

West Lothian Council: Equality Impact Assessment

A. About the function, service, policy, procedure, project etc

- 1 What is the name of the function/service/policy/procedure/project etc (called “policy” from this point) to be assessed?

Organisation Development (formerly Learning & Development)

- 2 What were the results of the screening for relevance?

Screening for relevance is conducted by asking the following 4 questions of the topic:

1. *Which aspects of the General Duty does it relate to?*
2. *Is there evidence or reason to believe that some groups could be affected differently? Which groups?*
3. *How much evidence do you have?*
4. *Is there any public concern that functions/policies are operated in a discriminatory manner?*

The policy has a medium/high level of relevance to:

- Race Relations Act 1976 (RRA Amendment Act 2000 & 06)
- Sex Discrimination Act 1975
- Disability Discrimination Act 1995 (DDA Amendment Act 2005 & 06)
- Protection from Harassment Act 1997
- CRE Code of Practice for Rented Housing
- Recommendations of McPherson Report
- Human Rights Act 1998
- Gender Equality Act 2007

While there is not a lot of evidence or public concern to support any discriminatory practices, Organisation Development (OD) does touch strongly on several areas of employment duty across many of the main strands of equality such as disability, race, gender, age in addition to lesser strands such as role, literacy and manual/shift working.

The diversity of the workforce within Housing & Building Services encapsulated manual and office based workers, decentralised community based working, lone workers and there is a demand for varied and sometimes specialist training. There is a clear need for compliance with the general duties of equality legislation across these disciplines and therefore a need for a full impact assessment.

3 Briefly describe the aim of the policy etc.

What needs or duties is it designed to meet? Who are the intended beneficiaries? How will it affect employees? How will it affect the community and the different groups of people within it?

Is the service contracted out or delivered under a service-level agreement or with partners? Who else is involved?

In what way will you involve any of these people in the impact assessment process?

The key purpose of the OD strategy is to support the service in ensuring that the targets outlined in the Business Plan are achieved. The strategy provides a framework for all activities relating to the recruitment, retention, support and development of employees. In essence, this approach should successfully achieve the aim of having a workforce reflective of the community it serves, responsive and mindful of their collective and individual needs.

The strategic and administrative functions of this policy are delivered by a central specific Organisational Development team consisting of a manager, 3 officers and 2 admin support workers from within the structure of H & BS. One of the officers within the team works in a satellite location within Building Services as the named officer responsible for overseeing the trades apprentice programme. There is also a cascade approach to the policy with managers and staff throughout the service responsible for identifying training needs, monitoring and reviewing activities, conducting Personal Development Plans (PDP's) and the day to day activities that stem from the policy.

A wide range of random staff from all levels within the service were interviewed as part of the service's Assessment & Review inspection in October 2007, their interviews will form the basis of this report. This report will also be made widely available to all staff within the service for consultation purposes.

B. Gathering the evidence and assessing the impact

- 4 Is there any evidence (or reason to believe) that this policy could have a different effect on some groups of people compared to others? (e.g. different needs, different experiences, different outcomes, different rates of participation, different abilities to access opportunities).

Is there an adverse impact around race, gender, disability, faith, sexual orientation, age, health, etc? What are the reasons for this adverse impact?

There is no reason to believe that this policy could have different or adverse effects on varying groups of people within the service as the very nature of the strategy is based on a foundation of needs based opportunities.

- 5 Please describe the evidence or reasoning you have used to make your judgement. What existing data for example (qualitative or quantitative) have you used to form your judgement? Tell us about the information as it applies to different groups (e.g. by race, gender and disability etc).

The systems that are in place for learning & development, recruitment, support and feedback are all set up with the intention of delivering equality of opportunity to staff.

The aforementioned inspection report findings

Communities Scotland inspection report

Successful staff Learning & Development (L & D) achievements annually within the service

Recent Race Relations Training feedback

- 6 Are there any unmet needs/requirements that can be identified that affect any of the specific groups?

There are a few unmet needs, but these are general improvements required which could affect all staff rather than any one specific group. However, a risk could present if this unmet need was raised via non-compliance with the general duty of any of the disability, race, gender or age equality schemes.

C. Making changes and promoting equality

- 7 If in your judgement, the policy etc does have an adverse impact, can you modify the policy to reduce/eliminate any adverse impact?

You need to think whether your modifications will:

- have a positive or negative effect on the promotion of equality of opportunity for any group
- help eliminate discrimination in any way
- encourage or hinder community relations.

The general recommendations which could be modified and would ensure that we meet our equality duties are:

Consistent approach by managers and staff on applying and approving training course selection using the provided EMS training database. It was found that not all training courses are on this database, in order to ensure equality of access to all staff, this must be kept up to date and all available training must be entered on to the system for staff selection.

