

## Bath and North East Somerset Council

### Equality Impact Assessment Toolkit

This toolkit has been developed to use as a guide when conducting an Equalities Impact Assessment (EqIA) on a policy, service or function. It includes questions that need to be answered by the person/team conducting the EqIA, plus questions that could be asked of key stakeholders during consultation phases. It is intended that this is used as a working document throughout the EqIA process: the final written report of the EqIA should follow the same format and cover each of the sections within it.

It is important to consider all available information that could help determine both whether the policy could have any potential adverse impact and whether it meets the particular needs of different equalities groups. Please attach examples of any monitoring information, research and consultation reports that you have used to assess the potential impact upon the six equalities strands.

**NB - Only fill in the sections that are relevant**

<b>Title of service, function or policy being assessed</b>	Freedom of Information Act Policy
<b>Name of directorate and service</b>	Audit, Risk and Information Service
<b>Name and role of officers completing the assessment</b>	Pete Drummond, Information Governance Manager (Security), Amanda Osborne (Information Governance Manager (Compliance))
<b>Contact telephone number</b>	01225 396872 / 396480
<b>Date assessment completed</b>	14 <sup>th</sup> August 2008

1.	<b>Identify the aims of the policy/service/function and how it is implemented.</b>		
	<b>Key questions</b>	<b>Answers / Notes</b>	<b>Actions required</b>
1.1	Is this a new a new policy / function or service or a review of an existing one?	Review	
1.2	What is the aim, objective or purpose of the policy/service/function?	To outline the Council's obligations under the FOI Act and to inform customers of their rights under the Act.	
1.3	Whose needs is it designed to meet? who are the main stakeholders?	All staff and members of the public.	
1.4	Who defines or defined the policy/function? How much room for manoeuvre is there?	Corporate Policy which must be adhered to by the Council. There are statutory obligations with regards to response times for FOI requests, however there is manoeuvrability in terms of the format of responses, and charging.	Communicate to Information Link Officers that they should take in to account an applicant's needs when deciding on format of response / charges.
1.5	Who implements the policy function? Is it possible for bias/prejudice to creep into the process?	Corporate mechanism that services are expected to follow, information can be distributed corporately or via Information Link Officers.	
1.6	Are there any areas of the policy or function that are governed by discretionary powers or judgement? If so is there clear guidance on how to exercise these?	As in 1.4 with regards to charges and formats.	
1.7	What factors or forces are at play that could	Depending on the nature of the	We need to be prepared to make Policy

	contribute or detract from the outcomes identified earlier in 1.2?	communication it may more adversely impact on those groups for who English is not their first language, groups with learning disabilities and groups who may not be familiar with or have access to relevant technology.	available in alternative languages as and when required. Make Information Link Officers aware of translation service facilities. Strapline as outlined in the Council's accessibility guidelines to be added to policy. Need to consider whether policy requires a Plain English assessment. Provide policy in alternative formats as and when requested by those who do not have appropriate access to relevant technology.
1.8	How do these outcomes meet or hinder other policies, values or objectives of the public authority (this question will not always apply)	Outcomes meet other policies in terms of helping to implement good Information Governance for the Council. Meets the Council's objectives in keeping the general public informed about its activities.	
1.9	How does the local authority interface with other bodies in relation to the implementation of this policy function? (this question will not always apply)	Where requests for information impact upon third parties (eg MBS) the Council liaises with those parties to ensure requests are fulfilled.	
1.10	Consider if any of the six equalities strands have particular needs relevant to the policy.	Depending on the nature of the communication it may more adversely impact on those groups for who English is not their first language, groups with learning disabilities and groups who may not be familiar with or have access to relevant technology.	As in 1.7 and 1.4 above.
1.11	Taking the six strands of equalities, is there anything in the policy that could discriminate or disadvantage any groups of people?	As above.	

## 2. Consideration of available data, research and information

	Key questions	Answers / Notes	Actions required
2.1	What do you already know about who uses and delivers this service or policy?	Information is kept on the types of groups who make FOI requests to the Council (in terms of private individuals, businesses, the media etc).	
2.2	What quantitative data do you already have? (e.g census data, employee data, customer profile data etc)	Information held in FOI request database about applicants, the nature of their request, the Council's response and compliance with timescales.	
2.3	What qualitative data do you already have? (e.g results of customer satisfaction surveys, results of previous consultations, staff survey findings etc).	Information is held on the number of internal reviews requested by applicants (complaints). Some feedback received via Voicebox survey in 2006.	
2.4	What additional information is needed to ensure that all equality groups' needs are taken into account? Do you need to collect more data, carry out consultation at this stage?	No additional information required. Issue regarding accessibility has been identified in 1.10 above.	
2.5	How are you going to go about getting the extra information that is required?	n/a	

## 3. Formal consultation (include within this section any consultation you are planning along with the

results of any consultation you undertake)			
	Key questions	Answers/notes	Actions required
3.1	Who do you need to consult with?	n/a	
3.2	What method / form of consultation can be used?	n/a	
3.3	What consultation was actually carried out as part of this EQIA and with which groups?	None	
3.4	What were the main issues arising from the consultation?	n/a	

