

report

meeting	NOTTINGHAMSHIRE AND CITY OF NOTTINGHAM FIRE & RESCUE AUTHORITY	
date	25 February 2005	agenda item number

REPORT OF THE CHIEF FIRE OFFICER

EQUALITY IMPACT ASSESSMENTS (EIA)

1. PURPOSE OF REPORT

The purpose of this report is to recommend the introduction of Equality Impact Assessments (EIA) into business processes within the Fire & Rescue Authority.

2. BACKGROUND

2.1 Nottinghamshire and City of Nottingham Fire & Rescue Authority has included Equal Opportunities Implications in its reports since its adoption of the "Corporate Standards in Personnel Management" on 2 September 1997.

2.2 This process, however, has been ad-hoc and a more resilient and auditable system is now required to ensure that the Fire Authority meets its obligations under various Equality and Fairness legislation.

3. REPORT

3.1 The current process of assessing Equal Opportunities Implications does not help the organisation in demonstrating they have fully examined all possible impacts on differential groups. It is now essential for the Authority to demonstrate its compliance legally and morally.

3.2 Replacing the current Equal Opportunities Implications with an Equality Impact Assessment (EIA) will provide thorough and systematic analysis of a policy/procedure/service area. Its primary function is to determine the extent of impact upon different groups and decide whether or not this impact is negative in terms of race, gender, disability, sexual orientation, religion or belief and/or age.

3.3 The Office of the Deputy Prime Minister has set Best Value Performance Indicators for all Fire Authorities to measure individual progress in the area of equality and diversity using the Local Government Equality Standard as a framework document. In order to achieve continuous improvement in equality the Standard works as a system for evidence based policy making.

3.4 Additionally, the Authority has a legal requirement under Section 71 of the Race Relations (Amendment) Act 2000, to eliminate unlawful racial discrimination, promote equality of opportunity and promote good relations between people of difference racial groups.

3.5 The Equality Impact Methodology has been developed through the CFOA Equality and Diversity Professionals Forum, and gives advice and guidance on equality impact assessments as part of business processes within Fire & Rescue Services (attached as Appendix A to the paper).

4. FINANCIAL IMPLICATIONS

- 4.1 Whilst there are no direct financial implications arising from this report, Members should be aware that, as work commences through Equality Impact Assessment, financial commitment may be revealed.
- 4.2 Where financial commitment becomes evident further information will be brought to the Fire Authority.

5. PERSONNEL IMPLICATIONS

There are direct personnel implications arising from this report having some form of impact on personnel policies and practices. These impacts will be addressed by completing the Equality Impact Assessment process. There are some training implications which will be addressed through existing mechanisms and contingencies.

6. EQUAL OPPORTUNITIES IMPLICATIONS

There are equal opportunities implications and these have been highlighted in the report.

7. RISK MANAGEMENT IMPLICATIONS

- 7.1 The Equality Standard forms part of Best Value. Failure to implement EIA across the Service will result in failure to achieve the Equality Standard for Local Government.
- 7.2 The damage to organisational reputation may have an adverse effect on our ability to deliver our service to community groups across the County and also limit our choice for recruitment within the working population.

8. RECOMMENDATIONS

- 8.1 That Members approve the replacement of Section 5, "Equal Opportunity Implications", on all Authority reports, replacing it with "Initial Equality Impact Assessment".
- 8.2 That Members approve that all relevant reports shall have Initial Equality Impact Assessment forms attached.
- 8.3 That Members approve the adoption of the full Equality Impact Assessment process as detailed in Appendix A.

9. BACKGROUND PAPERS FOR INSPECTION

None.

Paul Woods
CHIEF FIRE OFFICER

"Creating Safer Communities"

**Nottinghamshire and
City of Nottingham
Fire and Rescue Authority**



**Equality Impact
Assessments**



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NOTTINGHAMSHIRE FIRE AND RESCUE SERVICE

EQUALITY IMPACT ASSESSMENTS

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1. Introduction

The ODPM has set BVPIs for all Fire Authorities to measure individual progress in the area of equality and diversity using the Local Government Equality Standard as a framework document. The Standard has been developed as a tool for mainstreaming equalities for race, gender and disability but it can also be used in implementing policy around sexuality, religion and age to meet the requirements of the EU directive and future legislation. In addition it is designed to help fire authorities develop the structures that will help them determine the equality outcomes appropriate to their local fire service and provide evidence based continuous improvement.

In order to achieve continuous improvement in equality the Standard works as a system for evidence based policy making. Within this system, assessment processes provide the basis for collecting and reviewing evidence through which effective equality outcomes can be achieved. To begin with, self assessment will be the primarily concerned with putting the Standard in place. However, as a Fire Authority moves on to Level 3 it will be used to measure progress against the equality objectives set within the service plans.

