

Full Equality Impact Assessment (EqIA) Template

In order to carry out this assessment, it is important that you have completed the EqIA E-learning Module and read the Corporate Guidelines on EqIAs. Please refer to these to assist you in completing this form and assessment.

What are the proposals being assessed? (Note: 'proposal' includes a policy, service, function, strategy, project, procedure, restructure)	Main Grants Programme, application process 2012-13
Which Directorate / Service has the responsibility for this?	Community Health and Well-Being / Community Development
Name and job title of lead officer	Kashmir Takhar, Head of Community Development
Name & contact details of the other person(s) involved in the EqIA:	
Date of assessment:	2 nd February 2012

Stage 1: Overview

<p>1. What are the aims, objectives, and desired outcomes of your proposals?</p> <p>(Also explain proposals e.g. reduction / removal of service, deletion of posts, changing criteria etc)</p>	<p>The annual Main Grants Programme is an open, competitive process that allocates Council grant funding to local Third Sector organisations for the benefit of Harrow residents. It aims to offer an open, transparent process for the allocation of grant funding. The desired outcome is to support local organisations deliver a range of projects and services for the benefit of Harrow residents.</p> <p>This year's process operated in the same way as in previous years, with some revisions including;</p> <ul style="list-style-type: none"> • Revisions to the grant application form to provide a clear, easy to use, accessible form. • The proposed ring-fencing of 15% of the budget for allocation to small grants to ensure a wider distribution of grants. • The inclusion of panel observers from the Third Sector, who observed the panel assessment process.
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<p>2. What factors / forces could prevent you from achieving these aims, objectives and outcomes?</p>	<p>Factors that could prevent the achievement of these aims, objectives and outcomes are;</p> <ul style="list-style-type: none"> • A high number of applications for large amounts which results in few organisations receiving funding. • An unclear and complicated application process that advantages some groups over others, or disproportionately disadvantages some groups. • A lack of good quality applications that cannot be supported through grant funding. • A lack of good organisational and governance practice within organisations that puts grant funding at risk.
<p>3. How does this contribute to your Directorates Service Plan?</p>	<p>The Directorate service plan supports the delivery of the Council's corporate priorities. The Third Sector Investment plan aims to ensure that the allocation of Council resources to the Third Sector is more closely aligned to the delivery of these priorities. The service plan also aims to reach out and find new ways of involving residents, service users and partners in improving the services received locally.</p>
<p>4. Who are the customers? Who will be affected by this proposal? For example who are the external/internal customers, communities, partners, stakeholders, the workforce etc.</p>	<p>The customers affected by this proposal are;</p> <ul style="list-style-type: none"> • Third Sector organisations • Users of services provided by Third Sector organisations • Other Directorates that provide funding to Third Sector organisations
<p>5. Is the responsibility shared with another department, authority or organisation? If so:</p> <ul style="list-style-type: none"> • Who are the partners? • Who has the overall responsibility? 	<p>The responsibility for the delivery of the Main Grants Programme sits within the Community and Culture division. Officers from other Directorates contribute to the grant assessment process and Panel Observers from the Third Sector were invited to observe the process. Grant recommendations are discussed and made by Members of the Grants Advisory Panel (including a Voluntary Sector Adviser) to Cabinet.</p>
<p>5A. How are/will they be involved in this assessment?</p>	<p>Officers and Observers involved in the panel assessment process have provided their comments and feedback on the process and in particular their views on whether or not the process potentially disproportionately advantages or disadvantages any of the protected characteristics. An analysis of grant applications by protected characteristics served and the results of the equality impact assessment is provided to the Grants Advisory Panel to assist them in taking due regard to equalities when making recommendations to Cabinet.</p>

Stage 2: Monitoring / Collecting Evidence / Data

- **6.** What information is available to assess the impact of your proposals (*include the actual data, statistics and evidence*)? List the main sources of data, research and other sources of evidence (including full references) reviewed to determine impact on each equality group (protected characteristic). This can include results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys, workforce profiles, service users profiles, local and national research, evaluations etc
- (Where possible include data on the nine protected characteristics. Where you have gaps, you may need to include this as an action to address in the action plan)

