Integrated Impact Assessment Toolkit

Corporate Services
Revised March 2018

Contents

Section 1   What is Integrated Impact Assessment

1.1.1 Introduction

West Lothian Council provides services to a diverse community and the decisions made by the council can have a profound influence on the health and wellbeing of that community.

Integrated Impact Assessment (IIA) aims to enable the council to meet its legal duties to consider equality, human rights and health when considering changes to 'policy' or services or implementing new policies or services. It also provides an opportunity to identify and tackle any unanticipated impacts on the wider causes of poor outcomes in our communities, such as inadequate housing, low educational achievement, low income, reliable and accessible transport, poverty, stigma and social inequality. This process will also allow the council to critically assess whether a 'Policy' has wider impacts beyond its intended outcomes and if it impacts differentially on different groups in our communities.

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

1.2   Legal Context

1.2.1 Public Sector Equality Duty (PSED)

Section 149 of The Equality Act 2010 came into force in April 2011, introducing a new Public Sector Equality duty. 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 was introduced by the Scottish Government in 2012 (the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012). This legislation was introduced with the express purpose of enabling the better performance of the PSED contained in s149 (1) of the Equality Act 2010. This supplementary legislation requires Local Authorities to be proactive in meeting the general duty of eliminating unlawful discrimination, advancing equality and fostering good relations.

1.2.2 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 of the protected characteristics; therefore the Act protects all individuals against unfair treatment.

Undertaking an IIA is one way to ensure council policies meet these legal requirements.

Assessing the likely impact of our plans and services also makes good business sense, as it is important in developing any proposal to understand the needs of different population groups.

One of the main aims of the PSED is to improve transparency and accountability and this is also a priority for the Council when it comes to reporting on potential 'policy' changes and other equality related issues.
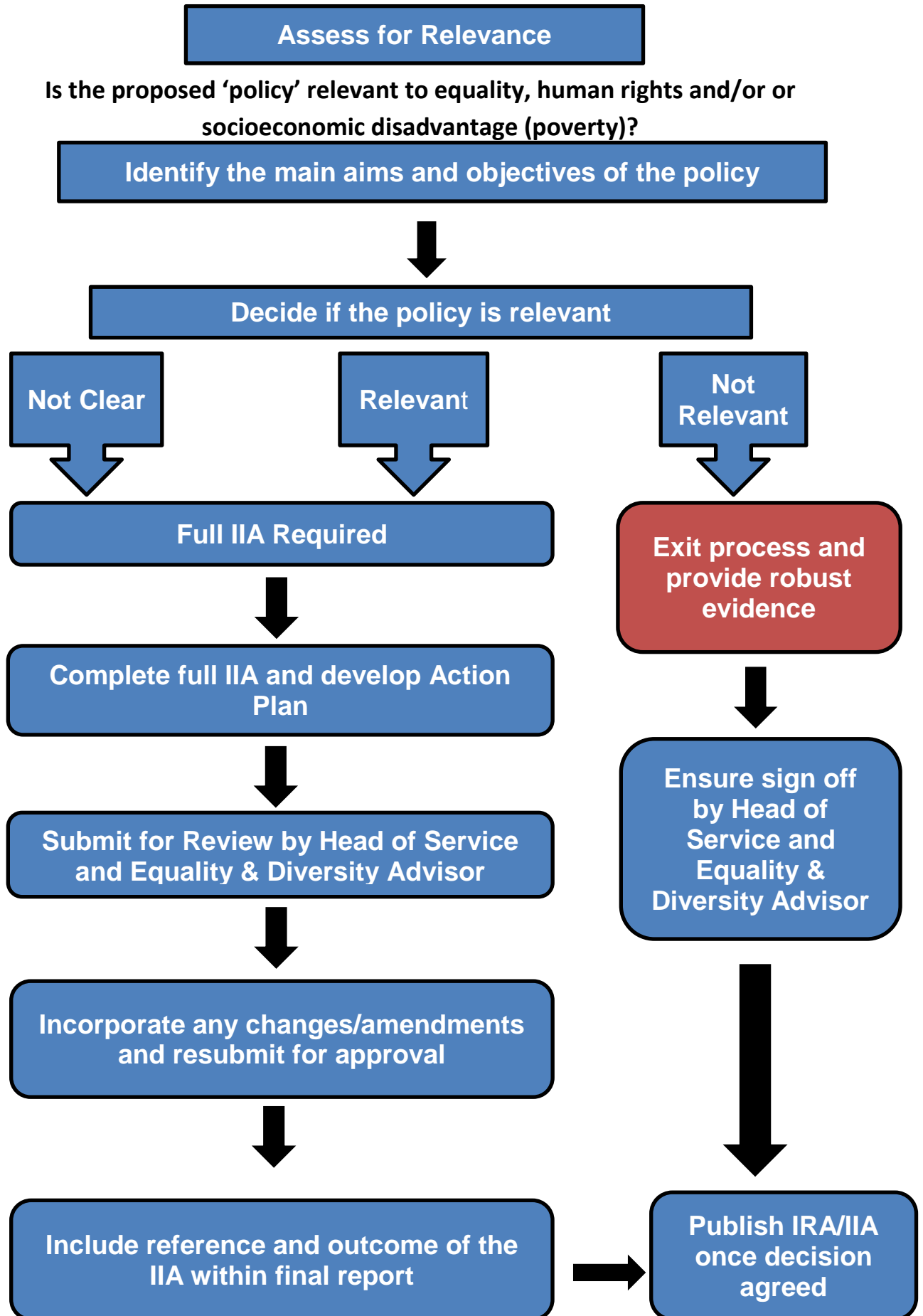
1.3   Definition of Policy

