

**DAVENTRY DISTRICT COUNCIL
IMPACT NEEDS REQUIREMENT ASSESSMENT**

Stage 1: Scope of the assessment

Under the Equality Standard the impact and needs/requirement assessment should cover race, gender and disability. The scope of the assessment may be extended to address other equality categories, (sexual orientation, religion/belief, age). (The INRA can be extended further to take into account the related issues of social inclusion and community cohesion). The advantage of this wider approach lies in developing a more integrated response to these issues. *Questions would need to be adapted to take these additional issues into account.*

Responsibility and ownership

Service area
Internal Audit
Lead officer
Scott Peasland (Audit Manager)
Officers responsible for assessment
Katie Jones (Performance Manager)
Others involved in the assessment – peer review/external challenge

Preliminary assessment

The first stage is to reflect on the current policy. In developing your views an initial 'brainstorming' session with colleagues may help.

What do you think are the main issues relating to race/gender/disability within your service/policy area?

Each individual auditor is responsible for ensuring that they conduct their own work with due professional care, which requires them to, amongst other things, be impartial, fair and not allow prejudice or bias to override their objectivity. Therefore, to ensure the service is not compromised, it is paramount that all auditee's are treated fairly and consistently.

Each auditor is asked to sign an annual declaration on due professional care, conduct and independence.

In answering the above question, think about:

- How does current policy currently meet needs around race/gender/disability?
- Are there any obvious barriers to accessing the service e.g. language, physical access, opening times etc?
- Where do you think improvements could be made?
- Have issues of equality been identified in this area of service within other local authorities?
- What do other officers in the service area think?
- What do you know already about equality impact or need?
- Is there any evidence that there is higher or lower take-up by particular groups?
- Have there been any demographic changes or trends locally?
- Is there any indication that particular policies create problems for specific groups?
- Where can relevant information be accessed?
- Are there any equality objectives?

What do stakeholders/peers think of the preliminary view?

All audit clients are asked to complete a post-audit questionnaire and score / provide comment on the conduct of the audit, including assessing the professionalism and objectivity of the auditor. Any returns are assessed upon receipt and overall satisfaction is evaluated annually and reported within the IA Service Plan. Any adverse results

are discussed with the Corporate Manager (Business Manager)

In developing your views on the service you should ask a number of stakeholders or people who might offer a challenge to the views you have developed.

Who might do this?

- An equality officer in your authority or external to the authority
- Representatives from local communities
- Representatives from local or national interest groups from the voluntary sector
- Black/disabled/women's staff groups
- Local access group

Assessing the preliminary evidence

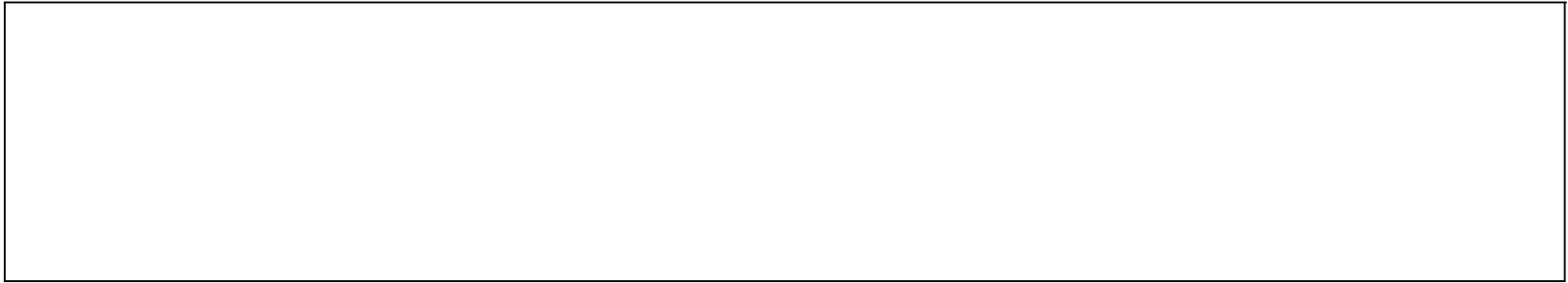
The above statements are a requirement of the service in meeting the CIPFA Code of Practice for Internal Audit.

- The initial review should form the basis for an assessment that will help you set out the terms of reference for your impact/needs/requirement assessment.

Consider the following:

- What is the scope of the assessment?
- What additional data will be needed? (see section on collecting data below)
- How does this service link to other service areas and other INRA?
- What additional assistance is needed to carry out the assessment?

Terms of reference for Stage 2 of the assessment



Stage 2: Detailed Questions for INRA

Assessing the aims and criteria for policies and procedures in delivering the service

What are the aims of the policy/procedures in place? <i>What needs is it designed to meet?</i> <i>What are the current priorities?</i>
IA is a statutory service provided in line with the Accounts & Audit Regulations 2003 (revised 2006). The CIPFA Code depicts the requirements of providing an effective service to meet best practice.
<i>Are the aims consistent with the council's Comprehensive Equality Policy?</i>
Yes.
Could these be in conflict with equality of opportunity or equal service provision? <i>How is the policy framed or targeted?</i>
No.
Is there any evidence of the way the policies/procedures impact on specific groups? Through Complaints/feedback, Consultation and Research <i>See guidance on consultation below</i>
No

Is there any evidence of differential and adverse impact around race/gender/disability (***see explanatory notes section below***)

No

Are there any unmet needs/requirements that can be identified that affect specific groups? (***When looking at requirements refer to provisions of Disability Discrimination Act***)

No

What can be done to improve access to/take up of services?