Age (including carers of young/older people)	<ul style="list-style-type: none"> • Analysis of grant applications received by protected characteristic served (see appendix 4a and 4b of the Grants Advisory Panel report, 1st March 2012) • Analysis of attendees of grant information sessions by characteristics served (see appendix 7 of the Grants Advisory Panel report, 1st March 2012)
Disability (including carers of disabled people)	<ul style="list-style-type: none"> • As above
Gender Reassignment	<ul style="list-style-type: none"> • As above
Marriage / Civil Partnership	<ul style="list-style-type: none"> • As above
Pregnancy and Maternity	<ul style="list-style-type: none"> • As above
Race	<ul style="list-style-type: none"> • As above
Religion and Belief	<ul style="list-style-type: none"> • As above
Sex / Gender	<ul style="list-style-type: none"> • As above
Sexual Orientation	<ul style="list-style-type: none"> • As above
<ul style="list-style-type: none"> • 7. Do you need to collect any additional data to be able to monitor the impact on different groups? 	<ul style="list-style-type: none"> • No

<ul style="list-style-type: none"> 8. Are there any other local/regional/national data sources that can inform this assessment if you have insufficient data on any of the groups? 	<ul style="list-style-type: none"> • 				
<ul style="list-style-type: none"> 9. Have you undertaken any consultation on your proposals? (this may include consultation with staff, members, unions, community / voluntary groups, stakeholders, residents and service users) 		<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> •
Who was consulted?	What consultation methods were used?	What did you learn from your consultation?	What do the results show about the impact on different equality groups (protected characteristics)?		
Members of the Grants Advisory Panel (GAP).	Presentation of report and discussion of proposals	GAP Members approved changes to the grant application form, however were concerned that small groups should not be competing with larger groups for funding.	GAP Members felt that small groups should not be competing with larger groups and should be considered for provision of a separate application form in the future.		
Members of the Third Sector were invited to provide their feedback on the grant application form.	Consultation workshop held on the 6 th June 2011 and individuals were invited to send in their comments via email.	The consultation feedback identified the need for training to support the Third Sector, clearer information on the scoring process and word limit on the application form and clearer criteria for financial stability.	The results of the consultation did not indicate that the application process had a differential impact on any of the equality groups. There was general agreement for the need for more training support to assist organisations in applying for funding.		
Members and observers of grant assessment panels.	Comments and feedback on the process was invited and were received by email.	Some members of the grant assessment panels felt that the process could disadvantage small or BME groups who might not understand the 'rules of the game'. Another panel member commented that 'it is a necessarily complex process as the applicant has to demonstrate that they meet certain criteria,	Overall panel members felt that the process did not impact differently on equality groups, however there were some comments regarding the potential disadvantage that could be faced by small or BME groups, or those with a learning difficulty, lower level of education or from a different language group.		

		hence a person with a lower level of education, learning difficulty or from another language group may find it very challenging.	
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NOTE: If you have not undertaken any consultation as yet, you need to consider if you need to carry out any consultation. For example, if you have insufficient data/information for any equality group and you are **unable** to assess the potential impact, you may want to consult with them on your proposals as how they will affect them. Any proposed consultation needs to be **completed before** progressing with the rest of the EqIA.

- **Guidance on consultation/community involvement toolkit can be accessed via the link below**
http://harrowhub/info/200195/consultation/169/community_involvement_toolkit

10. If you have not undertaken any consultation, explain why?

Stage 3: Assessing Impact and Analysis

11. What does your information tell you about the impact on different groups? Consider whether the evidence shows potential for differential impact, if so state whether this is an adverse or positive impact? How likely is this to happen? How you will mitigate/remove any adverse impact? How likely is this to happen? How will you mitigate/remove any adverse impact?

Protected Characteristic	Positive	Adverse	Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur.	What measures can you take to eliminate or reduce the adverse impact(s)? E.g. consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 5)
Age (including carers of young/older people)			No potential for differential impact identified.	
Disability (including carers of disabled people)			Panel members have identified the potential for a differential impact to occur where an application form is completed by someone with a learning difficulty.	Guidance notes were provided on the application form. Information sessions were provided for all grant applicants. These sessions provided a step-by-step guide to the application form. One to one support with completing the application form was also available from CaVSA (Hammersmith and Fulham CVS)

Gender Reassignment			No potential for differential impact identified.	
Marriage and Civil Partnership			As above	
Pregnancy and Maternity			As above	
Race		✓	Panel members have identified the potential for a differential impact to occur where an organisation may have English as a second language.	As above.
Religion or Belief			No potential for differential impact identified.	
Sex			No potential for differential impact identified.	
Sexual Orientation			No potential for differential impact identified.	
Other (please state)				

12. Cumulative impact – Are you aware of any cumulative impact? For example, when conducting a major review of services. This would mean ensuring that you have sufficient relevant information to understand the cumulative effect of all of the decisions.

