

Equality Impact Assessment Form

The Equality Act 2010 includes a public sector equality duty (the 'general duty'), replacing the separate duties on race, disability and gender equality. This came into force on 5 April 2011. The aim of the general duty is to ensure that public authorities and those carrying out a public function consider how they can positively contribute to a fairer society through advancing equality and good relations in their day-to-day activities. The duty ensures that equality considerations are built into the design of policies and the delivery of services, and that they are kept under review. This will achieve better outcomes for all.

The Council is required to have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Act
- advance equality of opportunity between people who share a relevant protected characteristic and those who do not
- foster good relations between people who share a protected characteristic and those who do not.

The guidance refers to these three elements as the three 'aims' of the general duty and so when we discuss the general duty we mean all three aims.

The Act explains that having due regard for advancing equality involves:

- removing or minimising disadvantages experienced by people due to their protected characteristics
- taking steps to meet the needs of people from protected groups where these are different from the needs of other people
- encouraging people with protected characteristics to participate in public life or in other activities where their participation is disproportionately low.

The Act describes fostering good relations as tackling prejudice and promoting understanding between people who share a protected characteristic and those who do not. Meeting the duty may involve treating some people more favourably than others, as long as this does not contravene other provisions within the Act.

The following principles are drawn from case law on the previous equality duties, and will continue to be relevant in relation to the new duty. To meet the general duty, a public authority must ensure:

- **Knowledge:** those who exercise its functions (its staff and leadership) are aware of the duty's requirements. Meeting the duty involves 'a conscious approach and state of mind'. Decision-makers should therefore be aware of the implications of the duty when making decisions about their policies and practices.
- **Timeliness:** the duty arises before and at the time that a particular policy is under consideration and a decision is taken. A public authority cannot satisfy the duty by justifying a decision after it has been taken.
- **Meaningful consideration:** consideration of the three aims of the general duty must form an integral part of the decision-making process. This is not a 'tick box' exercise – it must be exercised with rigour, with an open mind in such a way that influences the final decision.
- **Sufficient information:** the decision-maker must consider what information s/he has as well as what further information might be needed to give proper consideration to the general duty.
- **Review:** public bodies must have due regard to the aims of the general duty not only when a policy is developed and decided upon, but also when it is implemented and reviewed. The general duty is a continuing duty.
- **Non-delegation:** Anyone exercising public functions on behalf of a public body is required to meet the duty. This is because the duty rests with the public authority even if they have delegated any functions to another organisation.

The Equality and Human Rights Commission has produced guidance for the performance of the general duty in Wales, known as the specific duties in Wales. The specific duties include guidance on impact assessment and engagement that are both relevant to this process. Copies of the guidance are available on the Commission's website and via the equality section of StaffNet.

An impact assessment is a systematic way of finding out the impact of a policy on different protected groups. Officers who are responsible for policies are required to identify the likely impacts that may result from the introduction of a policy.

This impact assessment form has been developed to ensure that these groups are neither directly nor indirectly discriminated against in the planning and delivery of our services, nor by the decisions that we make.

An equality impact assessment must be carried out at a formative stage so that it is an integral part of the development of the policy, not a later justification of a measure that has already been determined.

How should you assess impact?

1. Identify **the objectives** of your policy and how it will work.
2. Examine local and national **data and research**.
3. Assess **the likely impact** on the protected groups.
4. **Consult and involve** people who are likely to be affected by your policy.
5. Make arrangements to **monitor and review** the impact of your proposal.
6. **Publish** the assessment.

It is the responsibility of the relevant Head of Service or Operational Manager to ensure that an assessment has been completed for the policy, practice, procedure or decision identified.

Complete form electronically and return to the Equalities Section: tsgreaves@valeofglamorgan.gov.uk. For support, ring: 01446 709446

Title and Description of Policy, Procedure, Practice or Decision (referred to as “policy” throughout form).	Equality Training Strategy
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Who is responsible for developing and implementing the policy?

Name	Nicola Hinton
Job Title	Corporate Equality Officer
Directorate	Corporate and Customer Services
Division	Equalities

1. Background and screening:

Who will be affected by this policy?

