



**Equality Analysis in Action**  
**a practical guide for St Leger Homes employees**

# CONTENTS

Introduction	
Equality Analysis in Action .....	1
a practical guide for St Leger Homes employees.....	1
Introduction .....	3
What is Equality Analysis? .....	3
Why is Equality Analysis important? .....	4
Review Decision to proceed with Equality Analysis.....	5
How to do Equality Analysis.....	5
Who is involved in an Equality Analysis?.....	6
Before you start .....	7
How to use the forms.....	7
Equality Analysis for other communities or groups.....	7
Promotion of good community relations and community cohesion.....	7
Links to other strategies, policies or action plans .....	7
Assessing policies and internal services.....	8
What is the end result?.....	8
Equality Analysis process steps and role responsibilities .....	9
Equality Analysis at a Glance.....	10
Equality Analysis Steps .....	12
Step 1 – Aim.....	12
Step 2 - Fact Finding.....	12
Step 3 – Engagement.....	12
Step 4 – The Analysis .....	13
Step 5 – Think of Alternatives.....	13
Step 6 - Human Rights Implications .....	14
Step 7 – Action Plans and Equality Targets.....	16
Step 8 – Monitoring and Feedback.....	16
Appendix 1 .....	17

## Introduction

This guidance supports St Leger Homes' commitment to fairness by equipping managers with the understanding and practical steps to carry out an effective equality analysis.

To understand why equality analysis is necessary requires an understanding that equality is not about treating everybody the same.

Equality means making sure that the individual requirements of different people and different communities are taken into account.

## What is Equality Analysis?

Equality Analysis is a way to make sure individuals and teams think carefully about :

**Commissioning services,  
Decommissioning services,  
Decision-making,  
Policies,  
Projects,  
Services,  
Strategies  
Functions**

**(CDDPPSSF)**

- Systematically analyse and record the actual, potential or likely impact.
- Identify any unmet needs.
- Provide a basis for action to improve services where appropriate.
- Maximise opportunities for ensuring equality

Equality Analysis systematically analyses and records the actual, potential or likely impact of CDDPPSSF or a significant change in CDDPPSSF – on different groups of people.

The impact for particular groups is analysed and anticipated so that, as far as possible, any negative consequences can be eliminated or minimised and any benefits or opportunities for ensuring equality can be maximised.

Equality Analysis focuses more attention on the quality of the analysis and how it is used in decision-making, and less on the production of a document, which some may have taken to be an end in itself.

Equality Analysis examines the effect on equality for all of the protected characteristics, and it covers all aims of the general equality duty, apart from those relating to marriage and civil partnership, where only the discrimination aim applies.

## Why is Equality Analysis important?

Equality Analysis is required by law.

Equality Analysis underpins our culture and values: fairness, excellence, empowerment and local.

Equality Analysis forms part of St Leger Homes commitment to improving equality practice. This commitment is expressed in the Framework for Fairness Scheme and Fairness Statement as specified in our Equality and Diversity Policy.

As a public body St Leger Homes must consider equality as we make our CDDPPSSF decisions. Equality Analysis is a way of ensuring that this is done in a structured way. It is essential in meeting the statutory equality duties.

### Important note:

Equality Analysis is not optional. It is a legal requirement!

The Equalities legislation requires local public bodies to analyse the impact or the likely impact of any proposed CDDPPSSF on equality.

**Public bodies must publish evidence of the equality analysis** they undertook to establish whether their policies or practices would further or have furthered the aims of the equality duty.

This includes providing details of the information that they considered and details of engagement undertaken when doing the analysis.

