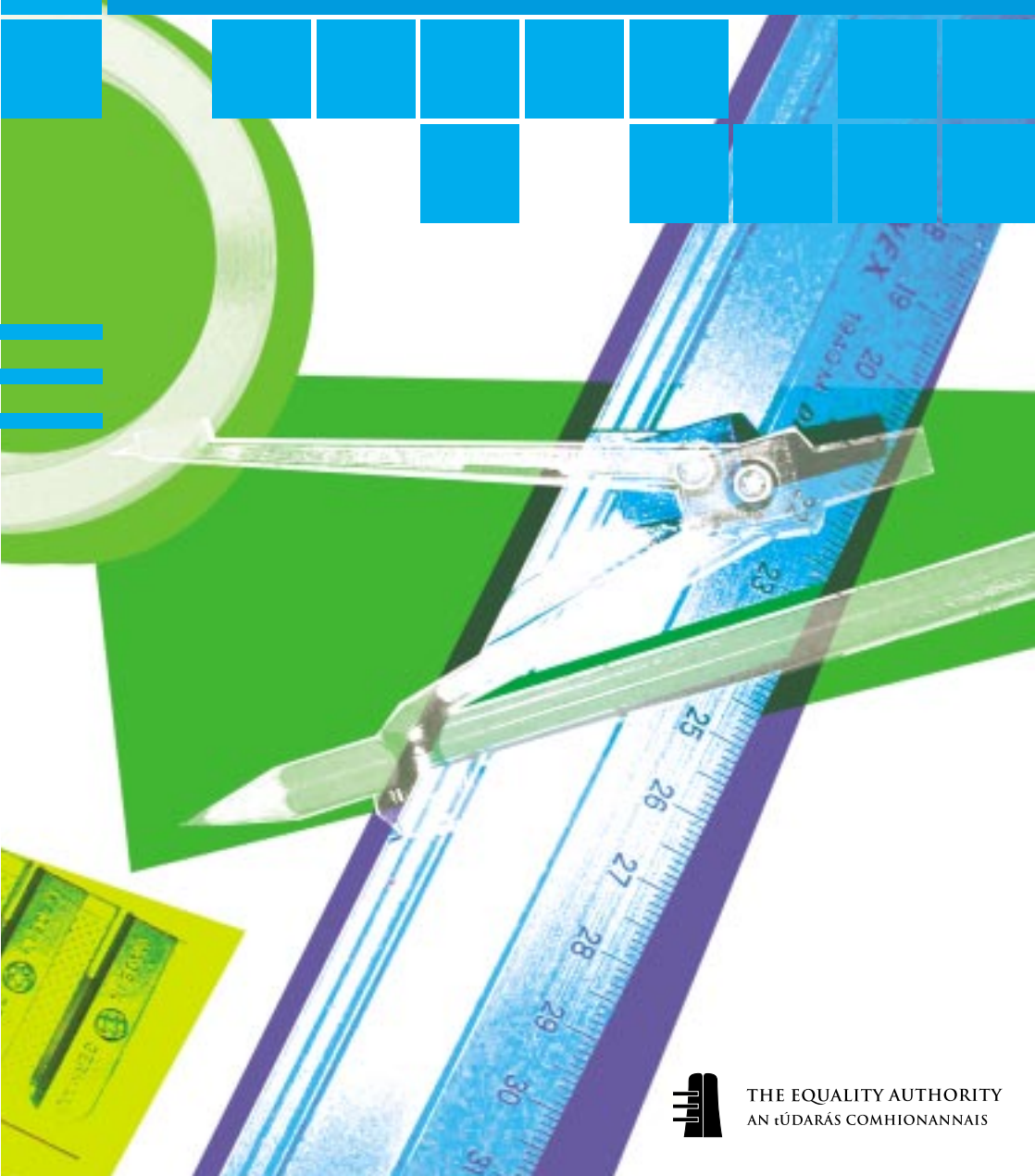


Equality Impact Assessment:

Initial Guidelines for the City & County Development Boards



THE EQUALITY AUTHORITY
AN tÚDARÁS COMHIONANNAIS

Introduction

In this context, the overall objective of an Equality Impact Assessment is to support actions proposed by City/County Development Boards to be delivered in a way that is relevant to and inclusive of groups experiencing inequality. It is a way to check that the design and delivery of actions have the capacity to accommodate diversity. By doing this, it will assist in achieving positive impact for all groups.