1.1 Legal Requirement

Section 71 of the Race Relations (Amendment) Act 2000 places a duty on fire authorities to eliminate unlawful racial discrimination, promote equality of opportunity and promote good race relations between people of different racial groups. The response to this duty is set out in the Fire Service's Race Equality Scheme (RES), which requires compliance by each department and should include EIAs .

The government has set National Best Value Performance Indicators (BVPI) intended to help us improve the quality of local services by establishing high standards. The Equality Standard for Local Government requires the Fire Rescue Service to mainstream equality and diversity into policy and practises at all levels.

Fire and Rescue Authorities are also subject to the Comprehensive Performance Assessment (CPA) and the equality dimensions of this assessment are being enhanced to ensure that any lack of progress in this assessment is addressed.

1.2 Business Case

Over the past 10 years there has been a growing acceptance that diversity is no longer a word that is merely in vogue, but a key business issue that acts as a fundamental differentiator between organisations trying to attract and retain staff and service a broad customer or community population.

Some of the main business drivers for the fire service to adopt strategies relating to diversity are: managing risk and reputation; appeal to an inclusive customer base; enhance individual and business performance; develop a creative, innovative culture and the attraction, retention and development of staff.

There is naturally a strong alignment between the agendas of diversity and corporate social responsibility (CSR) and the fire service has firmly positioned diversity at the heart of its corporate social responsibility strategy with the adoption of its core values. When individuals begin to see evidence of organisations driving forward the CSR agenda with real demonstrable change, this undoubtedly enhances the attractiveness of that organisation both as an employer and service provider.

In addition a representative decision making structure is more likely to deliver the best solution and design of services. Therefore customers who have been consulted will feel more valued and are more likely to view service delivery as fair and equitable.

The CPA has placed equality and diversity issues as an integral part of good corporate governance and is vital for success in becoming a top twenty authority.

Simple fairness demands that people from under-represented groups are not barred from access to services and decision making processes and therefore EIAs provide a useful checklist to eliminate unlawful discriminate against any group/s.

1.3 Race Equality Scheme

The RES is published on the intranet and Website and outlines the Fire Service's approach to:

- § Supporting the elimination of unlawful racial discrimination
- § Promoting equality of opportunity
- § Promoting good relations between people of different racial groups.

1.4 Equality Standard for Local Government

The Standard is the recognition that fire and rescue services should provide a fair and equally accessible service to all its customers. This principle of fairness is central to the Government's agenda to modernise the Fire and Rescue Service and is embraced in the concept of 'Best value' which lies at the heart of this agenda. The Standard seeks to encourage a local response to local circumstances while securing an approach that will ensure continuous improvement in equality practice.

The Standard consists of five levels of achievement in Leadership and Corporate Commitment: Consultation and Community Development and Scrutiny: Service Delivery and Customer Care: Employment and Training:

- Level 1 – commitment to a Comprehensive equality Policy (CEP)
- Level 2 – assessment and consultation
- Level 3 – setting equality objectives and targets
- Level 4 – information systems and monitoring against targets
- Level 5 – achieving and reviewing outcomes

The Standard outlines the Service's approach to mainstreaming equality categories into policies and services and delivering the five levels by October 2009 in the following equality categories, race, gender, disability, religion or belief, sexual orientation, and age.

2. Equality Impact Assessment (EIA)

2.1 Introduction

Equality Impact Assessment (EIA) is a thorough and systematic analysis of a policy/procedure/service area (this will be referred to as 'policy' throughout the document but includes all areas), whether it is written or unwritten, formal or informal, and irrespective of the scope of that policy.

The primary function of the EIA should be to determine the extent of differential impact upon the relevant groups and in turn whether that impact is adverse, i.e. whether it has a negative impact on groups or individuals in relation to one or more of the equality categories i.e. race, gender, disability, sexual orientation, religious or belief and/or age. Whilst an EIA must address all six categories, it is not intended that each category will be afforded equal emphasis throughout the assessment process; the EIA must be responsive to emerging issues and prioritise these accordingly. In the light of this assessment, if it is decided that the policy fails to meet the needs of specific groups or has discriminatory outcomes, the Service must consider alternative policies, which more effectively achieve the promotion of equality of opportunity or a measure, which might be employed to mitigate the adverse impact.

The processes involved in conducting an EIA should not be looked on as an end in themselves. Instead, it should be borne in mind that the aim of the assessment is the promotion of equality of opportunity and thus the outcomes of the EIA are of primary concern.