Equality Analysis helps us to identify inequalities in service design and delivery and employment. It helps make sure we do not discriminate in the way we provide services and employment and that, where possible, we do all we can to promote equality and good relations between different groups. Equality Analysis supports our culture and values by helping us to:

<b>Fairness</b>	<ul style="list-style-type: none"><li>• identify direct or indirect discrimination</li><li>• identify whether we are excluding different groups from any of our services</li><li>• mainstream equality in our policies and practices</li></ul>
<b>Excellence</b>	<ul style="list-style-type: none"><li>• target resources more effectively</li></ul>
<b>Empowerment</b>	<ul style="list-style-type: none"><li>• consider alternative policies or measures that might address any adverse impact</li><li>• promote equality and good relations between different groups.</li></ul>
<b>Local</b>	<ul style="list-style-type: none"><li>• better understand the needs and aspirations of the diverse communities we serve</li><li>• reality check our policies and services with the people affected by them.</li></ul>

## **Review Decision to proceed with Equality Analysis**

If the review is light touch and only for EMT to approve not Board, then there is no need to carry out a full formal Equality Analysis. The Policy Owner can take the previous Equality Analysis, amend relevant dates and email to Business Assurance Team and attach the Summary of Key Findings to the EMT report.

### For Projects initiated from an approved Corporate Strategy

Any project initiated from an approved Corporate Strategy that has already had an Equality Analysis does not need to have an Equality Analysis. This would be explained in the EMT report in the appropriate Equality Analysis section.

### For Projects not initiated from an approved Corporate Strategy

When a project specification is drawn up, the Head of Service needs to decide if the project has no likely perceived community or staff impact:-

- If NOT, then there does not need to be an Equality Analysis. The rationale would be explained in the EMT report in the appropriate Equality Analysis section
- If YES, then an Equality Analysis needs to be carried out

## **How to do Equality Analysis**

Equality Analysis can be a retrospective or prospective activity undertaken by managers and employees.

So that it can be used to inform decision making, Equality Analysis starts prior to policy development or at the early stages of a review.

To make this task easier, you may want to draw up a timetable for analysing your existing policies and practices that ties in with a time when a review of the policy is already planned.

If your service has significantly changed, you will need to carry out further Equality Analysis.

Equality Analysis is not a one-off exercise, it is on-going and cyclical and it enables equality considerations to be taken into account before a decision is made, this does not mean repeating the equality analysis, but using the experience gained through implementation to check the findings and to make any necessary adjustments.

## Who is involved in an Equality Analysis?

**Commissioning services,  
Decommissioning services,  
Decision-making,  
Policies,  
Projects,  
Services,  
Strategies  
Functions**

It is recommended that between 3 to 5 people are involved in an Equality Analysis. They should be drawn from different areas of expertise and could also include internal or external service users. This is your Equality Analysis Team.

The Equality Analysis Team should have a leader who is responsible for co-ordinating the Equality Analysis and making sure it is documented and recorded.

Then depending upon the CDDPPSSF to be assessed the Equality Analysis team should also aim to include at least two other people who will contribute the following:

- **Equalities expertise** – this could be someone in your service area who sits on the Equality & Diversity Steering Group or someone with an interest and some knowledge of this area of work
- **Information/monitoring/performance management expertise** – this will help when identifying data, identifying gaps in information and identification of performance based objectives and targets
- **Critical friend** – this could be another manager or external representative to help provide challenge
- **Human resources expertise** – in the case of employment based policies, services and functions to provide guidance around legal employment obligations and procedures.

Your Equality Analysis Team can include **relevant and appropriate employees** – for example, representatives from different working groups or different sections.

**Stakeholder involvement** – for internal services that may have an impact on other services or, where a service is outwardly focused, service user representatives such as a tenant may be helpful.

To complete an effective Equality Analysis you will analyse the effect on equality for all of the protected characteristics, and all aims of the general equality duty, apart from in relation to marriage and civil partnership, where only the discrimination aim applies.

### The legislative protected characteristics are :

\* Age

\* Race and Ethnicity

\* Gender Reassignment

\* Disability

\* Sexual Orientation

\* Marriage and Civil Partnership

\* Sex (Gender)

\* Religion or Belief

\* Pregnancy and Maternity

## Before you start

Collect any relevant equality information about your service, such as recent consultation reports, monitoring data, service reviews. Use this as a starting point for your analysis rather than repeating work that has already been carried out.

Monitoring data might show, for instance, that more men than women use your service, or particular communities are under-represented. This will be useful information, which will help you in your analysis.