There is not a high usage of the system, the system does not operate in building services due to the nature of their outdoor/manual role. With an increasing focus on community based work, staff should all be trained in basic use of the system to enable them to book themselves on to courses. Alternative methods of informing manual tradesmen of course availability should be explored as a variety of means of promoting learning & development opportunities is required across such a diverse workforce. BSTV is used to highlight development opportunities to staff within Whitehill Depot.

Consistent and meaningful pre and post evaluation forms have been created and are used at every training event with all forms being returned to the OD team for analysis. This not only assesses knowledge and understanding, perceptions and preconceptions but also captures any equalities information relating to potential discrimination such as access to venues, alternative methods of delivery and participation.

Consistent approach to induction for all new staff members – this ensures that everyone joining the service receives the same opportunities. A new induction booklet has been developed and is available on the intranet, hard copies will be also be available.

Performance information – possibility of capturing staff equality data for all those expressing interest and undertaking training should be explored. This enables meaningful analysis of equality of opportunity, what training needs are being identified within different groups of people and how successful the existing training is for staff with no special requirements versus disabled staff, staff from varying ethnic backgrounds, different age groups, varying roles, different age groups and men and women.

- 8 If you cannot modify the policy to reduce adverse impact, consider if the impact can be justified and explain. (It is unlikely that you will be able to justify any impact which amounts to unlawful discrimination.)

If the impact cannot be justified, how do you intend to deal with it?

N/A

D. Consultation

8 What steps have you taken/are you taking to consult externally as part of your assessment?

Whom have you consulted? What methods did you use? How long was the consultation period?

Have you consulted any “experts”? Did you involve any people in the affected groups in some other way during the process?

The inspection report from which this assessment stems was conducted in full consultation with a wide range of staff with varying needs and from different backgrounds, ages, gender via interviews, shadowing, file checks and full analysis of the written policies pertaining to the topic.

The inspection process was conducted over several weeks and upon completion of this report, it will be made available to all staff for consultation for a 3 month period as outlines within the council’s consultation guide.

The report will also be submitted to the relevant Housing & Building Services teams for comment and approval:

- Housing & Building Services Management Team
- Organisational Development Team
- Assessment & Review Team

E. Next steps

10 What were the results of the consultation?

What have you done with the results i.e. how do you intend to use the information gathered as part of the consultation?

The results of the consultation has so far have been included within the recommendation of this report and those of the Assessment & Review inspection report, an important component of this report is the accompanying improvement plan which is agreed by the Organisational Development Team for action over a 2 year period.

11 Have you published the results of that consultation? If so, where?
What arrangements were made to reach specific groups affected?

The reports are made available to all staff for comment and will be made available to the equality forums within WLC. The results will then be published via the internet and their existence promoted to staff via service wide publications and office closure training sessions.

12 What are your recommendations based on the conclusions of this assessment?

See section C7.

13 Please provide us with separate information about how you intend to monitor this policy in future. What is the review date set for this policy?

This policy will be monitored by the Management/Organisational Development team on an ongoing basis through feedback and performance measures.

The impact assessment process will be repeated in 3 years time or sooner if the policy changes.

14 How will you publish the results of this assessment? What methods will you use?
What arrangements are there to reach specific groups affected?

The results of this assessment will be published in full via the intranet/internet for public and staff use and will be advertised within Tenants News, the staff newsletter, via office closures and training sessions.

The appropriate staff equality forums will also be sent a copy of the full assessment as will Disability Scotland.

15 Have you conducted any other types of impact assessment on this policy? (e.g. health, financial, environmental).

N/A

16 Is there anything else you wish to add?

N/A

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| Assessment made by: | Sarah Kelly |
| Others involved in assessment: | Frances Eglinton OD Team Assessment & Review Team Neighbourhood Response Team Youth Homelessness Team Building Services Area Housing Offices |
| <p>Summary of assessment (this will be published).</p> <ul style="list-style-type: none"> ▪ What you did ▪ What evidence you used ▪ What you found ▪ What consultation you undertook ▪ What changes you made ▪ What will happen next. | <p>Conduct Screening for Relevance/Equality Impact Assessment</p> <p>Assessment & Review Inspection Report OD Strategy Published intranet policies</p> <p>Several general recommendation which could present a minor perceived risk of discrimination</p> <p>Full 3 months consultation period</p> <p>Recommendations carried forward to team and some have already been put in place</p> <p>Published via web</p> |
| Manager's Signature | |
| Date: | |
| Service area and job title: | |

When you have completed this form, please take a copy and send it to your service representative on the Corporate Working Group on Equality and/or the Equality Officer.