

Equality Assessment - Guidance and Recording Form

1. Introduction

Redditch Borough Councils is committed to providing equality of access and recognises that discrimination does not need to be intentional for unfair treatment or adverse impact to occur. Our approach to equality recognises that the range of different groups in our society may have different needs and we seek to ensure that our services are fairly and equitably provided to all sections of the community.

We are **legally required** (The Equality Duty, The Equality Act 2010) to demonstrate that we have given 'due regard' to:

- eliminate unlawful discrimination, harassment and victimisation
- advance equality of opportunity between people who share a protected characteristic and those who do not
- foster good relations between people who share a protected characteristic and those who do not.

This means that equality considerations need to be evidenced in our decision-making processes and policies. This template will support you to evidence how the Duty has been taken into account. The Equality duty is to meet 'needs', rather than any desires or preferences for a particular treatment or service. Complying with the General Duty may involve treating some people better than others, as far as this is allowed by discrimination law. For example, it may involve making use of an exception or the positive actions provisions in order to provide a service in a way which is appropriate for a particular group. The General Duty also explicitly recognises that disabled people's needs are different from those of non-disabled people. In considering the requirements to meet the needs of disabled people, public bodies should therefore take account of disabled people's disabilities. This might mean making reasonable adjustments for them or treating them better than other people.

2. When is Equality Assessment required?

Any potential impact on equality should be considered **before any key decisions are made** and should be integrated into day-to-day policy-making, business planning and other decision-making arrangements. This is particularly relevant when making difficult financial decisions; if we are proposing to **stop, reduce or change a service** then we must have relevant equalities evidence to justify this.

Due regard means consciously thinking about the three aims of the General Duty as a part of the process of decision-making. This means that consideration of equality issues must influence the decisions we make, when:

- Developing, evaluating and reviewing policy
- Designing, delivering and changing services
- Commissioning and procuring from others

You must consider what evidence is available and whether any more information is needed. You cannot assume that a policy will benefit all service users without evidence to support that conclusion. It is not necessary in every instance, to have hard statistical data. We can also use more qualitative sources such as service user feedback or external sources, for example, information available from the Equality and Human Rights Commission, local or national representative groups etc. Local, regional or national statistical information and research may also be used if relevant.

3. How is the Equality Assessment to be carried out?

To assess a service or policy, consider and use any or all of the following options:

- Walk through the processes as a customer would, or as a member of staff and test it from their point of view - this can be done by the service manager or jointly with the team. Record this experience and make a record of any actions required as a result.
- Set up a customer test with volunteers from community or staff groups. Get them to access the service from start to finish, assess their experience and feedback. Make a record of what was discovered, who the group members were and any actions required as a result.
- Conduct statistical analysis from any service usage information available or customer satisfaction surveys looking for patterns of usage by defined equality groups and obvious gaps in usage.

If further evidence comes to light after the initial completion of this assessment, if possible, go back to the original assessment and update it. Equality Assessment should be seen as a living, on-going process rather than a one off exercise.

4. Who carries out the assessment?

The manager of the service is responsible for ensuring that the assessment is carried out and recorded on this form.

A list of every completed Equality Assessment will be published on the relevant Council's website. Any Elected Member or member of the public can ask for copies of the assessment and any information that has been used in the completion of the assessment.

For further information or assistance please contact:

Policy Team on 01527 548284 or 01527 881616 or equalities@bromsgroveandredditch.gov.uk

Useful documents:

[Redditch](#) Equality Strategy

Quick start guidance to the Equality Duty can be found [here](#)

Equality Assessment Record - Example

Please ensure the following:

- That the document is understandable to a reader who has not read any other documents, and explains (on its own) how the Public Sector Equality Duty is met. This does not need to be lengthy, but must be complete.
- That available support information and data is identified and where it can be found. Also be clear about highlighting gaps in existing data or evidence that you hold, and how you have sought to address these knowledge gaps.
- That the equality impacts are capable of aggregation with those of other EIAs to identify the cumulative impact of all service changes made by the council on different groups of people.

Title of Service, Policy, Procedure, Spending Review being Proposed	Virtual Permits for Parking
Name of Service Area	Environmental Services
Name of Officer completing this assessment	Matthew Mead
Date Assessment Started	17/8/2022
Name of Decision Maker (in relation to the change)	
Date Decision Made	

Overview

Provide a clear overview of the aims of the service/policy/procedure and the proposed changes being made. Will the current service users' needs continue to be met? Why is the change being proposed? What needs or duties is it designed to meet?