## How to use the forms

**Commissioning services,  
Decommissioning services,  
Decision-making,  
Policies,  
Projects,  
Services,  
Strategies  
Functions**

The Equality Analysis template will give you a framework for analysing your CDDPPSSF, but this is not exhaustive and you can change or add to the framework as you wish.

In some cases, you might need more information, if you need to do some research, you will have to identify this in the equalities action plan in the final section of this document.

If the analysis indicates that you need to consider major changes to a CDDPPSSF, you will need to consult relevant communities and other stakeholders. But if the changes are minor, you might not need to consult on them; use your judgement. Staff training might be an important issue, note this in the action plan.

## Equality Analysis for other communities or groups

In addition to the 9 legislative protected characteristics or groups you may need to consider carrying out analysis to include the needs of other communities or groups of people, for example carers, looked after children, unemployed and people on low incomes, parents, lone parents or guardians or people who are homeless (see Appendix 1 for further groups). The template can be adapted as required.

## Promotion of good community relations and community cohesion

For example, if your proposals are aimed at addressing unmet needs in one community of interest, this could lead to resentment in the wider community and damage community relations, if you do not let everyone in the area know your plans and aims. This would mean explaining that the action is not about preferential treatment for some groups but to address imbalances in service provision.

## Links to other strategies, policies or action plans

You might already be taking action to improve services as part of a particular strategy, policy or plan. If so, refer to this in the comments/evidence column, rather than duplicate the whole strategy. You should also consider whether any further action is needed.

## **Assessing policies and internal services**

If the customers for your services are internal to the organisation, rather than members of the public, you still need to carry out an impact assessment on your work.

### **What is the end result?**

The ultimate aim of Equality Analysis is to improve what we do. The results will provide a baseline from which we can monitor our work on equalities. It will help the organisation to target its resources more effectively. It may also help to identify areas where improved relations with equality groups can be achieved.

## Equality Analysis process steps and role responsibilities

### Process Step 1

The responsibility for organising the Equality Analysis date, team, completing the Equality Analysis and carrying out Equality Analysis actions will be passed to the Service Manager and the

### Process Step 2

Once the Equality Analysis and actions have been approved by Head of Service or Service Manager, It is the responsibility of the Service Managers to enter the Equality Analysis actions and targets dates in the Performance Management System (Covalent) under Equalities Section. Guidance can be sought from their respective service area Equality Champion

### Process Step 3

All completed Equality Analysis (including completed Action Plan) need to be emailed to inbox of '**SLHD - Business Assurance Team**'. The Business Assurance team will file electronically in the relevant Equality Analysis year folder. It is the responsibility of the Service Manager to ensure that the Business Assurance Team receive the documents.

### Process Step 4

It is the responsibility of Service Managers in conjunction with their respective service area Equality Champions (if required) to quality assure their Equality Analysis

### Process Step 5

Sample of completed Equality Analysis will be checked by Organisational Development for quality

### Process Step 6

The Organisation has a legal responsibility to publish Equality Analysis year on year. This function will be discharged by the Business Assurance Team who will go through each Equality Analysis summary of key findings and publish in a single document on the St. Leger Homes website so they are available for public scrutiny

### Process Step 7

Any EMT/Board report that deals with commissioning or decommissioning services, developing new or formal reviews of policies, new projects not covered by existing strategies, services and strategies must have an Equality Analysis summary of key findings appendices attached. If not it must not be approved by Board /EMT

### Process Step 8

The Organisational Development Team will provide any specialist advice and guidance needed as well as training for managers and equality champions

## Equality Analysis at a Glance

These guidance notes will help you to carry out an Equality Analysis.

**C**ommissioning services,  
**D**ecommissioning services,  
**D**ecision-making,  
**P**olicies,  
**P**rojects,  
**S**ervices,  
**S**trategies  
**F**unctions

Successful Equality Analysis leads you towards identifying how the organisation's CDDPPSSF can be best delivered to meet the needs of all including disadvantaged or vulnerable communities and aims to reduce any adverse effects on communities.

Equality Analysis is a way of finding out whether your actions or proposals will affect some communities or groups of people differently.

Such differential treatment could lead to unfair decisions and unlawful treatment by the organisation. Equality Analysis should help to avoid this.