4. Assessment of impact			
	Based upon any data you have analysed, or the results of consultation or research, use the spaces below to list how the policy will or does actually work in practice for each equalities group. Identify any differential impact and consider whether the policy/function meets any particular needs of each of the six equalities groups. Also include any examples of how the policy or service helps to promote race, disability and gender equality.		
		Impact or potential impact (negative, positive or neutral)	
4.1	<b>Gender</b> – identify the impact/potential impact of the policy on women, men and transgender people	Neutral	
4.2	<b>Disability</b> - identify the impact/potential impact of the policy on disabled people (ensure consideration of a range of impairments)	Negative impact – dependant on the nature of the communication, it may more adversely impact on those groups for who English is not their first language, groups with learning disabilities and groups who may not be familiar with technology.	

	including visual and hearing impairments, mobility impairments, learning disability etc)		
4.3	<b>Age</b> – identify the impact/potential impact of the policy on different age groups	Neutral	
4.4	<b>Race</b> – identify the impact/potential impact on different black and minority ethnic groups	Neutral	
4.5	<b>Sexual orientation</b> - identify the impact/potential impact of the policy on lesbians, gay men, bisexual and heterosexual people	Neutral	
4.6	<b>Religion/belief</b> – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	Neutral	
	<b>Key questions</b>	<b>Answers/notes</b>	<b>Actions required</b>
4.7	Have you identified any areas in which the policy/service or function is indirectly or directly discriminatory? If you answer yes to this please refer to legal services on whether this is justifiable within legislation.	Indirectly discriminatory against those groups for whom English is not their first language, groups with learning disabilities and groups who may not be familiar with technology.	As at 1.7 and 1.4 above.
4.8	If you have identified any adverse impact(s) can it be avoided, can we make changes, can we lessen it etc? <b>(NB: If you have identified a differential or adverse impact that amounts to unlawful discrimination, then you are duty bound to act to ensure that the Council acts lawfully by changing the policy or proposal in question).</b>	Yes.	As at 1.7 and 1.4 above.

4.9	Are there additional measures that could be adopted to further equality of opportunity in the context of this policy/service/function and to meet the particular needs of equalities groups that you have identified?	Yes.	As at 1.7 and 1.4 above.
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<b>5.</b>	<b>Internal processes for the organisation – to be explored at the end of the mentoring process.</b>
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<b>Making a decision in the light of data, alternatives and consultations</b>			
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	<b>Key questions</b>	<b>Answers/notes</b>	<b>Actions required</b>
5.1	How will the organisations decision making process be used to take this forward?		We will ensure that equalities issues are addressed when drafting new policies or reviewing current policies.

<b>Monitoring for adverse impact in the future</b>			
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	<b>Key questions</b>	<b>Answers/notes</b>	<b>Actions required</b>
5.2	What have we found out in completing this EqIA? What can we learn for the future?	We do not have sufficient services in place for people for whom English is not their first language, people with learning disabilities and people without access to appropriate technology.	
5.3	Who will carry out monitoring?	Information Governance Team.	

5.4	What needs to be monitored?	New and existing policies and feedback from employees and the public.	
5.5	What method(s) of monitoring will be used?	Ad hoc.	
5.6	How will the monitoring information be published?	Ad hoc.	
<b>Publication of results of the equality impact assessment</b>			
	<b>Key questions</b>	<b>Answers/notes</b>	<b>Actions required</b>
5.7	Who will take responsibility for writing up the EqIA report?	Information Governance Team.	
5.8	How will the results of the EqIA be published?	Refer to Equalities Team.	
5.9	Who will take responsibility for this?	Refer to Equalities Team.	

## **6. Bath and North East Somerset Council Equality Impact Assessment Improvement Plan**

Please list actions that you plan to take as a result of this assessment (continue on separate sheets as necessary). These actions need to be built into the service planning framework and targets should be measurable, achievable, realistic and time bound.

Title of service/function or policy being assessed:

Name and role of officers completing assessment:

Date assessment completed:

Issues identified	Actions required	Progress milestones	Officer responsible	By when
<p>Depending on the nature of the communication it may more adversely impact on those groups for who English is not their first language, groups with learning disabilities and groups who may not be familiar with or have access to relevant technology.</p>	<p>Communicate to Information Link Officers that they should take in to account an applicant's needs when deciding on format of response / charges.</p> <p>We need to be prepared to make Policy available in alternative languages as and when required. Make Information Link Officers aware of translation service facilities. Strapline as outlined in the Council's accessibility guidelines to be added to policy. Need to consider whether policy requires a Plain English assessment. Provide policy in alternative formats as and when requested by those who do not have appropriate access to relevant technology.</p>		Information Governance Team	

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Once you have completed this form, use it as a basis for writing a report of the Equality Impact Assessment. Keep a copy of the form as a record of the processes you have been through in carrying out the EqIA and send one copy to the Equalities Team ([equality@bathnes.gov.uk](mailto:equality@bathnes.gov.uk), or by post to Equalities Team, Keynsham Town Hall, Bristol, BS31 1NL

Please contact your Directorate equalities officer for advice and guidance.

Major Projects: Cordelia Johnney  
Support Services Cordelia Johnney  
Customer services – Cordelia Johnney  
Improvement and performance – Louise Murphy  
Children’s services – Louise Murphy  
Adult Social services and housing – Samantha Jones  
Democratic and legal services - Samantha Jones

**Corporate Equalities Team**  
August 2007