

Equality Impact Assessment – Reasonable Adjustment Policy

| Question | Response |
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| 1. Name of policy / funding activity / event being assessed | Reasonable Adjustment Policy |
| 2. Summary of aims and objectives of the policy / funding activity / event | This policy aims to confirm our commitment to improving a person-centred approach to accessibility for all our customers, those identified within protected characteristic groups and vulnerable. It also sets out the guiding principles of our commitment to provide reasonable adjustments. It has an intrinsic link to the values-based approach - The BCHG Way. |
| 3. What involvement and consultation has been done in relation to this policy? | Engaged two customers with specialist knowledge. Learning from complaint handling – Case Ref 99, 147, 202,204. Input from colleagues. Reference material – Relationship of Equals, Housing Ombudsman Spotlight Report. |
| 4. Who is affected by the policy / funding activity / event? | Staff, customers, voluntary, charity and strategic partners. |
| 5. What are the arrangements for monitoring and reviewing the impact? | Whilst the policy is cross cutting taking a person-centred approach, the focus is to support our complaint handling, and will be monitored through complaint recording, and reported within the quarterly customer voice report and feature within the annual complaint learning report. |

| Protected Characteristic Group | Is there a potential for positive or negative impact? | Please explain and give examples of any evidence | Action to address negative impact (how will the policy be adjusted) |
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| Disability | Positive | This policy will support those with a visible and not visible disability on the principle that staff ask and not assume the adjustments required. | |
| Gender reassignment | Positive | This policy takes a person-centred approach and in doing so will be supportive of whatever choice a person makes. This is evidenced through customer engagement on the EDI Strategy 2023, recommended a person-centred approach. | |
| Marriage or civil partnership | Positive | This policy takes a person-centred approach driven by BCHG values | |


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| | | <p>promotes fairness and respect to marriage and civil partnership. A key principle is to ask and not assume and to take responsive action agreed with the customer. There are wider policies linked to Hate Crime and Domestic Abuse.</p> | |
| Pregnancy and maternity | Positive | <p>Being pregnant or having children may be a factor where reasonable adjustment is required. Training is given to staff in raising awareness on domestic abuse and safeguarding, which has higher probable presentation https://maternityaction.org.uk/wp-content/uploads/VAWG-report-November-2019.pdf The person-centred approach will ask the customer and agree action with them.</p> | |
| Race | Positive | <p>This policy takes a person-centred approach is driven by BCHG values, so our staff do not make assumptions or stereotype. The policy guideline principles state we ask the customer and agree action with them. The use of language line or another member of staff fluent in a language is encouraged. There is Hate Crime Policy in place to support this policy area. Further ongoing training will take place to cover any gaps identified.</p> | |
| Religion or belief | Positive | <p>This policy takes a person-centred approach driven by BCHG values that promotes fairness and respect to religious beliefs. Key principles are to ask and not assume and take responsive action such as female staff accommodate the needs of visiting and speaking to females for cultural sensitives. To make adjustment for privacy and mindful of meeting locations and understand the communication needs.</p> | |

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| Sexual orientation | Positive | This policy takes a person-centred approach driven by BCHG values promotes fairness and respect to sexual orientation. A key principle is to ask and not assume and to take responsive action agreed with the customer. There are wider policies linked to Hate Crime and Domestic Abuse. | |
| Sex (gender) | Positive | This policy takes a person-centred approach driven by BCHG values promotes fairness and respect to sexual orientation. A key principle is to ask and not assume and to take responsive action agreed with the customer. There is a link to Domestic Abuse policy. | |
| Age | Positive | An anticipatory assessment proactively aims to identify risk. This policy has guideline principles to be inclusive to ask and not assume. BCHG has a safeguarding panel to raise any awareness and this policy has a pathway to this. | |

Evaluation

| Question | Explanation / justification |
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| Is it possible the proposed policy, activity, event, or change in policy, activity or event could discriminate or unfairly disadvantage people? | No – the purpose of the policy is to remove disadvantage and therefore positive. |

Final Decision

| | Tick the relevant box | Include any explanation / justification required |
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| 1. No barriers identified therefore proceed . |  | <p>This Policy advances equality, respect and fairness.</p> <p>It can help reduce escalation and improve outcomes.</p> <p>Person- centred approach that look to an anticipatory proactive assessment to design out disadvantage and reactive recognise, record and</p> |

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| | | respond approach through which BCHG can learn and improve. |
| 2. You can decide to stop the policy or practice at some point because the data shows bias towards one or more groups | | |
| 3. You can adapt or change the policy in a way which you think will eliminate the bias | | |
| 4. Barriers and impact identified, however having considered all available options carefully, there appear to be no other proportionate ways to achieve the aim of the policy or practice (e.g. in extreme cases or where positive action is taken). Therefore, you are going to proceed with caution with this policy or practice knowing that it may favour some people less than others, providing justification for this decision. | | |

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| Date completed | 12 April 2024 |
| Completed by | Ramesh Malhan |
| Review date | November 2026 |

EIAs should be published alongside the relevant policy, activity, event.