In conducting an EIA there are certain methods and procedures that must be considered:

- § *Assessing how the proposed policies are likely to affect people from relevant groups; this should include collecting and analysing relevant data;*
- § *Consulting people who are likely to be affected by our proposed policies;*
- § *Reviewing and revising the proposed policies in light of the assessment and consultation.*

To assess the impact of a proposed policy it is important to have as much knowledge as possible about how the proposed policy will affect people. How this is assessed will depend on the nature of the policy itself but will include some of the following:

- § *Demographic data and other statistics, including census findings*
- § *Available research findings*
- § *Comparisons between similar policies in our Service and other Services*
- § *Survey data*
- § *Equality monitoring data*
- § *Ad hoc data gathering exercises*
- § *Specially commissioned research*

2.2 Initial Assessment or Screening

This will play a valuable role in new policy formulation, or when considering changes to an existing policy and will be carried out in **ALL** cases.

Before embarking on an EIA, it is important to determine the aims of the policy. This is a key stage in the development of an EIA. From this point it is possible to determine the EIA's terms of reference and whether full assessment is necessary.

On those occasions where one or more Fire and Rescue Services share responsibility for a policy, co-operation in carrying out the EIA should be considered.

It is important to recognise that the 'General Duty' under the Race Relations (Amendment) Act 2000 applies to all policies of the Service. It states, where a policy either originates, or is controlled in full or in part, by other persons, organisations or public authorities then arrangements must be put in place to co-ordinate the conduct of the EIA between these persons and/or bodies. Where the fire service has an involvement in the service delivery of a policy which is set elsewhere it will not be appropriate to disregard this involvement.

As an EIA proceeds it may become apparent that certain policies are associated. Where this is the case then it may be appropriate to link the EIA's of these policies.

2.3 Assessment of Impacts

When assessing the impact of the proposed policy it is important to look firstly at the differential impact of the policy. After this differential impact has been explored, only then can we look at the adverse impact of the policy.

Differential impact will occur when a particular group has been affected differently by the policy in either a positive, neutral or negative way. This differential impact will have been identified in the initial assessment of the policy.

After differential impact has been identified, the Fire Service must make a judgement as to whether the differential impact is adverse based on a systematic appraisal of the accumulated information. There is no statistical test available for making this judgement, nor would such a test be appropriate. Whether an impact is adverse is a question of professional judgement. The Fire Service should look at all available information and make a reasonable judgement on whether the impact is adverse. If the impact is adverse then policy makers must consider whether it is or is not unlawfully discriminatory and in both cases then respond to this assessment appropriately, that is by considering mitigation and alternative policies.

Assessment of impact concerns not only the policy under consideration but also any measures to mitigate the adverse impact or alternative policies that could more effectively achieve the promotion of equality of opportunity. Therefore there must be an assessment of the impact of any alternatives considered. This assessment may proceed within the original EIA, or if the alternative is significantly different from the original policy then either a new EIA may be appropriate, or the alternative may be screened. Consultations are likely to play a key role in each of these processes

The following questions may help guide assessment of impact:

- § *Is the policy directly or indirectly discriminatory?*
- § *If the policy is indirectly discriminatory can it be justified under the Acts?*
- § *Is the policy intended to increase equality of opportunity by permitting or requiring positive action or action to redress disadvantages? Is it lawful?*
- § *Is there any alternative measure which would achieve the desired aim without the adverse impact identified?*

If an adverse effect on any group can be identified, policy makers will need to assess whether the policy is unlawfully discriminatory taking into account that some policies are intended to increase equality of opportunity by requiring or permitting positive action, or action to redress disadvantages. They will then have to decide how to ensure that the Fire Authority acts lawfully.

Even if the policy is not unlawful, policy makers need to consider what to do in light of the adverse impact identified.

If the policy is intended specifically to address the needs of a particular group, it may well be justifiable, indeed necessary in order to promote the equality of opportunity of that group. If this is not the case, policy makers must consider whether there is any alternative measure which would achieve the aim desired without the differential impact identified.

- § *Is there any mitigation which would alleviate the adverse impact identified?*
- § *Are there additional measures which can be adopted which would further equality of opportunity in the context of this policy?*

When considering adverse impact it is important to highlight that an EIA is not merely about the identification of either direct or indirect discrimination. Instead it is about promoting equality of opportunity.

If it is discovered during an EIA that a policy is more likely to be unlawfully discriminatory, that policy should be abandoned and there is no necessity to proceed with the EIA. Any new policy which is proposed would then be subject to the screening process.

