

## Equality Impact Assessment (EqIA)

This tool assists services in determining whether the plans and decisions you are seeking to make will require a full Equalities Analysis. EqIAs help the Council comply with its duty under s.149 of the Equality Act 2010 to have “due regard” to specified equality matters. They are required in most cases but, in some cases, an EqIA is not necessary or is only necessary for certain aspects of a decision. Please email [equalities@walthamforest.gov.uk](mailto:equalities@walthamforest.gov.uk) for a copy of a full EqIA template.

The Council understands that whilst its equalities duty applies to all services, it is going to be more relevant to some decisions than others. We need to be pragmatic and ensure that the detail of Equality Impact Assessment (EqIAs) is proportionate to the impact of decisions on the equality

duty. In some cases, a full EqIA is not necessary and/or the equalities duties do not apply. In other cases, only part of a decision will require an EqIA to ensure the Council has due regard to its equality duties. The following examples are intended to assist:

| Where will a full EA be required?   | Where might an EqIA not be required?   |
|---|--|
| <p>In short, wherever a decision has a more than minimal or theoretical <b>adverse or negative</b> impact on those with protected characteristics, for example, if the Council is considering:</p> <ul style="list-style-type: none"> <li>• Ceasing a service.</li> <li>• Reducing a service or reducing it in particular areas, e.g., closing an office in Leyton but not Walthamstow.</li> <li>• Changes to the way a service is delivered, e.g., moving to personalisation or moving to online access only.</li> <li>• Changes to eligibility criteria, rules or practices for a service.</li> <li>• Changes to discretionary fees and charges.</li> </ul> | <ul style="list-style-type: none"> <li>• Where it can be proven that the decision has no equalities impact– with particular focus on negative impacts on service users and residents.</li> <li>• Where it can be proven that the decision has a minimal or theoretical equalities impact (and so does not need to be considered).</li> <li>• Where the decision is mandatory and there is no element of discretion (e.g., to adopt a member’s code of conduct or similar).</li> <li>• In rare cases, where a previous EqIA exists and a review shows that it is still relevant at the time of the final decision, i.e., the facts have not changed.</li> </ul> |

### Important:

- The screening tool should not be used to mask any equality impacts or as a “get out”.
- There can be a negative equality impact even if you think that, overall, you are proposing changes that will make services better. If there is an adverse or negative impact, you must complete a full EqIA.
- **Negative** impacts are often indirect, i.e., a rule that is on its face of universal impact but has greater impact on some groups in practice e.g. due to the ethnic makeup of an area.
- In most cases, the screening process requires a degree of collation and analysis of evidence. If this requires a lot of work, consider whether it is actually simpler to omit the

- screening process and undertake a full EqIA.
- The equality duty **continues** up to and after the final decision. If proposals or facts change before the final decision, any screening tool will need to be reviewed and evidenced.
- Any consultation undertaken should also inform the screening process, e.g., issues raised by those affected. Monitoring should take place after a decision as part of service delivery.
- The completed template will be attached to Cabinet or other decision-making report and so it must include sufficient detail to justify the decision not to carry out a full EqIA.

### What to do?

The screening process should be used on **ALL** new proposals, policies, projects, functions, saving proposals, major developments or planning applications, or when revising them, if there is no negative equality impact or there is uncertainty about whether there is a negative equality impact. **However**, if your proposal is of a significant nature and it is apparent from the outset that a full EqIA will be required, then you do not need to complete this screening template and can progress directly to a full EqIA. If a negative/adverse impact has been identified during completion of the screening tool, a full EA **MUST** be undertaken. If you have not identified any negative/ adverse impacts arising from your proposal, you do not need to undertake a full EqIA. However, make sure you have explained clearly why the

proposal does not have any negative/adverse impact. **If your proposal is going to Cabinet or Committee (e.g., Planning or Licensing) and you are not undertaking a full EqIA, you must:**

1. Share your report and completed screening tool with Equalities ([equalities@walthamforest.gov.uk](mailto:equalities@walthamforest.gov.uk)), who will check and challenge your findings and
2. Use the following wording under the Equality & Diversity paragraph in the Cabinet report: “An initial screening exercise of the equality impact of this decision was undertaken and determined there was no / minimal impact (delete as appropriate) on the Council’s equality duty.” Attach the completed template as an appendix to your report.