The purpose of this document is to provide City/County Development Boards with a model for an equality impact assessment that can be applied to the design and delivery of agreed actions in their strategy plans. It is envisaged that this exercise would be relatively simple and be consistent with the equality proofing template which was used by many of the City/County Development Boards when drafting their strategy plans.

This document sets out initial guidelines for carrying out an equality impact assessment and illustrates these by using a case study.

The focus for an equality impact assessment will be the nine grounds covered by the Employment Equality Act 1998 and the Equal Status Act 2000. These are:

- gender
- age
- race
- marital status
- disability
- religion

- family status
- sexual orientation
- membership of the Traveller community

Equality impact assessment models are very much in their infancy. These guidelines provide some core elements of an equality impact assessment and should be viewed as a first step in developing a more comprehensive model of equality impact assessment.

It is hoped that City/County Development Boards will encourage agencies involved in the delivery of services to carry out an equality impact assessment on their proposed actions.

Background

In 2002 the Equality Authority prepared a template to support City/County Development Boards in equality proofing their strategy plans. The purpose of the template was to encourage equality proofing, while recognising that equality proofing is very much in its infancy compared to other proofing systems.

Subsequently the Equality Authority completed a mapping exercise of all City/County Development Board Strategy Plans to identify any equality related measures included. This report shows that many of the City/County Development Boards applied the equality proofing template. All Strategy Plans make equality commitments to some degree. Most refer to equality either by signalling commitments to some of the

grounds covered by the equality legislation or by including specific references to equality proofing mechanisms and equality impact assessments. The Equality Authority continues to work with a number of City/County Development Boards to support the implementation of their equality commitments.

These guidelines for an equality impact assessment seek to build on this work and provide a first step tool in applying such an approach. The Equality Authority looks forward to working with City/County Development Boards in supporting their effective implementation.

Equality Impact Assessment

The Implementation Phase of the City/County Development Board Strategy Plan presents an ideal opportunity to carry out an equality impact assessment. During this phase detailed action plans containing time frames, targets and indicators, will be drawn up by the relevant agencies to progress the commitments contained in the Strategy Plans. It is at this point that an equality impact assessment could be most successfully applied. It is important to note, however, that an equality impact assessment could be carried out on an agreed action at any time.

An Equality Impact Assessment is an ex-ante exercise carried out on the proposed design and delivery of an action to assess its potential to accommodate diversity. If an action does not accommodate diversity, it is likely that the action will have an adverse impact on the groups concerned.

Definition

An equality impact assessment is an exercise that is carried out on the design and the approach to delivery of an agreed action. It aims to ensure that the action will benefit all groups covered by the equality legislation where relevant. It tests for potential adverse impact by determining the capacity of the action, in its design and delivery, to accommodate the diversity of identified groups across the nine grounds covered by the equality legislation.

If an action is found to have a potential adverse impact, an equality impact assessment provides an opportunity for the redesign of the action itself or of the approach to its delivery so that it might better promote equality. At times it may be necessary to put in place additional or specific measures that might help to reduce any adverse impact. It is necessary to note that there will be actions that have a neutral impact.

Who should carry out the equality impact assessment?

An equality impact assessment is an internal exercise. Agencies responsible for designing and delivering actions should carry out the equality impact assessment. It also requires external supports such as specific expertise and participation by relevant representative organisations external to the agency.

A step by step approach to an equality impact assessment

Step 1: Selecting the action

The first step is to select an action from the Strategy Plan. Ideally an equality impact assessment would be carried out on all actions. But this may not be possible due to time constraints, resources and practical issues. Therefore it is important to be strategic in terms of what actions are chosen. The following are some guiding principles that should assist in prioritizing actions for assessment.

(A). The scope of the action is important. If the action is to benefit all of the community, then it would be appropriate to check its design and delivery from an equality perspective.

(B). It is important to consider the scale of the action in terms of the resources identified to implement it. An action with a large budget should have a broader impact on the community as a whole and is therefore appropriate for an equality impact assessment.

Step 2: Screening

Screening, the second step, is a simple exercise to help you determine which of the nine grounds covered by the equality legislation should be included in an equality impact assessment.

It is a filtering mechanism to support the identification of groups whose diversity has practical implications for a particular action. The following table presents key characteristics or triggers to help you make this identification.

Using these triggers, you need to assess whether the diversity of each of the nine grounds has relevance for the selected action.