Vale of Glamorgan residents

Internal department(s) (please state which):

Customers/residents in a specific geographical location

Specific group of customers

Specify group (for example, a particular age group or gender, gypsy / traveller children in education, people with dementia):

Others

Please specify:

Please ✓

✓ In general

✓ All departments

Specify location:

What research or baseline information do you have about how your service is used by various groups of people?

The Equality Team offers training on a range of equality topics which are open to staff across the organisation.

Between 2007 and 2011, approximately 450 staff out of 5,000 received corporate equality training, equivalent to about 9% of staff. The intention of the equality training strategy is to make the most of the resources available to raise awareness of equality legislation and issues amongst the majority of staff.

Will this policy have a significant effect on how services are delivered?

Yes ✓ No

Please detail:

Raising awareness of equality legislation and issues should improve how services are designed and delivered so that staff and customer needs are better understood, taken into account and met.

Will this policy have a significant effect on how other organisations operate?

Yes No ✓

Please detail:

This strategy is intended to affect how those who work for the Council operate.

Does the policy involve a significant commitment of resources?

Yes ✓ No

Please detail:

The resources needed are:

- use of the training budgets to buy appropriate training; and
- time needed by staff to undertake the training.

Does the policy relate to an area where there are known inequalities (for example, disabled people's access to public transport, the gender pay gap, racist or homophobic bullying in schools, educational attainment of Gypsies and Travellers)?

Yes No

Please detail:

The purpose of training will be to raise awareness of equality legislation and the needs of all protected groups.

What are the intended outcomes of the policy (outcomes to be specific, measurable, achievable, results oriented, time-based)?

Please detail:

To ensure that the majority of staff are aware of their responsibilities under the public sector equality duty and specific duties for Wales.
To raise awareness of the needs of protected groups.

How will these be measured?

Please detail:

By the numbers of staff who undertake the training; e-learning test results; evaluation of the training; evaluation of how the training has been put into practice.

In the broader context, monitoring of feedback and complaints about service provision and satisfaction with the workplace culture.

Will the policy impact upon other policies or practices?

Yes No

Please detail:

Implementation of the training strategy will partly fulfil one to the equality objectives in the Strategic Equality Plan to raise awareness of the responsibilities under equality legislation and the needs of protected groups. It will also meet a commitment to training within the equal opportunity policy.

What data or research is available on the policy (for example, statistics, survey results, best practice advice)?

Please detail:

“How Fair is Wales” (Equality and Human Rights Commission) highlights the need to raise awareness of the needs of protected groups. Engagement with organisations based in the Vale of Glamorgan which are representative of the needs of protected groups endorsed this, resulting in the development of an equality objective within the Council’s Strategic Equality Plan.

Are there any gaps in data which necessitate further research or consultation?

Yes No

Please detail:

The above research and engagement supports the need for the development and implementation of this strategy which is designed to meet the approved equality objective within the Council’s Strategic Equality Plan.

Is there any evidence that there are different levels of service uptake for different protected groups, for example, do men use the policy more than women?

Yes No

Please detail:

Uptake of equality training has not been monitored by protected characteristics to date so it is not known whether there has been a different level of uptake by different protected groups. This issue is being addressed so that this can be monitored in the future. The Equality Impact Assessment will be revisited as this information becomes available.

Is there any evidence that there are barriers that might exclude any of the protected groups from accessing the policy?

Yes No

Please detail:

See above – this evidence is not currently available but is being developed. When the information is available, it will be analysed and action taken to address issues identified.

We know that not everyone has access to a personal computer to access e-learning, and we will be planning how to best take this training out to teams affected by this so that we reach the majority of staff. We will consider accessibility when reviewing and selecting e-learning programmes.

We will ensure that training is accessible for both the trainer and those attending by asking about individuals' needs before the training event and planning how these can be met. This will include using accessible training venues and using hearing loops.

Timing of training can be an issue for parents and carers. E-learning can be accessed at the learner's convenience. Where we have to take this training out to groups, we will arrange to do so at planned meetings or at times convenient to the team where possible.

When arranging courses for people to attend, we will take into account school start and end times and avoid arranging training in school holidays.

If there are no barriers, what is your evidence to support this?