Please note that all **new** CDDPPSSF or those under review or being substantially changed should be analysed.

Service areas must decide which of their CDDPPSSF will be analysed, based on a number of factors, including:

- The impact on external customers and if this will differ for different communities
- Likelihood that staff or customers will be affected differently
- Whether the function will affect relations between communities
- Any statutory obligations that apply
- Whether the service is specifically designed to tackle discrimination or disadvantage.

Equality is not about treating everybody the same. For example, providing a service for everybody only on a Friday will adversely affect certain religious groups. Equality means making sure that the individual requirements of different people and different communities are taken into account.

Therefore, you need to consider the likely impact or barriers in relation to **protected characteristics**:

- **Race and ethnicity**

This includes BME (Black and Minority Ethnic) and non-BME communities including Refugees and Asylum Seekers, Gypsies and Travellers.

- **Gender**

Including impact on male and female.

- **Gender Identity**

This includes transgender.

- **Disability**

This involves using the Social Model of Disability. For more information see Appendix 1 or contact the Organisational Development Team.

- **Age**

This involves considering the needs of both older and young people and people of working age.

- **Faith/religious or other beliefs**

- **Sexual orientation**

This includes people who are lesbian, gay or bisexual.

- **Pregnancy and Maternity**

- **Marriage and Civil Partnerships**

- Other groups who might not have equal access to your service such as Carers, Parents, lone parents and guardians, homeless people, looked after children, people living in fuel poverty etc. (see Appendix 1)

### **Equality Analysis Team**

A small group of at least 3 (upto 5) people should carry out the Equality Analysis, including people who know the function well. The group should include someone who will make sure that any actions or targets feed in to service plans. See above 'who is involved in equality analysis' for suggestions on how to do this.

### **Record Keeping**

Keep records of your decisions and the actions. Use the Equality Analysis Template to record the key points of your analysis. The completed analysis needs to be considered by the Head of Service for approval and comments.

## Equality Analysis Steps

### Step 1 – Aim

It is important at the start of the Analysis to spend time to briefly identify the purpose and aims of the CDDPPSSF. This should include consideration of any specific objectives and how these will be delivered:

- What are you trying to achieve and for whom
- Who are the main stakeholders and what do they want
- Who needs to contribute to meet the objectives
- Are there any individuals or groups who might be prevented from benefiting from the service.

**This information can be entered in the ‘Aim and Scope’ section of the Equality Analysis template**

### Step 2 - Fact Finding

Gather any relevant equalities and customer information or data that exists in relation to the delivery of the CDDPPSSF. This should include any research, statistics, performance indicators, customer feedback, information and reports from earlier consultation.

You will need to assess and identify any gaps in the information you have and make a decision about whether you need that information now in order to complete your analysis. In many cases the information you have will be incomplete, especially in relation to religion or belief, and sexual orientation. However, you should continue with the analysis and include an action within your action plan for finding out more about how this information can be obtained as the service is developed.

If you have not already done it, you will need to identify how you will involve people from different equalities groups in the delivery of your service.

**This information can be entered in the ‘What Equality Information is available’ section.**

### Step 3 – Engagement

Do you have a plan with clear reasons for carrying out engagement? This is a fundamental part of the Analysis to find out what other people think of your policy, services or ideas and actions: To avoid engagement fatigue, find out if any similar consultation exercises have taken place and use their findings. If you do this, and feel confident that your actions will have clear benefits, you might find that you don’t actually need to consult at this point. It should include:

- Feedback from service users, members of the public, managers and staff on how well the policy or service is being delivered to a wide range of people

- Discussion on any proposed changes to how the policy or service will be delivered to test them out before implementation
- A review of the service information and outcomes to promote/celebrate success with details of how you will consult with services users and those who don't
- Different techniques to promote the policy or service to gain greater access and awareness
- A summary of the comments received with feedback to people you've consulted to show how their views have been taken into consideration.

**This information can be entered in the 'Engagement undertaken and key Findings' sections of the EA template.**

### Step 4 – The Analysis

Use the information that has been gathered to analyse whether there is likely to be a negative impact upon any individuals, groups or communities. Then think about the actions you will need to take to remove or avoid these barriers.

