



Integrated Impact Assessment Guidance

**This guidance must be used in conjunction with the
Integrated Impact Assessment Toolkit**

Corporate Services

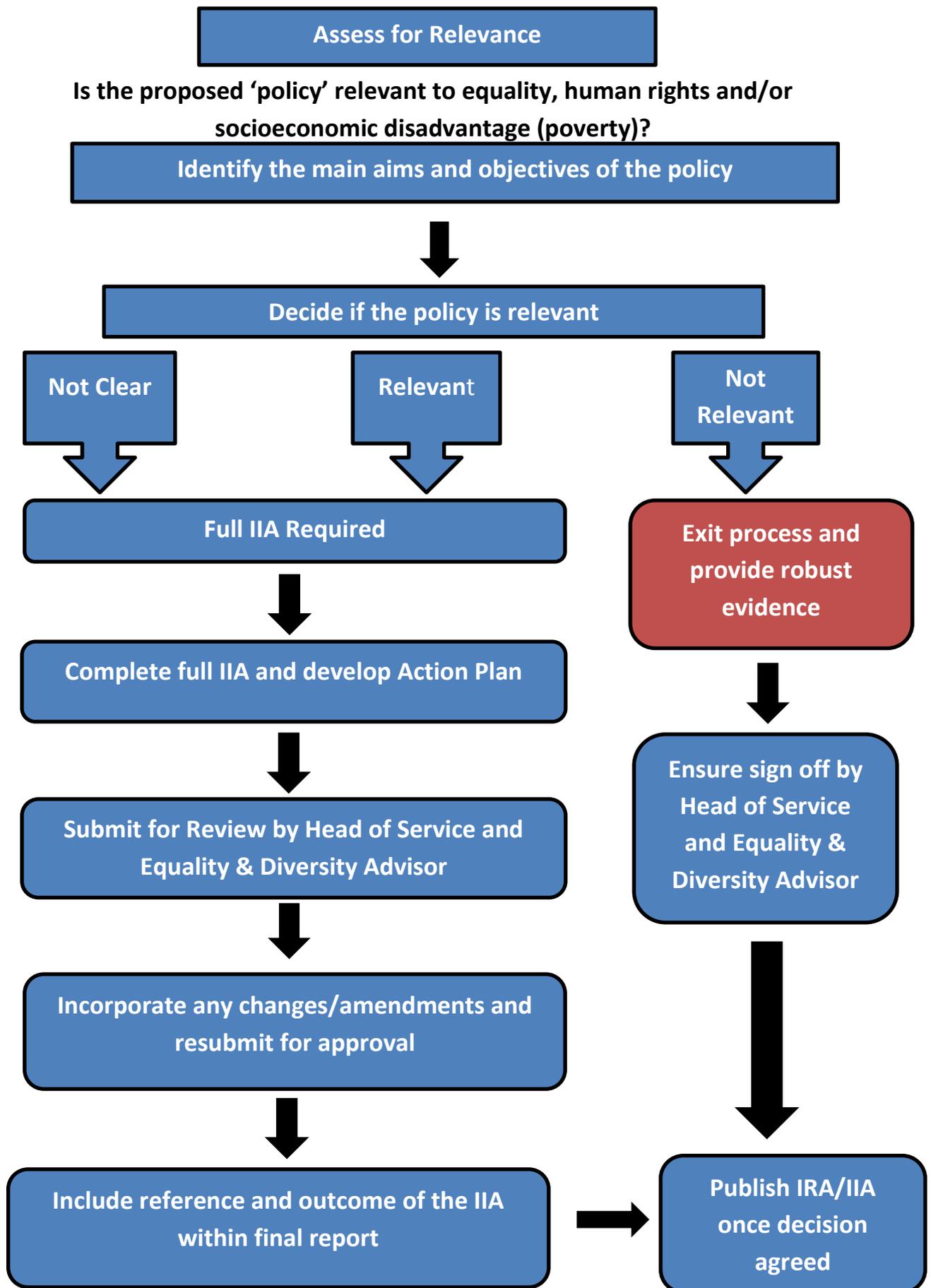
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Integrated Impact Assessment Flowchart



Part One – Understanding Integrated Impact Assessment

1. Purpose of the Guidance

This guidance document has been designed to provide you with supporting information that supports the completion of the Integrated Impact Assessment (IIA) Toolkit (separate document) and the formal IIA Training available. Please note that employees involved in the IIA process must have completed the IIA training and the mandatory corporate Equality and Diversity training, as a general understanding of equality and in particular the Protected Characteristics is required to ensure IIA is conducted effectively and appropriately.

