

# SWINDON COLLEGE

## Institutional Policies & Procedures

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## 1 Context and objectives

- 1.1 The college goes beyond mere compliance with equality law. It aspires to being a proponent of best practice in all aspects of equality and diversity. The college aims to create and maintain an inclusive organisation where all can learn, work and reach their full potential.
- 1.2 The objective of this policy is to outline the college's approach to fulfilling this commitment and to make it clear to all parties what they may expect from the college and equally what the college expects from them.
- 1.3 This new Equality Policy reflects the harmonised and strengthened content and requirements of the Equality Act 2010 and the college's further statutory responsibilities under the new Public Sector Equality Duty. It replaces the Comprehensive Equality & Diversity Policy and all Equality Schemes and brings a new approach to making change happen. The Act (and this policy) identifies nine 'Protected Characteristics'. These are:
- **Age**<sup>1</sup> (older people, younger people, people of any age group)
  - **Disability**<sup>2</sup> (physical or sensory impairments, mental health disability, some long term medical conditions, aspects of learning difficulties, neuro-diverse conditions such as dyslexia, autism, Tourette's or ADHD)
  - **Gender reassignment**<sup>3</sup> (transsexual people, transgender people – also see section 17)
  - **Marriage and civil partnerships**<sup>4</sup> (a person who is married, a person who is a civil partner)
  - **Pregnancy and maternity**<sup>5</sup> (pregnant women, women on maternity leave, women who have recently given birth)
  - **Race** (colour, nationality, ethnic or national backgrounds, heritage)
  - **Religion or belief**<sup>6</sup> (any religion or lack of religion, any religious or philosophical belief or lack of belief)
  - **Sex** (women and men - gender)
  - **Sexual orientation** (gay and lesbian people, bisexual people, heterosexual (straight) people)
- 1.4 All nine protected characteristics are covered with regards employment. The protected characteristic of marriage and civil partnership is explicitly excluded in the further education chapter of the Act (Ss.90-94).

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<sup>1</sup> Age refers to 18 years and older only for service provision; not due to be implemented until April 2012

<sup>2</sup> A person who has a physical or mental impairment and the impairment has a long-term and substantial effect on their ability to carry out day-to-day activities

<sup>3</sup> More widely defined – no longer needs medical supervision – people who are proposing to undergo, are undergoing or have undergone part or all of a process to reassign the person's sex by changing physiological or other attributes of sex

<sup>4</sup> Any person who is currently of either of these legal states; does not cover single people or past status

<sup>5</sup> Dates defined differently for work or general discrimination issues. Paternity & adoption leave and discrimination are covered under separate legislation

<sup>6</sup> Only the courts can ultimately decide whether a claimed "belief" is a true philosophical belief – the law states "any" but courts have found some claimed beliefs to be too trivial

- 1.5 The Act defines the following types of illegality and our policy recognises these:
- Direct discrimination, including by association (e.g. carer) and perception
  - Indirect discrimination
  - Harassment
  - Victimisation
  - Discrimination arising from a disability
  - Failure to make reasonable adjustments.
- 1.6 These are further defined in Appendix 1.
- 1.7 The rest of this policy outlines how the college intends to fulfil its General Public Sector Duty to give due regard to:
- **eliminating** discrimination, harassment and victimisation
  - **advancing** equality of opportunity between those who share a relevant protected characteristic and those who don't
  - **fostering** good relations between those who share a relevant protected characteristic and those who don't;
- 1.8 and its Specific Public Sector Duty that allows the public to judge our progress. The college will publish and go on to achieve at least one (and probably more) Equality Objective at least 4-yearly and before 6<sup>th</sup> April 2012. It will also publish data with regards our service provision to learners and about our staff and recruitment, the first being before 31<sup>st</sup> January 2012.
- 1.9 Action Plans will be used for specific purposes and focused to areas of our business. They will have explicit and achievable goals and be shorter term in nature to deal with any identified issues at any given time. They will typically be focused on closing any achievement gap (Performance & Implementation Group), admissions and participation (Marketing) and recruitment and staffing (Human Resources). Each Action Plan will link to our Equality Objectives and be the vehicle to incrementally achieving the Objective(s).