Example:
A local authority is making changes to four different policies. These are funding and delivering social care, day care, respite for carers and community transport. Small changes in each of these policies may disadvantage disabled people, but the cumulative effect of changes to these areas could have a significant effect on disabled people's participation in public life. The actual and potential effect on equality of all these proposals, and appropriate mitigating measures, will need to be considered to ensure that inequalities between different equality groups, particularly in this instance for disabled people, have been identified and do not continue or widen. This may include making a decision to spread the effects of the policy elsewhere to lessen the

The grant application process is an annual, open, competitive process. The assessment of applications is neutral as to whether or not applicants have received grants in former years' annual grants rounds or receive funding from any other source.

Some organisations rely on funding from a range of bodies. In the current economic environment some of this funding is being reduced or withdrawn which could have a cumulative impact on some organisations and the delivery of services for clients.

concentration in any one area.

13. How do your proposals contribute towards the requirements of the Public Sector Equality Duty (PSED), which requires the Council to have due regard to eliminate discrimination, harassment and victimisation, advance equality of opportunity and promote good relations between different groups.

(Include all the positive actions of your proposals, for example literature will be available in large print, Braille and community languages, flexible working hours for parents/carers, IT equipment will be DDA compliant etc)

Equality Group	Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010	Advance equality of opportunity between people from different groups	Foster good relations between people from different groups	What actions can you take to meet these requirements? (Also include these in the Improvement Action Plan at Stage 5)
Age (including carers of young/older people)	All applicants are asked to indicate on the application form how their proposed project / activity will tackle disadvantage, foster good relations and promote equality of opportunity. The applicants response to this question forms part of the overall score. This means that successful grant applications will have provided evidence that their project contributes to the PSED.	All applicants are asked to indicate on the application form how their proposed project / activity will tackle disadvantage, foster good relations and promote equality of opportunity. The applicants response to this question forms part of the overall score. This means that successful grant applications will have provided evidence that their project contributes to the PSED.	All applicants are asked to indicate on the application form how their proposed project / activity will tackle disadvantage, foster good relations and promote equality of opportunity. The applicants response to this question forms part of the overall score. This means that successful grant applications will have provided evidence that their project contributes to the PSED.	As part of the monitoring process of grants, officers will seek evidence that the actions described in response to this question have been undertaken and that grant funding has been used to support the delivery of the PSED.
Disability (including carers of disabled people)	As above	As above	As above	As above
Gender Reassignment	As above	As above	As above	As above
Marriage and Civil	As above	As above	As above	As above

Partnership				
Pregnancy and Maternity	As above	As above	As above	As above
Race	As above	As above	As above	As above
Religion or Belief	As above	As above	As above	As above
Sex	As above	As above	As above	As above
Sexual Orientation	As above	As above	As above	As above

14. Is there any evidence or concern that **direct or indirect discrimination may occur with reference to anti discrimination legislation?**

Direct discrimination - occurs when a person is treated less favourably than others on the grounds of their age, disability, gender, race, religion or belief, or sexual orientation. Refer to main guidelines and toolkit for examples of direct discrimination.

Indirect discrimination - occurs when a rule, condition or requirement, which applies equally to everyone, has a disproportionately adverse effect on people from a particular equalities group when there is no objective justification for the rule. Refer to main guidelines and toolkit for examples of indirect discrimination.

		Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Direct	Yes									
	No	✓	✓	✓	✓	✓	✓	✓	✓	✓
Indirect	Yes									
	No	✓	✓	✓	✓	✓	✓	✓	✓	✓

If you have answered 'yes' to any of the above you need to stop and rethink and should not proceed with your proposals. **(You are also encouraged to seek Legal Advice)**

Stage 4: Decision

15. Please indicate which of the following statements best describes the outcome of your EqIA (✓ tick one box only)

Outcome 1 – No change required: when the EqIA has not identified any potential for discrimination or adverse impact and all opportunities to promote equality are being addressed.

