

## **A Guide to Carrying out Equality Impact Assessments (EIA)**

### **1 What is an EIA?**

A way of systematically and thoroughly assessing, and consulting on the effects that a proposed policy, strategy, or service is likely to have on people, depending on their **racial group, disability, age, gender, nationality, language, faith or sexuality**. The assessment extends to monitoring the actual effects of the policy, strategy or service once it is put into practice, possibly as a test run, and being alert to any concerns about the way it is (or is not) working.

### **2 Purpose of an EIA**

- Develop policies, services, plans and strategies with diverse needs and concerns in mind and makes sure that services do not overlook, marginalise or exclude any groups or individuals because of their race, colour, age, gender, disability, language, religion, nationality etc.
- Deal with the possibility that a policy, strategy or service proposal could lead to unlawful discrimination
- Pre-empts the possibility that a proposed policy, service or strategy could affect diverse/different groups unfavourably or negatively and enables you to take remedial action or consider alternatives
- Makes the consideration of equality and diversity central to the way the organisation carries out its functions.
- Encourages greater openness and public involvement in policy making, services, strategies

### **3 When do you do it?**

As soon as you are about to develop a policy, plan, strategy, process or service, ask **'what would it mean to people (patients, their carers, staff) depending on their race, ethnicity, age, gender, disability, sexuality, language?'**

### **4 Consulting**

Consultations are central to the EIA process and groups identified as affected by your work, decisions, policy or service will need to be consulted and involved to enable improvements/changes to be made.

### **5 Monitoring**

Monitoring is key to the EIA process and we must ensure that all our core activities are regularly monitored and the data used to assess the direct impact on diversity. These will extend to monitoring clinical services, patient access, employment, training and workforce activities, complaints, PPI, PALS and Incident reporting process

### **6 Publishing Consultations and Assessments**

All assessments carried out, including consultations, outcomes and actions taken to minimise any adverse impact identified, will need to be published as per Race Relations Legislation. EIA's and consultations will be published on the Trust's web site, internal magazine and to local communities via our Equality and Outreach Facilitator.

## **7 HOW TO DO AN EQUALITY IMPACT ASSESSMENT**

If there are any partners or other organisations involved in developing a policy, service or strategy, please make sure they are involved in the EIA process.

### **STEP 1**

Make sure your proposed or new policy, service, strategy or plan has a

- clear aim, objectives and outcomes
- state who the authors are and who will monitor the policy to ensure it achieves its desired outcomes and promotes equity

## **STEP 2**

### **SCREENING - USING APPROPRIATE DATA TO ASSESS IF A PROPOSED OR NEW POLICY, SERVICE STRATEGY WILL HAVE ANY RELEVANCE TO DIVERSITY**

#### **a) Establishing Relevance**

You may find the following examples of data, useful in establishing if the proposed policy, service or strategy will have any relevance to equality and diversity (ie disability, age, gender, race, language, religion, nationality).

**Examples of Data** – Data about patients who use services; those who do not use the services but need to because of health inequalities, prevalence of disease in specific groups or local population data; complaints data; HR monitoring, PALS information, health equity audits, PPI reports, staff surveys, patients surveys, feedback from patients, patient consultations, ethnicity monitoring data, patients who use language line, national directives/evidence, legislation, community feedback, outreach activities, performance indicators, good practice from other Trusts, equality legislation, NHS plans and policies.

**b) Policy, service, strategy will have no relevance** - do not proceed to the next steps, but state clearly in your proposal/documentation, why there is no relevance, evidence supporting this and also how the proposed policy or service will be equitable and fair for all. Sign off the template and return to Margaret Adjaye, room 58, Grosvenor Wing.

**Note:** As our services and policies affect a diverse local population, we will find that most of our activities will have some relevance. Also, sometimes due to insufficient data, information or knowledge about specific groups or communities, we may feel that a policy or service will have no relevance to diversity. Put monitoring in place, eg ethnicity monitoring, organise patient feedback sessions, health equity audits or pilot the policy or service to see how it is likely to behave, before doing a full EIA.

**c) If the data shows that the proposed policy or service has relevance to diversity, proceed to Step 3.**

## **STEP 3**

### **ASSESSING THE IMPACT THAT A PROPOSED POLICY OR SERVICE IS LIKELY TO HAVE ON DIVERSITY. QUESTIONS TO CONSIDER:-**

- Who or which groups could be affected directly or indirectly by the proposed policy or service (use evidence in Step 2 to identify who)
- What are the likely effects of the proposed policy or service (interrogate the data in Step 2 further) or talk to the groups identified or introduce a pilot programme. Could it be interpreting, translation, poor access to building, where the service is delivered, who will be delivering the service (lack of skills, information) eligibility issues, service could be carried out in discriminatory manner, could it break race relations legislation, lack of appropriate information, lack of know-how or information about specific communities, cultural issues, attitude of staff?
- How will the proposed policy or service ensure that there is no unfair discrimination, directly or indirectly and that particular groups will not be excluded, marginalised or disadvantaged?
- How will it promote equality of opportunity?
- How will it promote harmony between different groups?
- How will it meet equality legislative duties, such as Race Relations, Disability, Sex Discrimination, Human Rights, legislation on Religion, Sexual Orientation?
- Could the proposed policy or service have an adverse impact on diverse/particular groups?

- How could the policy or service be implemented/delivered, including where it is delivered, so that it meets diverse needs?
- If the policy will promote equity and fairness for all, please state clearly and share good practice

#### **STEP 4**

#### **CONSULTATIONS**

Consult with groups or individuals to who are likely to be affected by the proposed service or policy and ask them some of the questions in Step 3, but also find out from them  
 a) the impact that the proposal is likely to have on them – adverse, minimal or no impact and  
 b) to identify how to minimise impact, actions need to re-dress any imbalances, disparities or inequalities, including how best to sustain and maintain equality

When consulting with patients, users, consider the environment for consultations, (eg faith setting, home, community centres), resources, interpreters or signers if needed, give users time to think carefully over questions and to give useful feedback.

#### **STEP 5**

#### **WHAT WILL NOW CHANGE AS A RESULT OF QUESTIONS AND CONSULTATIONS**

Consider – which aspects of the policy will be changed, additional measures to be taken to reduce or remove impact without changing the policy's overall aims? What further alternatives could be explored? Will you abandon policy or service entirely, based on EIA outcomes? How do we make sure in trying to achieve equality for one group, others are not excluded or disadvantaged?

If you decide to go ahead with the policy or service in its current state, irrespective of what the EIA outcomes are you will need to justify why.

**Note** you can never justify direct discrimination according to the law. Indirect discrimination however could be justified.

#### **STEP 6**

#### **FINANCIAL IMPLICATIONS, NEED FOR ADDITIONAL RESOURCES**

Please state what is required and how much, in order to make a policy or service equitable and fair.

#### **STEP 7**

#### **MONITORING ARRANGEMENTS**

This is a must not optional. All decisions must include monitoring arrangement to ensure that policy or service, when implemented behaves appropriately.

As part of monitoring you may consider a pilot to see how the policy/service is likely to work and use the information you gather to inform the EIA process or improvements to be made. You must be clear at all times on information to be gathered, who will be involved and timescales.

When monitoring consider how the effects on equality of opportunity and good relations will be monitored?

#### **STEP 8**

#### **ACTION PLAN**

What key actions will you take or have been taken, over what period of time, who will be involved and what difference this will make.