

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: 12 March 2024

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EQUALITY IMPACT ASSESSMENT

~ **Sign Off Guidance.**

NB only complete **section g. Sign Off** (page 4) when the EIA is ready to be attached to the report recommending final approval of the proposal.

- For all decisions:
 - All EIAs to be signed off at Assistant Director (AD) level (or Head of Service where there is no AD)
 - EIAs with equality implications to be signed off Director level.
 - EIAs for 'Key Decision' reports must always be signed off by your Director, the Council's Monitoring Officer and your Executive Director.

a. EIA Author:

Job Title:

Directorate:

Start Date:

Title of draft proposal being assessed? - An Equality Impact Assessment must be undertaken for all Full Council, Cabinet, and Delegated Executive Decisions, and for relevant Committee Decision.

b. Which decision making route will the proposal take for approval? - e.g., DED, Committee, Cabinet, Full Council. If unknown put "to be confirmed"

c. Is the proposal a "Key Decision"? - NB a "[Key Decision](#)" is one which must be published on the Council's [Public Notice of Key Decisions](#) webpage

Yes / No

d. 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 \(sthelens.gov.uk\)](#)

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e. **The draft proposal has the potential to affect**

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

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

Summary of Current Position Table provides a summary of progress and must be maintained as the EIA is developed over time. 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.

Summary of Current Position - Stages	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?		[Do not use this table at the start of the EIA process. Please complete Stage 1 on page 5, before writing anything here]
Stage 2: Evidence gathering: identifying the target population and/or individuals likely to be affected by the proposal		[Do not use this table at the start of the EIA process. Please complete Stage 2, before writing anything here]
Stage 3: Engagement/Consultation: With groups and individuals likely to be affected		[Do not use this table at the start of the EIA process. Please complete Stage 3, before writing anything here]
Stage 4: Impact Assessment. Identify potential or actual discriminatory impact and mitigation		[Do not use this table at the start of the EIA process. Please complete Stage 4, before writing anything here]
Stage 5: Reporting the findings. Please set out the findings of the Impact Assessment and the Mitigation Action Plan.		[Paste the text from your completed Stage 5 Summary of EIA Text Box here]

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g. Sign Off NB only complete this section when the EIA is ready to be attached to the report recommending final approval of the proposal.

- For all decisions:
 - All EIAs to be signed off at Assistant Director (AD) level (or Head of Service where there is no AD)
 - EIAs with equality implications must also be signed off at Director level.
 - EIAs for ‘Key Decision’ reports must always be signed off by your Director, the Council’s Monitoring Officer and your Executive Director.

By adding your Signature, you are acknowledging that the EIA gives ‘due regard’ to the draft proposal.

- The Officer drafting the proposal has completed the EIA; identifying actual or potential 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 available to the decisions maker at the point of making the decision.

A copy of the EIA document **must** be attached as an appendix to Cabinet and Full Council Reports (also attached as an appendix for any relevant Committee Report) or be uploaded in the DED’s “Equality” section. This ensures that the EIA is available to the decision maker at the point of making their decision, and, where permissible, are published with [Cabinet](#) and [Full Council](#) papers, and [Delegated Executive Decision](#) information

Policy and Equalities Officer or Principal Policy Lead if Policy and Equalities Officer is unavailable (for all EIAs)					
[Sign here]	Name		Job Title		Date
Assistant Director or if there is no Assistant Director then Head of Service (for all EIAs)					
[Sign here]	Name		Job Title		Date
Director (always to sign when the EIA is for a Key Decision, else only to sign for other decisions when the EIA has identified equality implications)					
[Sign here]	Name		Job Title		Date
Monitoring Officer (only when the EIA is for a Key Decision)					
[Sign here]	Name	Jan Bakewell	Job Title	Director of Legal & Governance	Date
Executive Director (only when the EIA is for a Key Decision)					
[Sign here]	Name		Job Title		Date

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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? This refers only to consultation on the developing proposal with people who may be affected by it e.g., staff, residents, community, service users, etc.

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 can be found in the [State of the Borough Assessment](#), the [indices of multiple deprivation](#), and the [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	
Council Workforce	
Borough Communities	
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](#). **[NB Consultation and Engagement in the EIA process does not include discussions with officers who are advising you on the development of your proposal, such as Legal, People Management, Finance, EDI Lead, DMT, SLT, EMB, etc.]**

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 people who share different protected characteristics will be disadvantaged, have unmet need, or be disproportionately affected by the proposal?

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 - to be completed after the consultation / engagement exercise. (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	
Socio Economic Disadvantage	

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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				
Disability				
Gender Reassignment				
Marriage and Civil Partnership				
Pregnancy and Maternity				
Race				

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Protected Characteristic	Impact	Level of Impact	Summary of Impact	Action or Mitigation Required
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 (where relevant), 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 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.

Summary of EIA Text Box - 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. Use this text box to complete that summary. If there is no equality impact identified as a result of the impact assessment, then record that explicitly here. **NB** Once completed, paste a copy the **Summary of EIA Text** from this box, into the **Stage 5 row** of the **Summary of Current Position Table** in **section f. What stage has the EIA reached?** in the initial section of this EIA.

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Summary of EIA Text Box

- For a DED use the **Summary of EIA text** above for the “Has Equality and Human Rights Implications” section, under “Other implications.”
- For a Cabinet/ Full Council and relevant Committee Reports use the **Summary of EIA text** above for Section 9 Equality Impact Assessment.
- A copy of the EIA document **must** be attached as an appendix to Cabinet/Full Council Reports, to relevant Committee Reports, and in the DED’s “Equality” section.

Equality Impact Assessment Mitigation Action Plan - use this table to record negative impact identified in the Stage 4 Impact Assessment, and the actions identified to mitigate (avoid, minimise, lessen, or remove), that impact. **NB** If no negative impact is identified the put NA.

Please ensure that the details of each Action, its purpose, timescales, and resource implications are discussed and agreed by the Lead Person nominated for its implementation.

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?	

NB The report recommending final approval of the proposal, may include recommendations based on the findings of this EIA, but these recommendations should be developed separately from the reported outcomes of 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.