Examine the design and delivery of the action in light of each trigger, with a view to establishing whether the diversity it defines has practical implications for the design or delivery of the action. This should be a relatively simple step and does not require any data collection. It should result in a list of grounds to be included in the equality impact assessment.

You might wish to consult with some of the representative organisations from within the nine grounds to assist this process

The Characteristics/Triggers

Gender

“Women have traditionally been more economically dependent than men. They now play multiple roles while continuing to have primary responsibility for care.”

Marital Status

“People can be single, married, separated, divorced, widowed or cohabiting.”

Family Status

“People have a variety of caring responsibilities including caring for children, for people with disabilities and for older people.”

Age

- Younger People

“Children and young people are in learning phase of life and, in the younger years, are more economically dependent than adults.”

- Older People

“Older people are moving towards the latter phase of their working lives and many experience a reduction in their level of income and diminished access to services.”

Disability

“People with disabilities are trying to operate within a disabling social, economic and physical environment. They also have diverse needs, based upon diverse levels and types of impairment.”

Lesbians and Gay Men

“Lesbians and gay men are attracted to and may form relationships with people of the same gender. While lesbians and gay men may comprise up to 10 percent of any given population, many choose to hide their identity.”

Ethnicity

- Travellers

“Travellers have a nomadic tradition and a means of communication, beliefs, values and practices distinct from the majority culture.”

- Black and other minority ethnic groups

“Black and other minority ethnic groups have their own means of communication, beliefs, values and practices distinct from the majority culture.”

Religious Belief

“People have different religious beliefs and others have no religious belief. This can shape their values and practices.”

Step 3: Collect relevant data on the identified grounds

The screening exercise has allowed for the identification of the grounds to be included in the equality impact assessment. In order to explore what the practical implications are in more detail, data across those grounds that have been identified as relevant to the selected action should be collected.

You should approach this information gathering exercise in a practical and proportionate way. It should be seen as a way of identifying some of the key issues for the grounds in relation to the action. It is not necessary to gather all existing data on the ground but instead to collect key data of relevance to the selected action.

Think about the proposed action in terms of its implementation. This should help to guide you in terms of collecting relevant data. What you are trying to do is to identify any key data that might be available and readily accessible that will inform you about the identified groups in the area of the proposed action.

You will need to consider relevant data on each group's:

- **Situation** - the status of the group in terms of resources, housing, labour market, education etc.
- **Experience** - relationships between the group members and the wider society; and
- **Identity** - the values, beliefs and aspirations held by a particular group

Some of the data will be statistical in nature. However statistics alone do not provide the full picture and might not be available. It is also important to gather relevant qualitative information and data. Using qualitative and quantitative research published by other agencies or bodies including the community and voluntary sector and representative organisations is also important.

It is also important to collect any available local data. This will allow you identify any specific factors that might be relevant for a particular region or community.

To complete the picture it may be necessary to commission new data for some of the grounds.

For details of some sources of information please see Appendix

Step 4: Assessment of impact

The data gathered should be analysed to identify priority issues that need to be explored in relation to the design and

approach to the delivery of the action being assessed. You must then determine, using the list of identified issues, whether the proposed design and method of delivery of the action accommodates diversity and thus has the capacity to have a positive impact on the relevant groups. If an action cannot accommodate diversity it is likely to have an adverse impact. If you determine that the action is not able to accommodate the identified diversity, then steps will need to be taken to redesign the action or redesign the delivery mechanism so that it takes account of issues identified.

The following questions may help to guide this assessment.

- a) Given the data available, will the action accommodate the diversity of the identified grounds in its design and delivery?
- b) Does the action comply with equality legislation?
- c) Could the action be redesigned to better accommodate diversity and lessen any adverse impact?
- d) Could the method of delivery be re-designed to better accommodate diversity and lessen any adverse impact?
- e) Are there any further actions that could be taken to alleviate any adverse impact identified?

When considering adverse impact it is important to highlight that the equality impact assessment is about promoting equality.

Step 5: Formal consultation

At this stage formal consultation with equality interests should take place. A consultative initiative should be

organised with people and their organisations from within the groups being examined in the equality impact assessment. You should ask for views on the equality impact assessment carried out and on changes that are required to address any potential adverse impact. If there are no local representative organisations, national representative organisations can offer assistance.

Step 6: The Decision

When all available information has been considered, a preliminary assessment has been completed and feedback from representative organisations received, a decision on how best to design and implement the action must be taken. A rationale for this decision should be clearly laid out.

