How will information, pre and post consultation, be made available?

Question 10 Decide whether the policy needs to	he revised or amended in the light of the
consultation?	be revised of amended in the light of the
 Does the consultation show that the policy will have an adverse impact on a particular group (or groups)? Is it likely to make it difficult to promote equal opportunities or good relations between different groups? Can the policy be revised or additional measures taken, so that it achieves its aims, but without risking any adverse impact? What are the main findings of your consultations, and what weight should they carry? 	
Question 11 Make monitoring arrangements- Yo equality relevant policies	u are required to monitor the impact of all
 How will the policy be monitored? What sort of data will be collected and how often will it be analysed? (Annually is recommended) Will the monitoring include qualitative 	
methods, such as surveys, or follow-up consultations?	
 How will the effects of the policy on equality of opportunity and good relations be monitored? 	
 What criteria will be used to assess these? 	
 How will any concerns be taken into account in any review of the policy? 	

Any other information or comments:

Relevant Dates:

Signature:	Completed by	(print name):	
Signature:			
	Signature:		

Dated:	

Date to be reviewed	Person Responsible	Report to be Published

the best information available a , concise, balanced and in propo				
concise, balanced and in propo	rtion to the n			
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f-contained document				
n and clear language				
elf	elf-contained document lain and clear language	elf-contained document	elf-contained document	elf-contained document

VERSION	AUTHOR	DATE	CHANGES
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