



MANCHESTER
CITY COUNCIL

Stage 2 Equality Analysis: Equality Impact Assessment

Guidance and Template

Equality Analysis Overview

Due Regard

1. Equality lies at the heart of everything that Manchester City Council seeks to achieve; from shaping a city that recognises the value and the needs of all of its residents, to delivering services that improve the life opportunities of our most vulnerable people.
2. By integrating consideration of equality and good relations into our day-to-day business, we can demonstrate that we are paying due regard to the three aims of the general equality duty. The duty's three aims are:
 - I. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
 - II. Advance equality of opportunity between people who share a protected characteristic and those who do not
 - III. Foster good relations between people who share a protected characteristic and those who do not
3. Having due regard involves:
 - I. Removing or minimising disadvantages suffered by people due to their protected characteristics
 - II. Taking steps to meet the needs of people from protected groups where these are different from the needs of other people
 - III. Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low
4. The Public Sector Equality Duty requires the Council to undertake equality analysis of all of its current and proposed functions. Completing equality analysis is central to how we pay due regard.

Protected Characteristics

5. The Equality Act 2010 offers protection from numerous types of discrimination, harassment and victimisation on the grounds of a range of people's characteristics. These ['protected characteristics'](#) are:
 - age
 - disability
 - gender reassignment
 - marriage and civil partnership
 - pregnancy and maternity
 - race
 - religion or belief
 - sex
 - sexual orientation

6. The Act also offers protection on the grounds of *discrimination by association*. This provision relates to people who do not necessarily have a protected characteristic themselves, but who may face discrimination because they are associated with individuals who do have protected characteristics, for example a carer of a disabled person. For this reason, the Council has included carers in its equality analysis framework.

Getting Started

7. Although the Public Sector Equality Duty requires the Council to undertake equality analyses, it is not prescriptive about what form these analyses should take. For consistency and transparency, the Council is committed to utilising its **Equality Impact Assessment (EIA)** framework to fulfil its requirements. The EIA framework has two key stages:
 - Stage 1 – *Relevance Assessment* (see 2.2 of this guidance note for more detail)
 - Stage 2 – *Equality Impact Assessment*
8. Please consider which of these documents is most applicable to the function that you are analysing and the stage of analysis that you are at. Support, advice and guidance on this and all other stages of the EIA framework is available from the Equalities Team (see *Appendix 2* for contact details).

Completing your Equality Impact Assessment – A Step by Step Guide

*This step by step guide is for services that have identified that a Stage 2 equality analysis, **Equality Impact Assessment (EIA)**, is required. Before commencing with your EIA, please read all of this guidance note thoroughly.*

Identifying who is responsible for the EIA

1. Your EIA is owned at service-level, with officers from within the service that is being analysed taking responsibility for the data gathering, the analysis, the authoring and the action planning. Director-level sign off at the completion of the EIA means that there is a wider accountability at Directorate level.
2. Immediate responsibility sits with the 'lead manager for the analysis' – this individual will normally be a senior manager within the service (i.e. Head of Service), who is linked into the decision-making process.
3. Authoring the EIA is undertaken by the 'officer responsible for the analysis'. This will be a person from within the service who demonstrates sound analytical skills and who is able to provide a detailed insight into the function being analysed, drawing on knowledge and expertise from other colleagues within the service.

Establishing relevance

4. Before beginning your EIA, you should have first established that the function is relevant to equality by using the Stage 1 Equality Analysis: Relevance Assessment document.
5. If you have not already completed your Relevance Assessment, please do so using the tool below:

http://www.manchester.gov.uk/downloads/download/3700/equality_impact_assessments_guidance

Scoping your EIA

6. Having established relevance to equality, you will need to establish a methodology for your EIA. Scoping out this methodology will help you to break the process down into more manageable stages.

7. You should consider:
 - What relevant equality information do I have available and where can I get this from?
 - Who can support me / am I relying on to gather data?
 - Do my data display a blend of quantitative and qualitative evidence?
 - Can I use data from national and / or local research reports, the Census, ward profiles, customer profile or feedback data, complaints, recommendations from inspections / audits etc?
 - What previous data collection / research / engagement exercises can I draw on?
 - Have I gathered as thorough a body of *relevant* evidence as possible?
 - Do I have any gaps in my data and what can I do to fill these?
 - Will a desk-top research exercise fill the gaps?
 - Will a focused engagement process fill the gaps?
8. For more information on methods of engagement for Public Sector Authorities, please visit:
<https://www.equalityhumanrights.com/en/publication-download/engagement-and-equality-duty-guide-public-authorities>
9. If you have gaps in your information that can't be easily filled, consider what longer term measures you will take to fill these gaps. Ensure that actions to achieve this are referenced in the EIA action plan.