3. The Full Equality Impact Assessment

3.1 Consideration of Relevant Data and Research

It may be in the Fire Service's interest to work with other authorities when collecting data. This co-operation will be vital in maximising resources and minimising duplication of effort. Beyond this, a general partnership approach to data collection is likely to be the most efficient and effective method and should be actively promoted.

3.2 Sources of Data

It is suggested that the following questions could be asked:

- § *What do we need to know about this policy?*
- § *What information is needed to ensure that all perspectives are taken into account?*
- § *Who should be involved in determining what information is needed?*
- § *What existing quantitative data is available, in-house and externally?*

- § *What existing qualitative or evaluative research is available, in-house and externally?*
- § *What additional data is needed?*
- § *Is there a need to generate primary data?*
- § *Is there a need for secondary analyses of existing data?*
- § *Who will be partners in information gathering/provision?*
- § *What processes are required to consult effectively with these partners?*

An EIA depends on the effective use of data, whether quantitative or qualitative data, and whether internally or externally derived.

Quantitative data refers to numbers (i.e. quantities), typically derived from either a population in general or samples of that population. This information would often be analysed either using descriptive statistics (which consider general profiles, distributions and trends in the data), or inferential statistics (which are used to determine 'significance', either in relationships or differences in the data).

Qualitative data refers to the experiences of individuals from their perspective, most often with less emphasis on numbers or statistical analysis. It is likely that consultations, for example, are more likely to yield qualitative than quantitative data. Both types of data should be regarded as equally relevant, no one type of data is inherently more valuable than the other.

Before beginning an EIA a thorough audit of available data should be carried out, paying particular attention to in-house data sets which either can be used or adapted for the purposes of EIAs. The results of the 2001 census are invaluable and should be consulted at an early stage in an EIA.

There may be a temptation routinely to employ one-off data gathering exercises in order to address perceived shortfalls in available information. While this may be necessary in response to significant contemporary issues, it is not a substitute for putting in place procedures which allow data to be gathered at regular intervals to inform current and future EIAs. With this in mind it may be important to identify in-house sources of data as a first stage in the data gathering process. For example, existing administrative databases may be potentially useful sources of information.

Furthermore, comments which have been gathered during all previous consultations, and including the preparation of the RES and IRMP 1, should continue to inform decision-making and should be regarded as a valuable source of information. Likewise, consultants' reports, academic publications and consultations with trade unions, voluntary and community sectors should continue to inform the process.

3.3 Methods of Data Collection

It is important to reiterate the point that various data collection techniques are likely to be used during an EIA and including both quantitative and qualitative methods.

By way of example, the following could each play a role (although this list is not intended to be exhaustive and the techniques may also be known by alternative names).

- § *Consultations*
- § *Surveys (e.g. face-to-face, telephone, postal)*
- § *Observations of behaviour*
- § *Administrative databases*
- § *Secondary analyses of existing databases*
- § *Focus group interviews*
- § *In-depth interviews*
- § *Pilot projects*
- § *Review of complaints made*
- § *User feedback*
- § *Academic publications*
- § *Consultants' reports*
- § *Citizens' juries*

It is important to be mindful of human rights and data protection issues when considering appropriate data collection techniques. If in doubt, consult with representatives of affected groups or relevant agencies before embarking on data collection. It should always be made clear that individuals have the right to decline to provide information and they should be made aware of how resulting data will be processed. Be aware that particular issues of sensitivity and confidentiality may arise in relation to disability and sexual orientation.

Before in-house databases and other systems of data collection have become well established, the gathering of data to inform an EIA is likely to be time consuming and in some areas only limited information is likely to be available. In all cases, lack of data should not be an excuse for inaction.

Any data must be presented in a manner which is easily accessible and understandable and which gives sufficient detail of the procedures used in the collection to allow for replication.

Where reasonable and practicable, raw data should be made available for inspection on request, with summary statistics included in the published report. It may be useful to present this information in a standardised form, using tables and figures for ease of access.

3.4 Consideration of Measures

The consideration of mitigation and alternatives are crucial elements of the process. Options must be developed which reflect different ways of delivering the policy outcome.

The consideration of mitigation of adverse impacts is intertwined with the consideration of alternatives. Mitigation can take the form of lessening the severity of the impact or providing some other remedy, where the adverse impact cannot reasonably be reduced.

The mitigation of adverse impacts must be considered at the various stages of the policy-making process. Clear evidence of the mitigation of impacts must be apparent in the policy assessments, and details of mitigation and its implementation must be included in the final recommendations. Evidence of the consideration of mitigation must be presented during decision making.

