

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, appeals 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:	18 th May 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 Main Grants Programme appeals process offers organisations that have been unsuccessful with their application for funding an opportunity to appeal this decision. The Main Grants Programme is an annual, open, competitive process that allocates Council grant funding to local Third Sector organisations. It aims to offer an open, transparent process for the allocation of funding. The desired outcome is to support local organisations to 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 the following revisions;</p> <ul style="list-style-type: none"> • Some revisions to the grant application form to provide a clear, easy to use, accessible form. • The 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 panel assessment meetings. <p>The appeals process opens once organisations have been notified of the outcome of their application. Organisations are invited to submit an appeal in writing on no more than two sides of A4, within seven</p>
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	<p>working days. The grounds for appeals are;</p> <p><i>The information presented to the Grants Advisory Panel was incorrect or information was omitted and that this had a material effect on the decision.</i></p> <p>Applicants are advised that no new information can be taken into account at the appeal stage.</p> <p>To assist them in making their appeal organisations are provided with a copy of their assessment sheet, which shows how their application was scored against each of the assessment criteria.</p> <p>Appeals are considered by a panel that consists of the Portfolio Holder for Community and Cultural Services, the Divisional Director Community and Culture and an independent adviser from outside of Harrow. This year an independent observer from the Third Sector was also included. All members of the appeals panel have had no previous involvement in the assessment of applications.</p> <p>The appeals panel considers each appeal and reviews the scores awarded by the grant assessment panel. If the panel feel that the appeal is upheld they will adjust the scores awarded. The appeals panel make the final decision on whether the original score should be adjusted and whether or not the appeal is upheld.</p> <p>In 2012/13 ten appeals were received. Five of these appeals were awarded additional scores taking them within the scoring threshold agreed for funding.</p> <p>The aim of the appeals process is to provide a fair and transparent process for dealing with appeals.</p>
<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 are;</p> <ul style="list-style-type: none"> • The appeals process is unclear and complex thereby deterring applicants from submitting appeals. • A lack of confidence and trust in the process which results in organisations not submitting appeals. • The involvement of an independent adviser that is not truly independent. • Additional lobbying by groups outside of the process.
<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 delivery of the Third Sector Investment plan aims to ensure the allocation of Council resources to projects and activities that are aligned to these priorities.</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 appeals process sits within the Community and Culture division. An independent adviser is part of the panel that considers appeals and an independent observer from the Third Sector was invited to observe the process. An update report on grant appeals will be presented to the Grants Advisory Panel (which includes a Voluntary Sector Adviser) in June 2012.</p>
<p>5A. How are/will they be involved in this assessment?</p>	<p>The independent adviser and observer involved in the appeals panel were invited to give their feedback on the process and give their views on whether or not they felt the process had the potential for any adverse impact on any of the protected characteristics.</p>
<p>Stage 2: Monitoring / Collecting Evidence / Data</p>	
<ul style="list-style-type: none"> • 6. What information is available to assess the impact of your proposals (<i>include the actual data, statistics and evidence</i>)? 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) 	
<p>Age (including carers of young/older people)</p>	<p>Results of the consultation questionnaire distributed to voluntary and community sector organisations in 2011. A report on the results was presented to the Grants Advisory panel at their meeting on 2nd March 2011. The Grants Advisory Panel also had further discussion about the appeals procedure at their meeting on the 1st March 2012. Feedback on the appeals process was also sought from both the independent adviser and observer.</p>
<p>Disability (including carers of disabled people)</p>	<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"> n/a 		
<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) 	•	•	•
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).	Discussion of grant recommendations and appeals process.	GAP Members wished to ensure a fair and transparent appeals process was followed.	GAP Members felt that the appeals procedure should remain and that a member-led panel was a fair and transparent way of dealing with appeals.
Voluntary and Community Sector	On-line questionnaire, focus	51% strongly disagreed or	Half of the respondents to the survey

	groups, consultation workshop.	disagreed that the appeals procedure should be removed; 35% strongly agreed or agreed that the appeals procedure should be removed.	disagreed with removing the appeals procedure.
Independent Panel Observer	The Panel Observer observed the appeals panel and provided written feedback on his observations.	The Independent Observer felt the process was fair and that the information provided by each applicant was properly assessed by the panel.	The Independent Observer did not feel that the process had any differential impact on equality groups.
Independent Adviser	The independent adviser provided written feedback on her observations of the appeals process.	The independent adviser did not feel that any part of the process advantages or disadvantages any of the protected groups, she stated 'I don't see how it could be any fairer'.	The independent adviser did not feel that the process had any differential impact on equality groups.

