

**Policy on:**

**Equality and Diversity**

**Compliant with Charter  
Outcomes and Standards:**

Yes

**Compliant with Tenant  
Participation Strategy:**

Yes

**Compliant with Equal  
Opportunities:**

Yes

**Compliant with Business Plan:**

Yes

**Compliant with Risk**

Yes

**Date for Approval:**

**25 March 2020**

**Date for Review:**

**March 2025**

**Responsible Officers:**

**Director**



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## 1. Introduction

Shire Housing Association is committed to advancing equality, eliminating discrimination and promoting good relations in terms of both the service we provide as a Registered Social Landlord (RSL) and as a responsible employer. This policy aims to outline the steps that Shire Housing Association will take to embed equality and diversity into everything we do in order to ensure excellent service delivery to our customers and to promote the Association as an employer of choice.

Throughout Shire Housing Association there will be a consistent approach in promoting equality and diversity across all areas within the organisation.

All employees are required to abide by this policy. This policy also covers discrimination by and towards members of the public, governing body members, contractors and staff from other agencies. Shire Housing Association opposes all forms of unlawful discrimination.

This policy recognises the importance of incorporating a culture of equality and diversity which reflects the SHA's Business Plan vision of "Great Homes, Great People and Vibrant Communities",

## 2. Background

Tackling inequality is not something new, U.K Governments have proclaimed a commitment to addressing equality and diversity issues for many years. However, inequalities still exist in Scotland and within the UK. The Equality Act 2010 superseded previous discrimination legislation, replacing it with one single piece of legislation. This policy will be compliant with the current legislation and promote a culture of dignity and respect for all.

Lack of equal opportunities is not only a serious moral issue but also has a significant impact on business performance. Studies have shown that high levels of motivation are achieved in an environment of respect and fairness. Shire Housing Association will aim to ensure that all employees, Board Members and customers are treated with fairness and respect and not be discriminated on the grounds of marriage & civil partnership, sex, race, disability, age, religion or belief, gender reassignment, pregnancy & maternity and sexual orientation, or disadvantaged by any conditions or requirements which cannot be shown to be relevant to performance. Shire Housing Association will therefore ensure all employees are provided with equality of opportunity in the course of their employment starting from recruitment.



### 3. Legislative Obligations and Regulatory Requirements

This policy takes account of legal, regulatory and best practice requirements, including (but not limited to):

- The Equalities Act 2010
- Human Rights Act 1998
- The Housing (Scotland) Act 2010
- Section 9 of Raising Standards in Housing
- The Scottish Social Housing Charter
- Section 5.3 of the Regulatory Standards of Governance and Financial Management

This policy is committed to the provisions of the Equality Act 2010 which consolidated fourteen previous major anti discriminatory legislative acts into a single piece of legislation. The Equality Act 2010 specifically protects individuals or groups from direct or indirect discrimination, harassment or victimisation because they have a protected characteristic. The nine protected characteristics covered by the Equality Act 2010 are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race (including ethnic or national origins, colour and nationality)
- Religion or belief (including lack of belief)
- Sex
- Sexual orientation

SHA are committed to fulfilling the specific Public Sector Equality Duty (PSED) outlined within the Equality Act 2010, although not a legislative obligation for RSL's, SHA recognise eliminating unlawful discrimination, harassment and victimisation, advancing equality of opportunity between different groups and fostering good relations between different groups as best practice and an essential part of SHA's guiding principles and commitment to Equality and Diversity.

### 4. Definitions and Types of Discrimination

#### Diversity

Is about valuing individual differences. SHA is committed to valuing and managing people's differences to enable them to contribute to and participate in our work. We recognise that people with different backgrounds, skills, attitudes and experiences can bring fresh ideas and perceptions that will benefit SHA.



## **Equality**

Is making sure people are treated fairly and given fair chances. Equality is not about treating everyone in the same way but recognises that their needs are met in different ways. Equality focuses on those areas covered by the law and described as the Protected Characteristics noted within the policy.

## **Protected Characteristics**

The grounds on which discrimination claims can be made:

Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy & Maternity, Race, Religion or Belief, Sex, and Sexual Orientation.

## **Direct Discrimination**

Is treating someone less favourably than others based on a protected characteristic.