## 2 Scope

- 2.1 The commitments within this policy apply to all learners, staff, governors, volunteers and users of the College. The policy also forms the standards the College sets for work with other organisations and visitors with regards achieving equality, for example work placements & employers, collaborative partners and not least contractors.
- 2.2 The college will comply with all reasonable requirements of OFSTED and other bodies appropriately and not least to ensure that the college's reputation is then measured and reported in the best possible light.
- 2.3 Currently E&D is a "limiting grade" and therefore it is a business necessity that the college achieves a grade 2 for E&D at a minimum (preferably a grade 1) if it is to achieve the ambition of being a grade 1 college.

### 3 Strategic Plan

3.1 Our mission statement is:

***“To deliver high quality vocational teaching and learning that meets the needs of the local community and inspires success.”***

3.2 This is supported by 6 strategic objectives.

3.3 These should be read with Equality in mind. For instance, meeting the individual and collective needs of all people is a key principle of equality. Similarly, inspiring success for everyone, whatever their Characteristics, is another principle to work towards.

3.4 The Equality Objectives should be seen to sit alongside the Strategic Plan and that these compliment and reinforce each other.

### 4 Responsibility, accountability and compliance

4.1 Governors<sup>7</sup> are responsible for ensuring that:

- Positive action is taken to ensure that the membership of the Corporation reflects the diversity of the communities served by the College.
- They are aware of and take ownership of the college’s responsibilities as outlined in this policy and equality legislation, notably the Equality Act 2010.
- They monitor the college’s provision by reference to the performance and representation of different groups of learners and staff
- They ensure that equality analysis is available to them before making any major strategic decisions.

4.2 The Senior Management Team<sup>8</sup> is responsible for ensuring that:

- The College’s Strategic Plan encompasses our commitment to equality of opportunity and Directorate action plans deliver equality
- The Quality Improvement Plan has equality at its core
- The college recruits and retains an inclusive and diverse workforce which is appropriately developed to ensure each individual has the opportunity to achieve their full potential and thus improving the performance of the whole
- Comprehensive and transparent equality impact assessments are carried out as an integral part of the business cycle and all major changes and decisions have a full equality analysis conducted as part of the process.

4.3 The College Management Team is responsible for ensuring that:

- They promote this policy amongst their staff and ensure compliance
- They ensure that actions within their departments contribute towards the college meeting its Public Sector Duties (see 1.7 & 1.8 above)

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<sup>7</sup> The Governing Body is legally responsible under the Equality Act 2010

<sup>8</sup> The Principal and Chief Executive takes operational responsibility on behalf of the Governing Body and has delegated the Director of HR to take the strategic lead; all SMT members have a shared duty to advance equality within their directorates and support the above roles.

- All programmes of learning offered, whether existing or new, will be regularly reviewed through the SAR and curriculum planning processes to examine how far they meet the needs of all students with particular reference to equality of opportunity
- Learners' participation, attendance and success is monitored throughout the year and early remedial action is taken
- Take appropriate action where necessary to assist minority or under-represented groups to increase participation, retention and achievement tailored to any patterns within curriculum areas (e.g. gender bias)
- Teaching observation reports include an evaluation of how successfully equality and diversity is embedded and advanced
- Internal verification procedures include scrutiny of equality and diversity
- Schemes of work, lesson content and teaching resources of staff within their areas are reviewed against the commitments within this policy and take action to make improvements or adjustments accordingly
- Business Support areas analyse their service and resources against the commitments within this policy and take action to make improvements or adjustments accordingly, accounting for equality in their SAR.

4.4 Staff are responsible for ensuring that:

- They are aware of this policy and duties in relation to all of the protected characteristics and the college's Public Sector Duties under the Equality Act
- They demonstrate sensitivity to issues of diversity and that they attend and complete staff training to help their understanding of the issues in this area
- Whatever their role, they challenge inappropriate behaviour of any person wherever it might occur within the college or during its activities
- That visitors and contractors are made aware of and comply with the policy
- They conduct themselves throughout their employment in a way that positively supports this policy and protects the college's reputation.

