

ST HELENS BOROUGH COUNCIL

EQUALITY IMPACT ASSESSMENT TOOL

TO INFORM THE DEVELOPMENT OF DECISIONS OF
POLICY OR FUNCTION

This document replaces: New.

Department of Origin: Corporate

Section: Policy, Change, & Reform

Author: Equality, Diversity, and Inclusion Officer

Post Holder (responsible for keeping Policy updated): Equality, Diversity, and Inclusion Officer

Related policies: St Helens Borough Council's Comprehensive Equality Policy

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Policy Review cycle: three years from first publication

Date of last update: NA

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To assess proposed decision related to Council Policy and Statutory Functions

EQUALITY IMPACT ASSESSMENT

- a. **EIA Lead Officer:**
- Email address:**
- Head of Service:**
- Assistant Director:**
- Director:**
- Executive Director:**
- Directorate:**
- Start Date:**

What draft proposal is being assessed?

- b. **Will the draft proposal be submitted through a decision-making process?**

Yes / No If 'yes' please state which decision-making route the proposal will take and, if being approved by a decision-making body, then please state which decision-making body and, when known, the meeting date

- c. **Does your draft proposal cover Healthcare, Housing, or Education Function?**

Yes/No If yes then, in addition to completing this Equality Impact Assessment, you must also complete an Armed Forces Covenant Impact Assessment, which is a statutory requirement under the Armed Forces Act 2021. The Armed Forces Covenant Impact Assessment template and guidance can be accessed through this link [Armed Force Covenant Impact Assessment - Connect \(sthelens.gov.uk\)](https://www.sthelens.gov.uk/armed-forces-covenant-impact-assessment)

- d. **The draft proposal has the potential to affect**

Service Users:	Council Workforce:	Borough Communities	Other	If other, please state	
Yes/No	Yes/No	Yes/No	Yes/No		

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e. **What stage has the EIA reached?** [When beginning your EIA, please complete stages 1 and 2 \(on pages 5 & 6\) before completing this section](#)

This table provides a ‘cover note’ of progress and must be maintained as the EIA is developed over time.

Summary of current position Column: Please ensure you note the stage reached and any consultation or engagement carried out. Simple activities may not need all these stages. Any reports to senior managers during the development of the draft proposal, for example feasibility or options appraisal reports, should include content on the latest analysis and findings from the EIA, even though further development of the EIA may be required before it can fully inform the draft proposal, and receive the ‘sign off’ necessary to proceed through the decision-making processes.

NB Once the EIA Sign Off is completed, send the final version of the EIA to the Council’s EDI Officer for publication on the Council’s Website.

Stage	Date	Summary of current position
Stage 1: Setting out the Proposal: What are the elements of the proposal being assessed; including the main purpose and aims?		
Stage 2: Evidence gathering: identifying the target population and/or individuals likely to be affected by the proposal		
Stage 3: Engagement/Consultation: With groups and individuals likely to be affected		
Stage 4: Impact Assessment. Identify potential or actual discriminatory impact and mitigation		
Stage 5: Reporting the findings. Please set out the findings of the Impact Assessment and the Mitigation Action Plan.		[If on completion of stages 1 -4 there are no implications for people who share different equality protected characteristics, then state that here explicitly]
Stage 6: Sign-Off. Sign off by Senior Management, acknowledging that the EIA has been completed.		[If there are no equality impact implications then Sign off to Director level only]

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Equality Impact Assessment Process

1 Setting out the Proposal

What proposal is being assessed; including the title of the proposal, and the main purpose and aims; what is being proposed and why?
In relation to the proposal being assessed, please set out the following
What must the LA provide under statute? List all statutory duties and regulations relevant to the proposal.
Any discretionary element of provision or function? What elements of the proposal does the council have choice over?
What is currently provided?
What could change as a result of the proposal and how could it change?
What is being consulted on?

2 Evidence Gathering

Who may or will be affected by the proposal? Evidence helps to frame the issues relevant to the proposal. Put as much detail about the equality and diversity profiles of the groups and individuals who share different protected characteristics affected or potentially affected by this proposal; updating the table as the EIA develops and the understanding of who will be affected emerges in more detail. Include evidence from consultation, complaints, service user equality profiles, staff equality profiles, and compare representation with community profiles. [Local Insight](#) 'Reports' section holds Ward, Locality, and Borough population. Census 2021 and workforce profile data is published on the [EIA Intranet / COG page](#).