✓

Outcome 2 – Adjustments to remove adverse impact identified by the EqIA or to better promote equality. **List the actions you propose to take to address this in the Improvement Action Plan at Stage 5**

Outcome 3 – Continue with proposals despite having identified some potential for adverse impact or missed opportunities to promote equality. In this case, the justification needs to be included in the EqIA and should be in line with the PSED to have 'due

regard'. In some cases, compelling reasons will be needed. You should also consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the impact. (explain this in 15A below)	
Outcome 4 – Stop and rethink: when your EqIA shows actual or potential unlawful discrimination. (You are also encouraged to seek Legal Advice)	
15A. If your EqIA is assessed as outcome 3 , explain your justification with full reasoning to continue with your proposals?	

Stage 5: Making Adjustments (Improvement Action Plan)

16. List below any actions you plan to take as a result of this impact assessment. This should include any actions identified throughout the EqIA.

Area of potential adverse impact e.g. Race, Disability	Action proposed	Desired Outcome	Target Date	Lead Officer	Progress
Race	Information sessions for grant applicants to provide them with information to assist them in completing the application form.	All organisations have access to the same information to assist them with completing the application form.	9 th November 2011 and 14 th November 2011	Kashmir Takhar, Head of Community Development	Completed
Race	One to one advice provided by CaVSA to support individual organisations with completing the form.	As above.	28 th November 2011	Kashmir Takhar, Head of Community Development	Completed
Small Groups	Assessment of small grant applications undertaken separately. Ring-fencing 15% of the budget for allocation to small grant applicants.	Small grant applicants are assessed proportionately and have a proportionate chance of receiving funding as large grant applicants.	8 th March 2012	Kashmir Takhar, Head of Community Development	Grant recommendations to be discussed by GAP at their meeting of the 1 st March.

Stage 6 - Monitoring

- The full impact of the decision may only be known after the proposals have been implemented, it is therefore important to ensure effective monitoring measures are in place to assess the impact.

17. How will you monitor the impact of the proposals once they have been implemented? How often will you do	Successful grant recipients are expected to participate in an annual monitoring process.
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this?	
18. What monitoring measures need to be introduced to ensure effective monitoring of the policy? (Also Include in Improvement Action Plan at Stage 5)	Annual monitoring process to include monitoring of actions taken by organisations to support the PSED.
19. How will the results of any monitoring be analysed, reported and publicised?	The results of monitoring are assessed by grant officers and reported to the Grants Advisory Panel. Reports provided to the Grants Advisory Panel are publicised on the Harrow Council website.
20. Have you received any complaints or compliments about the policy, service, function, project or decision being assessed? If so, provide details.	The feedback from Panel Observers has in general been positive. All panel observers rated the process either good, very good or excellent in terms of overall fairness. The feedback from the information sessions shows that, of those that completed the evaluation form 100% stated that they found the sessions useful.

Stage 7 – Reporting outcomes

The completed EqIA must be attached to all committee reports and a summary of the key findings included in the relevant section within them.

EqIA's will also be published on the Council's website and made available to members of the public on request.

21. Summary of the assessment

NOTE: This section can also be used in your Cabinet reports etc but you must ALSO attach the full EqIA to the report

- What are the key impacts – both adverse and positive?
- What course of action are you advising as a result of this EqIA?
- Are there any particular groups affected more than others?
- Do you suggest to proceeding with your proposals although an adverse impact has been identified?

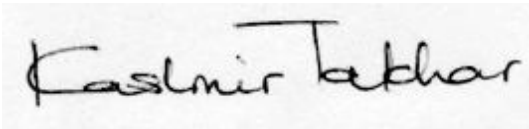

The equality impact assessment undertaken for the grant application process for 2012-13 does not indicate any adverse impact on the protected characteristics. The feedback indicates some concern that the process may impact on small groups, however measures have been included in this year's process to assist distribution of funding to small groups including; the separate assessment of small grant applications and the ring-fencing of 15% of the budget for allocation to small groups.

22. How will the impact assessment be publicised? E.g. Council website, intranet, forums, groups etc

The impact assessment will be publicised on the Harrow Council website with the publication of the report for the Grants Advisory panel meeting on the 1st March 2012.

Stage 8 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)

The completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.

23. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?	Directorate Equalities Task Group.		
Signed: (Lead officer completing EqIA)		Signed: (Chair of DETG)	
Date:	15 Feb 2012	Date:	15 Feb 2012