- Are the premises and/or environment from where the policy or service will be delivered from easy for everyone to find, get into or use, safe and user friendly
- Does the data/information highlight any differential impact, and if so for whom
- Do you have a strategy that makes communication and information as accessible to as many people as possible
- Is a system in place to measure and evaluate how people from different equality groups are involved in and benefiting from the policy or service
- What methods have you used to consult with and get feedback from a range of individuals, groups and communities
- Are there any particular training needs arising for staff involved in delivering the policy or service to diverse communities.

If people have to pay for your service, or if a service provides particular benefits or concessions, is this fair for everyone and how will changes to these costs affect different groups?

**This information can be entered in the 'How do you think the Policy/Service meets the needs of different Communities and Groups' section of the EA template.**

### Step 5 – Think of Alternatives

You may have to do things differently if your Analysis highlights any important differences or barriers to any individual or group from accessing your service. This will mean coming up with alternative ways for delivering the service where the impact will not be reduced. For example, you may need to develop different delivery strategies for different groups to ensure that the service you are delivering is appropriate and accessible to them all. The following should be considered:

- What are the options
- What are the costs associated with each option and how can they be resourced

- How does each option affect different groups or communities
- Do your opening times, appointment and waiting systems, timescales or deadlines suit everyone
- Will the alternatives promote equality of opportunity, improved treatment and access
- How will people know about the new way(s) of delivery so that they can benefit.

**This information can be entered in the 'Analysis of the actual or likely effect of the Policy/Service and the Does the Service/Policy provide any improvements/remove barriers' sections of the EA template.**

## Step 6 - Human Rights Implications

Taking human rights into account when designing and delivering services is good for business. It is likely to improve the quality of our service and improve the organisation's reputation. Making sure we comply with human rights can also improve our organisation's performance during inspection and regulation.

There are three types of rights:- **Absolute rights:** These cannot be breached or restricted under any circumstances. **Limited rights:** These can be limited in the particular circumstances set out in each Article. **Qualified rights:** These can be limited to the extent necessary to achieve certain important objectives, like protecting public health, or security.

The rights contained in the following articles are those which are most likely to be relevant to work in social housing.

- **Article 6 - Right to a fair trial** (absolute right),
- **Article 8 - Right to respect for private life, family life and the home** (qualified right)
- **Article - 14 Prohibition of Discrimination** (qualified right)

If you need assistance on the Human Rights Act please contact your Service Manager or Service Area Equality Champion.