We will develop the means to monitor attendance to give us a better insight into this but in the meantime, will use the knowledge we already have of potential barriers (see above) to reduce these.

Is there evidence that any of the protected groups will have different needs or priorities with regard to the proposed policy?

Yes No

Please detail:

In general, we know that protected groups, such as people with disabilities or people who use English as a second language, have different needs in respect of accessing training. At the moment, we do not have enough statistical data on Council staff to inform us of their specific needs but this is under development.

Is there any evidence that the policy could discriminate, directly or indirectly, against people in any of the protected groups?

Yes No

Please detail:

There is no current evidence to suggest that the planned equality training discriminates against protected groups. We will use guidance on how to make training accessible to a diverse range of people when developing the training.

Can anything be done further to promote equality of opportunity by altering the policy?

Yes No

Please detail:

We will use the methods described above to monitor uptake of and satisfaction with training so that we are able to make reasonable adjustments where this would be helpful.

2. Relevance

Is an equality impact assessment relevant to this policy?

Yes No

Where, as a result of the above screening, the officer responsible for the policy believes that an equality impact assessment is not relevant, they should initially discuss this with the Council's equalities coordinator, and record and explain the decision.

Please detail:

3. Gender

Will the policy have a negative impact, directly or indirectly, on women or men?

Please detail evidence:

It is not anticipated that there will be a negative impact on men or women.

Will the policy have a positive impact, directly or indirectly, on women or men?

Please detail evidence:

Considering the needs of parents and carers, who may be men but are most likely to be women, in the timing of the training will have a positive impact. For example, starting training at a time that allows children to have been taken to school and avoiding school holidays means that women are more likely to be able to attend training events.

Will the policy have no gender-specific impact?

Please detail evidence:

There is the potential to have a gender impact as described in the above example.

What action can you take to mitigate against any negative impact, and/or to have a more positive impact on men or women?

Please detail evidence:

See above.

As better information becomes available as we monitor access to training and feedback on training by protected characteristic, we will review whether we need to make adjustments to the training programme.

4. Race

Will the policy have a negative impact, directly or indirectly, on people based on their race, colour, nationality (including citizenship) or ethnic or national origin(s)?

Please detail evidence:

It is not anticipated that there will be a negative impact.

Will the policy have a positive impact, directly or indirectly, on people based on their race, colour, nationality (including citizenship) or ethnic or national origin(s)?

Please detail evidence:

It is anticipated that there will be a positive impact on people related to their age generally, as better awareness is raised of the needs of people of different ages.

Will the policy have no impact, directly or indirectly, on people based on their race, colour, nationality (including citizenship) or ethnic or national origin(s)?

Please detail evidence:

It is envisaged that the training will have a neutral impact on staff in relation to race but that generally, there will be a positive impact (see above).

What action can you take to mitigate against any negative impact, and/or to have a more positive impact on people based on their race, colour, nationality (including citizenship) or ethnic or national origin(s)?

Please detail evidence:

As better information becomes available as we monitor access to training and feedback on training by protected characteristic, we will review whether we need to make adjustments to the training programme.

5. Disability

A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Will the policy have a negative impact, directly or indirectly, on disabled people?

Please detail evidence:

It is not anticipated that there will be a negative impact on disabled people.

Will the policy have a positive impact, directly or indirectly, on disabled people?

Please detail evidence:

We will follow guidelines to make training programmes accessible and use accessible venues.

It is anticipated that there will be a positive impact on disabled people as better awareness is raised of their needs.

Will the policy have no impact, directly or indirectly, on disabled people?

Please detail evidence:

It is envisaged that the training will have a neutral impact on disabled staff but that generally, there will be a positive impact (see above).

What action can you take to mitigate against any negative impact, and/or to have a more positive impact on disabled people?

Please detail evidence:

As better information becomes available as we monitor access to training and feedback on training by protected characteristic, we will review whether we need to make adjustments to the training programme.

6. Welsh language

Will the policy have a negative impact, directly or indirectly, on the Welsh language?

Please detail evidence:

Welsh Awareness training sessions will be provided, which assist in developing language sensitivity.

Will the policy have a positive impact, directly or indirectly, on the Welsh language?