N/a.

What is the justification for taking these measures?

N/a.

Stage 3: Decisions and Recommendations

What are the main conclusions from the assessment? Is there evidence of adverse impact? <i>Is there evidence of unmet needs requirements?</i>
N/a.
Stakeholder comments on main conclusions
N/a.
What recommendations are made on the basis of the conclusions and comments? Should we: <ul style="list-style-type: none">• Take any forms of immediate action?• Develop equality objectives and targets for race/gender/disability based on conclusions?• Initiate further research?
N/a.
Consider resource allocation for actions and timetable

Collecting data

In most cases the initial INRA will rely on existing data sources. Additional data may be collected as part of the assessment and further consultation may be carried out. The decision will depend on the judgement of the team. There are likely to be data gaps at this stage but the collection of new data could be one of the 'equality objectives' emerging from this initial assessment. This would then be included in the service plan for the following year or in an action plan

Decide what data and management information is needed

- Use both quantitative or qualitative data
- Ensure there is information that allows all perspectives to be taken into account
- Identify and document any gaps in data. Explain how these gaps will be addressed. The team may have to generate primary data.
- Identify all current and relevant data sources (this list is indicative and should be broadened to accommodate other data)
 - Satisfaction rates
 - Performance Indicators
 - BVPI data
 - Access Audits
 - Census data Latest census ONS
 - Benchmarking
 - Results of consultation
 - Current Equalities forum
 - Workforce profile

Consultation – some questions to consider

- Is there enough information from recent consultation to give you the information you require
- Does the service have on going dialogue with relevant interest or user groups?

Depending on the existence or not of recent and reliable consultation results an authority needs to ask the following questions:

- Who do we need to talk to?
- What groups or individuals have legitimate interests?
- How do we ensure that they are part of the consultation?
- What methods do we employ?
- How do we make it accessible?

Which of the above methods is likely to yield best results given that some of the individuals and groups are considered 'hard to reach' by the authority

- What resources are available?

What time scale is set for obtaining information; are there staff with appropriate skills; are translation facilities available?

Differential and Adverse Impact

The purpose of carrying out an Impact/Needs/Requirement Assessment (INRA) under the Equality Standard is to provide the basis for creating Equality Objectives and Performance Indicators that will drive improvement and change in delivering equalities. The INRA may provide a number of possible outcomes.

1. The INRA shows that employment practices or services have a different impact measured by race/gender/disability.
2. The INRA shows a different impact which is demonstrated to be adverse impact on one or more groups
3. The INRA shows no differential impact in employment practices or service delivery
4. There is insufficient evidence to judge whether there is differential impact
5. The INRA indicates that there is unmet need across one or more groups

It should be clear that if the outcome demonstrates adverse impact then the authority should be taking immediate action to remedy the situation and objectives would be set accordingly. However, where outcome of the INRA falls into one of the other categories set out above there will be also be a need to set objectives. The purpose of these objectives will be to

- Improve the quality of data/research so that there is a clearer understanding of impact
- Develop 'good race relations'/ 'good equality practice'
- Deliver Corporate Equality Policy/ corporate objectives on equality

No Differential Impact/ Not Enough Evidence

In carrying out an assessment, the assessment team will frequently find that they don't have enough information to make an assessment. In this case they would consider whether to

- a) carry out immediate research, or
- b) set up equality objectives and targets that will fill the gap. This may involve new forms of data collection or research.

They may also consider their service with reference to 'good practice' inside the authority and outside. By doing this they may identify objectives to promote good equality practice.

No Evidence of Impact/ Insufficient Clarity

In many cases the outcome from the INRA will be 'no evidence of adverse impact' or at least the impact may be unclear. In these cases the team should consider

- whether there is evidence of unmet need.
- objectives that will improve information/evidence

Differential and Adverse Impact

Identifying adverse impact is a key part of the INRA process. In making a judgement of adverse impact the assessment team are likely to go through a number of stages to find out if different groups are disadvantaged:

- First they will have measured through their collection of data, a different impact of their employment practices or service delivery on women or black and minority ethnic groups or disabled people.
- Secondly they will have examined whether this different impact is adverse. Does it disadvantage or discriminate unfairly against any of the groups in a way that is unlawful. (This may be a difficult decision to make and where adverse impact is indicated then legal or expert opinion may be required)
- Thirdly, having established that there is adverse impact, identify potential solutions to remedy the situation.
- Finally, set objectives to achieve the preferred solution within a reasonable timescale.

The question of adverse impact and its interpretation in law may be complex but the purpose of INRA is for local authorities to develop awareness and take reasonable action. The timescales for reasonable action will depend on the scale and nature of the problem identified. The following example illustrates how the findings of differential or adverse impact may be dealt with in practice.

**Source: DIALOG – THE EQUALITY STANDARD FOR LOCAL GOVERNMENT
GUIDANCE 2 & 3.**