4.5 Learners are responsible for ensuring that:

- They attend induction, enrichment and tutorial activities concerning equality and diversity and fulfil their responsibilities towards other learners and members of staff
- Their coursework reflects sensitivity to issues of equality and diversity and does not include any discriminatory content<sup>9</sup>
- They do not use any of the college equipment or resources to produce or research material in such a way that could be considered discriminatory or in opposition to the commitments within this policy
- They refer cases of inappropriate behaviour by any staff, visitors or fellow students to a member of staff, act as good role models to peers and challenge inappropriate behaviour where they are confident in so doing.

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<sup>9</sup> This in no way is intended to limit proper academic consideration of difficult or sensitive subjects  
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## **5 Involving stakeholders**

- 5.1 Equality of opportunity and inclusivity is, and will continue to be, at the heart of the college ethos. The college will seek to involve and consult with its community and make consultation accessible as far as is practicable.
- 5.2 Consultation on the development and implementation of the Equality Policy and more so the development of our Equality Objectives will involve individuals and groups as well as the formal groups and committees of the College such as the Corporation, Senior and Middle Management teams, staff and student fora and the analysis of surveys. Consulting our own people (learners and staff) must never be overlooked.
- 5.3 The College believes that effective involvement of learners in the College's activities will have a positive impact on learner achievement, employability and citizenship. Involvement of learners will also raise the quality of the College's provision for learners, customers and potential learners. Therefore it has a Learner Involvement Strategy which details how this will be achieved. Learner led societies/action groups which focus on ensuring equality or celebrating diversity will be particularly encouraged and supported. The Student Council includes an explicitly elected Equalities Representative.
- 5.4 Stakeholders include potential learners, future staff and not least employers. Our influence with the latter at the same time as understanding their future needs is a core relationship. These themes are picked up next.

## **6 Partnerships and contracts**

- 6.1 Some contracts are let through consortia (CPC & OGC) that have sector quality standards inbuilt. These include compliance with equality legislation.
- 6.2 As a public body and as an educational establishment, the college will promote equality with our partners and at the same time not expose any learner to an inappropriate placement. A professional judgement will be made on this with every placement combined with extra reinforcement with a learner where appropriate (see the college's new Work Experience Guidelines where this is dealt with in detail). Every placement must have due regard to equality in the package of work experience.

## **7 The Community we serve**

- 7.1 Swindon College endeavours to be at the heart of the community, not just to provide a service to it. Whenever we can, we therefore welcome individuals and groups into the college and take the college into the community at every opportunity.
- 7.2 The term "community" means the community of Swindon and the wider surrounding area (the college's "catchment area"). It also means parts of this area and localities within it. It also means sections of society.

- 7.3 The college needs to ensure that it reaches all parts of the community as the service must be available to all and used by as many as possible to be fully inclusive.
- 7.4 Where minority groups are under-represented then it is the college's duty to reach them. The college will ensure there are no barriers to access in any terms and that all believe they can join Swindon College. Demographics and needs change but constant analysis of participation feeds the Marketing Action Plan and where priorities lie and where the college must make most effort to engage people.

## **8 Equality analysis and equality impact assessment (EqIA)**

- 8.1 The form and process will be used by every manager who wishes to make a change to any policy or process, or where a new policy or procedure is needed (An explanation of the processes can be seen in Appendix 2 and the new form is Appendix 3).
- 8.2 **It is essential that Equality Impact Assessment is part of change management and is contiguous to it.** A form filled in after a policy has been written would be irrelevant and of no use. Thinking through the effects of any policy or change on different groups of people is an integral exercise if it is really to take their needs into account. The proper consideration of people's needs from the beginning of the process means that they will be treated equally and fairly.
- 8.3 The Senior Management Team will not approve any policy or change of process without strong evidence that equality has been considered throughout the process including the presence of a signed off EqIA.
- 8.4 Managers are not expected to carry out detailed research on equality for this process. However, they should refer to the analysis and reports published with regards learners or staff to help inform their consideration of what the issues might be when considering change. They must also consider any action plan relevant to their area and all must address what contribution the change will make towards achieving our Equality Objectives.
- 8.5 Where major changes are to be made (e.g. strategic decisions about the College's services, major structural changes), then the basic EqIA form would not be sufficient. Instead, a full Equality Analysis should capture the evidence of equality considerations made. This should take the form of several stages, evidencing and justifying decisions made and any mitigating steps taken. As a minimum, there must be a "before and after" process to predict what might happen and then to check what the actual outcomes were.
- 8.6 This is not an extra process but one essential to planning and change management and a method for the Governing Body to fulfil their legal responsibilities under the Equality Act 2010.