Analysing the equality information

10. Using the evidence that you have gathered, you should now be able to interrogate it to answer the question, "If I take action X, what will the actual or potential outcomes of this activity be on equality?"
11. It is important that your EIA specifically identifies *disproportionate impacts* on equality; an impact that affects all customers in the same way, regardless of whether they have a protected characteristic or not, would not be a disproportionate impact. The test is, "Does this function affect different groups of people differently?"
12. Where your EIA identifies a disproportionate impact, it will be important for you to state the nature of this impact and any actions that will be taken in response to it. This might mean adjusting some aspects of the function or could involve signposting to other services.
13. It is essential that your EIA is evidence-based and that a golden thread can be followed from your data, through your analysis to your conclusions. Do not rely on stereotypes, or on generalisations that cannot be evidenced.
14. Following your analysis, your EIA will be able to identify:
 - Which characteristics will be impacted and how, including an analysis of cumulative / cross-characteristic impacts where applicable.
 - Which aims of the equality duty (see point 2) relate to your function and how they are affected
 - How any disproportionate impacts can be safeguarded or mitigated as required.

Documenting your conclusions

15. The conclusions of your analysis should be recorded on the EIA template attached below as *Appendix 1*. All fields will expand so don't feel restricted in the detail that you provide. As this will be a publicly accessible document, it should:
 - Provide the context and detail of your function clearly, as many readers will not share your understanding of it
 - Adopt a Plain English approach: avoid abbreviations, jargon or technical terms where possible
 - Demonstrate your point clearly, evidencing how the data was analysed and what it told you
16. Where actions have arisen from your EIA, ensure that these are recorded on the EIA Action Plan at the back of the template, or that you indicate which other action plan they have been embedded within i.e. your Directorate business plan.

Tracking your progress

17. EIAs can take some time to complete from the first draft to the final document submitted to decision-makers. To help you to keep track of your progress on each EIA that you are responsible for, there is an EIA Tracker Tool available at:
http://www.manchester.gov.uk/downloads/download/3700/equality_impact_assessments_guidance

Decision making and publication

18. Your EIA should be commenced at the earliest practical stage in the decision-making process. This will normally be once a proposal has been arrived at, but before a decision is reached on it. Your EIA will analyse the impacts of the proposal on equality, to inform the final decision-making.
19. Where a proposal is subject to consultation, a first draft of the EIA can be commenced before or during consultation, based on any existing data and research. Once the consultation is closed, its outcomes can then be analysed and factored into a second draft of your EIA before being progressed to sign-off.
20. Whilst equality analysis forms an integral part of informing the Council's decision-making processes, EIAs themselves are not intended to make recommendations to decision-makers. The purpose of your EIA is to show that you have *paid due regard* to equality. It therefore shouldn't be authored towards a preordained outcome; it should simply provide an objective, evidence-based illustration of 'how it is' for decision-makers to consider.
21. Your completed EIA will require Director-level sign off to demonstrate Directorate level accountability for its contents. Sign-off must be in the form of an actual signature and not an emailed authorisation.

22. Your finished and signed EIA should then be scanned and emailed to your nominated lead officer in the Equality Team (see *Appendix 2*) for publication on the Manchester City Council website.

Monitor and evaluate

23. It is important to monitor the impacts that your EIA has highlighted and to evaluate whether the actions in your EIA Action Plan have been implemented and are effective. Where actions have not been effective, they should be revisited and revised accordingly.
24. It is recommended that your EIA review takes place 12 months after the function that was originally being assessed has become implemented. Your EIA Action Plan should timetable this review in.

Scrutiny and support

25. A selection of EIAs and Equality Action Plans will periodically be submitted for review at Overview and Scrutiny Committee meetings.
26. A process of ongoing consultation and support on equality analysis is also provided by your nominated lead officer in the Equality Team.

Appendix 1: Demonstrating Outcomes of Equality Analysis

EQUALITY IMPACT ASSESSMENT

1. Directorate		2. Section		3. Name of the function being assessed	
4. Is this a new or existing function?		5. Officer responsible for the assessment		6. Lead manager responsible for the assessment	
7. Date assessment commenced		8. Date of completion		9. Date passed to Equalities Team	

Summary of Relevance Assessment

1. Has a Stage 1 Equality Analysis: Relevance Assessment document been completed?
(double click on a check box below and select *checked*)

Yes ☐ Date of assessment:

No ☐ Please refer to 2.2 in the guidance above.

2. Please indicate which **protected characteristics** the relevance assessment identified as relevant to the function that is being assessed (double click on a check box below and select *checked*):

Age ☐, Disability ☐, Gender Reassignment ☐, Marriage or Civil Partnership ☐,

Race ☐, Religion or Belief ☐, Sex ☐, Sexual Orientation ☐.