Please detail evidence:

We continue to support people to develop Welsh language skills through various Welsh language courses.

Will the policy have no impact, directly or indirectly, on the Welsh language?

Please detail evidence:

Supporting the development of Welsh language skills has a positive impact on the Welsh language.

What action can you take to mitigate against any negative impact, and/or to have a more positive impact on the Welsh language?

Please detail evidence:

As better information becomes available as we monitor access to training and feedback on training by protected characteristic, we will review whether we need to make adjustments to the training programme.

7. Age

Will the policy have a negative impact, directly or indirectly, on different age groups (e.g. people over 50, people under 16)?

Please detail evidence:

It is not anticipated that there will be a negative impact on people related to their age.

Will the policy have a positive impact, directly or indirectly, on different age groups?

Please detail evidence:

It is anticipated that there will be a positive impact on people related to their age generally, as better awareness is raised of the needs of people of different ages.

Will the policy have no impact, directly or indirectly, on different age groups?

Please detail evidence:

It is envisaged that the training will have a neutral impact on staff in relation to age but that generally, there will be a positive impact (see above).

What action can you take to mitigate against any negative impact, and/or to have a more positive impact on people of different age groups?

Please detail evidence:

As better information becomes available as we monitor access to training and feedback on training by protected characteristic, we will review if we need to make any adjustments to the training programme.

8. Religion, belief or non-belief

Will the policy have a negative impact, directly or indirectly, on people with different religions, beliefs or non-beliefs?

Please detail evidence:

It is not anticipated that there will be a negative impact on people related to their religion or beliefs.

Will the policy have a positive impact, directly or indirectly, on people with different religions, beliefs or non-beliefs?

Please detail evidence:

It is anticipated that there will be a positive impact on people related to their religion or beliefs as awareness is raised of needs related to this protected characteristic.

Will the policy have no impact, directly or indirectly, on people with different religions, beliefs or non-beliefs?

Please detail evidence:

It is envisaged that the training will have a neutral impact on staff in relation to religion or belief but that generally, there will be a positive impact (see above).

What action can you take to mitigate against any negative impact, and/or to have a more positive impact for people with different religions, beliefs or non-beliefs?

Please detail evidence:

As better information becomes available as we monitor access to training and feedback on training by protected characteristic, we will review if we need to make any adjustments to the training programme.

9. Sexual orientation

Will the policy have a negative impact, directly or indirectly, on lesbians, gays, bisexuals or heterosexual people?

Please detail evidence:

It is not anticipated that there will be a negative impact on people related to their sexual orientation.

Will the policy have a positive impact, directly or indirectly, on lesbians, gays, bisexuals or heterosexual people?

Please detail evidence:

It is anticipated that there will be a positive impact on people related to their sexual orientation as awareness is raised about the needs of people with this protected characteristic.

Will the policy have no impact, directly or indirectly, on lesbians, gays, bisexuals or heterosexual people?

Please detail evidence:

It is envisaged that the training will have a neutral impact on staff in relation to sexual orientation but that generally, there will be a positive impact (see above).

What action can you take to mitigate against any negative impact, and/or to have a more positive impact for lesbians, gays, bisexuals or heterosexual people?

Please detail evidence:

As better information becomes available as we monitor access to training and feedback on training by protected characteristic, we will review if we need to make any adjustments to the training programme.

10. Gender Reassignment

Will the policy have a negative impact, directly or indirectly, on transgender people?

Please detail evidence:

It is not anticipated that there will be a negative impact on transgender people.

Will the policy have a positive impact, directly or indirectly, on transgender people?

Please detail evidence:

It is anticipated that there will be a positive impact on transgender people as awareness is raised about the needs of people with this protected characteristic.

Will the policy have no impact, directly or indirectly, on transgender people?

Please detail evidence:

It is envisaged that the training will have a neutral impact on staff in relation to gender identity or being transgender but that generally, there will be a positive impact (see above).

What action can you take to mitigate against any negative impact, and/or to have a more positive impact for transgender people?

As better information becomes available as we monitor access to training and feedback on training by protected characteristic, we will review if we need to make any adjustments to the training programme.