Also include any data you have about [care experienced people](#) and [people who experience socio-economic disadvantage](#) who may be affected by the proposal. 'Care experience' refers to any person who has spent time in care. As part of the Council's Corporate Parenting role, please think about how you can create opportunities for our care leavers within your proposal. **Socio-economic disadvantage** can be experienced as inequalities of outcome in housing, health, education, employment, in participation in public life, and in the criminal justice system. Socio-economic analysis and profiles can be found in the [indices of multiple deprivation](#) or LCR's [Cost of Living Index Dashboard](#).

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Evidence - Gather as much evidence and as much detail as possible to identify which groups of people or individuals who share different protected characteristics will potentially, or actually, be affected by the draft proposal / proposed changes.	
Service Users	
Workforce	
Community	
Other	
Protected Characteristic	What further data, research, or information is available about groups of people or individuals who share different protected characteristics, which is relevant to the EIA?
Intersectional issues (i.e., for two or more characteristics)	
Age	
Care Experience	
Disability	
Gender Reassignment	
Marriage and Civil Partnership	
Pregnancy and Maternity	

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Evidence - Gather as much evidence and as much detail as possible to identify which groups of people or individuals who share different protected characteristics will potentially, or actually, be affected by the draft proposal / proposed changes.	
Race	
Religion and Belief	
Sex	
Sexual Orientation	
Socio Economic Disadvantage	

3. Engagement/Consultation: The decision about who to engage with, and how and when to engage, is the key to effective Equality Impact Assessment. Engagement must be conducted in line with (i) any statutory consultation requirements, and (ii) the Council's [Consultation Code](#)

Is engagement or consultation required, now or during the further development of the draft proposal? Yes/No

If No, then provide a summary of the reason why you have reached this conclusion in the box below. Then move onto Stage 4. Impact Assessment.

If Yes, then please continue with this section

Planning your engagement / consultation

Does the evidence in Stage 2, show that the draft proposal:

- Will result in an any groups of people who share a Protected Characteristic being treated differently from other people? Yes/No
- Will the differential treatment advance equality for people with Protected Characteristics? Yes/No
- Will the differential treatment cause or increase disadvantage for people with Protected Characteristics? Yes/No

If yes, please state which groups and how? Use this information to inform questions in your consultation or engagement

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Consultation and Engagement Findings (Duplicate for each engagement activity)

Dates of Consultation:	
Summary of the engagement / consultation activity carried out – include what aspects of the proposed decision were consulted on, list any questions relevant to the Equality Impact Assessment (in space below)	
Protected characteristic	Summarise the equality impacts identified through the engagement and detail any suggestions on how to avoid, minimise, or mitigate discriminatory or potentially discriminatory impact
Intersectional issues (i.e., for two or more characteristics)	
Age	
Care Experience	
Disability	
Gender Reassignment	
Marriage and Civil Partnership	
Pregnancy and Maternity	
Race	
Religion and Belief	
Sex	
Sexual Orientation	
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Engagement Findings: Drawing on the engagement findings and your understanding of the effects of the draft proposal, indicate how the draft proposal will contribute, if at all, to the three strands of the Public Sector Equality Duty (PSED).	
PSED Strand	How will the proposed decision contribute to this strand?
Eliminate Discrimination, Harassment and Victimisation	
Advance Equality of Opportunity	
Foster Good Community Relations	

4. Impact Assessment

Use this table to record the potential or actual impact of the draft proposal using the evidence and outcomes of consultation, identify the issue for and assess impact on people who share different protected characteristics, identifying:

- Potential or actual discriminatory impact - **who is disadvantaged, who has unmet need, who is disproportionately affected?**
- Mitigation for each potential or actual discriminatory impact - **what can we do to lessen or remove that disadvantage.**
- Potential or actual positive impact within the proposal to enhance equality of opportunity and community cohesion.
- What can you do in this proposal to support care experienced people and provide opportunities for our care leavers?
- What can you do in this proposal to tackle socio-economic deprivation?

Add more rows as required, especially if there is more than one impact identified for a protected characteristic.

For the Column, **Impact** - for each row put either Positive, Negative or Not Applicable (NA). Do not leave blank.

For the Column, **Level of Impact** – how severe is the impact? Put either Low, Medium, High, or None depending on analysis. Do not leave blank.