3. Please indicate which **aims of the equality duty** the relevance assessment identified as relevant to the function being assessed (double click on a check box below and select *checked*):

Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act ☐

Advance equality of opportunity between those who share a protected characteristic and those who do not ☐

Foster good relations between people who share a protected characteristic and those who do not ☐

Equality Impact Assessment Template

1. About your function

Briefly describe the key delivery objectives of the function being assessed	
What are the desired outcomes from this function?	

2. About your customer

Do you currently monitor the function by the following protected characteristics?	Protected Characteristics	Y/N	If no, please explain why this is the case and / or note how you will prioritise gathering this equality data
	Age		
	Disability		
	Gender Reassignment		
	Marriage and Civil partnership		
	Pregnancy and Maternity		
	Race Religion or belief (or lack of religion or belief)		
	Sex		
Sexual orientation			
4. What information has been analysed to inform the content of this EIA?			

<p>Please include details of any data compiled by the service, any research that has been undertaken, any engagement that was carried out etc.</p>	
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3. Delivery of a customer focused function

Does your analysis indicate a disproportionate impact relating to Age ?	Y	N	
Please describe the nature of any disproportionate impact/s Please indicate what actions will be taken to address these			
Which action plans have these actions been transferred to?			
Does your analysis indicate a disproportionate impact relating to Disability ?	Y	N	

Please describe the nature of any disproportionate impact/s Please indicate what actions will be taken to address these			
Which action plans have these actions been transferred to?			
Does your analysis indicate a disproportionate impact relating to Gender Reassignment?	Y	N	
Please describe the nature of any disproportionate impact/s Please indicate what actions will be taken to address these			
Which action plans have these actions been transferred to?			
Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	Y	N	
Please describe the nature of any disproportionate impact/s Please indicate what actions will be taken to address these			

Which action plans have these actions been transferred to?			
Does your analysis indicate a disproportionate impact relating to Religion or Belief (including different cultures, and lack of religion or belief)?	Y	N	
Please describe the nature of any disproportionate impact/s			
Please indicate what actions will be taken to address these			
Which action plans have these actions been transferred to?			
Does your analysis indicate the potential to <i>cause discrimination</i> in relation to Sex ?	Y	N	
Please describe the nature of any disproportionate impact/s			
Please indicate what actions will be taken to address these			
Which action plans have these actions been transferred to?			

Does your analysis indicate a disproportionate impact relating to Sexual Orientation ?	Y	N	
Please describe the nature of any disproportionate impact/s Please indicate what actions will be taken to address these			
Which action plans have these actions been transferred to?			
Does your analysis indicate a disproportionate impact relating to Race (including ethnicity and nationality)?	Y	N	
Please describe the nature of any disproportionate impact/s Please indicate what actions will be taken to address these			
Which action plans have these actions been transferred to?			
Does your analysis indicate a disproportionate impact relating to Gender identity ?	Y	N	

Please describe the nature of any disproportionate impact/s Please indicate what actions will be taken to address these			
Which action plans have these actions been transferred to?			
Does your analysis indicate a disproportionate impact relating to Carers?	Y	N	
Please describe the nature of any disproportionate impact/s Please indicate what actions will be taken to address these			
Which action plans have these actions been transferred to?			
Does your analysis indicate a disproportionate impact relating to Socio-economic considerations? (including lack of digital access)	Y	N	
Please describe the nature of any disproportionate impact/s			

Please indicate what actions will be taken to address these	
Which action plans have these actions been transferred to?	

4. EIA Action Plan

Service / Directorate lead:

Strategic Director:

Equality, Diversity and Inclusion Team lead:

Actions identified from EIA	Target completion date	Responsible Officer	Is this action identified in your Directorate Business Plan and / or Equality Action Plan? (Yes / No / n/a)	Comments

5. Director level sign off

Name:		Date:	
Directorate:		Signature:	

NB: Sign-off must be in the form of an actual signature; not an emailed authorisation.

Appendix 2

Each Directorate has a nominated officer from within the Performance Research and Intelligence's, Equality, Diversity and Inclusion Team to provide consultation, advice, guidance and support.

The nominated officers for each Directorate are:

Directorate	Nominated EDI Team Lead
Corporate Core	Keiran Barnes –07989 148 324 keiran.barnes@manchester.gov.uk
Children's	Lorna Young –07904 679 204 lorna.young@manchester.gov.uk
Adults	Sofia Higgins –07989 162 966 sofia.higgins@manchester.gov.uk

Useful Background information and further reading:

Equality Act 2010: <https://www.legislation.gov.uk/ukpga/2010/15/contents>
[Equality Act Handbook for advisers](#)

Protected Characteristics:
[Equality & Human Rights Commission \(EHRC\) guides](#)

Resources on Equality Analyses:
University of Kent - [Equality Analyses](#)
[Equality Impact Analysis Toolkit](#)

Public Sector Equality Duty
[EHRC Guidance](#)