## **9 Equality Objectives**

- 9.1 The college will set one or more Equality Objectives. The first of these will be by 6<sup>th</sup> April 2012<sup>10</sup> in compliance with the Equality Act.
- 9.2 Equality Objectives will be set at least every 4 years. These are long-term goals essential to delivering our business fairly. The college will review these annually in any case and set new ones or adjust these Objectives in order to maintain the effectiveness of them.
- 9.3 Action Plans specific to Directorates will deliver the Objectives (see S.4.2).

## **10 Publication**

- 10.1 This Policy will be published on the college's public website and staff intranet. A summary will be published in both the student and staff handbooks. A summary will form part of induction to all staff and governors on appointment and to all learners. This policy will be provided in alternative formats on request.

## **11 Staff development and awareness**

- 11.1 The College will provide periodic training and awareness raising to staff and governors through:
- Passing the mandatory online E&D induction course within 3 weeks of commencing employment
  - Regular articles in SCene
  - Materials and information on the intranet, on 'Moodle' and in the LRC
  - A range of training sessions on staff development days
  - An annual updating for staff
  - Training during the annual governors conference
  - Specialist advice to the Senior Management Team continuously
  - Specific sessions for CAMS (currently 3 times a year) and CMT
  - Providing 'good news' feedback to governors, staff and learners through various media
  - 1:1 Coaching in how to effectively embed equality and diversity in the curriculum led by Learning Coaches supported by the E&D Coordinator
  - Specialist support to ALS team in developing their processes and advice
  - Advice to SEMs and support of The Intervention Meeting with regards vulnerable learners and especially their retention
  - Support in dealing with any issues that arise cross-college by providing advice on demand.

## **12 Teaching and learning**

- 12.1 All courses and learning activities provided by the college will have equality and diversity embedded in their content and delivery. Resources, learning materials,

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<sup>10</sup> Specific PSD pending House of Lords September 2011  
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case studies, projects and learning activities will reflect and promote equality and diversity whether or not this is included in awarding body criteria.

- 12.2 All teachers will review schemes of work, lesson plans, course materials and learning strategies to ensure teaching:
- Takes account of the diverse learning needs, styles and preferences of learners
  - Responds to empower and validate the diverse perspectives of learners
  - Is anti-discriminatory and teaches learners about their rights and responsibilities to each other in the classroom, the workplace and wider society
  - Fosters understanding of how stereotyped attitudes and prejudiced thinking damage relationships, hinder communication and are therefore bad for education and business
  - Acknowledges and celebrates the contribution of women and men of all backgrounds, ages, cultures and religions to human progress in all fields.
- 12.3 All teachers will make it clear to learners that any work submitted for assessment or carried out on college premises or equipment must not include any discriminatory content or promote any organisation which breaches the commitments within this policy and equality legislation.
- 12.4 The College has a role in promoting good practice in equality and diversity in the workplace. Work-based assessors will monitor equality and diversity through progress reviews and meetings with learners and employers/workplace supervisors. The College expects that an employer with a work-based learner will have an equality and diversity policy. The College will work alongside its partner employers to improve equality and diversity in the workplace and to eliminate discrimination (see 6.2 above).
- 12.5 The quality of the promotion of Equality and Diversity will be assessed through SARs, internal and external verification and observation of teaching and learning. The college's scheme of work and lesson observation processes and papers are designed to capture and test for the embedding of equality & diversity in every lesson. This is overseen by the Quality Manager and supported by the Learning Coaches.
- 12.6 Individual learners will have their learning and personal support needs identified and met through effective planning, reasonable adjustments and the involvement of support staff or specialist agencies. Teachers, assessors and support staff will act as positive role models in the learning environment and will routinely challenge any unacceptable behaviour or language, whether or not learners from any of the protected groups are present.
- 12.7 The student induction and enrichment programme includes information and activities which make the college's commitments under this policy very clear and help to raise learners' general awareness and understanding. Equality and diversity will feature as a standing agenda item at all course rep meetings.