Methods of delivering policy outcomes which have a less adverse effect on the relevant group, or which better promote equality of opportunity for the relevant groups, must in particular be considered. Consideration must be given to whether separate implementation strategies are necessary for the policy to be effective for the relevant group. The following must be considered:

- § *How does each option further or hinder equality of opportunity?*
- § *How does each option reinforce or challenge stereotypes which constitute or influence equality of opportunity?*
- § *What are the consequences for the group concerned and for the Service of not adopting an option more favourable to equality of opportunity?*
- § *How will the relevant group be advised of the new or changed policy or service?*
- § *What are the costs of implementing each option?*
- § *Will the social and economic costs and benefits to the relevant group of implementing the option outweigh the, costs to the Service or other groups?*

Clear evidence of the consideration of the impacts of alternatives must be apparent in the relevant documentation. The realistic consideration of the impacts of reasonable alternatives must be evident in any final recommendations. Justifications must be given if these alternatives have not been accepted.

There may be occasions where differential impact can be justified as part of a wider strategy associated with positive action in relation to particular groups, or where the policy deliberately attempts to encourage equality of opportunity for a particular group. Where this is the case any actions must be justified and it will be a question of providing a clear and legal rationale for these actions.

The Fire Service must ensure that an option for alleviating an adverse impact on a particular racial group does not in turn create an adverse impact for another racial group. If an adverse impact is unavoidable then it must be justified.

3.5 Consultation on the Actual Impact of Existing Policies and the Likely Impact of Proposed Policies

An EIA requires consultation. Consultation must be carried out with relevant public bodies, voluntary, community, trade union and other interest groups with a legitimate interest in the matter. This should include those directly affected by the policy to be assessed, whether or not they have a direct economic or personal interest. It should be timely, open and inclusive and conducted in accordance with the principles detailed in the RES to ensure that sufficient time and resources are dedicated to the consultation process to encourage full participation particularly by marginalised groups.

Wide publication of the consultation exercise is essential to inform the public and relevant groups about the policy being assessed, and to invite comments on it. This may include press releases, prominent advertisements in the press, the Internet and direct invitations to groups which are likely to be interested in and able to represent interests and views which would otherwise be inadequately represented.

Consultation with groups and individuals should begin as early as possible. Consideration must be given to which method of consultation is most appropriate to the circumstances. Consideration should be given as to whether face-to-face meetings, small group meetings, focus groups, discussion papers with the opportunity to comment in writing, and questionnaires, are best.

The accessibility of the language and the format of information must be considered to ensure that there are no barriers to the consultation process. Information should be available on request in accessible formats such as Braille and audiocassette and in minority languages to meet the needs of those who are not fluent in English. Public authorities must ensure that systems are in place to ensure that information is available in such accessible formats in a timely fashion.

The following questions may be of assistance in guiding consultation:

- § *Who is directly affected by the policy?*
- § *What relevant groups have a legitimate interest in the policy?*
- § *How do we ensure that those affected or with a legitimate interest in the policy are consulted?*
- § *What methods of consultation will be used and at which stages of the EIA?*
- § *How will information be made available to those consulted?*
- § *Will the information be accessible to minority groups?*
- § *What measures can be taken to facilitate effective consultation in light of any barriers that may exist?*
- § *Have previous attempts at consultation with particular groups been unsuccessful? If so, why, and what can be done to overcome any obstacles?*
- § *What resources are available to encourage full participation by marginalised groups?*
- § *If meetings are to be held, where will they be held and at what time of the day?*

Formal consultation should be included as a critical stage in the EIA, namely immediately prior to decision-making. Less formal 'consultation' should inform the entire EIA process.

It is most important that consultations take place with those likely to be directly affected by the policy and this is essential during formal consultation. As already stated, consultations in general play an integral role in the EIA and these consultations must be underpinned by a good working relationship with relevant consultees.

3.6 Decision by Public Authority

As the Fire Service has a statutory and moral duty to have due regard to the need to promote equality of opportunity it is not sufficient merely to take equality into account, it must be accorded considerable weight. That is, the need to promote equality of opportunity must be given regard or weight in accordance with the public authority's statutory duty as outlined in Section 71 of the Race Relations (Amendment) Act 2000. However this does not necessarily mean that the equality duty overrides other clearly conflicting statutory duties with which the public authority must comply. Instead, the Service must act in a proportionate manner and accord weight not only to administrative considerations but also to the statutory equality of opportunity duty. Such considerations must be reflected in decision-making in relation to an EIA.

The decision-making process represents the natural endpoint of the 'Consideration of Measures' (see above). At this stage, all available information is combined in a decision or decisions with respect to adopted or proposed policies, together with the rationale for that decision. Decision-making documentation must indicate that the impact of alternative policies and mitigation was considered.