**1 Proposal / Project Title: Case Management system for handling Complaints, freedom of information request (FOI) and Subject Access Request (SAR)**

**2 Brief summary of the above: (include main aims, proposed outcomes, recommendations / decisions sought)**

1. The London Borough of Waltham Forest recognises the imperative to upgrade its digital systems for three essential statutory services, driven by a commitment to transparency and the enhancement of resident experience. The current systems fail to adequately support the operational needs of our teams, resulting in inefficiencies and unsustainable practices. Specifically, the project focuses on enhancing the case management system for complaints, Freedom of Information (FOI) requests, and Subject Access Requests (SARs). The project aims to improve the case management experience for complaints, FOI, and SARs.
2. Complaints can still be lodged without an account, through various channels such as phone, letter, or directly by members of our team.
3. The aspect of the project, work stream planned include:
  - Identify a group of residents that we have access to
  - Arrange user interviews with individuals so that we can validate pain points/gain points
  - Arrange focus group sessions where residents can walk through their perfect journey for complaints
  - Brainstorm ideas (this may also assist the Web element of the programme) so we can work out how they would want to see information sign posted

**3 Considering the equality aims (eliminate unlawful discrimination; advance equality of opportunity; foster good relations) indicate for each protected group whether there may be a positive impact, negative (adverse) impact, or no impact arising from the proposal. *\*Please note in addition to our statutory obligations under the Equality Act 2010, Waltham Forest Council include care leavers as having a protected characteristic and to this extent passed a motion in April 2023 to recognise this action. Therefore, Waltham Forest Council's EqIA process also includes a requirement to explore the impact of a proposal on that group.***

DSARs are the result of the GDPR's right of access – one of eight data subject rights enshrined in the Regulation. When an individual submits a data subject access request (or SAR, as it was known under the Data Protection Act), organisations must provide them with a copy of any relevant information about them.

| <b>4 Protected Characteristic (Equality Group) <input checked="" type="checkbox"/></b> | <b>Positive Impact</b>              | <b>Negative Impact</b>   | <b>No Impact</b>                    | <b>Briefly explain your answer. Consider evidence, data and any consultation.</b><br><a href="https://www.walthamforest.gov.uk/content/statistics-about-borough">https://www.walthamforest.gov.uk/content/statistics-about-borough</a>     |
|--|-------------------------------------|--------------------------|-------------------------------------|--|
| Age  | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/>            | Not familiar with technology.<br>Mitigation are the care hubs, libraries, contact centre where this can be logged manually. The all-in-one solution for customer/ resident request.  |
| Disability   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Mitigation are the care hubs, libraries, contact centre where this can be logged manually. For some protected characteristic they are prone to lapses in memory. This system and process will ensure reminders are sent out automatically. |
| Pregnancy and Maternity  | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Click here to enter text.  |
| Race   | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Click here to enter text.  |
| Religion or Belief   | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Click here to enter text.  |
| Sex (Including Gender Re-assignment)   | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Click here to enter text.  |
| Sexual Orientation   | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Click here to enter text.  |

|   |  |                                     |   |                           |
|---|--|-------------------------------------|---|---------------------------|
| Marriage and Civil Partnership  | <input type="checkbox"/>   | <input type="checkbox"/>            | <input checked="" type="checkbox"/>                 | Click here to enter text. |
| Care Levers*  | <input type="checkbox"/>   | <input type="checkbox"/>            | <input checked="" type="checkbox"/>                 | Click here to enter text. |
| <b>5 There are no negative/adverse impact(s)</b><br>If you have not identified any negative/adverse impacts please briefly explain your answer, providing evidence to support decision. | The change is a swap to a better system. There is also a plan to improve the process. Civica iCase the new case management system will ensure universal accessibility to complaints, FOI, and SARs, thereby enhancing the customer experience for all residents, regardless of their protected characteristics.                                      |                                     |   |                           |
| <b>6 Describe how opportunities to advance equality and foster good relations for any of the protected characteristics has been taken up (where relevant).</b>                          | The opportunity for a complete end to end customer experience. This ensures departments deliver responses on time. Many of the functionality can be automated to create efficiency. Making the complaints process more customer centric improves the customer experience. It will also enhance in preserving and improving the council's reputation. |                                     |   |                           |
| <b>7 As a result of this screening is a full EA necessary (Please check <input checked="" type="checkbox"/><input checked="" type="checkbox"/> appropriate box)</b>                     | <b>Yes</b>   | <b>No</b>                           | <b>Briefly explain your answer.</b>                 |                           |
|   | <input type="checkbox"/>   | <input checked="" type="checkbox"/> | <b>No negative impacts identified.</b>              |                           |
| <b>8 Name of Lead Officer: Suncha Adjodha</b>   | <b>Job title: Project Manager</b>  |                                     | <b>Date screening tool completed: 12 March 2024</b> |                           |

Signed off by Head of Service:

Name:

Eoin Quiry

Date:

17/0424