## **Indirect Discrimination**

A policy, practice, procedure, provision or criteria that applies to everyone in the same way but might disadvantage a particular protected group, and which cannot be objectively justified in relation to the job.

## **Harassment**

Conduct that violates a person's dignity or creates an intimidating, hostile degrading, humiliating or offensive working environment. The intention of the perpetrator is irrelevant, it is the impact on the individual which determines whether harassment has taken place.

### **– Harassment by a Third Party**

As an employer, the Association is potentially liable for the harassment of their staff or customers by people they do not themselves employ, for example a contractor or consultant,

## **Victimisation**

Treating someone less favourably and discriminating against them because they have pursued or intend to pursue their rights relating to alleged discrimination, complained about the behaviour of someone harassing them or given evidence in someone else's discrimination complaint.

## **Positive Action**

Addressing imbalances in the workforce, by encouraging members of under-represented groups to apply for jobs. Positive action may be applicable in setting equality targets. No quotas will be set by Shire Housing Association, but equality targets may be set to encourage people from a particular group or groups to apply for a vacancy in comparison to the local community where they are under-represented.



### **Failure to make Reasonable Adjustments**

Where arrangements disadvantage an individual because of a disability and reasonable adjustments are not made to overcome the disadvantage.

### **Associated Discrimination**

Discrimination against a person because they have an association with someone with a particular protected characteristic. E.g. a non-disabled person is discriminated against because of the action they need to take care of disabled dependent.

### **Perceptive Discrimination**

Discrimination against a person because the discriminator thinks the person possess a particular characteristic. E.g. a person is not shortlisted for a job on the bases that the recruiter assumes the applicant does not have the correct VISA to work in the UK as they have a foreign looking name on their application form.

### **Institutionalised Discrimination**

This was first defined in the context of racism and exemplified in the Macpherson Report into the enquiry of the death Of Stephen Lawrence as “the collective failure if an organisation to provide an appropriate and professional service to people because of their colour, culture or ethnic origin. It can be seen or detected from processes, attitudes and behaviours which amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and racist stereotyping which disadvantages minority ethnic people”

The Association extends the above to cover all action where these are related to a protected characteristic.

### **Employees**

All permanent, temporary fixed term staff, including all managers, Director/Chief Executive, and agency workers.

### **Stakeholders**

Contractors, consultants, tenants, customers, service users, other outside agency workers.

### **Reasonable Adjustments**

Where arrangements disadvantage an individual because of a disability, there is a requirement to make reasonable adjustments to help overcome the disadvantage.



## 5. Policy Principles

**This Equality and Diversity policy aims to:**

- Ensure integration with equality and diversity practices into all that SHA does, and ensure that employees and Board Members are treated with fairness and respect from each other and from members of the public, stakeholders, and contractors.
- Require SHA to implement fair and just employment practices ensuring that no job applicant or employee will receive less favourable treatment on any grounds.
- Ensure people are recruited and employees promoted solely on the basis of their own merit, experience, ability and potential. This applies throughout the entire duration of employment as all decisions will be based on only relevant merits.
- Ensure we provide an environment appropriate to the needs of those from all walks of life and offer a culture that respects and values each other's differences and promotes dignity, equality and diversity.

## 6. Implementation of Policy

The Management Board is responsible for approving this policy and for overseeing its implementation. The Director and Management Team have operational responsibility for policy implementation and for reporting to the Management Board the outcomes SHA is achieving.

SHA will ensure that all new employees and management committee members will receive induction on this policy. The policy will be widely promoted and integrated into all policies and procedures within SHA. Copies of the policy will also be freely available and displayed in our offices.

To ensure compliance with the policy, staff and Board members will be provided with equality and diversity training on a bi-annual basis, in line with the policy review date.

This policy applies to everyone in SHA and everyone has a responsibility to be alert to discriminatory behaviours and practices should they occur. Unacceptable behaviour and practices must not occur, however if a situation arises, it will be dealt with immediately. Breaches of the equality and diversity policy will be regarded as misconduct and will lead to disciplinary action which may include dismissal.

## 7. Recruitment & Selection

It is SHA's policy that all recruitment decisions will be based completely on the merits and abilities of candidates alone and no other criteria will be used. In order to achieve

this, equality and diversity practices will be integrated into every stage of the recruitment and selection process.