Protected Characteristic	Impact	Level of Impact	Summary of Impact	Action or Mitigation Required
Intersectional (of two or more characteristics)				
Age				
Care Experience				

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Protected Characteristic	Impact	Level of Impact	Summary of Impact	Action or Mitigation Required
Disability				
Gender Reassignment				
Marriage and Civil Partnership				
Pregnancy and Maternity				
Race				
Religion and Belief				
Sex				
Sexual Orientation				
Socio Economic Disadvantage				

5. Reporting the findings and Mitigation Action Plan

The findings of the EIA may be reported to senior managers and the decision-making body / decision maker, at several stages during the development of a draft proposal. For example, the impact assessment may inform a feasibility report, or options appraisal, which may need to be considered by the Senior Leaders, Portfolio Holders, or Partnership Boards, before the proposal is ready for final approval.

Any reports linked to the Draft Proposal, which are going through formal decision-making processes, such as Delegated, Committee, Cabinet, or Full Council, must include the latest findings of the EIA, even if these are at a relatively early stage.

The report recommending final approval of the proposal, must await and be fully informed by the findings of the completed EIA. If there are any alterations or changes to the nature of the proposal, as a result of its progress through the Council's decision-making processes, then a further

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Equality Impact Assessment must be carried out on those changes or amendments, before the final decision on the proposal can be considered for approval by the decision-making body.

This is because the decision-making body has a legal requirement, when making a decision, to do so in the full knowledge of the equality implications of that decision, at the point when the decision is made. The final approval report must include:

- A summary of the EIA findings, stating clearly (i) the equality implications, (ii) all potential or actual discriminatory outcomes, and (iii) actions that will be taken to avoid, minimise, or mitigate those potential or actual discriminatory outcomes.
 - For a DED the EIA summary must be included under “Other implications” in the section “Has Equality and Human Rights Implications.”
 - For a Cabinet Report the EIA summary must be included under Section 9 Equality Impact Assessment.
- The Equality Impact Assessment must be attached as an appendix to the Cabinet Report, and in the “Equality” section of the DED.

NB. The report recommending final approval of the proposal, may include recommendations based on the findings of the EIA, but these should be separate from the reporting of impacts. Recommendations will be developed separately from the EIA and arise from Senior Managers considering equality impacts combined with other aspects of the proposal, such as finance, the wider benefits of the proposal, and so on.

Equality Impact Assessment Mitigation Action Plan

Any actions to mitigate (avoid, minimise, lessen, or remove), actual or potential discriminatory impact, identified in this Equality Impact Assessment, must be listed below, to complete the full EIA.

Potential negative impact (add rows if necessary)	Action required to mitigate the potential negative impact	Lead person	Timescale	Resource implications

EIA and EIA Mitigation Action Plan Review Arrangements	
Date of the next review of the EIA	
How often will the EIA Action Plan be reviewed?	
Who will carry out this review?	

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6. Sign Off

NB If on completion of stages 1 -4 there are no implications for people who share different equality protected characteristics, then EIA Sign Off needs to be to Director level only.

By adding your Signature, you are acknowledging:

- The Officer drafting the proposal has completed the EIA; identifying actual or potential discriminatory impact for people who share different protected characteristics and identifying actions to mitigate (lessen or avoid) any discriminatory impact identified.
- The outcomes of the EIA have been given due consideration in the draft proposal.
- The draft proposal is ready to progress through the Council’s decision-making processes.

The Equality Impact Assessment must be published online for public scrutiny.

NB Once the Sign Off is completed, the EIA Lead Officer must send the final version of the EIA to the Council’s EDI Officer for publication on the Council’s Website. Ensure this whole section, **Stage 6 Sign Off**, is removed whenever the EIA is published as a public document.

The equality implications and mitigations must be visible for transparency and scrutiny.

The EIA Stages 1 - 5 **must** be:

- published as an appendix to all decisions related to the proposal the EIA assessed.
- used to inform relevant “Equality” implication section within all reports related to the proposal, including the Committee Report recommending final approval of the proposal.

EIA Lead Officer		
Signed	Name	
	Date	
	Job Title	
Equality, Diversity, and Inclusion Officer		
Signed	Name	
	Date	
Head of Service		
Signed	Name	
	Date	
	Job Title	
Assistant Director		
Signed	Name	
	Date	
	Job Title	
Director		
Signed	Name	
	Date	
	Job Title	
Director of Policy & Transformation		
Signed	Name	
	Date	
Director of Legal and Governance		
Signed	Name	
	Date	
Executive Director		
Signed	Name	
	Date	
	Job Title	