For the purposes of this guidance the term IIA refers to both Integrated Relevance Assessment (IRA) (the screening aspect) and the full Integrated Impact Assessment process unless otherwise stated.

1.1 What is Integrated Impact Assessment

The purpose of Integrated Impact Assessment (IIA) is to ensure we comply with the law, taking account of equality, human rights and socioeconomic disadvantage (poverty) implications when making decisions. It also ensures decision makers are fully informed, at a formative stage in the decision making process.

This process will allow us to critically assess whether a 'policy' has wider impacts beyond its intended outcomes and if it impacts differentially on different groups in our communities.

The term 'policy' is used throughout this guidance note and the toolkit (separate document) and applies to policies, strategies, provisions, criteria, functions, practices, budget savings and activities, including the delivery of services.

1.2 Why is Integrated impact Assessment Required

Assessing impact is an important part of the public sector's decision making process. It is important in developing any proposal to understand how the needs of different groups and the potential barriers they may face may differ. IIA is a mechanism which enables you to consider the needs/barriers and identify any adverse impacts of different groups. It enables us to:

- Develop better policies and practices based on evidence
- Prevent or mitigate negative impacts
- Meet our legal requirements in terms of equality, Human Rights, Socioeconomic disadvantage and child poverty
- Be more transparent and accountable

We have a legal requirement to assess our 'policies' for impact to ensure we do not discriminate and to reduce inequality of outcome caused by socioeconomic disadvantage, it ensures statutory compliance and also can avoid legal action. This process also gives us the opportunity to **identify and highlight positive impacts**.

1.3 When is Integrated Impact Assessment Required

Assessing the impact is not an end in itself and should be an integral part of any 'Policy' development/change/revision/implementation etc. The regulations emphasise that it is the **impact** of applying a new or revised 'policy' that must be impact assessed and equally we must **actively consider** how we **could** reduce inequality of outcome.

The assessment process **must happen** before a 'policy' is finalised and as early in the development process as possible. The 'policy' should be developed enough to enable an objective, reasonable and clear assessment to be undertaken. The assessment **cannot** be retrospective, or undertaken only near the end of the process, but instead should be seen as integral to the development process and able to inform the consultation process.

Assessing impact does not end with the introduction of the new or revised 'policy'; it is important to monitor the actual impact of the 'policy' as it is implemented, and revisit the assessment as part of any review. Therefore, assessment of impact should be considered as an ongoing, end-to-end process, from early discussions right through to the final decision about whether to go ahead with a 'policy' or service change and beyond, to monitor the actual impact of the implementation.

In order to fulfil our general duty it is critical that all services conduct an IIA in the following circumstances;

- All significant policies, strategies, projects, service reforms/changes should have as a minimum an Integrated Relevance Assessment (IRA) built into the planning process
- All budget options for each financial year will require as a minimum to be assessed for relevance
- All reports to Council Executive require impacts relating to equality, human rights and socioeconomic disadvantage to be referenced, this should be a detailed summary included in the report and a copy of the IRA/IIA included in the background papers

All changes to council 'policy' or resources must be assessed for relevance and should be undertaken before any changes are agreed – this is a legal requirement.

N.B. It's important to consider cumulative impacts; this is especially relevant when you are making changes to a number of services across one or more service areas for example - making changes to policies for funding and delivering social care, day care, respite for carers and community transport.

Small changes in each of these policies may have a relatively minor effect on disabled and older people, but the cumulative effect of changes to these areas could have a significant effect on the participation in public life of these groups.

1.4 Who is responsible for completing an Integrated Impact Assessment

The person or persons responsible for developing the 'Policy', or delivering a service are responsible for undertaking the assessment. The duty to complete the assessment **cannot** be delegated, therefore the person with the ultimate responsibility for the 'Policy' and its implementation must be aware that the IRA/IIA is being undertaken and **must sign off the final document**. The Equality and Diversity Advisor will also have input in this process.