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

Everything we do as a council has the potential to impact on equality, human rights and socioeconomic disadvantage and have relevance to the Public Sector Equality Duty (PSED) in the Equality Act (2010) and the corresponding supplementary 'Specific Duties' contained within the Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012 , Fairer Scotland Duty (part 1 of the Equality Act 2010), Human Rights Act 1998 and the Child Poverty (Scotland) Act 2017, therefore Integrated Impact Assessment (IIA) should not be restricted to a review of formal 'policy' documents or written action plans.

1.4   **Integrated Impact Assessment Flowchart**

Assess for Relevance

Is the proposed 'policy' relevant to equality, human rights and/or or socioeconomic disadvantage (poverty)?

Identify the main aims and objectives of the policy

Decide if the policy is relevant

Not Clear

Relevant

Not Relevant

Full IIA Required

Exit process and provide robust evidence

Complete full IIA and develop Action Plan

Submit for Review by Head of Service and Equality & Diversity Advisor

Ensure sign off by Head of Service and Equality & Diversity Advisor

Incorporate any changes/amendments and resubmit for approval

Include reference and outcome of the IIA within final report

Publish IRA/IIA once decision agreed

West Lothian Council

Integrated Relevance Assessment Form

1. Details of proposal	
Policy Title (include budget reference number if applicable)	Education Benefits Online Applications
Service Area (detail which service area and section this relates to)	Anti-Poverty Service
Lead Officer (Name and job title)	Jack Wiggins – Service Designer
Other Officers/Partners involved (list names, job titles and organisations if applicable)	Elaine Nisbet – Anti-Poverty Manager Nicola Reid - Financial Inclusion Team Manager Stuart Isbister – Senior Customer Service Officer Kirsty Rodger – Senior Section Leader Gavin Baxter – Section Leader Fiona Fisher – Section Leader
Date relevance assessed	09/07/2020

2. Does the council have control over how this policy will be implemented?			
YES	✓	**NO**	☐

3. The General Duty of the Equality Act 2010 requires public authorities, in the exercise of their functions, to have due regard to the need to:

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

NB: In this section you must also consider the Human Rights Act and the key PANEL(Participation, Accountability, Non-Discrimination, Empowerment and Legality) principles of Human Rights – (further detail on what these are, are provided in the guidance document)

Which groups of people do you think will be, or potentially could be, impacted upon by the implementation of this policy? You should consider employees, clients, customers and service users (Please tick below as appropriate)	
Age - Older people, young people and children	Yes
Disability - people with disabilities/long standing conditions	Yes
Gender reassignment - Trans/Transgender Identity – anybody who's gender identity or gender	No

expression is different to the sex assigned to them at birth	
Marriage or Civil Partnership – people who are married or in a civil partnership	No
Pregnancy and Maternity – woman who are pregnant and/or on maternity leave	No
Race - people from black, Asian and minority ethnic communities and different racial backgrounds	No
Religion or Belief – people with different religions and beliefs including those with no beliefs	No
Sex - Gender Identity - women and men (girls and boys) and those who self-identify their gender	No
Sexual Orientation – lesbian, gay, bisexual, heterosexual/straight	No