### **13 Admissions**

- 13.1 Applicants to the College will not be discriminated against on the basis of any of the protected characteristics or association with them. The College has an important role in promoting participation in education and training for minority groups. Therefore applications from people from minority groups will be welcomed and, wherever possible, reasonable adjustments made to ensure the College can meet any individual needs.
- 13.2 In addition to our general ethos on this, all staff will comply with the provisions of the Equality Act 2010 with regards admissions<sup>11</sup>. In particular, no-one will be discriminated against in the arrangements made for admissions, the terms of offer or by refusing to admit a learner.
- 13.3 Similarly, no-one will be discriminated against in the way we provide education.
- 13.4 The statutory Codes of Practice for FE/HE of the Equality Act should be referred to as well as the Act<sup>12</sup>.
- 13.5 As with the rest of the Act, the legislation is wider and stronger in protecting people with disabilities and this must be recognised in all decision-making.
- 13.6 Advice should be taken to assist in making informed decisions.

### **14 Publicity, marketing and published images**

- 14.1 The College will ensure that it has no negative imagery of individuals in its publications and, wherever possible, will provide positive images of people covered by the protected characteristics within the Equality Act 2010.
- 14.2 Where possible, images of and by our own people will be used so as to show reality and encourage ownership.

### **15 Monitoring and reporting**

- 15.1 Data is based on self declaration by staff and students. Every effort will be made to reduce the category of 'not known/not provided' to increase the validity and analysis of data, especially with regards staff under-declaring of disability. However the College respects the right of an individual not to declare and more so with sensitive personal data.
- 15.2 All applicants and new employees are invited to declare information about themselves with regards all nine protected characteristics<sup>13</sup>, where they feel comfortable in doing so. This helps the college to demonstrate that all are treated fairly and to take more informed action where it is found necessary.

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<sup>11</sup> Ss90-93 Equality Act 2010 do not apply to Marriage and Civil Partnership

<sup>12</sup> These bring some balance to the law whereby cost can be a factor when making reasonable adjustments *but cost alone cannot be a justification for refusing to educate someone*. Every case must be considered on its merits. The good of the individual learner, other learners and the college as a whole are all relevant considerations. How best education can be provided must be the premise not whether someone can participate or not.

<sup>13</sup> Additionally, a data validation exercise has been conducted to increase the accuracy of the information we already hold and to expand to all nine characteristics.

- 15.3 Similarly, our enrolment processes capture the same range of information<sup>14</sup>.
- 15.4 Information is used for statistical reporting, informing the provision of reasonable adjustments for people with a learning difficulty or disability, analysing equality and action planning for quality improvement. The information is held for no other reason and reporting in a public forum is not individual or recognisable.
- 15.5 Additional analysis and reporting will be focused on need and the service provision and therefore learner outcomes. The Success, Retention and Achievement Rates (SRA) for long courses at 16-18 and 19+ is our core business and therefore is the focus with equality too, in particular with regards any achievement gaps, to be identified so that action is taken to close them.
- 15.6 Two annual reports are produced at a time when the latest data is available.
- 15.7 For learners<sup>15</sup>, analysis becomes possible during October when validated results are received. A report is prepared for the Quality & Standards Committee before the end of the calendar year.
- 15.8 More detailed analysis is conducted on the same data to pursue specific topics and issues as part of the Performance and Implementation Group's work. Data from other sources such as learner surveys is also taken into account.
- 15.9 For staff, a snapshot is used at the end of the academic year. Analysis is then conducted and a report is prepared for the Resources Committee during the autumn. This report concentrates on three areas; our recruitment outcomes, the operation of all HR processes and an analysis of our staff as a whole and by various divisions.
- 15.10 Further analysis is conducted continuously and reported to the Director of HR<sup>16</sup>.
- 15.11 For the snapshot of staff, enhanced data will be immediately available and should be included in this year's report.
- 15.12 It is recognised that it will take time to take both staff and learners with us on the use of this data and its completeness will take time as confidence grows.