Introduction off Virtual Parking permits to reduce waste and carbon emissions and make the system easier to use and with quicker response times no need to post documents resident able to change their own permit for example they change cars quickly on the day

Who is the proposal likely to affect?	Yes	No
All residents	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Specific group(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
All Council employees	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Specific group(s) of employees	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other – Provide more details below	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Details

Outline who could be affected and how they could be affected by the proposal/service change. Include current service users and those who could benefit from but do not currently access the service.

The main group that will be negatively affected will be people who don't have access to the internet at present in the UK 96% of the population have internet access this fall to 80% when the resident is over 65 years old. Add information about population of Redditch.

The main advantage of the new system is your details can be updated quickly as the permit holder manages their own account. There is no need to visit council building or put documents in the post they can all be uploaded online this is easier for people with busy lives.

The system is now used in Bromsgrove and works well with no issues involving the residents scheme Bromsgrove has an older population on average than Redditch

Evidence and data used to inform your equality impact assessment

What data, research, or trend analysis have you used? Describe how you have got your information and what it tells you.

We used information from Office of National Statistics for Internet access based on 2020

Engagement and Consultation

What engagement and consultation have you undertaken about the proposal with current service users, potential users and other stakeholders? What is important to them regarding the current service? How does (or could) the service meet their needs? How will they be affected by the proposal? What potential impacts did they identify because of their protected characteristic(s)? Did they identify any potential barriers they may face in accessing services/other opportunities that meet their needs?

When we implement the scheme we will run a large publicity campaign to inform resident that the new system is being implemented including when we send out the renewal letters this will be the last off these we send. There will be drop in sessions at the town hall where we will have translation services available to help show residents how to use the new system and help deal with any issues.
There is a PC with internet access at the town hall and the Library for any residents without home internet access

Public Sector Equality Duty

Due regard must be given to the three aims of the Equality Duty. This means that you must consciously think about the three aims as part of the process of decision-making. Consider the current service and any proposed changes, thinking about what issues may arise.

Equality Duty Aims	Evidence
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<p>Eliminate unlawful discrimination, harassment and victimisation How does the proposal/service ensure that there is no barrier or disproportionate impact for anyone with a particular protected characteristic</p>	<p>Due to the lower amount of internet access to older people they are going to be affected by the proposal but currently according to office for National statistics these numbers are rising.</p>
<p>Advance equality of opportunity between different groups How does the proposal/service ensure that its intended outcomes promote equality of opportunity for users? Identify inequalities faced by those with specific protected characteristic(s).</p>	
<p>Foster good relations between different groups Does the service contribute to good relations or to broader community cohesion objectives? How does it achieve this aim?</p>	

Is there evidence of actual or potential unfairness for the following equality groups?

- Does the proposal target or exclude a specific equality group or community?
 - Does it affect some equality groups or communities differently and can this be justified?
 - Is the proposal likely to be equally accessed by all equality groups and communities? If not, can this be justified?
- (It may be useful to consider other groups, not included in the Equality Act, especially if the proposal is specifically for them e.g. lone parents, refugees, unemployed people, carers)

Impact of proposal

Describe the likely impact of the proposal on people because of their protected characteristic and how they may be affected. How likely is it that people with this protected characteristic will be negatively affected? What are the barriers that might make access difficult or stop different groups or communities accessing the proposal? How great will that impact be on their well-being? Could the proposal promote equality and good relations between different groups? How?

If you have identified any area of actual or potential unfairness that cannot be justified, can you eliminate or minimise this?

What mitigating actions can be taken to reduce or remove this impact? (Include these in the action plan at the end of the assessment) Equal treatment does not always produce equal outcomes; sometimes you will have to take specific steps for particular groups to address an existing disadvantage or to meet differing needs.

Protected Group	Impact of proposal	Justification for any actual or potential unfairness identified	If you have identified any area of actual or potential unfairness that cannot be justified, can you eliminate or minimise this?
Age	Access to system		<p>There is a PC at the Town hall so residents can renew their permits as time goes on the number of residents without internet access will drop many other council now use these systems. There be introduction days to show people how to use the system at the town hall with the parking team.</p>
Disability	None		
Transgender	None		
Marriage and Civil Partnership	None		
Pregnancy and Maternity	None		
Race	None		
Religion or Belief	None		
Sex (Male/ Female)	None		
Sexual Orientation	None		

How will you monitor any changes identified?