4. Do you have evidence or reason to believe that this policy will or may impact on socio-economic inequalities? Consideration must be given particularly to children and families

Socio-economic Disadvantage	Impact – please tick below as appropriate)
Low Income/Income Poverty – cannot afford to maintain regular payments such as bills, food, clothing	Yes
Low and/or no 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	Yes
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	Yes
Area Deprivation – where you live (rural areas), where you work (accessibility of transport)	No
Socioeconomic Background – social class i.e. parents education, employment and income	Yes

5. Integrated impact assessment required?
(Two **ticks (✓)** above = full assessment necessary)

YES	✓	**NO**	☐	

6. Decision rationale – if you have ticked no above, use this section to evidence why a full IIA is not required

Signed by Lead Officer	Jack Wiggins
Designation	Service Designer
Date	01/06/2020
Counter Signature (Head of Service or Depute Chief Executive responsible for the policy)	Donald Forrest
Date	3 August 2020

- **No assessment required – process ends**
- **Include** a detailed summary of the decision rationale in any council reports and include a copy of the IRA with the background papers.
- **Full Assessment required – continue to Full Assessment Form**

Full Integrated Impact Assessment Form

1. Details of proposal	
Details of others involved	Nicola Reid - Financial Inclusion Manager Stuart Isbister – Senior Customer Service Officer Kirsty Rodger – Senior Section Leader Gavin Baxter – Section Leader Fiona Fisher – Section Leader
Date assessment conducted	23/07/2020

2. Set out a clear understanding of the purpose of the policy being developed or reviewed (what are the aims, objectives and intended outcomes) including the context within which it will operate.
Policy to be reviewed is the change of Education Maintenance Allowance, Free School Meals and Milk, and School Clothing Grant applications from being solely paper based to being shifted to an online application form. This will operate within the newly formed Anti-Poverty Service, being transferred from Education Services. The aims are to improve the customer journey, making it easier for applicants to apply, whilst also streamlining back office processes so that customers receive decisions quicker.

3. Please outline any needs and/or barriers which equality groups (People with Protected Characteristics) may have in relation to this policy

Age	**What effect/difference will the policy have on people** **Older parents (who are more likely to be less technically literate) may have more difficulties in applying**
	How do you know that **Discussions with potential applicants during user research**

Disability	**What effect/difference will the policy have on people** **May be less able unable to apply online due to disability.**
	How do you know that Discussions with disabled people whilst doing user research
Gender Reassignment – **Trans/Transgender Identity**	**What effect/difference will the policy have on people** **None**
	How do you know that **No impact on ability to use computer/devices**
Marriage or Civil Partnership	**What effect/difference will the policy have on people** **None**
	How do you know that **No impact on ability to use computer/devices**
Pregnancy and Maternity	**What effect/difference will the policy have on people** **None**
	How do you know that **No impact on ability to use computer/devices**
Race	**What effect/difference will the policy have on people** **None**
	How do you know that **No impact on ability to use computer/devices**

Religion or Belief	**What effect/difference will the policy have on people** **None**
	How do you know that **No impact on ability to use computer/devices**
Sex - Gender Identity	**What effect/difference will the policy have on people** **None**
	How do you know that **No impact on ability to use computer/devices**
Sexual Orientation	**What effect/difference will the policy have on people** **None**
	How do you know that **No impact on ability to use computer/devices**

4. Please outline any needs and/or barriers which may affect vulnerable groups falling into poverty and disadvantage in relation to this policy

Vulnerable groups may include the following;

- **Unemployed**
- **Single parents and vulnerable families**
- **People on benefits**
- **Those involved in the criminal justice system**
- **People in the most deprived communities (bottom 20 SIMD areas)**
- **People who live in rural areas**

- **pensioners**
- **Looked After Children**
- **Carers including young carers**
- **People misusing services**
- **Others e.g. veterans, students**
- **Single adult households**
- **People who have experienced the asylum system**

- **Those leaving the care setting including children and young people and those with illness**
- **Homeless people**
- **People with low literacy/numeracy**
- **People with lower educational qualifications**
- **People in low paid work**
- **People with one or more Protected Characteristic**

What effect/difference will the policy have on people
All groups – should be easier to apply for EMA in the most part.

May have issues accessing/using a computer and uploading documents.

How do you know that
User research with members of the public.

5. Action Plan

What action/s will be taken, by whom and what is the timescale for completion

Actioner Name	Action Date
Jack Wiggins/Stuart Isbister	**04/06/2020**

What is the issue
Forced use of electronic device to apply

What action will be taken
A paper form to be used by those who cannot access/use the online form will be developed and will be available within schools.