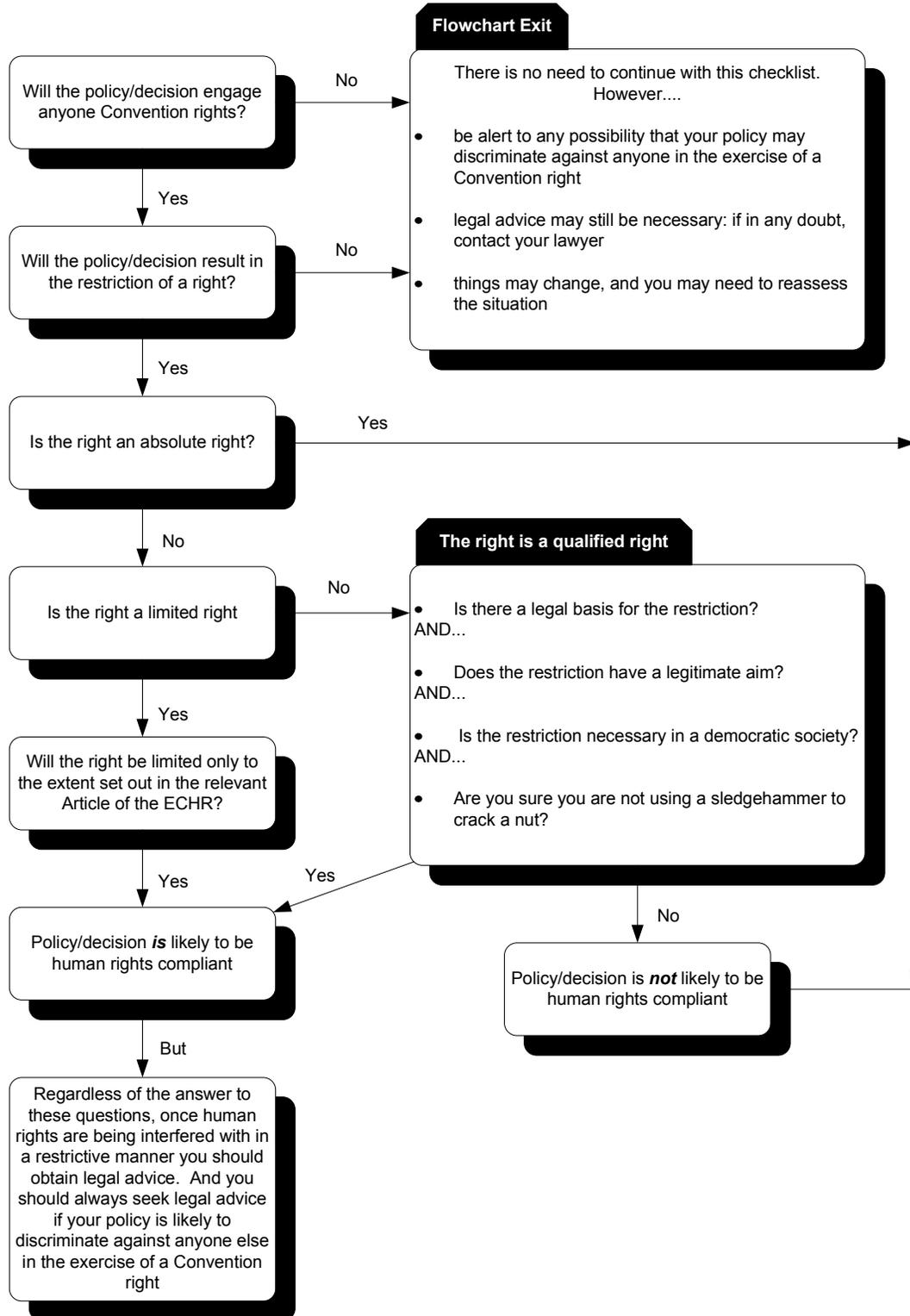
The Human Rights Flowchart is provided as a decision making aid for staff carrying out Equality Analysis to ascertain whether the policy change is likely to have a Human Rights Implication.

Further Reading:

<http://www.equalityhumanrights.com>

**This information can be entered in the 'Any Specific Human Rights implication' sections of the EA template.**

# Human rights flowchart



## Step 7 – Action Plans and Equality Targets

Simply collecting data is of little benefit. The main reason is to review what the information is telling you so that you make improvements or changes if these are necessary. Therefore, before finalising your Analysis, you must identify what actions you must take and how you will go about monitoring the involvement of people from different equality groups. You should:

- Ensure all actions are SMART with targets for improvement
- Allocate responsibility, resources and timescale for each action or target to make sure they are carried out in a timely manner
- Review and report progress on all actions or targets as part of your service improvement plan
- Targets should set improvement rates for identified differentials in service delivery
- Amend your action plans as needed to deal with any new issues that arise from the consultation process.

**This information needs to be entered in the 'Action Plan' identifying the equality objectives and targets.**

## Step 8 – Monitoring and Feedback

Once the Analysis has been completed and the actions agreed, you should let people know the outcome by writing up a summary of the findings. Decide when and how you will review your action plans and the progress against targets. This could include further consultation or a public promotion campaign after a policy or service change has been implemented, to let people know that you have included their views after you engaged them.

Finally, it is vital that you follow through with your Action Plan and regularly report on progress. If issues arise that you could not have anticipated during the analysis, they should be picked up as part of the service improvement process. Adjust your action plans as needed to deal with these new issues.