Where an EIA suggests differential impact for two or more relevant groups, this may present particular problems in terms of possible solutions. This may be especially true where the perceived needs of these groups are in conflict. Possible solutions include looking at the context of the problem (for example, is there particular under-representation of one of the two groups?), the role of mitigation and/or a consideration of alternative policies. It would also be appropriate when making decisions to bear in mind solutions which meet other policy initiatives.

A highly structured approach to decision-making will not be possible, given the types of data, both quantitative and qualitative, which will be drawn upon. At the same time it would be useful to systemise the decision-making processes and thereby to be able to record a procedure which can be scrutinised and can be justified.

It would be necessary to explain conclusions reached on the validity and reliability of quantitative and qualitative data. In particular, where different types of data differ in relation to the determination of whether or not there is adverse impact.

The following questions may help guide decision-making:

- § *Who will play a role in the decision-making process?*
- § *What information will inform the decision-making process?*
- § *What weights will be assigned to various pieces of information? How will these weights be determined?*
- § *How is the decision-making process to be structured?*
- § *How will the decision-making process be recorded?*

3.7 Monitoring

Monitoring consists of continuous scrutinising, follow-up and evaluation of policies. It is not solely about the collection of data, it can also take the form of regular meetings and reporting of research undertaken. Monitoring is not an end in itself but provides the data for the next cycle of policy review.

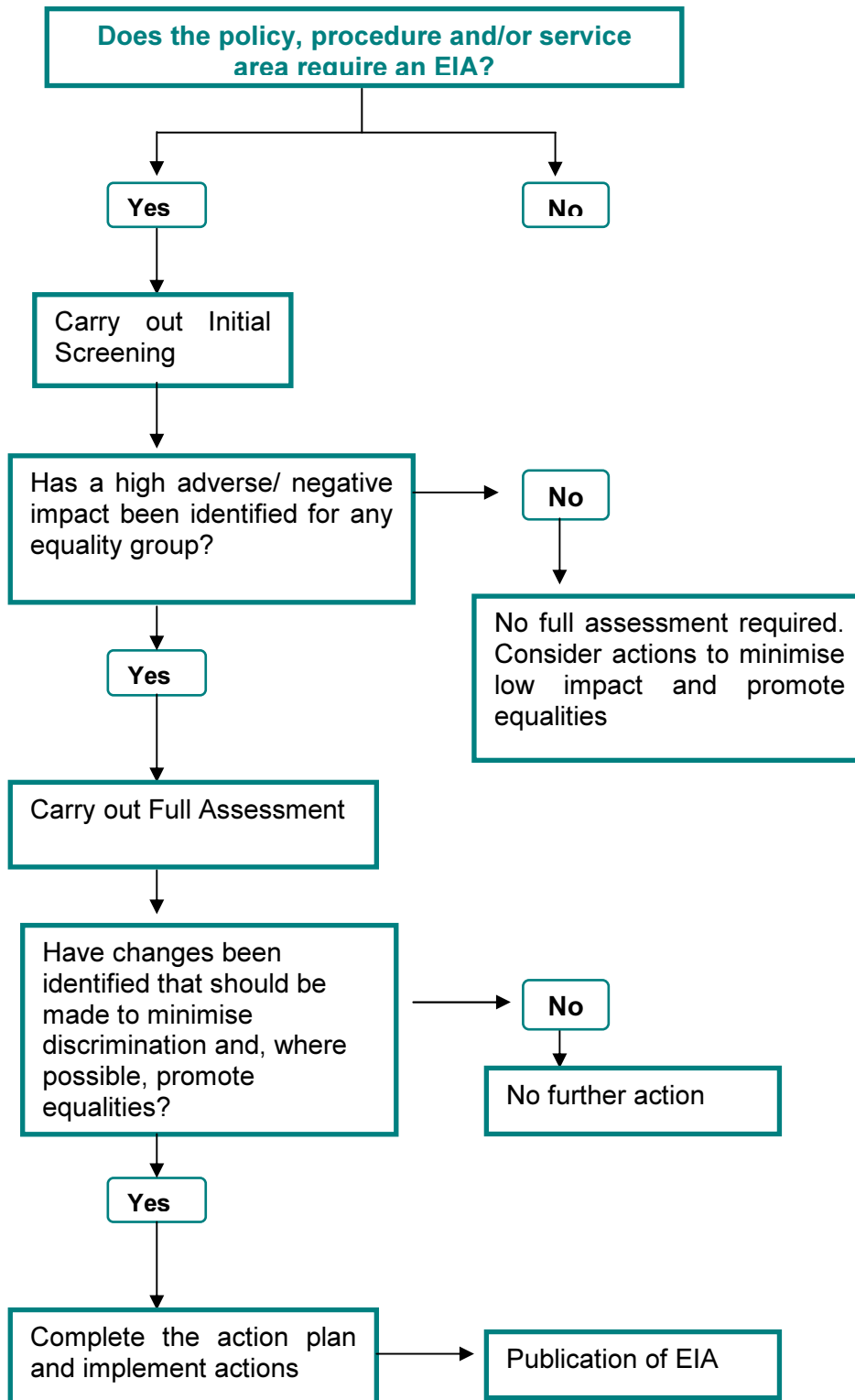
When implementing step one of the EIA process, 'Consideration of Available Data and Research', systems of monitoring should be established which allow for the routine collection of data in the future. Alongside these procedures there may be a need to establish particular methods for data collection in response to particular policy concerns. In turn, these methods may focus in particular on those groups which are adversely affected by the policy in question. The advice given at the 'Consideration of Available Data and Research' stage about data collection is equally applicable to monitoring. Monitoring should consist of both quantitative and qualitative methods.