A fair recruitment process will remove barriers to the employment of people of different backgrounds. This will enable us to recruit from the widest pool of talent, potentially raising the standard of their intake and therefore increasing the opportunity of a more diverse workforce which reflects the community it is serving. A more diverse workforce will improve the organisation's service delivery, as it will include staff with more knowledge and experience, meet and aid in meeting the needs and aspirations of service users and potential service users.

To highlight SHA's commitment to promoting equality and diversity from the beginning of the employment relationship, all vacancies will be aimed at as wide a group as possible and any advertisement for a vacancy will state that an equality and diversity policy is in place. The information contained in the advert and all vacancy literature will be clear and accurate to attract the most appropriate candidates from all groups across society, allowing them to decide their own suitability for the vacancy and whether they wish to proceed with applying. For those that wish to apply, we will ensure that all applications have clear instructions for completion and application forms will be free from personal questions that are not relevant to the vacancy and that may lead to discrimination.

We will ensure all staff involved at any stage in the recruitment and selection process will receive equality and diversity awareness training. This will ensure that those involved in the recruitment process will not discriminate either knowingly or unknowingly by asking any questions which may lead to discrimination.

## **8. Terms & Conditions of Employment**

As part of the employment relationship covered under this equality and diversity policy, all contracts of employment will be issued in accordance with the job role and not the job holder. Employee's terms and conditions will be standard across all employees regardless of any of the protected characteristics. Employees will not receive less favourable terms and conditions for any reason other than relating specifically to the job role and the grade it attracts.

## **9. Training and Development**

Equality and diversity will apply throughout all training activities and resources. Training and development opportunities will be given to all employees according to their job role. It is crucial that all employees are able to participate and enjoy any training opportunities or activities without discrimination or fear of harassment. Every attempt will be made to ensure learning materials will provide a positive image of people reinforcing an image and of equality of opportunity.





## 10. Redundancy Selection

Redundancy selection will be made according to the statutory requirements and in line with Employers in Voluntary Housing's Redundancy Policy. Criteria will be discussed with the Trade Union and/or nominated representatives. The criteria will be set out and will be objectively fair and consistent. This will ensure that employees selected for redundancy are selected according to the chosen selection criteria and not in any discriminatory way either indirectly or directly.

## 11. Complaints: employees

This procedure is complemented by our formal complaints procedure. For further details please refer to the policy.

Where an employee feels they have been discriminated against, victimised or harassed by another employee (including managers), the aim should be to deal with it informally in the first instance.

### Informal Stage

An employee should aim to resolve the matter informally as it may be that the discriminatory action is unconscious and easily resolved once the situation is highlighted. This is often the most efficient way with dealing with such circumstances and helps maintain good working relations.

The employee should raise the issue informally with their line manager (if the complaint is against their manager then the manager next in line.) The manager will speak to the employee whom the complaint is against. If it is found that the behaviour was in breach of this policy, an appropriate level of sanction will be decided in line with our Disciplinary Policy.

In addition, a file note of the incident will be kept on the complaining employee's file, including a statement that the note will only be taken into account if there are any further incidents.

Dealing with the matter informally does not remove the complaining employee's right to have the matter dealt with formally.

### Formal Stage

If the employee is dissatisfied with the outcome, or the complaint is very serious, they should raise the matter in writing, detailing the complaint to their line manager. The complaint should then be dealt with under our Grievance Policy. In line with this process an investigation into the complaint will be carried out. Employees who feel they are being subjected to harassment should raise the issue in line with our Dignity at Work Policy.

If the outcome of the investigation is that a formal disciplinary hearing should take place, this will be conducted in line with Disciplinary Procedures.

### **Complaints made against employees**

Where a complaint is made against an employee by another employee, Board member or stakeholder, it will be investigated and dealt with under the Disciplinary Policy.

## **12. Complaints: Stakeholders**

The right to be treated equally with dignity and respect extends to outside contractors, partners, service users, customers and any other agencies that are associated with SHA. Therefore, stakeholders also have a right to have any issues addressed under this policy. Any complaints will be investigated, and appropriate action will be taken.