Those involved in this stage should have the necessary authority to ensure that any decisions that are made will be implemented. It is important that the results of the Equality Impact Assessment are available to the public. This should include a record of the steps taken and any decisions made.

Step 7: Monitoring

It is important that the action is monitored for its impact in the future. Any results from the monitoring process should be considered when reviewing the action. It is important to put in place data collection mechanisms across the grounds identified as part of the equality impact assessment in order for monitoring to be effective.

Case Study

Develop programmes for adult literacy and second chance education

Step 1: Selecting the action

This action has been chosen from an existing strategy plan. It has been chosen because the scope is wide in that it is targeted at all adults with literacy difficulties, and is intended to have a positive impact for all adults with literacy difficulties. In addition, this action is likely to have substantial resources dedicated to it.

Step 2: Screening

By examining the action using the triggers, it can be agreed that the diversity of the following grounds may be relevant to the proposed design and delivery of the action:-

Lesbians and Gay Men
Gender
Disability
Family Status
Black and minority ethnic groups
Traveller community
Older People

The information provided in the triggers gives us enough information to know that the diversity of the above grounds will have practical implications for the proposed design and delivery of programmes for adult literacy and second chance education. To understand more fully what those practical implications might be we need to collect relevant data.

Step 3: Collect the Data

The following table lists some key data on the grounds of relevance to the provision of literacy and second chance education. This data is presented, where possible across three headings:

- Situational Data
- Experience Data
- Identity Data

As was expected there is very little statistical data on the grounds in relation to literacy and second chance education. There is no data available for people with disabilities or Travellers in relation to Adult Education programmes, adult literacy or third-level programmes. However there is some useful data available on general educational levels which does break down the data at least on gender and age. The OECD International Adult Literacy Survey (IALS, 1997) notes the close links between low literacy levels and lower educational levels. Therefore any data available on educational levels will be useful for this exercise. In addition, the survey also notes an association between low income and low literacy levels. Any available data on income levels for the grounds might also be of some use.

Ground: Women

Situation: 25% of women have problems with the simplest literacy tasks. Women experience lower levels of literacy in the case of both Document and Quantitative literacy.

Experience: Women are more likely to assume child rearing responsibilities in the home and may be unable to access education programmes without childcare provision.

Women can experience attitudinal and organisational barriers based on sexism.

Identity: Specific learning processes (e.g location, methodology) may be required to secure the effective participation of women.

Ground: Men

Situation: 25% of men have problems with the simplest literacy tasks. Men are more likely to be educationally disadvantaged.

Experience: Men are less likely to engage in education programmes.

Identity: Men may not see literacy or education programmes as relevant to them. Specific learning processes (e.g location, methodology) may be required to secure the effective participation of men.

Ground: Lesbians and Gay Men

Situation: -

Experience: Lesbians and Gay men experience barriers of exclusion and harassment due to homophobia.

Identity: -

Ground: Disability

Situation: Less likely to have had access to formal education.

Experience: Experience barriers in physical infrastructure and means of communication.

Lack of access to transport is a barrier for people with mobility-related impairments
People with disabilities need materials in accessible formats.

People with disabilities can experience attitudinal and organisational barriers based on disability.

Identity: -

- Ground:** **Older people**
- Situation:** Substantially lower levels of literacy among older people (White Paper on Adult Education, July 2000).
Older people have not benefited from free access to formal education.
39% of older people (39% of the 50-59 year olds) have not completed second level (OECD, 2000).
- Experience:** Older people can experience barriers due to negative stereotypes based on ageism.
- Identity:** Specific learning processes (e.g location, methodology) may be required to secure the effective participation of older people.
-
- Ground:** **Family Status**
- Situation:** Women are more likely to assume caring responsibilities.
Unmarried and separated lone parents have considerably lower education levels than average and are more likely to experience lower levels of literacy.
- Experience:** May be unable to access programmes due to lack of childcare, of a caring infrastructure for older people and people with disabilities, and of supports for those with caring responsibilities.
- Identity:** -

- Ground:** **Black and minority ethnic groups**
- Situation:** People with no literacy skills in their mother tongue are often under represented in adult education and language programmes.
- Experience:** Black and minority ethnic people can experience attitudinal and organisational barriers based on racism.
- Identity:** A range of different languages are used English for speakers of another language can be a key literacy tool. A diversity of symbols will be employed in a context of cultural diversity.
-
- Ground:** **Traveller community**
- Situation:** Evidence of low levels of literacy across all age groups.
Are less likely to benefit from formal education.
Low levels of participation in second chance education programme.
- Experience:** Travellers can experience attitudinal and organisational barriers based on racism.
- Identity:** Traveller culture includes a nomadic dimension and could involve movement from place to place.
Traveller culture includes its own symbols and values.