EQUALITY IMPACT ASSESSMENT

Equality Impact Assessment Guidance and Template

This document provides guidance when completing an Equality Impact Assessment (EIA). The EIA template can be found at the end of this document.

What is an Equality Impact assessment (EIA) and why do we need to complete one?

An equality impact assessment (EIA) is an evidence-based approach designed to help organisations ensure that their policies, practices, events and decision-making processes are fair and do not present barriers to participation or disadvantage any protected groups from participation. This covers both strategic and operational activities.

The term 'policy', as used throughout this document, covers the range of functions, activities and decisions for which your organisation is responsible, including for example, strategic decision-making, arranging strategy & funding panels, conferences, training courses and employment policies.

The EIA will help to ensure that:

- we understand the potential effects of the policy by assessing the impacts on different groups both external and internal
- any adverse impacts are identified and actions identified to remove or mitigate them
- decisions are transparent and based on evidence with clear reasoning.

When might I need to complete an EIA?

The EIA should be done when the need for a new policy or practice is identified, or when an existing one is reviewed. Depending on the type of policy or activity advice can be sought from either your HR team or through peer review.

Ideally, an EIA should form part of any new policy, event or funding activity and be factored in as early as one would for other considerations such as risk, budget or health and safety.

Who is responsible for completing and signing off the EIA?

Depending on the nature of the policy, event or funding activity, the responsibility of who should complete the assessment, who should be consulted, and who should sign off the EIA will vary. Ultimate responsibility on whether an EIA is required and the evaluation decision(s) made after completing the EIA lies with the senior responsible officer, budget holder, or the most relevant senior manager.

What is discrimination?

Discrimination is where someone is treated less favourably or put at a disadvantage because of their protected characteristic. The different groups covered by the Equality Act are referred to as protected characteristics: disability, gender reassignment, marriage or civil partnership status, pregnancy and maternity, race, religion or belief, sexual orientation, sex (gender), and age.

Discrimination is usually unintended and can often remain undetected until there is a complaint. Improving or promoting equality is when you identify ways to remove barriers and improve participation for people or groups with a protected characteristic.

Building the evidence, making a judgement in cases of new policies or management decisions there may be little evidence of the potential effect on protected characteristic groups. In such cases you should make a judgement that is as reliable as possible. Consultation will strengthen these value judgements by building a consensus that can avoid obvious prejudices or assumptions.

Provisional Assessment

At the initial stages, you may not have all the evidence you need so you can conduct a provisional assessment. Where a provisional assessment has been carried out, there must be plans to gather the required data so that a full assessment can be completed after a reasonable time. The scale of these plans should be proportionate to the activity at hand. When there is enough evidence a full impact assessment should be prepared. Only one EIA should be created for each policy, as more evidence becomes available the provisional assessment should be built upon.

Valuing Differences

EIAs are about making comparisons between groups of employees, service users or stakeholders to identify differences in their needs and/or requirements. If the difference is disproportionate, then the policy may have a detrimental impact on some and not others.

You are looking for bias that can occur when there are significant differences (disproportionate difference) between groups of people in the way a policy or practice has impacted on them, asking the question “Why?” and investigating further.

Evaluation Decision

There are four options open to you:

1. No barriers or impact identified; therefore, activity will proceed.
2. You can decide to stop the policy or practice at some point because the evidence shows bias towards one or more groups
3. You can adapt or change the policy in a way which you think will eliminate the bias, or
4. Barriers and impact identified, however having considered all available options carefully, there appear to be no other proportionate ways to achieve the aim of the policy or practice (e.g. in extreme cases or where positive action is taken). Therefore, you are going to proceed with caution with this policy or practice knowing that it may favour some people less than others, providing justification for this decision.

In most cases, where disproportionate disadvantage is found by carrying out EIAs, policies and practices are usually changed or adapted. In these cases, or when a change has been justified you should consider making a record on the project risk register.