If a stakeholder feels that they are being discriminated against in the course of their working day with SHA, the following procedure should be followed.

### **Informal Stage**

Where possible, incidents should be dealt with informally. The stakeholder should report the matter to their lead contact within SHA as soon as possible. It may be that the discriminatory action is unconscious and easily resolved once the situation is highlighted.

The manager will discuss the situation with the individual whom the complaint is against and explain the expected standards of behaviour and the consequences of failing to comply with these. It will be made clear to the individual that continuation of such conduct may result in being refused access to our premises, or services.

### **Formal Stage**

Where informal action is not appropriate, or the matter is of a serious nature, the complaint will be dealt with using the formal procedure. Where the formal procedure is instigated a thorough investigation will take place in the first instance. Where it is found that the individual has acted in an inappropriate manner, they will be written to officially by the relevant senior manager informing them that their comments, actions, behaviours are not acceptable and potentially discriminatory. The letter will state that further incidents will not be tolerated and that they may result in being refused access to our premises or contact with its customers/employees/board members. In cases of physical violence or serious threats the appropriate manager will notify the police.



### **Complaints made by stakeholders**

Where stakeholders are in receipt of inappropriate behaviour from an employee of SHA, board member or another stakeholder in connection with our business, the stakeholder should also raise the issue with their lead contact. The lead contact will then investigate into the complaint and deal with it in accordance with the appropriate procedure (depending whether the complaint is against an employee, a board member, a contractor, a partner, etc.).

## **13. Complaints: Governing Body Members**

Where a board/committee member feels they have been discriminated against, victimised or harassed, the aim should be to deal with it informally in the first instance.

### **Informal Stage**

If a Board Member feels they are in receipt of inappropriate behaviour from another Board Member, an employee or any stakeholder in connection with SHA, they should raise this immediately with the Director/or Chair. The Director/Chair will discuss the issue with whom the complaint is against, explaining the required standards of behaviour and the consequences of failing to comply.

### **Formal Stage**

Where formal action is more appropriate, a thorough investigation will take place into the complaint. The complaint will then be dealt with in accordance with the appropriate procedure (depending whether the complaint is against an employee, a Board Member, a contractor, a partner, etc.). In cases of physical violence or serious threats an appropriate manager will notify the police.

### **Complaints made against a Board Member**

Where a complaint is made against a Board Member, the Association B complaints' procedure will be used as appropriate. The complaint will be investigated by the Chair or another authorised person. If it is found that the inappropriate behaviour occurred, the Board Member will be warned and informed of consequences of failure to comply with the expected standards of behaviour, which may include removal from the Board.

## **14. General Data Protection Regulations**

The organisation will treat your personal data in line with our obligations under the current data protection regulations. Information regarding how your data will be used and the basis for processing your data is provided in Shire Housing Association's Employee Privacy Notice.



## 15. Monitoring the Policy

Responsibility for monitoring the application of this policy will rest with the Director of Shire Housing Association.

The policy will be reviewed by the management Board every five years unless any legislative changes require an earlier review. with the amendments being made as appropriate and communicated to all staff and relevant stakeholders.

## 16. Equality Impact Assessment

Equality and diversity issues are of importance to Shire Housing Association and the organisation wishes to ensure that we are not complacent with regard to this matter.

We will therefore carry out Equality Impact Assessments (EIA) on policy documents. It is not practical to carry out the assessment on block and will therefore carry out the assessments as policies are being reviewed.

It is important to recognise that providing the same service to everybody can on occasions create a disadvantage.

The Equality and Human Rights Commission in Scotland states that a policy or practice which proactively considers equality is like to be a better quality policy in terms of being more responsive to the needs of those affected. The process helps to mainstream equality consideration into policy and decision making.

The Association will apply a screening process to determine which policies should be subject to an impact assessment. Judgement requires to be used, but the approach is to ask the questions of every policy. Where the answer to any one question is "yes" then an impact assessment will normally be carried out.

- a) Does the policy affect service users, employees or the wider community and therefore potentially have a significant effect in terms of equality? The relevance will not depend on the number affected but on the effect it has on them.
- b) Is it a major policy, significantly affecting how functions are delivered in terms of equity?
- c) Does it relate to policy area or issues that previous consultation involvement has identified as being important to particular protected groups?
- d) Does it relate to an area where the Association has identified a need to improve equality outcomes?
- e) Does it relate to an area where there are known inequalities?