You will need to ensure that monitoring systems are established to check for impact on the protected characteristics and human rights after the decision has been implemented. Describe the systems which are set up to:

- monitor impact (positive and negative, intended and unintended) for different groups
- monitor barriers for different groups
- enable open feedback and suggestions from different communities
- ensure that the EIA action plan (below) is delivered

The actions required to address these findings are set out below.

Action Required	By Whom	By When	Completion Date
Add rows as appropriate			

Sign off on completion	Name	Signature	Date
Lead Officer completing assessment			
Equalities Officer			

When you have completed this assessment, retain a copy and send an electronic copy to the Policy Team (Equalities) attaching any supporting evidence used to carry out the assessment.

Glossary

Direct discrimination

Treating someone less favourably than someone else in the same circumstances e.g.

- In employment, racist or sexist banter, derogatory comments and innuendo
- Failure to treat grievances seriously or to investigate effectively
- Unfairly denying access to employment, training or facilities and services

Indirect discrimination

Where a provision, criterion or practice is applied equally to all but has the effect excluding or reducing the access for a particular group and is not a proportionate means of achieving a legitimate aim. Even if this effect is unintentional, it can still be unlawful e.g.

- Unnecessary height restrictions for access to employment opportunities
- Refusing training for promotion to people who work part-time
- Requiring fluency in a language where this is not necessary
- Relying on word of mouth to recruit to employment or training opportunities

- Qualification requirements that are not justified for the level of the job.

Policy, Practices and Services

Refers to any activity the council does, be that a service we provide, an initiative we run, a policy we write or a procedure we observe.

- It may refer to the way we do things which are customary
- It may refer to activities we undertake such as meetings, focus groups or publications we produce.

Protected Characteristics

Age

Consider all age groups although legal protection only applies to people aged 18 or over

Disability

Consider all types of impairment, physical and mental, sensory, visible and hidden

- Learning disability
- Families and carers of disabled children
- Mobility impairments
- Wheelchair users
- Mental health needs/ disorders and psychological conditions
- HIV/ Aids
- Sensory impairments such as sight and hearing
- Cancer and long term progressive conditions such as MS

Gender

Refers to the physiological fact of being male or female. consider whether something has a different impact on men or women - particularly if it's more of an impact on women, consider the impact if they have caring responsibilities whether its childcare or other types of care

Gender re-assignment

Transgender (Gender Dysphoria) or the preferred term, Gender Confirmation. Consider all stages of re-assignment, before, during and after re-assignment treatment or gender confirmation surgery

Marriage and Civil Partnerships

It *only* covers those who are married or in a civil partnership (NB single status is not protected in the Equality Act)

Pregnancy and maternity

This includes physical state of pregnancy, on maternity leave or planning maternity leave or returned from maternity leave and includes breast feeding

Race

This includes race, colour, nationality, national or ethnic origin and caste (caste through case law, not explicitly referenced)

- Race is a generic overall term
- Colour refers to the colour of a person's skin
- Nationality applies to internationally recognised nationalities
- National Origin applies where you have changed your nationality in your life time or there is something about you that indicates that your parents or grandparents' origins were in another part of the world – e.g. name, religion
- Ethnic Origin applies where identifiable groups have established a unique and different ethnicity to the rest of the population – this currently applies to Jews, Gypsies, Sikhs Irish and Scottish Travellers
- Caste is the traditional organisation of South Asian, particularly Hindu, society into a hierarchy of hereditary groups.

Religion or Belief

All established religions and beliefs (and non-belief) including but not limited to the following:

- Christianity
- Hinduism
- Islam
- Judaism
- Sikhism
- Baha'i
- Buddhism
- Jainism
- Paganism
- Parsi or Zoroastrianism
- Rastafarianism
- Atheism
- Agnosticism
- Humanism

Sexual orientation

- Gay – usually refers to men with sexual orientation towards other men although sometime refers to women with sexual orientation towards other women
- Lesbian – refers to women with sexual orientation towards other women
- Bisexual – refers to men and women with sexual orientation to either or both their own gender or the opposite gender
- Heterosexual refers to men and women with sexual orientation towards the opposite gender