## **16 Review**

- 16.1 This policy will be reviewed every three years.
- 16.2 However, due to the newness of the law and changes to its interpretation it will be first reviewed after one year (i.e. September 2012). This will ensure that the policy has been effectively implemented.

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<sup>14</sup> from 2011-12

<sup>15</sup> The expansion of data collection for learner SRA will not show results for 2 years until the present intake complete their courses. However, participation rates can be reported on from this year.

<sup>16</sup> E.g. a Pay Audit, summer 2011

## 17 Promoting “Trans” equality<sup>17</sup>

17.1 Since this may be an area in which staff and students have less knowledge and understanding, this policy includes this specific statement:

*“The College welcomes applications from staff and students irrespective of their gender identity or gender reassignment. It recognises the need to respect an individual’s right to work or study with dignity, to respect their personal identity and name and for their privacy and confidentiality.”*

17.2 The College will:

- Refer to trans people by the gender in which they live rather than by their birth gender and comply with any wishes expressed on this
- Not pass on information about a trans person’s Gender Recognition without their written consent
- Ensure all records of someone who has a Gender Recognition Certificate reflect their legal gender and no reference to their previous gender is held, or passed on to third party<sup>18</sup>
- Grant time off for gender reassignment treatment on the same basis as for other sickness or injury (see sickness & gender reorientation policies)
- Maintain any records of a person’s previous gender securely and for access by named persons (Director of Human Resources or the Principal).
- Reference should be made by managers to our Gender Reorientation Policy document that gives initial guidance.
- The “need to know” is very restricted. It should be dictated by and negotiated with the member of staff or learner themselves. In principle, only one college manager needs to know but in reality this is more likely to be a line manager and a member of HR, so that all appropriate adjustments can be made and processes completed.

*To summarise:*

**The College will not tolerate abuse, prejudice, harassment or bullying and will use the appropriate disciplinary policy to investigate and address any incidents.**

**Codes of conduct for students and staff explicitly state that discriminatory practices will not be tolerated. Notices are displayed in prominent locations to this effect, as well as positive messages about the college’s commitment to advancing equality.**

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<sup>17</sup> Transgender or “Trans” people are terms used for those who cross conventional boundaries of gender. This ranges from how someone dresses through to gender reassignment. Transsexual people are those who believe their gender does not match their appearance or anatomy. “Gender variation” is best term.

<sup>18</sup> A specific process exists with CRB checks where someone has changed their identity

## Appendix One

Definitions of terms (source: LSIS guides)

- **Equality** is about creating a fairer society where everyone can participate and have the opportunity to fulfil their potential – to live as equal citizens in society free from discrimination and harassment.
- **Diversity** is about respecting, valuing and celebrating aspects that make us unique as individuals – recognising that we contribute to society because of these aspects, not in spite of them.
- **Direct Discrimination** happens when someone is treated unfairly, or less favourably than another person, because they have a protected characteristic. This often arises because of assumptions, stereotyping or prejudice. The Equality Act 2010 extended the definition of direct discrimination to cover **association discrimination** and **perception discrimination**. This is direct discrimination against someone because they associate with a person who has the protected characteristic or because they are perceived to have a protected characteristic.
- **Indirect discrimination** happens when a 'provision, criteria or practice' is applied that appears to affect everyone equally but which in fact puts people who share a protected characteristic at a disadvantage.
- **Harassment** happens when someone who behaves in such a way that their conduct has the purpose or effect of creating an environment that is hostile, degrading, humiliating or intimidating. Sexual harassment can include unwelcome sexual advances, touching, sexual jokes, displaying pornographic images and sending e-mails of a sexual nature.
- **Victimisation** happens when someone experiences disadvantage *because* they have supported someone in making a complaint or an allegation of discrimination or because they have personally made a complaint or allegation.