The IRA/IIA should be carried out as a group exercise. The Lead Officer responsible for the IRA/IIA must have completed the necessary training as detailed in section 1.1. The group should include:

- those involved in developing the 'Policy' and bring together different perspectives on the subject matter
- those who will be involved or may ultimately implement the 'Policy'
- a person with an operational or front line perspective
- those with a particular knowledge of equality issues and
- it is good practice to invite an employee representative and/or HR colleague particularly where the proposal will have an impact on service delivery or will impact on staffing arrangements or other workforce issues.

Unless in exceptional circumstances the group should consist of at least four people to bring a broad perspective, and include where possible people with protected characteristics where there are gaps in evidence.

2 Legal Context

2.1 Public Sector Equality Duty (PSED)

The Public Sector Equality Duty (PSED) (often referred to as the 'general duty') requires public bodies in the exercise of their functions, to have due regard to the need to:

1. Eliminate unlawful discrimination, harassment and victimisation and other prohibited conduct
2. Advance equality of opportunity between those who share a protected characteristic and those who do not; and
3. Foster good relations between those who share a protected characteristic and those who do not

Supplementary legislation (the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012), requires the council to be proactive in meeting the general duty of eliminating unlawful discrimination, advancing equality and fostering good relations.

Further information relating to Assessment of Impact can be found here

<https://www.equalityhumanrights.com/en/publication-download/assessing-impact-and-public-sector-equality-duty-guide-public-authorities>

2.2. Protected Characteristics

The legislation requires that people are not discriminated against, harassed or victimised on the grounds of their 'Protected Characteristic'. The Protected Characteristics are;

- age,
- disability,
- gender reassignment,
- marriage and civil partnership,
- pregnancy and maternity,

- race – this includes ethnic or national origin, nationality and also includes Gypsy/Travellers,
- religion or belief (including lack of belief),
- sex (gender),
- sexual orientation.

Every person has one or more protected characteristic; therefore the Act protects all individuals against unfair treatment.

2.3 Human Rights

Taking a human rights based approach is about making sure that people's rights are put at the very centre of policies and practices. This approach should be an embedded consideration, whether during the IRA (screening process) or when conducting a full IIA.

The PANEL principles (detailed below) are one way of breaking down what this means in practice.

In summary we need to consider, where applicable to what (if any) extent a 'policy' impacts on the key PANEL principles of Human Rights. These are as follows:-

- Participation – people should be involved in decisions that affect their rights. Participation must be active, free, meaningful and give attention to issues of accessibility, including access to information in a form and a language which can be understood
- Accountability – there should be monitoring of how people's rights are being affected, as well as remedies when things go wrong
- Non Discrimination – All forms of discrimination must be prohibited, prevented and eliminated. People who face the biggest barriers to realising their rights should be prioritise
- Empowerment – Everyone should understand their rights, and be fully supported to take part in developing policy and practices which affect their lives
- Legality – requires the recognition of rights as legally enforceable entitlements and is linked in to national and international human rights law

Human rights include "civil and political" rights, such as:

- Freedom of expression
- Freedom of religion or conscience
- Freedom of assembly
- The right to a fair trial
- The right to privacy
- The right to vote

Human rights also include "economic, social and cultural" rights, such as:

- The right an adequate standard of living
- The right to adequate food, housing, sanitation and water
- The right to education
- Rights at work

As with all impact identification; it is important to note, that the process of consideration is not limited to identifying those impacts we wish to improve or mitigate, but also where applicable, those **positive impacts** that may enhance the human rights of an individual(s).

Further information relating to Human Rights can be found here

<http://www.scottishhumanrights.com/rights-in-practice/>

2.4 Fairer Scotland Duty (Socio-economic disadvantage)

The Fairer Scotland Duty, part 1 of the Equality Act 2010 places a legal responsibility on the council to actively consider ('pay due regard' to) how they can reduce inequalities of outcome caused by socioeconomic disadvantage, when making strategic decisions.

This duty gives us an opportunity to do things differently and put tackling inequality genuinely at the heart of key decision making.

In broad terms, 'socio-economic disadvantage' means living on a low income compared to others in Scotland, with little or no accumulated wealth, leading to greater material deprivation, restricting the ability to access basic goods and services. Socio-economic disadvantage can be experienced in both places and communities of interest, leading to further negative outcomes such as social exclusion. Disadvantage can also arise depending on your social class; this is more difficult to measure and will require further consideration.

