



Open Consultation

Equality Impact Assessment Policy & Procedure

We are seeking your views on changes to our Equality Impact Assessment Policy & Procedure.

Consultation Closing Date: 28 April 2022

If you need this document in another format, please [contact us.](#)

Purpose of the consultation

We would like to hear your views on our revised Equality Impact Assessment (EIA) Policy & Procedure.

Background

At PSOW, we are committed to supporting and promoting equality, diversity, and inclusion in everything we do. We also have legal duties to consider the effects of our decisions, policies or services on some communities, individuals, or groups:

- we must consider different impacts on people with 'protected characteristics'. The protected characteristics are:
 - age
 - disability
 - gender reassignment
 - marriage and civil partnership
 - pregnancy and maternity
 - race
 - religion or belief – including lack of belief
 - sex (gender)
 - sexual orientation.

- we must also check if our new or revised policies have a positive or negative impact on
 - opportunities for persons to use the Welsh language and
 - treating the Welsh language no less favourably than the English language.

- finally, we want to make sure that our work does not impact in a negative way on people who are disadvantaged because of their socio-economic situation. We do not have to consider this by law, but we believe that it is the right thing to do.

To help us assess how our work impacts on different communities, individuals and groups, we have in place an Equality Impact Assessment Policy & Procedure.

The revised Equality Impact Assessment Policy & Procedure

We last revised our Equality Impact Assessment Policy & Procedure in March 2020. You can find our current Equality Impact Assessment Policy & Procedure and our current EIA form on our website [here](#).

We now want to update that document and make some changes that will make our EIA process simpler and more effective.

Why we think we need to adjust our Equality Impact Assessment Policy & Procedure.

We always intended to review this policy and procedure after two years. However, we also noticed some issues that make it sometimes difficult for us to undertake our EIAs:

- staff found it difficult to identify and analyse the relevant evidence
- sometimes, staff were unsure if they needed to conduct a full assessment, or if initial screening for possible impacts would be enough
- the procedure involved identifying the level of impact (high – medium – low). These levels were not defined and difficult to apply in practice
- the procedure was focused on our corporate policies (new or revised). We also applied it to other aspects of our work, for example our Own Initiative Investigation into homelessness assessments. However, the procedure was difficult to apply to those more varied projects.

The main changes

The main changes that we propose to introduce are as follows:

When we will conduct an EIA

We will use our revised procedure to assess our:

- core functions – such as complaint handling or improvement work
- policies, procedures and strategies – new or revised
- major projects – such as Own Initiative Investigations, customer satisfaction research or large-scale outreach events
- major decisions – decisions significantly affecting how we operate (for example, a decision to temporarily adjust the availability of our service).

EIAs of our functions

The EIAs of our core functions will be high-level and general assessments, based on a broad range of evidence: our service user and staff surveys, our complainant and staff equality profile, broader research and other matters. These EIAs will be completed and kept up to date by our Head of Equality, Diversity and Inclusion.

The purpose of these EIAs will be to identify the general areas of our work with possible positive or negative impacts on equality. We will then make sure that when we consider a policy, decision or project relevant to that function and we take into account the possible positive or negative impacts identified in these high-level EIAs.

The EIAs of our functions will have already considered a wide range of relevant evidence, so colleagues conducting the assessments of more specific policies, projects and decisions would have that evidence at their fingertips. This should help them to focus more on collecting additional evidence that may be relevant to the specific issue that they are assessing.

Initial screening

We will simplify the initial screening stage of the procedure, from the current 9 questions to 3. These questions will be:

- Does this policy, project or decision relate to our functions or areas of work within those functions for which our EIAs have identified equality impacts?
- Does this policy, project or decision relate to our Equality Objectives?
- Is there a risk that this policy, project, or decision could lead to disadvantaging any group of people?

When we will publish an EIA

So far, we have been publishing our EIAs if we found that the impact was 'high' ('substantial'). We will now focus on identifying any positive or negative impacts and publish all full EIAs that we complete.

Consultation questions

1. Does our revised Equality Impact Assessment Policy & Procedure present clearly and adequately our equality duties and commitments?
2. Our Equality Impact Assessment Policy & Procedure considers protected characteristics, Welsh language and socio-economic disadvantage. Do you think that attention to these different aspects is appropriately covered and integrated?
3. Will conducting the high-level EIAs of our functions for the purposes explained in the consultation document be useful?

If not, what other ways would you suggest to help us streamline and simplify how we identify and assess equality evidence and conduct the initial screening?

4. Are the proposed initial screening questions sufficient to help us identify the policies, projects and decisions that must be assessed in full?

5. What effects could this policy and procedure have on the Welsh language and specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English?

How could positive effects be increased, or negative effects be mitigated?

6. Do you have any other comments about our revised Equality Impact Assessment Policy & Procedure?

How to respond

Submit your response by midnight **28 April 2022** in any of the following ways:

- Complete our [online form](#)
- Email your response to: communications@ombudsman.wales
- Post your response to:
Public Services Ombudsman for Wales
1 Ffordd yr Hen Gae,
Pencoed
CF35 5LJ

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Responses to consultations may be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tell us.

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Thank you for your interest in our EIA Policy and Procedure.