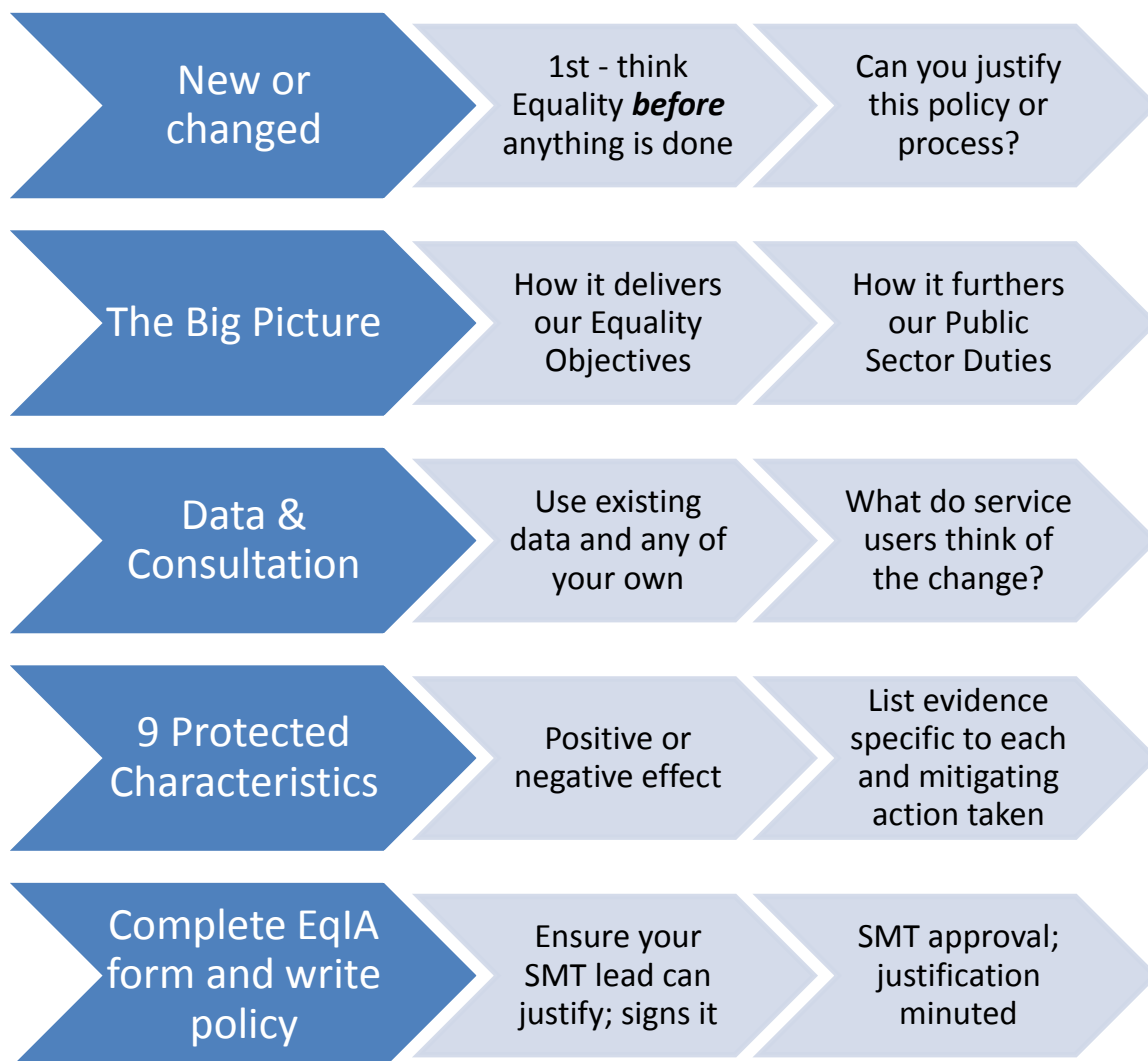
## Appendix Two

Equality Impact Assessment (Policies+) & Equality Assessment (major change)

### Major service changes

A bespoke Equality Assessment will be carried out. The same principles will be used as with the Equality Impact Assessment but a much more detailed assessment will be conducted including a full data analysis. This must be a full justification of the changes to be made and include both pre-change and post-change assessment.

### New or amended policy or process = Equality Impact Assessment (EqIA)



**Appendix Three**

Equality Impact Assessment Form – attached