- f) Does it relate to a policy where there is a significant potential for reducing inequalities or improving outcomes?

### **Policy Aims**

- What is the purpose of the policy?
- Target Audience – who is affected by the policy or who is intended to benefit from the policy, and how?
- Who is responsible for delivering the policy?
- How does the policy fit into our wider or related policy objectives?

### **Target Audience**

- What does the information we have tell us about how the policy might impact positively or negatively on different groups within the target audience?
- Comment on what the information tells us about how the policy might impact positively or negatively on the different groups within the target audience(s).
- Identify whether the policy provides an opportunity to promote equality and diversity and good relations by altering the policy or working with others.
- State whether a further impact assessment is required to be carried out and state the timeframe for this action.
- Highlight any follow up action not already programmed and state the timeframe for this.

### **Follow Up**

Where follow up is required, the tasks and timeframe for them need to be noted within the section. Tasks therefore need to be incorporated into an Equality and Diversity Action Plan to ensure they are addressed

### **Impact Assessment on Equality and Diversity Policy**

The impact assessment is at Appendix 1 if the policy is approved the assessment of this policy will be carried out. All policies reviewed after the approval of this document will include as an appendix the impact assessment.

## **17. Risk Assessment**

Shire Housing Association recognises the potential risks should we fail to adhere to the Equality and Diversity Policy or action any issues which arise from the impact assessment.



## Appendix 1 - Equality Impact Assessment Tool

### Equality impact assessment template

The aim of an equality impact assessment (EIA) is to ensure that policies help to promote equality. The EIA contributes to effective policy making by providing an opportunity to minimise risk and maximise the benefits of a policy, therefore ensuring we have the best possible policy in place. It also helps us to meet our requirements under the general equality duties. **Throughout this document we use the word 'policy' to refer to what we are assessing. In this context, the term includes the different things that we do, including strategies, functions, procedures, practices, decisions and projects.**

All our EIAs should consider the potential impact of policies in respect of all eight areas of equality under our remit and diversity.

Our approach to EIAs will help us to strengthen our work to promote equality. It will also help to identify and address any potential discriminatory effects before introducing a policy and reduce the risk of potential legal challenges. When carrying out an EIA you should consider both the negative and positive consequences of your proposals

Not all Shire Housing Association policies will benefit all groups in equal measures; some policies will be designed to address particular issues. However, if a project is designed for a specific group, you also need to think about what potential effects it could have on other areas of equality.

Source document: Equality and Human Rights Commission



## Screening Template

Please use the following template to help determine whether an equality impact assessment (EIA) is required

<b>Name of the policy</b>
<b>Reviewing Manager:</b>

<b>Policy Author :</b>
Name:
Job title:
Date:
Signature:

### **Does the policy require an equality impact assessment (EIA)?**

Please answer the following questions.

**1. What are the main aims, purpose and outcomes of the function, strategy, project, decision or policy and how do these fit in with the wider aims of the organisation?**

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**2. How will these aims affect:**

1. Does the policy affect service users, employees or the wider community and therefore potentially have a significant effect in terms of equality? The relevance will not depend on the number affected but on the effect it has on them.
2. Is it a major policy, significantly affecting how functions are delivered in terms of equity?
3. Does it relate to policy area or issues that previous consultation involvement has identified as being important to particular protected groups?
4. Does it relate to an area where the Association has identified a need to improve equality outcomes?
5. Does it relate to an area where there are known inequalities?
6. Does it relate to a policy where there is a significant potential for reducing inequalities or improving outcomes?

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**3. What aspects of the policy, including how it is delivered, or accessed, could contribute to inequality? This should relate to all areas of our remit.**

**4. Will the policy have an impact (positive or negative) upon the lives of people, including members of particular communities and groups? What evidence do you have for this?**

**5. What different needs, experiences or attitudes are particular communities or groups likely to have in relation to this policy?**

### **Is an EIA required?**

If your answer to question 2 has identified potential impacts and you have answered yes to any of the questions 3, 4, or 5, then you should carry out a full EIA. Before proceeding with the EIA you should discuss the scope of the assessment with colleagues. You should then use the [main EI Assessment](#) form.