Please detail evidence:

11. Pregnancy and maternity

Will the policy have a negative impact, directly or indirectly, on women during pregnancy or maternity?

Please detail evidence:

It is not anticipated that there will be a negative impact on women during pregnancy and maternity.

Will the policy have a positive impact, directly or indirectly, on women during pregnancy or maternity?

Please detail evidence:

It is anticipated that there will be a positive impact on women during pregnancy and maternity as awareness is raised about their needs.

Will the policy have no impact, directly or indirectly, on women during pregnancy or maternity?

Please detail evidence:

It is envisaged that the training will have a neutral impact on staff who are pregnant or on maternity leave but that generally, there will be a positive impact (see above).

What action can you take to mitigate against any negative impact, and/or to have a more positive impact for women during pregnancy or maternity?

Please detail evidence:

As better information becomes available as we monitor access to training and feedback on training by protected characteristic, we will review if we need to make any adjustments to the training programme.

12. Consultation and involvement

What consultation and involvement activities have taken place? (for example focus groups, public surveys, public meeting, etc.)

Please detail:

We have used the feedback we received from engagement on equality objectives for the Strategic Equality Plan about raising awareness of staff on equality legislation and the needs of protected groups. This took place in November 2011 through focus groups. Our Consultation Officer also attended a number of meetings with groups representative of the needs of protected groups during the same period. Following this, the draft objectives were put on StaffNet for staff to comment on and on the Council's website to invite feedback from the public.

What arrangements have been made to consult and involve people and organisations representing the protected characteristics, which have been identified as potentially being affected by the policy? (for example men, women, parents, carers, the black and minority ethnic community (including asylum seekers, refugees, economic migrants), disabled people, the Welsh speaking community, the lesbian, gay and bisexual community, transgender people, different faith groups, etc.)

Please detail:

See above.

How have the results of the consultation been implemented?

Please detail:

The equality training strategy has been developed in response to national research (such as How Fair is Wales, Equality and Human Rights Commission) and feedback from engagement on equality objectives.

13. Monitoring

What monitoring data do you intend to collect? (for example the number of disabled people using your service)

Please detail:

We are currently improving the way we capture and use employment and equality data and this will be used to help us understand better whether our training is accessible and useful to protected groups.

How often will you analyse and report this data?

Please detail:

This data will be reported on each year in our annual equality report.

Where will you publish the report on this data?

Please detail:

We will publish it on our website and circulate it to organisations likely to have an interest in progress such as those which engaged with us to develop our equality objectives.

14. Publication of policy

How will you publish and publicise the policy to ensure equality of access to this information (including raising awareness with minority groups, producing information in accessible formats, etc.)?

Please detail:

We will publish it on our website and circulate it to organisations likely to have an interest in progress such as those which engaged with us to develop our equality objectives.

15. Further action

Any recommendations for action that you plan to take as a result of this impact assessment (listed in the sections above) should be included in your Team Plan or Departmental Service Plan.

Please detail:

The actions are included in the equality objective on raising awareness. The supporting actions will be included in service and team plans.

16. Outcome

An equality impact assessment may have four possible outcomes, though more than one may apply to a single policy. Please indicate the relevant outcome of the impact assessment below.

Please tick as appropriate:

No major change – the impact assessment demonstrated that the policy was robust; there was no potential for discrimination or adverse impact. All opportunities to promote equality have been taken.

Adjust the policy – the impact assessment identified potential problems or missed opportunities. The policy was adjusted to remove barriers or better promote equality.

Continue the policy – the impact assessment identified the potential for adverse impact or missed opportunities to promote equality. The justification(s) for continuing with it have been clearly set out. (The justification must be included in the impact assessment and must be in line with the duty to have due regard. Compelling reasons will be needed for the most important relevant policies.)

Stop and remove the policy – the impact assessment identified actual or potential unlawful discrimination. The policy was stopped and removed, or changed.

17. Authorisation

This equality impact assessment must be authorised by the relevant Head of Service or Operational Manager.

Approved by (name)	Beverly Noon
Job Title	Operational Manager
Date	11/12/12

18. Completed Impact Assessments:

A copy of this form must be sent to the Equalities Coordinator for publication on the Council's website.