For this exercise some of the main sources of data available were:

- The White Paper on Adult Education, Department of Education and Science, July 2000,
- Report of the Task Force on the Travelling Community, Irish Government, 1995,
- Commission on the Status of People with Disabilities, Irish Government, 1996,
- Implementing Equality for Lesbians Gays and Bisexuals, Equality Authority, 2002,
- Implementing Equality for Older People, Equality Authority, 2002,
- Gender and Learning, A study of the learning styles of women and men and their implications for further education and training, Aontas, 2002,
- Access and Participation in Adult Literacy Schemes, National Adult Literacy Agency, 1998,
- Submission of National Adult Literacy Agency to the National Disability Authority on Standards in Disability Services, NALA, 2002,
- Irish Vocational Education Association Policy on Educational Provision for Asylum Seekers, Refugees and other Non-nationals, An IVEA Working Group report, 2001,

- Early School Leavers, Forum report No. 24, National Economic and Social Forum, 2002.

Step 4: Impact Assessment

On considering the above data, a list of priority concerns for the grounds is identifiable.

In terms of the design and delivery of adult literacy and second chance education programmes the following are key issues:

- Need to ensure flexibility in delivery such as course times, venues etc to accommodate caring responsibilities, transport barriers and the potential for nomadism.
- Need to ensure that economic dependency is not a barrier to participation.
- Need to ensure accessibility of formats and methodologies including:
 - Materials that positively reflect cultural diversity in terms of symbols and perceptions.
 - Formats that allow communication across different types of disability including sensory, physical and intellectual impairments.
 - Methodologies that suit older people, men, women.
- Need to ensure practical initiatives are identified to address the potential range of attitudinal and organisational barriers.

- Need to ensure practical steps to communicate the benefits of the action to specific groups and in particular to men, Travellers, Black and minority ethnic groups.
- Need to assess the capacity to target resources on those groups identified as having a particular need for such programmes including Travellers, older people and people with disabilities.

At this stage the proposed design and delivery of the action must be considered in light of the above issues to ensure that it has the capacity to accommodate the diversity identified. The list of questions detailed in Step 4 should be applied. If it is decided that the action is not able to accommodate diversity then steps will need to be taken to redesign the action or redesign the delivery mechanism so that it takes account of the issues identified above.

Step 5: Consultation

The next step is to consult with equality interest groups. In this case, the following groups should be contacted:-

Local Women's Groups
Local Men's Groups
Local Disability Groups
Local Lone Parents Groups and Carers Associations
Local Traveller Groups
Local Black and minority ethnic groups
Local Lesbian and Gay Groups
Local Older Peoples' Groups

If there are no local representative organisations, the following national organisations could be contacted for assistance:

National Women's Council of Ireland
The Forum of People with Disabilities and People With Disabilities in Ireland
Irish Traveller Movement and Pavee Point
Parents Alone Resource Centre and Care Alliance of Ireland
National Consultative Committee on Racism and Interculturalism
Senior Citizens Parliament or Age Action or Age and Opportunity

(see Appendix for details)

Step 6: Decision

It is at this stage that a decision on how best to implement the action is taken. A document on the Equality Impact Assessment should be written up and made available.

Step 7: Monitoring

It will be important to monitor the implementation of the action to ensure that it does not have an adverse impact for any of the identified grounds. Data will need to be gathered in relation to participants as men and women, people with disabilities, gays and lesbians, older and younger people, carers and lone parents, Black and minority ethnic people and Travellers.

Appendix: Some Sources of Information

Ground: Gender

National Organisations:

National Women's Council of Ireland

16 South Street, Dublin 2

Tel: 01 661 5268 Fax: 01 676 0860 www.nwci.ie

National Development Plan Gender Equality Unit

Department of Justice, Equality and Law Reform

Key Policy and/or Resource Documents:

National Action Plan for Women

Department of Justice, Equality and Law Reform, 2002

Towards a Vision of a Gender Equal Society

Equality Authority, 2002

Ground: Sexual Orientation

National Organisations:

Gay HIV Strategies

Fumbally Court, Fumbally Lane, Dublin 8 Tel: 01 415 8413

National Lesbian and Gay Federation

Unit 2, Scarlet Row, Temple Bar, Dublin 8 Tel: 01 671 0939

Key Policy and/or Resource Documents:

Implementing Equality for Lesbians, Gays and Bisexuals - Equality Authority, 2002

Partnership Rights - John Mee & K, Ronayne, Equality Authority 2000

Ground: Age

National Organisations:

Age & Opportunity

Griffith Avenue, Dublin 2 Tel: 01 8057709

Age Action Ireland

30/31 Lower Camden Street, Dublin 2

Tel: 01 475 6989 Fax: 01 475 6011

National Council on Ageing and Older People

22 Clanwilliam Square, Grand Canal Quay, Dublin 2

Tel: 01 676 6484 Fax: 01 676 5754

National Youth Council of Ireland

3 Montague Street, Dublin 2 Tel: 01 478 4122

National Youth Federation

20 Lower Dominick Street

Tel: 01 872 9933 Fax: 01 872 4188

Key Policy and/or Resource Documents:

Implementing Equality for Older People

Equality Authority 2002

Ground: Religion

National Organisations:

Islamic Cultural Centre

163 South Circular Road, Dublin 8 Tel: 01 453 3242

Conference of Religious of Ireland

Tabor House, Miltown Park, Dublin 6

Tel: 01 269 8011 Fax: 01 269 8887

Ground: Disability

National Organisations:

Forum of People with Disabilities

21 Hill Street, Dublin 1 Tel: 01 878 6077

National Association for Mentally Handicapped of Ireland

5 Fitzwilliam Place, Dublin 2

Tel: 01 676 6035 Fax: 01 676 0517

People with Disabilities in Ireland

Richmond Square, Morning Star Ave,

Off North Brunswick Street, Dublin 7 Tel: 01 872 1744

National Disability Authority

25 Clyde Road, Dublin 4 Tel: 01 608 4000

Schizophrenia Association of Ireland

38 Blessington Street, Dublin 7 Helpline: 1890 621631

Disability Federation of Ireland

2 Sandyford Office Park, Dublin 18

Tel: 01 295 9344 Fax: 01 295 9346

www.disability-federation.ie

Key Policy and/or Resource Documents:

A Strategy for Equality - Commission on the Status for People with Disabilities 1996

Ground: Family Status

National Organisations:

One Parent Exchange and Network

Greendale SC, Dublin 5 Tel: 01 832 0264 Fax: 01 832 0757

Cherish

2 Lower Pembroke Street, Dublin 2 Infoline: 1890 662212

Care Alliance of Ireland

30/31 Lower Camden Street, Dublin 2

Tel: 01 475 6989 Fax: 01 475 6011

Key Policy and/or Resource Documents

Lone Parents - Report No. 20, National Economic and Social Forum, July 2001

Lone Parents Returning to the Labour Market:

Prospects in the Retail Sector P. Conroy Jackson and M. Pierce - OPEN 1999

Supporting Carers - Comhairle, 2002

Ground: Race

National Organisations:

National Consultative Committee on Racism and Interculturalism

26 Harcourt Street, Dublin 2 Tel: 478 5777 www.nccri.com

Association of Refugees and Asylum Seekers in Ireland

213 North Circular Road, Dublin 7

Tel: 01 838 1142 Fax: 01 838 1143

African Refugee Network

90 Meath Street, Dublin 8 Tel: 01 473 4523 Fax: 01 454 0745

The Migrant Information Centre

3 Beresford Place, Dublin 1 Tel: 01 888 1355

Email: mic@columban.com

The Vincentian Refugee Centre,

St Peters Church, Phibsboro, Dublin 7

Tel: 01 8102580 Fax: 01 8389950

Key Policy and/or Resource Documents

National Action Plan Against Racism

- Department of Justice, Equality and Law Reform
(forthcoming)

Building an Intercultural Society - Equality Authority,
2003.

Ground: Membership of the Traveller Community

National Organisations:

Pavee Point

46 North Great Charles Street, Dublin 1

Tel: 01 878 0255 Fax: 01 874 2626

Irish Traveller Movement

4/5 Eustace Street, Dublin 2

Tel: 01 679 6577 Fax: 01 679 6578 Email: itmtrav@indigo.ie

National Traveller Women's Forum


Unit 1, Tuam Rd Centre, Tuam Road, Galway

Tel: 091 771509

Key Policy and/or Resource Documents:

Report on the Taskforce for the Travelling Community

Irish Government July 1995



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Dublin 2
Ireland

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