

**Audit Wales
National Report**

Equality Impact Assessments: more than a tick box exercise?

Recommendations/Improvement Areas

Overview and Scrutiny Committee 25 January 2023

Equality Impact Assessments: more than a tick box exercise?

Published September 2022

<p>What are we trying to achieve, the outcome</p>	<p>As set out in our current Strategic Equality Plan, our aim is to make Rhondda Cynon Taf a place where everyone matters and where no one experiences discrimination or disadvantage because of their identity or background. In doing so, seeing everyone in Rhondda Cynon Taf as an equal citizen whilst recognising that people will have different needs. As the largest employer in the area, RCT leads by example and fulfils its legislative duties to ensure Rhondda Cynon Taf is a place where discrimination and prejudice have no place, because its the right thing to do.</p> <p>Our Corporate Plan 2020-24 sets out our approach to treat residents equally, with understanding and respect, with all having access to quality services, whether they wish to engage with the Council in English or Welsh.</p>
<p>Why we need to do it:</p>	<p>Over recent years we have been working to strengthen and improve our use and application of data and information to shape decisions that impact on residents both now and in the future. Lessons learnt about our communities from our experience of dealing with the pandemic, particularly in areas of high deprivation, have confirmed the value of ensuring that within communities, no one is left behind. Part of this work has been to continue to strengthen and embed Equality Impact Assessment and associated processes into the business of the Council to shape/inform decision making, as well as meet our statutory duties. We welcome the Audit recommendations/improvement areas to support and challenge our progress.</p>

	Recommendations	Council's response	Next Steps	Time Scale	Responsible Officer
1.	<p>Clarifying the scope of the duty to impact assess policies and practices</p> <p>There is scope for confusion about which type of policies and practices must be subject to an assessment for their impact on the public sector equality duty.</p> <p>The Welsh Government should clarify its interpretation of the duty, including whether and how it expects public bodies to apply any test of proportionality and relevance.</p>	<p>Agree with recommendation</p> <p>The Council would welcome clarity in this respect</p>	Contribute to and keep abreast of Welsh Government changes to address this recommendation.	Ongoing	Christian Hanagan/ Melanie Warburton
2.	<p>Building a picture of what good integrated impact assessment looks like</p> <p>Many public bodies carry out integrated impact assessments that include consideration of the Public Sector Equality Duty (PSED) alongside other duties. But practice is inconsistent and often involved collating multiple assessments in one place, rather than being truly integrated, to help maximise the intended benefits of integrated impact assessments, the Welsh Government should work with key stakeholders with an interest in the</p>	<p>Agree with recommendation</p> <p>The processes and duties could be better integrated at national level in order to maximise the real value added rather than the processes arising from the plethora of reporting etc. duties to which they are subject.</p>	Contribute to and keep abreast of Welsh Government changes to address this recommendation.	Ongoing	Melanie Warburton

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	areas commonly covered by integrated impact assessments and those with lived experiences, to share learning and work towards a shared understanding of what good looks like for an integrated impact assessment.				
3.	<p>Applying the equality duties to collaborative public bodies and partnerships</p> <p>The public sector landscape has changed since the introduction of the PSED and the Welsh specific duties, with an increasing focus on collaborative planning and delivery. The Welsh Government should review whether it needs to update the Wales specific regulations to cover a wider range of collaborative and partnership arrangements. These include public services boards, regional partnership boards and other service specific partnerships.</p>	<p>Agree with recommendation.</p> <p>There is a clear disconnect between the past and current requirements in respect of collaboration and the implications where partners are subject to differing requirements.</p>	Contribute to and keep abreast of Welsh Government changes to address this recommendation.	Ongoing	Melanie Warburton
4.	<p>Reviewing public bodies' current approach for conducting EIAs</p> <p>While there are examples of good practice related to distinct stages of the EIA process, all public bodies have lessons to learn about their overall</p>	<p>Agree with recommendation</p> <p>See also Key Improvement Areas below</p>	Continue to review and consider all relevant guidance and information, including	March 2024	