If the policy is not in conflict with any aspect of the Associations duties or wider equality responsibilities, there is no need to conduct an EIA. If an EIA is not required, please print and sign the declaration below.

### **Declaration**

The policy does not have a significant impact upon equality issues and therefore does not require an EIA.





<b>Author(s) of EIA.</b>	
Name:	
Job title:	Date:
Signature:	
<b>Quality check: screening document has been checked by:</b>	
Name:	
Signature:	Date:
Comments:	
<b>Director (Sign-off)</b>	
Name:	
Signature:	Date:



**EIA and Declaration must be attached to policy document as Appendix**

**Step 1– scoping the equality impact assessment (EIA)**

Building on the material included at the screening stage, you should begin the EIA by determining its scope. The EIA should consider the impact or likely impact of the policy in relation to all areas of our remit. The EIA should be proportionate to the significance and coverage of the policy.

<b><i>Name of the policy</i></b>
<b>What are the main aims, purpose and outcomes of the policy and how does it fit in with the wider aims of the organisation?</b>

<b>List the main activities relating to the policy and identify who is likely to benefit from it</b>

<b>What do you already know about the relevance of the policy? What are the main issues you need to consider?</b>
Some things to consider:
<ul style="list-style-type: none"><li>• How is the policy likely to affect the promotion of equality in the areas of age, disability, gender, gender reassignment, race, religion or belief, sexual orientation?</li><li>• How do you think that the policy will meet the needs of different communities and groups?</li><li>• What consultation has already been undertaken which is relevant to the development of this policy?</li><li>• Are there any examples of existing good practice in this area – such as measures to improve access to the policy among particular groups?</li><li>• Do you think that your policy presents any problems or barriers to any community or group?</li></ul>



**What further data or information do you need to carry out the assessment?**

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**Step 2 – involvement and consultation**

When considering how you will involve and consult other people in developing the policy, you need to think about internal and external audiences and all areas of our remit.

For each of the equality target groups listed in the answer table directly below, outline any previous involvement or consultation which is relevant to this policy. Briefly describe what you did, with whom, when and where. You should list the methods of consultation used. Please outline a brief summary of the responses gained and links to relevant documents, as well as any actions.

<b>Age</b>
<b>Disability</b>
<b>Gender</b>
<b>Gender reassignment</b>
<b>Race</b>
<b>Religion or belief</b>
<b>Sexual orientation</b>

**What do previous consultations show about the potential take-up of any resulting activities or services?**

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### **Step 3 – data collection and evidence**

**What evidence, data or information do you already have about how this policy and its potential take-up might affect equality in any of the areas covered by our remit, and what does this tell you?**

Please cite any quantitative (for example, statistical or research) and qualitative evidence (for example, monitoring data, complaints, surveys, focus groups, questionnaires, meetings, interviews) relating to groups having different needs, experiences or attitudes in relation to this project. Describe briefly what evidence you have used.

**What additional research or data is required to fill any gaps in your understanding of the potential or known effects of the policy? Have you considered commissioning new data or research?**

### **Step 4 –assessing impact and strengthening the policy**

What evidence do you have about how the policy will affect different groups and communities in relation to equality and diversity?

**How does/will the policy and resulting activities affect different communities and groups?**

Guidance note. Some things to consider:

- Is there any potential for, or known, adverse or positive impacts of the policy?
- You should consider how the policy might affect communities with small populations; people affected by discrimination in multiple areas of equality (age, disability, gender, gender reassignment, race, religion or belief, and sexual orientation)
- Are there examples of good practice that can be built on?

You may wish to consider how the policy will be delivered or communicated.



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With the evidence you have gathered consider the following:

**What measures does, or could, the policy include to help promote equality of opportunity?**

For example, positive measures designed to address disadvantage and reach different communities or groups?

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**What measures does, or could, the policy include to address existing patterns of discrimination, harassment or disproportionality?**

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**What impact will the policy have on promoting good relations and wider community cohesion?**

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Strengthening the policy:

**If the policy is likely to have a negative effect ('adverse impact'), what are the reasons for this?**

Including direct or indirect discrimination

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**What practical changes will help reduce any adverse impact on particular groups?**

Consider changes in communication methods, providing language support, collecting data, revising programmes or involvement activities.