Progress against action
Draft Form has been developed – to be issued.

Action completed	Date completed

30/07/2020	
Actioner Name	**Action Date**
What is the issue	
What action will be taken	
Progress against action	
Action completed	**Date completed**
Actioner Name	**Action Date**
What is the issue	
What action will be taken	
Progress against action	
Action completed	**Date completed**
Actioner Name	**Action Date**
What is the issue	
What action will be taken	
Progress against action	
Action completed	**Date completed**

Actioner Name	**Action Date**
What is the issue	
What action will be taken	
Progress against action	
Action completed	**Date completed**
Actioner Name	**Action Date**
What is the issue	
What action will be taken	
Progress against action	
Action completed	**Date completed**
Actioner Name	**Action Date**
What is the issue	
What action will be taken	
Progress against action	
Action completed	**Date completed**

6

Actioner Name	Action Date
What is the issue	
What action will be taken	
Progress against action	
Action completed	Date completed

Actioner Name	Action Date
What is the issue	
What action will be taken	
Progress against action	
Action completed	Date completed

Actioner Name	Action Date
What is the issue	
What action will be taken	
Progress against action	
Action completed	Date completed

Actioner Name	Action Date
What is the issue	
What action will be taken	
Progress against action	
Action completed	**Date completed**

6. Details of consultation and involvement

Who will be or has been involved in the consultation process

a. **State which groups are involved in this process and describe their involvement.**

b. **Describe any planned involvement saying when this will take place and who is responsible for managing the involvement process.**

c. **Describe the results of the involvement and how you have taken this into account.**

User Research was undertaken within ASDA Livingston in February 2020. This included speaking to potential parents of applicants to understand their ability to use an online form. Further User Research was undertaken at Bathgate Academy Parent's Evening in March 2020 to understand what users would need from an online form to make it work for them.
Testing was then undertaken with users of the service in June 2020 to ensure the form was useable and development was continued.

This involvement resulted in a variety of user needs being establish which the team have worked towards meeting in the development of the new service.

7. Data and Information

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.**

Evidence used included primarily user research conducted first hand with potential users of the service.

Feedback from users indicated that an online application method would benefit them and help make applications easier. A list of user needs was derived, and indicated that the solution needed to be accessible, easy to use, and cater for many different user groups. This is what we have tried to deliver.

Online applications benefit the customer as they will no longer have to collect a form from an office/school, and then return it. This saves the customer time and effort, and it is hoped this approach would encourage

more applications. Online applications also allow us to catch common mistakes before they are submitted, meaning less time spent on both sides chasing for incomplete or innacurate information.

8. Mitigating Actions

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.

To eliminate any digital discrimination it is proposed that a paper back up application form is accepted and will be available via schools in the same manner that has been there previous years. This will mirror the online application form and will be offered if an applicant cannot use the online application process.

As COVID-19 restrictions ease, and Customer offices reopen, members of the public can be directed to public access machines to access the digital offering.

Individuals can also be directed to Adult Learning to gain the skills required to not only complete the online form, but also to access others forms of help and support.

9. Monitoring and Review

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?

Please detail below
Applications will be monitored by both the Digital Team and the Benefit Support Team for the first few weeks, and this will then be handed over to the Benefit Support Team in the Anti-Poverty Service. This will be monitored by the number of paper applications received. It is expected that these will be low, however there should still be some. Results will be checked to ensure this approach works for all and will be replicated in future developments as required. Due to be renewed annually. Financial Inclusion Team Manager will be responsible.

10. Recommendation and Reasoning

☐   Implement proposal with no amendments
✓   Implement proposal taking account of mitigating actions (as outlined above)
☐   Reject proposal due to disproportionate impact on equality, poverty and socioeconomic
    disadvantage

    Reason for Recommendation

Implement with Digital First approach – ensure paper option becomes available in a reasonable timescale before applications close (at least six weeks before, but as soon as practicable).

Signed by Lead Officer	Jack Wiggins
Designation	Service Designer
Date	27/07/2020
Counter Signature (Head of Service or Depute Chief Executive responsible for the policy)	Donald Forrest
Date	7 August 2020

- **Integrated impact assessment completed**
- **Final assessment must be published on the council website once the decision to Implement has been agreed:**
  Council EQIA Publication Page
- **Link must be included in "Background References" section of committee/management reports**