In summary, socio-economic disadvantage is focused on:-

- **low income** - cannot afford to maintain regular payments such as bills, food, clothing
- **low wealth** - enough money to meet basic living costs and pay bills but have no savings to deal with any unexpected spends and no provision for the future
- **material deprivation** - being unable to access basic goods and services i.e. financial products like life insurance, repair/replace broken electrical goods, warm home, leisure and hobbies
- **area deprivation (including communities of interest and communities of place)** - where you live, where you work, visit or spend a continuous amount of time can all have an impact i.e. rural areas, accessibility of transport, education and employment impact, people who have experienced homelessness and / or the asylum system, those who share an identity and / or a Protected Characteristic
- **Socio-economic background** – disadvantage that can arise from parents' education, employment and income – social class in other words

The council is covered by the Public Sector Equality Duty (PSED) and the Human Rights Act and we also have responsibilities in relation to child poverty as stipulated in the Child Poverty (Scotland) Act 2017. This means we can use an integrated

approach to focus on equality, human rights, socio-economic disadvantage and child and family poverty.

Although the Fairer Scotland Duty is derived from the Equality Act 2010, it is separate from the public sector equality Duty (PSED), but there are clear links between the aims of both duties as those who share particular protected characteristics are often at higher risk of socio-economic disadvantage.

Further information relating to the Fairer Scotland Duty can be found here

<http://www.gov.scot/Resource/0053/00533417.pdf>

2.5 Do I need to complete a Health Inequalities Impact Assessment

It's worth noting that there is considerable cross over between equality, socioeconomic disadvantage and health, as many of the disadvantages faced by equality groups includes poor health and health inequalities.

Health Inequalities Impact Assessment (HIIA) involves a more detailed assessment of equality, inequality of access to services, health and, in addition, human rights impacts.

For most proposals an IIA should be all that is necessary to highlight the issues that will need to be addressed and no further assessment will be necessary.

In some cases, involving major strategies and plans, it may be necessary to complete a full HIIA. Guidance and supporting documentation can be found on the Health Scotland website by following the link below;

<http://www.healthscotland.scot/publications/health-inequalities-impact-assessment-guides-and-resources>

2.6 Do I need to complete a Strategic Environmental Assessment (SEA)

Is the 'policy' likely to impact on the environment? This must be considered due to the close links between the environment, equality, human rights, socio economic disadvantage and health. The environment in which you live can have a significant impact on your life chances.

For most proposals an IIA should be all that is necessary to highlight the issues that will need to be addressed and no further assessment will be necessary.

In some cases, involving major strategies and plans, it may be necessary to complete a SEA, advice and guidance should be sought from Planning before you under any SEA.

Guidance and supporting documentation can be found on the Scottish Government website by following the link below;

<http://www.gov.scot/Topics/Environment/environmental-assessment/sea>

Part Two – Undertaking Integrated Impact Assessment

3. Assessment Process

- 3.1** There are two aspects to the assessment process, stage one screening for relevance and stage two completing a full assessment.

The types of activity that should not need to be impact assessed are:

- results from research
- reports of surveys
- meeting minutes
- progress updates

The types of activity that are likely to require a full assessment are:

- significant policies, strategies, projects, service reforms/changes, budget savings and activities
- changes that affect people i.e. employees , clients, customers, service users, members of the public
- area/partnership wide plans

3.2 Helpful points to note when completing either an IRA or an IIA are;

- the 'policy' title should be clear and as descriptive as possible and in Plain English
- the document should be free from jargon, acronyms, abbreviations and 'council speak'
- apply a simple and straightforward approach to completion of the document and do not assume that the person or persons' reading the document are aware of what the 'policy' is and what it is about
- provide as much detail is possible
- avoid making bold statements i.e. this 'policy' will not disproportionality affect any equality groups or those affected by socioeconomic disadvantage unless you have clear documented evidence that can substantiate the statement
- The process should not be completed in isolation, it's a group exercise

3.3 Stage one – Integrated Relevance Assessment (IRA)

The first stage is to consider whether a full assessment is required, this consideration should be done in the form of a screening process. Screening should be carried out at the outset of a 'policy' in order to embed and include equality, human rights and socioeconomic disadvantage at the earliest part in the process.