Monitoring must be sensitive to issues associated with human rights and privacy and the Fire Service should seek advice from consultees and/or the relevant agency or group representatives when establishing such procedures.

3.8 Publication of Results of Race Equality Impact Assessments

The Service must publish the results of the impact assessments in report form and this should be in a systematic and consistent manner, at the same time acknowledging that each EIA will be unique.

It is likely that a draft EIA report will have been made publicly available during formal consultation but the final version of the report should give reasons for either rejecting or accepting the results of the consultations. The format of the published report is likely to vary depending on the nature of the policy under assessment but a suggested outline can be found at appendix D.



APPENDIX B

INITIAL EQUALITY IMPACT ASSESSMENT

Directorate		Department/Section		Manager		Telephone No.	
						e-mail	
Name of Policy/Service to be assessed				Date of Assessment		Is this a new or existing policy?	
1 Briefly describe the aims, objectives and purpose of the policy/service.							
2. Who is intended to benefit from this policy/service, and in what way?							
3 What outcomes are wanted from this policy/service?							
4 Who are the main stakeholders in relation to the policy/service?				5 Who implements the policy/service, and who is responsible?			
6 Are there concerns that the policy/service has/could have a differential impact on the following groups and what existing evidence (either presumed or otherwise) do you have for this?		Y	N	Please explain			
Race		Y	N				
Gender		Y	N				
Disability		Y	N				

Religion or Belief	Y	N	
Sexuality	Y	N	
Age	Y	N	
7 Could the differential impact identified in 6 amount to there being the potential for adverse impact in this policy/service?	Y	N	Please explain
8 Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group? Have you consulted those who are likely to be affected by the policy/service?	Y	N	Please explain for each equality heading (questions 6) on a separate piece of paper.
9 Should the policy/service proceed to a full impact assessment?	Y	N	10 Date on which Full assessment to be completed by. Date

I am satisfied that this policy has been successfully impact assessed.

I understand the Impact assessment of this policy is a statutory obligation and that, as owners of this policy, we take responsibility for the completion and quality of this process.

Signed (completing Officer) Date.....

Signed (Head of Section)..... Date.....

PLEASE NOTE – THIS IMPACT ASSESSMENT WILL BE SCRUTINISED BY THE EQUALITY AND DIVERSITY SECTION WHO REPORT TO THE HEAD OF HUMAN RESOURCES.

If you have identified unjustified differential/adverse impact on areas of either function, policy or service provision, please read the guidelines and complete below. If you haven't, please go to 7 and sign and date

<p>3 Consultation Who was consulted What were the key points identified in the consultation.</p>					
<p>4 Options List the options considered to modify the policy/service to reduce adverse impact on group/s.</p>					
<p>5 Decisions What solution/s was chosen to modify the policy/service to remove unintended or unjustified impact on group/s.</p>	<p><i>Please List Solutions for Unjustified Impact</i></p>		<p><i>Please List Solutions for Unjustified Impact</i></p>		
<p>6 Monitor/Review How will you monitor the progress on impact of policy/service.</p>	<p><i>Please explain</i></p>		<p><i>Date of Review</i></p>		
<p>7 Signed Print Name Job Title</p>	<p>..... </p>	<p>Date Started</p>	<p>.....</p>	<p>Date Completed</p>	<p>.....</p>
<p><i>Reminder: If you have identified unintentional differential/adverse impact of either function, policy, or service provision, the impact assessment cannot be Signed off until the consultation has taken place with the relevant group/s.</i></p>					

PLEASE NOTE – THIS IMPACT ASSESSMENT WILL BE SCRUTINISED BY THE EQUALITY AND DIVERSITY SECTION WHO REPORT TO THE HEAD OF HUMAN RESOURCES.