**A copy of the completed EA should be sent to your Service Manager or Head of Service for validation if either of them were not members of the Equality Analysis team. After approval by your Service Manager/Head of Service within your Service Area, the EA and Action Plan should be entered into Performance Management System (covalent) under Equalities Actions for monitoring and reporting purposes**

If you have any questions or need any further information please contact the Organisational Development Team (01302) 862982 or (01302) 862870 or email: [mahroof.hussain.@stlegerhomes.co.uk](mailto:mahroof.hussain.@stlegerhomes.co.uk)

## Appendix 1

### **Race**

When looking at race consider different ethnic groups within the five broad census headings, and groups not listed as separate census categories, for example Middle Eastern, North African, European, Gypsies and Travellers, Asylum Seekers, Refugees and migrant workers.

### **Gender**

Remember that women and men may have different priorities in relation to what services they want and different needs for how these are provided. Men-only or women-only delivery for some services could be an option.

### **Disability or long-term limiting illness/condition**

All service providers have a duty to make reasonable adjustments for disabled people, including physical features of premises, so it is advisable to anticipate any adjustments that may be required. Consider the barriers faced by different groups of disabled people as listed below. Note also that changes to legislation mean that conditions such as MS, HIV and cancer are now covered from the time of diagnosis

- Physical impairment - such as people who have difficulty in using their arms or who have mobility issues which mean using a wheelchair or crutches
- Sensory impairment - such as being blind / having a serious visual impairment or being deaf / having a serious hearing impairment or a speech impairment
- Mental health condition - such as depression or schizophrenia
- Learning disability/difficulty - such as Down's syndrome or dyslexia or a cognitive impairment such as autistic spectrum disorder
- Long-standing illness or health condition such as cancer, HIV, diabetes, chronic heart disease, or epilepsy.

### **Gender Identity, Reassignment and Transgender**

Transgender is a wider umbrella term used to include people whose gender identity and/or gender expression differs from their birth sex. The term may include, but is not limited to, transsexual people and others who define as gender-variant. Transsexual is the term used to describe a person who intends to undergo, is undergoing or has undergone gender reassignment (which may or may not involve hormone therapy or surgery). Gender reassignment is covered by the gender reassignment provisions in the Sex Discrimination Act (SDA).

Considering the different needs of people from Trans communities can be complex. Key areas of concern include 'hate crime' and a lack of social facilities.

### **Lesbian Gay Bisexual People**

Key areas of concern include 'hate crime' and a lack of social facilities. Remember that this type of information is very personal and although people may be willing to declare their sexual orientation on surveys to aid improvement of services they may prefer it to not otherwise be known.

### **Older People**

Older people have different needs so we need to ensure the views of older people are heard and increased participation is encouraged. Communication, mobility and transport are areas we need to consider to aid this involvement, also access to learning opportunities to develop new skills.

### **Younger People**

Younger people have different needs and we need to ensure their views are heard and increased participation is encouraged along with opportunities to help develop services.

### **Religion or Belief**

Also includes people who do not follow a religion or have any particular belief system. Because 'hate crime' is a concern for many people from different faith communities this may be a factor in low responses to surveys, so imaginative ways of gathering this information could be considered and good practice established to highlight the benefits of accurate data. Consider issues around times/dates of visits and service provision being flexible to work around religious celebrations, events and regular worship.

### **Carer**

A carer is someone who looks after a partner, relative or friend who has a disability, is an older person, or has a long term condition. Carers may be paid or unpaid, can often be isolated and are of every age group and ethnic origin. We may therefore need to use more diverse approaches to delivering services and ways to consult with this group; consider using radio, internet, library services or other imaginative ways of consultation. Carers (Equal Opportunities) Act 2004.

### **Other Groups**

It is good practice to consider the profile of *all* our communities who belong to different socio-economic groups e.g. Parents, lone parents and guardians, people on low incomes, people living in fuel poverty, people who misuse drugs (legal and illegal), ex-offenders, victims of domestic violence, homeless people and to note anything of which you are already aware or that results from your research.

### **Social model of Disability**

Disabled people do not face disadvantage because of their impairments but experience discrimination in the way society is organised. This includes failing to make education, work, leisure and public services accessible, failing to remove barriers of assumption, physical, communication, stereotype and prejudice and failing to outlaw unfair treatment in our daily lives.