In order to complete the screening process effectively it is important to highlight/reflect the following:

- All available strategic documents associated with the proposed 'policy'
- Any reports, consultations, external academic research and any in-house research for example data on service uptake/access, data on populations in need, that supports and informs the aims of the 'policy'
- Areas of interest covering positive and negative impacts across all of the Protected Characteristics

- an indication of the degree of impact and how you know this
- provide a guide as to whether any impacts identified would or could be mitigated by an amendment to the 'policy'
- conclude whether more detailed work is required to address any areas of concern, unanswered questions that have arisen or conclude that no areas of concern were identified

If whilst completing stage one you identify that no impacts have been identified and there are no areas for concern, then you **must** give a **detailed explanation** to support your decision rationale. This decision will require to be signed off by the Head of Service and the Equality and Diversity Advisor.

A detailed summary of the decision rationale must be included in any council reports and a copy of the IRA included in the background papers.

It's important to note that a review of the screening process can be actioned at any time, especially if new information becomes available or unforeseen consequences arise.

N.B. As a general rule of thumb, if you have two or more ticks in either the equality or socioeconomic disadvantage sections of the IRA form then a full assessment (stage two) will be required as this indicates that impacts and/or areas for concern have been identified and require further investigation.

3.4 Stage two – Full Integrated Impact Assessment (IIA)

3.4.1 Purpose of the 'policy' (Section two of Form)

The first part of the process is to describe and provide detail on the 'policy' (remember 'policy' represents and applies to policies, strategies, provisions, criteria, functions, practices, budget savings and activities, including the delivery of services) that is being assessed for impact. It is important to describe its purpose, in other words what are the aims, objectives and intended outcomes including the context within which it will operate. This provides the context for what impacts are likely and what the intention of the 'policy' is.

3.4.2 Needs and / or barriers which equality groups may have (section three of the form) in relation to the 'policy'

Completion of this section will allow you to identify the likely impacts across the Protected Characteristics. Key points to consider are:-

- potential impacts both positive and negative on each of the Protected Characteristics
- what is the scale of the potential impact - will the introduction of the 'policy' have a significant, moderate or minor impact
- is one group likely to be more affected than another
- or is the impact more wide ranging and general in its effect
- can any impacts identified be mitigated by an amendment to the 'policy'
- use other appropriate and relevant sources to assist with the completion of this section

3.4.3 Needs and / or barriers which vulnerable groups falling into poverty and disadvantage may have (section four of the form) in relation to the 'policy'

Completion of this section will allow you to identify the likely impacts on vulnerable groups. Key points to consider are:-

- potential impacts both positive and negative on each of the vulnerable groups
- what is the scale of the potential impact - will the introduction of the 'policy' have a significant, moderate or minor impact
- is one group likely to be more affected than another
- or is the impact more wide ranging and general in its effect
- can any impacts identified be mitigated by an amendment to the 'policy'
- use other appropriate and relevant sources to assist with the completion of this section

3.4.4 Action Plan (section five of the form)

This section should be used to identify any actions that are required to be undertaken to further inform the process. For example whilst completing sections three and / or four you identify that you have insufficient information or data about how the 'policy' might affect one group or another therefore you decide to consult and engage with this group.

3.4.5 Consultation and Engagement (section six of the form)

This section should be used to record the following information:-

- who will be or has been involved in the consultation and engagement process
- state what groups will be or have been involved in the process and describe their involvement
- describe any planned involvement saying when this will take place and who is responsible for managing the involvement process
- describe the results of the consultation and engagement process and how you have taken this into account.

Remember you will need to consider the individual needs of those you are consulting and engaging with. For example is the event being held in a location that is accessible to disabled people, do you require to book interpreters/translators, is the day chosen for the event 'a day of rest/worship' for certain religions/beliefs, does the location of the event have suitable public transport links, are gender neutral toilets available, does the location present safety issues for those attending if the event is being held at night, how do you intend to consult and engage with employees who are absent from work and / or off on maternity/paternity leave.

3.4.6 Data and Information (section seven of the form)

This section should be used to record the following:-

What equality data, poverty data, research, information or other evidence has been used to inform this assessment?