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 was identified by either the independent observer or independent adviser.	
Disability (including carers of disabled people)			As above	
Gender Reassignment			As above	
Marriage and Civil Partnership			As above	
Pregnancy and Maternity			As above	
Race			As above	
Religion or Belief			As above	
Sex			As above	
Sexual Orientation			As above	
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

The annual grant application programme is a competitive process that does not guarantee funding to any particular organisation. The assessment of applications is neutral as to whether or not applicants have received grants in former years' grants rounds or receive funding from any other Council department or external source.

In the current financial climate with reduced public sector funding and increased competition for funding it is possible that an organisation may be

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 concentration in any one area.	cumulatively impacted by reductions in funding from a number of sources.
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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. Applicants responses to this question forms part of the assessment process. Successful grant applicants will be required to provide evidence of how their project or activity contributes	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. Applicants responses to this question forms part of the assessment process. Successful grant applicants will be required to provide evidence of how their project or activity contributes	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. Applicants responses to this question forms part of the assessment process. Successful grant applicants will be required to provide evidence of how their project or activity	As part of the monitoring process, 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.

	to the PSED during the funding period.	to the PSED during the funding period.	contributes to the PSED during the funding period.	
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 Partnership	As above	As above	As above	As above
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 EqlA (✓ tick one box only)

Outcome 1 – No change required: when the EqlA 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 EqlA 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 EqlA 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 EqlA shows actual or potential unlawful discrimination. (You are also encouraged to seek Legal Advice)	
15A. If your EqlA 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 EqlA.

Area of potential adverse impact e.g. Race, Disability	Action proposed	Desired Outcome	Target Date	Lead Officer	Progress

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 this?	Successful grant recipients are expected to participate in an annual monitoring process and provide information on target beneficiaries.
18. What monitoring measures need to	

<p>be introduced to ensure effective monitoring of the policy? (Also Include in Improvement Action Plan at Stage 5)</p>	<p>The annual monitoring process will need to be amended to include the monitoring of actions taken by organisations to support the PSED.</p>
<p>19. How will the results of any monitoring be analysed, reported and publicised?</p>	<p>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.</p>
<p>20. Have you received any complaints or compliments about the policy, service, function, project or decision being assessed? If so, provide details.</p>	<p>The feedback from the Independent Observer and Independent Adviser were very positive.</p>
<p>Stage 7 – Reporting outcomes The completed EqlA must be attached to all committee reports and a summary of the key findings included in the relevant section within them. EqlA's will also be published on the Council's website and made available to members of the public on request.</p>	
<p>21. Summary of the assessment</p> <p>NOTE: This section can also be used in your Cabinet reports etc but you must ALSO attach the full EqlA to the report</p> <ul style="list-style-type: none"> ➤ What are the key impacts – both adverse and positive? ➤ What course of action are you advising as a result of this EqlA? ➤ Are there any particular groups affected more than others? ➤ Do you suggest to proceeding with your proposals although an adverse impact has been identified? 	<p>The equality impact assessment undertaken for the 2012/13 grant appeals process does not indicate any adverse impact on the protected characteristics.</p>
<p>22. How will the impact assessment be publicised? E.g. Council website, intranet, forums, groups etc</p>	<p>The impact assessment will be publicised on the Harrow Council website with the publication of the report to the Grants Advisory panel meeting on the 25th June 2012.</p>
<p>Stage 8 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group) The completed EqlA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.</p>	
<p>23. Which group or committee considered, reviewed and agreed the EqlA and the Improvement Action Plan?</p>	<p>Directorate Equalities Task Group.</p>

Signed: (Lead officer completing EqIA)		Signed: (Chair of DETG)	
Date:		Date:	