APPENDIX D

REPORT FORMAT FOR THE FULL EQUALITY IMPACT ASSESSMENT

The report should begin with an Executive Summary of the results of the EIA, in particular focusing on any decisions which may have been reached. It should contain a description of the policy aim, the context within which the policy operates, the scope of the policy and any existing data which are available and which may have informed development in the past.

An example of how the report should be constructed is as follows:

Introduction

This section should explain why the EIA came to be undertaken.

Background

This section should give the background information to the policy and the perceived problems with the policy which are the reason for the Impact Assessment.

Methodology and Sources of Data

This section should outline the methodology used to collect data and what sources of data were used. In addition to this it should explain any other procedures which have been used to draw together pertinent information (such as original data collection exercises).

Assessment of Impact on Equality

This section should consist of a detailed explanation and assessment of the policies impact on race/gender/disability/sexuality/religion/age equality.

Consideration of Alternative Approaches/Mitigation of Adverse Impact

This section should explain in detail all the considerations of alternative approaches/mitigation of adverse impact of the policy.

Monitoring Arrangements

This section should also outline systems which will be put in place to monitor for adverse impact in the future and should include all relevant timetables. In addition it may include the following:

- § An explanation of monitoring and why it is important
- § Monitoring systems and methods you used
- § Summary and assessment of your monitoring, making it clear whether you found any evidence of discrimination
- § How you will use these results to develop future policy and practice.

Formal Consultation

This section should outline all the consultation that has taken place on the EIA, and may include the following:

- § Why you carried out the consultation
- § Details about how you went about it
- § A summary of all the replies received from people you consulted
- § An assessment of your proposed policy (or policy options) in the light of the responses you received.

- § A statement of what you plan to do next

Publication of Equality Impact Assessment

This section should state how the EIA will be published.

Conclusions

Conclusions drawn from the results in terms of the policy impact and will outline the decision-making process concerning policy review. This section should state the decisions made by the authority on the basis of the EIA, for example, by the way of an action plan, with associated timescales. If a decision is made to introduce measures to mitigate adverse impact or alternative policies then it would be appropriate to address each of the six questions listed below:

- § How does each option further or hinder equality of opportunity?
- § How does each option reinforce or challenge stereotypes which constitute or influence equality of opportunity?
- § What are the consequences for the group concerned and for the public authority of not adopting an option more favourable to equality of opportunity?
- § How will the relevant group be advised of the new or changed policy or service?
- § What are the costs of implementing each option? Will the social and economic costs and benefits to the relevant group of implementing the option outweigh the costs to the public authority or other groups? An evaluation of net social benefits achieved by adopting each option must be considered.
- § Does the public authority have international obligations which would be breached by, or could be furthered by, each of the options?

APPENDIX E

GLOSSARY OF TERMS

Policy

A policy is a high level overall plan that embraces the general goal and objectives of the organisation

Procedure

A procedure is a documented controlled steps or activities that accomplish the goals and directive of a related policy.

Function

A set of activities organised by the provider to deliver a service.

Service Delivery

A set of processes that is delivered directly and/or indirectly to the user/s.

Direct Discrimination

Means treating one person less favourably than another on racial grounds. Direct Discrimination is unlawful under the Race Relations Act 1976.

Indirect Discrimination

Means that a requirement or condition which is applied equally to everyone

- can be met by a considerably smaller proportion of people from a particular equality category
- is to their detriment
- cannot be justified

All three conditions must apply.

Differential/Adverse Impact

Means significant differences in patterns of representation or outcomes between racial groups/equality categories. Adverse impact may not in itself be proof of discrimination, one way or the other. What it means is that you need to investigate the processes that have resulted in adverse impact and tackle any barriers or failings you find.

Monitoring

The process of collecting, analysing and evaluating information, to measure performance, progress or change.

Consultation

Asking for views on policies or services from staff, colleagues, service-users or the general public. Different circumstances call for different types of consultation. For example, consultation may include meetings, focus groups, surveys, questionnaires etc.

Proportionality

The weight given to the equality strand should be proportionate to its relevance to a particular function. This approach may mean giving greater consideration and resources to functions or policies that have the most effect on the public and our staff.

Relevance

For example race equality will be more relevant to some public functions than others. Relevance is about how far a function or policy affects people, as members of the public and as employees.