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	approach. Public bodies should review their overall approach to EIAs considering the findings of this report and the detailed guidance available from the EHRC and the Practice Hub. We recognise that developments in response to our other recommendations and the Welsh Government's review of the PSED Wales specific regulations may have implications for current guidance in due course.		the Equality Impact Assessment in Wales Practice Hub , pending the findings arising from the Welsh Government Review of the PSED Wales specific regulations		

	Key Improvement Areas	Council's response	Next Steps	Time Scale	Responsible Officer
AWEQIA01	Greater clarity over which type of policies and practices must be impact assessed	<p>Agree -see above re national clarity.</p> <p>Locally, we reviewed and strengthened our Equality Impact Assessment and associated processes to reflect the requirements of the Socio- Economic Duty in 2021/22. We know there is more to do to embed the Equality Impact Assessment and the associated processes, integrate with wider processes for data informed decisions,</p>	<p>See above re Welsh Government findings.</p> <p>In the meantime, how the Council is applying the Public Sector Equality Duty PSED has been reflected in the Equalities section of the Council's Self Assessment, considered by Governance and Audit Committee in December 2022 and Council on 18 January 2023.</p>	Dec 22 Jan 23	Melanie Warburton/Lesley Lawson

	Key Improvement Areas	Council's response	Next Steps	Time Scale	Responsible Officer
		improve visibility and demonstrate the added value for residents.	We will also use AW findings to continue to challenge and strengthen our arrangements.	30 Jun 23	Melanie Warburton
AWEQIA02	Greater clarity about the arrangements for assessing the impact of collaborative policies and practices	Agree There is currently no defined process for assessing the impact of collaborative policies and practices.	We will consider how EQIA processes can be strengthened to better incorporate collaborative policies and practices as part of our ongoing review of best practice.	March 2024	Melanie Warburton
AWEQIA03	Greater clarity about expectations to consider the PSED as part of an integrated impact assessment	Agree The Council's Impact Assessments, including the PSED Impact Assessment, are currently stand alone, i.e. are not integrated. Any future plans to integrate the Assessments will include the PSED. In the meantime, there are opportunities to raise greater awareness of the requirements, processes and outcomes of the PSED Impact Assessment.	As indicated above, EQIA01 we will review Equalities and Human Rights Commission (EHRC) and Practice Hub guidance ensuring that best practice is incorporated into existing arrangements and processes. Take steps to strengthen support to services through the development of a wider range of information/materials, e.g. videos and e-learning.	March 2024	Melanie Warburton

	Key Improvement Areas	Council's response	Next Steps	Time Scale	Responsible Officer
AWEQIA04	Better and more timely identification of the practical impacts of decisions on people and how different protected characteristics intersect	Agree We recognise we need to do more to engage with people with protected characteristics and how this intersects with the practical impacts of decisions.	We are currently reviewing our approach to engagement with people with protected characteristics will take account the findings within the report as part of this review	Dec 2023	Melanie Warburton / Chris Davies
AWEQIA05	More engagement and involvement of people with protected characteristics	Agree We recognise we need to do more to engage with people with protected characteristics. We are currently reviewing our approach and will take account the findings within the report to review our approach. The Council would welcome further guidance from Welsh Govt in this respect.	We will continue to review our approach and widen engagement with people with protected characteristics. The findings Research Project currently being supported Regional Infuse Programme will be used to inform and strengthen our approach. We will engage with Welsh Government to seek further guidance.	Sept March 2024	Melanie Warburton/ Chris Davies

	Key Improvement Areas	Council's response	Next Steps	Time Scale	Responsible Officer
AWEQIA06	Better monitoring of the actual impacts of policies and practices on people. A shift in the mindsets and cultures to move EIA away from being seen as an add-on 'tick box' exercise	Agree We are currently developing of a single and consistent source of Council within a new Data Repository. This resource will also provide easy access to relevant data that will inform/support and challenge the Equality Impact Assessment and greater opportunity and for more robust and integrated monitoring of impacts of policies and practices etc on people both now and in the future.	As well as putting in place the Data Resource we will consider how we can develop processes to better monitor the impact of decisions and review existing practices and monitoring frameworks so that they are integrated into the Council's monitoring framework.	Data Resource in place by July 2023 Monitoring Frameworks in place Dec 2023	Melanie Warburton/Chris Davies Melanie Warburton/Lesley Lawson