(Information can include, for example, surveys, databases, focus groups, in-depth interviews, pilot projects, reviews of complaints made, user feedback, academic publications, and consultants' reports)

- a. What information or other evidence has been used in the development of the policy?
- b. What does research, consultation and other data or information tell you about the impact of the policy? (Describe the information and the conclusions, and state where the information can be found).
 - (i) Quantitative (numbers, percentages, statistical data)
 - (ii) Qualitative – (written/spoken words, opinions, surveys)
- c. Describe any gaps in the available information, and record within section five (Action Plan Section), action you are taking in relation to this (e.g. new research, further analysis) and when this is planned.
- d. Give details of any existing local or national evidence which has been used to inform the development of your policy.

3.4.7 Mitigating Actions (section eight of the form)

This section of the form should be used to record the following:-

If the 'policy' has a negative/adverse impact on a particular group/s, but is still to be implemented, please provide justification for this.

Note: If the 'policy' is unlawfully discriminatory under the Equality Act 2010 and/or is having a negative impact on poverty and socioeconomic disadvantage under the Fairer Scotland Duty, you MUST identify, how the 'policy' can be amended or justified so the Council acts lawfully.

- a. How could you modify the 'policy' to eliminate discrimination or to reduce any identified negative impacts? If necessary, consider other ways in which you could meet the aims and objectives.
- b. How could you modify the 'policy' to create or maximise the positive aspects of the proposals and to increase equality and reduce poverty and socioeconomic disadvantage.
- c. Describe any modifications which you can make without further delay (for example, easy, few resource implications).
- d. If you propose to make any of the modifications shown above, describe any potential new negative impacts on other groups in society or on the ability to achieve the aims and how you will minimise these.
- e. Please describe the resource implications of any proposed modifications taking into account financial, people and property issues.

3.4.8 Monitoring and Review (section nine of the form)

This section of the form should be used to record the following:-

- a. How will the implementation and impact of the policy be monitored, including implementation of any amendments? For example, what type of monitoring will there be? How frequent?
- b. What are the practical arrangements for monitoring? For example, who will put this in place? When will it start?
- c. How will results of monitoring be used to develop future policies?
- d. When is the policy due to be reviewed?
- e. Who is responsible for ensuring this happens?

There will almost certainly be a range of actions that arise from the assessment process. It is recommended that the Assessment recommendations and actions required are reviewed after six months if possible and as a minimum no longer than 12 months. Assessment review dates should be built in to service plans and the person who owns the 'policy' will be responsible for ensuring the actions are followed up.

3.4.9 Recommendation and Reasoning (section 10 of the form)

This section of the form should be used to record the following:-

- Implement proposal with no amendments
- Implement proposal taking account of mitigating actions (as outlined in section eight)
- Reject proposal due to disproportionate impact on equality, human rights, poverty and socioeconomic disadvantage

Lastly you must give a reason for your recommendation and ensure the lead officer and the Head of Service or Depute Chief Executive signs off the assessment.

The lead officer is responsible for ensuring the final assessment is published on council website once the decision to implement has been agreed, this is a legal requirement.

A summary of the decision rationale must be included in any council reports and a copy of the IIA included in the background papers.

4 Data Sources

Although by no means an exhaustive list, listed below are some helpful data sources for you to consider when gathering evidence during the assessment process.

Equality and Human Rights Commission - www.equalityhumanrights.com

Scottish Government Equality Evidence Finder –
<http://www.gov.scot/Topics/People/Equality/Equalities/DataGrid>

Scottish Government - <http://www.gov.scot/Home>

Census Scotland - <http://www.scotlandscensus.gov.uk/>

Joseph Rowntree Foundation - www.jrf.org.uk

Chartered Institute of Personnel and Development – www.cipd.co.uk

Advisory, Conciliation and Arbitration Service (ACAS) – www.acas.org.uk

Office for National Statistics – www.ons.gov.uk

Poverty Alliance - <http://www.povertyalliance.org/>

Inclusion Scotland – www.inclusionScotland.org

LGBT Youth Scotland - www.lgbtyouth.org.uk

Stonewall UK – www.stonewall.org.uk

Stonewall Scotland - www.stonewallScotland.org.uk

Scottish Transgender Alliance - www.scottishtrans.org

Equality Network - www.scottishtrans.org

Royal National Institute for the Blind (RNIB) - www.rnib.org.uk

Guide Dogs - www.guidedogs.org.uk

Enable Scotland - www.enable.org.uk

See Me - www.seemescotland.org

Scottish Association for Mental Health - www.samh.org.uk

Centre for Mental Health - www.centreformentalhealth.org.uk

Cancer Research - www.cancerresearchuk.org