Have you considered Shire's legal responsibilities under the Disability Discrimination Act, including treating disabled people more favourably where necessary?



**What evidence is there that actions to address any negative effects on one area of equality may affect other areas of equality or diversity?**

**What will be done to improve access to, and take-up of, services or understanding of the policy?**

Some things to consider:

- Increasing awareness of the policy among all staff and Board members.
- Encouraging wider public involvement in our work or communications activities.
- Encourage different groups, including disabled people, to get involved in what we do.

Please note that you may need to revisit this section once you have completed the policy development process.

### **Step 5 – procurement and partnerships**

#### **Consideration of external contractor obligations and partnership working**

Is the project due to be carried out wholly or partly by contractors? If yes, have you done any work to include equality and diversity considerations into the contract?

If you have, please set out what steps you will take to build into all stages of the procurement process the requirement to consider the general equality duties and equality more broadly.

Specifically you should set out how you will make sure that any partner you work with complies with equality and diversity legislation and how you will monitor this. You will need to think about:

- tendering and specifications
- awards process
- contract clauses
- performance measures, and
- monitoring and performance measures.



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**Step 6 – making a decision**

**Summarise your findings and give an overview of whether the policy will meet Shire’s responsibilities in relation to equality and diversity**

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**What practical actions do you recommend to reduce, justify or remove any adverse/negative impact?**

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Any actions should be noted at Step 8.

**Step 7 – monitoring, evaluating and reviewing**

**How will you monitor the impact and effectiveness of the new policy?**

This could include adaptations or extensions to current monitoring systems, relevant timeframes and a commitment to carry out an EIA review once the policy has been in place for one year.

List details of any follow-up work that will be undertaken in relation to the policy (e.g. survey, specific monitoring process etc). Include this work in [Step 8 - action plan](#).

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**How will the recommendations of this assessment be built into wider planning and review processes?**

This may include policy reviews, annual plans and use of performance management systems.

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**Give details of how the results of the impact assessment will be published, including consultation results and monitoring information if applicable.**

The results of all impact assessments will be published on the Associations website.

### **Step 8 – action plan**

The below provides an opportunity to state how any negative impact will be mitigated. It also allows you to list how you will tackle any gaps in the policy. Look back through steps 1 – 7 of the EIA and include any identified actions in the plan below. Ensure that each action is listed with a target date and assigned to a named member of staff.

Please note that staff will be required to report back to the Board on progress of the action plan within three months of sign-off.

Taking into consideration your responses outlined in Steps 1-7, complete the 5 step action plan below.





### Step 2 involvement and consultation

Actions:
Target date:
Responsible Manager:
Comments:
Quality check: document has been checked by:
Comments:

### Step 3 Data collection and evidence

Actions:
Target date:
Responsible Manager:
Comments:
Quality check: document has been checked by:
Comments:

### Step 4 Assessment and analysis

Actions:
Target date:
Responsible Manager:
Comments:
Quality check: document has been checked by:
Comments:

### Step 5 Procurements and partnerships

Actions:
Target date:
Responsible Manager:



Comments:
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Quality check: document has been checked by:
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Comments:
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**Step 7 Monitoring, evaluating and reviewing**

<p>Actions: It is important to detail how your policy will be monitored, when the results of monitoring will be published (if applicable) and when it will be reviewed.</p>
Target date:
Responsible Manager:
Comments:
Quality check: document has been checked by:
Comments:

**Step 9 – sign-off**

**The final stage of the EIA is to formally sign off the document as being a complete, rigorous and robust assessment**

The policy has been fully assessed in relation to its potential effects on equality and diversity hand all relevant concerns have been addressed.

(Once you have completed the EIA sign the below to confirm all necessary action required has been taken and advise the Board.)

**Author of EIA**

Name:
Job title:
Date:
Signature:
Comments:

**Quality check: screening document has been checked by:**

Name:
Job title: Other Manager
Date:
Signature:
Comments:

**Director (sign-off)**

Name:
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Vibrant Communities.



Date:
Signature:
Comments:

