

GUIDANCE

# Meeting the Equality Duty in Policy and Decision-Making

England (and non-devolved public  
authorities in Scotland and Wales)

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# 1 | Introduction to this guide

## Context for this guide

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This guide is one of a series written by the Equality and Human Rights Commission (the Commission) to explain how public authorities can meet the requirements of the Equality Act 2010 (the Act). The Act brought together all previous equality legislation in England, Scotland and Wales. The Act includes a public sector equality duty (the equality duty), replacing the former duties relating to race, disability and gender equality. The equality duty came into force on 5 April 2011.

There are five England/GB guides giving advice on the equality duty:

1. The essential guide to the public sector equality duty
2. Equality objectives and the equality duty
3. Equality information and the equality duty
4. Meeting the equality duty in policy and decision-making
5. Engagement and the equality duty

*The essential guide* provides the main overview of the equality duty requirements. The other four documents provide more detailed guidance on key areas and advice on good practice.

This is the third edition of this guide.

If you require this guide in an alternative format and/or language please contact us to discuss your needs. Contact details are available at the end of the publication.

## Legal status of this guide

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This guidance provides advice on how to meet the equality duty. It will assist public authorities to decide what they need to do to comply with their legal duties under:

- Section 149 of the Equality Act 2010 (the public sector equality duty), and
- The Equality Act 2010 (Specific Duties) Regulations 2011.

## Who is this guide for

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This guide is aimed at those responsible for implementing the public sector equality duty in public authorities in England (and non-devolved public authorities in Scotland and Wales). It will be of interest to staff throughout public authorities, but particularly those responsible for decision-making, policy development, information gathering and analysis. In addition, it will be relevant for those involved in business planning, procurement, human resources, grant making, governance and scrutiny. The guide will also assist those who have an interest in the work of public authorities, such as service users, voluntary bodies, unions, and equality organisations.

It provides advice relevant to two types of public authority: those that are subject only to the general equality duty, and those that are also subject to the specific duties ('listed authorities'). The different requirements for both of these types of bodies are set out clearly throughout this guide.

## Content of this guide

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This guide:

- Explains the requirements of the general equality duty for decision and policy-making.
- Provides advice on how to understand the relevance of your functions to equality and good relations.
- Provides advice on how to assess the potential impact of your functions on people with protected characteristics. This includes your policies and practices and the decisions that you make.
- Explains how your understanding of potential impact on equality can be used to influence policy development and decision-making.

## 2 | Introduction to policy and decision-making and the duty

The public sector equality duty (the equality duty) is made up of a general equality duty which is supported by specific duties. The 'public sector equality duty' is the formal title of the legislation, the 'general equality duty' is the overarching requirement or substance of the duty, and the 'specific duties' are intended to help performance on the general equality duty. An overview of the equality duty is set out in our essential guide. This includes further information about the meaning of 'due regard'.

The general equality duty requires public authorities, in the exercise of their functions, to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act.
- Advance equality of opportunity between people who share a relevant protected characteristic and people who do not share it.
- Foster good relations between people who share a relevant protected characteristic and those who do not share it.

These are often referred to as the three aims of the general equality duty. The functions of a public authority include all of their powers and duties. This means everything that they are required to do as well as everything that they are allowed to do. Examples include: policy decisions, budgetary decisions, public appointments, service provision, statutory discretion, individual decisions, employing staff and procurement of goods or services.

The Equality Act explains that having **due regard** for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics.
- Taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people.
- Encouraging people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low.

It states that meeting different needs involves taking steps to take account of disabled people's disabilities. It describes fostering good relations as tackling prejudice and promoting understanding between people from different groups.

## The general equality duty and policy and decision-making

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Public authorities are required to have due regard to the aims of the general equality duty when making decisions and when setting policies. Each aim must be considered in turn: for example the obligation to have due regard to advancing equality is quite separate from the obligation to have due regard to eliminating discrimination.

**Understanding (or assessing) the impact of your policies and practices on people with different protected characteristics is an important part of complying with the general equality duty.** This can help you to consider whether the policy will be effective for all sorts of different people. For example, does a particular policy meet the needs of people with protected characteristics? Does it minimise disadvantages faced by them? You will need to ensure that you have sufficient information in order to be able to evaluate the impact effectively.

This approach can help you to understand the risk and extent of any adverse impact or potential unlawful discrimination. It can enable you to develop practical courses of action to advance equality and mitigate negative consequences before a proposed policy is adopted.

The general equality duty does not set out a particular process that public authorities are expected to follow. It is up to each authority to choose the most effective approach. This will vary depending on the size of the organisation, the functions they carry out, and the nature of the particular decision.

Having due regard to the aims of the general equality duty is about using good equality information and analysis, at the right time, as part and parcel of your decision-making processes.

Case law has established some principles that explain what having 'due regard' means in practice. These principles are set out more fully in the Essential Guide to the Public Sector Equality Duty and in the Technical Guidance on the Public Sector

Equality Duty. In summary, public authorities covered by the general equality duty must ensure that:

- Decision-makers are aware of the general equality duty requirements and place equality considerations at the centre of policy formulation, side by side with other considerations.
- Decision-makers understand that the duty falls on them personally. What they know and what they take into account is what matters – not what is in the mind of officials who report to them.
- Compliance with the general equality duty takes place before and at the time a particular policy is under consideration and when a decision is taken.
- Decision-makers consciously consider the need to do the things set out in the aims of the general equality duty as an integral part of the decision-making process. They must recognise it is not just a matter of 'box ticking'.
- Decision-makers have sufficient information to understand the effects of the policy, or of the particular decision, on the aims set out in the general equality duty.
- Decision-makers review policies or decisions if circumstances change (e.g. if the make-up of service users alters). This is vital as the duty is a continuing one.
- Decision-makers take responsibility for complying with the general equality duty with regard to all relevant functions. Responsibility cannot be delegated to external organisations that are carrying out public functions on their behalf.
- Decision-makers consciously consider the need to do the things set out in the aims of the general equality duty not only when a policy is developed and decided upon, but when it is being implemented.

# 3 | How to meet the equality duty in policy and decision-making

## What should be assessed?

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In order to have due regard to the aims of the general equality duty, you will need to understand the impact of your functions on equality. This includes your existing policies and any new policies under development.

**In this guide, we use the term ‘policy’ as shorthand for the full range of your policies, practices, activities and individual decisions.** This includes informal customs and practices. Take a proportionate approach to what you need to consider, mindful of your organisation’s size, resources and functions, and the importance of the policy to equality and good relations. The policies you will consider will usually fall into three main categories:

1. Organisational policies and functions (e.g. the stop and search procedures of a police force).
2. Key decisions (e.g. a health body considering cuts to psychiatric services).
3. Policies that set criteria or guidelines for others to use (e.g. a local authority setting criteria about school admissions).

For **new** policies, consider their potential impact on equality throughout the process of developing the policy. **You should not wait for information to be available on the actual impact** (i.e. when it is implemented) as this will prevent your assessment from influencing your policy development and decision-making. When data on the actual impact of your final policy does become available, you will need to establish whether your earlier assessment was correct, or whether refinements are necessary in light of the new information.

Not all policies can be expected to benefit everyone equally, particularly if they are targeted at addressing particular problems affecting one group of people, such as women with learning disabilities. You should also consider the interplay between the different protected characteristics.

Having 'due regard' to equality considerations across all of your functions may also involve assessing the impact on equality of decisions that are made together, such as a major review of services or when setting overall budgets. This would mean ensuring that you have sufficient information to understand the **cumulative** (or combined) impact of these decisions.

**Example** — A local authority is making changes to policies on the funding and delivery of four different service areas. These are: social care, day care, respite for carers, and community transport. Small changes to each of these policies may each disadvantage disabled people. Therefore, the cumulative impact of all the changes could have a significant impact on the ability of disabled people to live independently and participate in public life. Appropriate mitigating measures should be considered, with the aim of advancing equality of opportunity between disabled people and those who are not disabled.

You will also need to understand the impact on equality when implementing a policy that has been developed elsewhere, for example by a government department. While responsibility for the policy itself may rest with the department that developed it, you may have choices in how you implement it. Consider whether any mitigating measures or alternative ways of delivering your policies could minimise any negative impacts on people with different protected characteristics. If the policy originates with you, take steps to ensure that you meet your obligations under the general equality duty when the policy is implemented by other organisations.

## Timing of your assessment

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Your assessment should start early in the policy development process or at the early stages of a review. **Assessing impact on equality should not be a one-off exercise.** This is because the general equality duty is a continuing duty and policy contexts and other circumstances will change over time. Equality considerations are to be taken into account both when decisions are made and **after** policies are in place. There is no point in considering the impact of your policies on equality if your findings are not given active consideration in your policy development and decision-making processes. Considering and reflecting on equality matters should benefit both your policy design and the delivery of your services.

**Remember** — In the past, a number of public authorities assessed the impact on equality of their policies and practices at the end of the policy development process. In some cases this resulted in successful legal challenges. Undertaking assessments at this stage can lead to several problems:

- You will be unlikely to be able to demonstrate that you have had due regard to the aims of the general equality duty when decisions were made. This would leave you open to legal challenge.
- The policy may still lead to potentially discriminatory activity or adverse impacts on particular groups of people.
- There may be an opportunity to advance equality that is missed, so people with some protected characteristics do not benefit from the policy to the same extent that others do.
- The policy is not likely to be effective in achieving its aims if it hasn't taken into account the impact it will have.

### Who should undertake your assessment?

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Assessing the impact on equality should be a core part of policy making, in the same way that resources and risk are considered. It is most effective when it is integrated into day-to-day policy-making, business planning and other decision-making arrangements. Those responsible for particular functions should be aware of the general equality duty and consciously take it into account in their work. They should collate evidence of a structured attempt to focus on equality issues.

If you have a designated equality lead, they can provide useful expertise, but it is good practice for people across the organisation to take ownership of this work as an integral part of policy development. Staff will therefore benefit from clear advice and information about the approach they should take when assessing impact on equality in their day-to-day work. Remember that, overall, the duty rests with the decision-maker. What matters is what he or she took into account and what he or she knew when making a decision.

If an assessment of a function (or elements of it such as information gathering) are outsourced, it is important to remember that the public authority is legally accountable for any decisions that are made as a result.

## How should I assess the impact on equality and use the findings in my policy and decision-making?

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As stated earlier, there is no prescribed methodology for assessing the impact on equality. Developing your own method as an organisation can help you to take a consistent and proportionate approach. The important thing is that the method works for you and enables you to meet your legal obligations. If you develop a standard methodology, check it against available guidance, engage with stakeholders, and share ideas with relevant partner organisations. You should check that your method meets all the requirements of the general equality duty.

Although you do not need to use a template document called an 'equality impact assessment', you can choose to do so if you find this approach to be helpful to your equality work.

### **A good method:**

- Is integrated into mainstream policy development and decision-making.
- Has the backing and buy-in of senior staff (including sign-off).
- Draws on relevant equality information and the results of any engagement activity.
- Ensures timely and informed consideration of the aims of the general equality duty, and keeps a record of this.
- Records the reason for any decision that a policy has no relevance to the aims of the general equality duty.
- Requires decision-makers to consider taking steps to mitigate adverse impacts where they have been identified.
- Documents how information about the actual impact of the policy will be used to review the policy in future, if necessary.
- Is regularly reviewed to ensure that it is effective and up-to-date.

### **Suggested process**

The steps below are a suggested approach rather than a prescribed requirement. They are based on legal principles established by case law.

## a | **Prioritise your policies**

It is useful to check all your policies to establish their relevance to equality. Most public authorities have policies that are particularly important for advancing equality or fostering good relations; for example, grant-making programmes, school admissions and exclusions policies, health screening policies, stop and search policies, changes to service delivery (e.g. withdrawal or reduction of services), and recruitment or pay policies, are often relevant.

Policies that set quality standards for others to follow may also be important. Equally, most public authorities will have some policies which are not particularly relevant to equality; for example, a policy on when to check the temperature of fridges in a hospital. Some policies may be more difficult to judge. For example, licensing arrangements for clubs may appear to affect everyone in the same way. In practice, however, they may be highly relevant to the risk of violence towards women or young people. They may also have an impact on the good relations aim of the duty, for example in relation to their effect on lesbian and gay people or certain ethnic minorities.

The following questions can help you to determine relevance to equality. This is not an exhaustive list:

- Does the policy affect service users, employees or the wider community? The relevance of a policy to equality depends not just on the number of those affected but on the significance of the impact on them.
- Is it likely to affect people with particular protected characteristics differently?
- Is it a major policy, significantly affecting how functions are delivered?
- Will the policy have a significant impact on how other organisations operate in terms of equality?
- Does the policy relate to functions that have been identified through engagement as being important to people with particular protected characteristics?
- Does the policy relate to an area with known inequalities?
- Does the policy relate to any equality objectives that have been set by your organisation?

If you decide that a policy is not relevant to equality, you should be confident of your reasons for this. The fact that 'no information is available' is not adequate to justify a decision that a policy is not relevant to equality. Recording your reasons why a policy is not relevant will help you to increase transparency, encourage engagement and may assist in demonstrating compliance with the general equality duty.

To promote transparency, it is helpful to publish information about the equality dimensions of policies you regard as being relevant to equality. This will enable people to understand the decisions that you have taken, which may in turn help you to foster good relations between different groups.

### **b | Gather relevant information**

For policies that are relevant to equality, you should take steps to gather basic information to help you undertake your assessment. It is useful to bring together the key people who are likely to be involved in developing and implementing the policy. This includes external organisations if a policy is being developed in partnership. You may find it helpful to adopt the following approach.

First, establish how the aims of the policy relate to equality. Think about the purpose of the policy, the context in which it will operate, who it should benefit, and what results are intended. At this stage you can start to think about potential impacts on people with different protected characteristics. This would allow you to consider changing your policy aims in order to take better account of equality considerations.

**Example** — A public authority is developing its policy on staff leadership skills. The purpose of developing such a policy is to ensure that all staff gain appropriate training. It assesses the training needs of the staff, and analyses the available information. The assessment shows that there is a disproportionately low number of women at senior management level and that there is no targeted training available for female staff to gain the appropriate skills. Based on this, the public authority reviews its initial policy aims and decides to implement targeted management training for women staff. (This is lawful under the positive action provisions of the Equality Act 2010.)

Next, consider which aspects of the policy are most relevant to equality. This will help you to focus your attention on the most important areas, including the inter-relationship between policies.

**Example** — In developing a new housing strategy, a local authority identifies a number of different elements as being relevant to equality. It decides to focus on those areas when assessing the potential impact on equality. It looks at:

- take-up of housing services
- satisfaction rates and number and type of complaints
- supported housing provision
- homelessness rates and causes
- choice-based lettings
- availability and management of adapted housing
- Gypsy and Irish Traveller site provision
- staff training.

Think about which aims of the general equality duty and which protected characteristics your policy is most relevant to. It is important that you have appropriate and reliable information about the different groups sharing protected characteristics that are likely to be affected. Understanding the impact on different groups is a key step in identifying whether a policy might unlawfully discriminate.

Modern public services should be shaped by evidence-based policy-making, and using clear methods will help you to collect, analyse and present evidence about equality in a consistent way. This will in turn help you to develop and deliver better policies and services. The information that will be most useful will depend on the nature of the policy. In order to identify important impacts on people with different protected characteristics, it may be useful to look at:

- Comparisons with similar policies in other departments or authorities to help you identify relevant equality issues.
- Analysis of enquiries or complaints from the public to help you understand the needs or experiences of different groups of people.
- Recommendations from inspections or audits to help you identify any concerns about equality matters from regulators.
- Information about the local community, including census findings to help you establish the numbers of people with different protected characteristics.
- Recent research from national, regional and local sources that includes information on relevant equality issues.

- Results of engagement activities or surveys to help you understand the needs or experiences of people with different protected characteristics.
- Information from the public, and from voluntary organisations to help you understand the needs or experiences of people with different protected characteristics.

If you do not have equality information about people with particular protected characteristics, consider whether you need to fill information gaps. This could mean undertaking short surveys, or some engagement work. If it is not possible to collect this in time to inform your assessment, consider how you can increase your understanding in the short term before undertaking more robust research at a later date. This could mean, for example, meeting with stakeholders. The information that you collect at a later date will be valuable for your monitoring and review work. The information you gain from engagement with stakeholders will help you to understand the potential impacts of your policy on different groups.

Although tailored information collection may be needed from time to time, it has generally proved more efficient for equality information to be collected as part of your mainstream information collection and analysis. Establishing a reliable and up-to-date information resource that policy-makers can draw on and contribute to, is an effective way of achieving this.

**Tips for small organisations** — Smaller organisations can pool resources with other organisations to develop a shared database of evidence that is not sensitive or confidential, such as research reports or population statistics.

### **c | Analyse your equality information**

Bringing together your equality information and analysing it will enable you to make a judgement about the likely impact of the policy on equality. You may find it helpful to consider what questions will help you to understand the potential impact. For example, when reviewing a recruitment policy for disability equality, it would be useful to establish how many disabled people have applied for posts, how many were appointed, and at what grades. Other information may also be useful, such as how long people stay working for your organisation and why they leave.

An approach that you may find useful is to ask yourself the following:

- Do policy outcomes and service take-up differ between people with different protected characteristics?
- What are the key findings of any engagement you have undertaken?
- If there is a greater impact on one group, is that consistent with the policy aims?
- If the policy has negative impacts on people sharing particular characteristics, what steps can be taken to mitigate these effects?
- Is any part of the policy unlawful under the Equality Act 2010?
- Will the policy deliver practical benefits for certain groups?
- Does the policy miss opportunities to advance equality of opportunity and foster good relations?
- Do other policies need to change to enable this policy to be effective?

A proposed policy may be in breach of the Equality Act 2010 if it leads to direct discrimination, indirect discrimination, harassment or victimisation, or where there has been a failure to make a reasonable adjustment for disabled workers or service users. For guidance on the Equality Act 2010, please refer to the Commission's guidance and Codes of Practice on employment, goods and services, and equal pay. These are on our website.

Remember that assessing impact on equality is not simply about identifying, and mitigating or removing, negative effects or discrimination. It is also an opportunity to identify ways to advance equality of opportunity and foster good relations. This may involve building positive action measures into the delivery of your services or your employment policies, as permitted by the Equality Act 2010.

It may also be appropriate to consider also how you can tackle wider inequalities which your organisation is not solely responsible for causing, but which you can play an important role in addressing. For example, a school can have a positive impact on closing the gender pay gap by helping girls and boys to consider non-traditional subject and career choices.

Be wary of making overly general conclusions in your findings. For example, if you conclude that a policy will universally benefit all service users without any evidence to support that conclusion, it may be difficult for you to demonstrate compliance with the general equality duty.

Understanding the impact on equality will be easier for existing policies, because you can base your evaluation on evidence of actual impact, and make a reasonable and informed judgement about whether the policy is having positive or negative consequences for particular protected characteristics. This will enable you to decide whether you need to amend your policy or introduce measures to mitigate adverse impacts on certain groups.

#### **d | Make your decision**

Your decision may lead to your policies benefitting certain groups of people rather than others. A strong evidence base and transparency about how you reached your decision should help you to explain and justify your decisions internally and externally. Having your decisions and rationale easily accessible to members of the public should also help to counter any misconceptions.

As noted above, the courts have recognised that the duty places equality considerations, where they arise, at the centre of policy development side by side with other pressing issues such as financial considerations. The weight given to equality issues should be proportionate to the significance of the policy to the aims of the duty. Generally, where the policy is likely to have an adverse impact on large numbers of people who share a protected characteristic, greater weight should be given to the aims of the general equality duty. When the number of people affected is small, the weight given to equality considerations is not necessarily less if the policy would have a serious impact on the individuals concerned.

Part Two of this guidance summarises the principles from case law that explain what ‘due regard’ means in practice. Departure from these principles may make a decision vulnerable to legal challenge. If a decision-maker gives disproportionate weight to factors other than equality, this may also be challenged if the decision is irrational or based on irrelevant considerations or facts.

#### **e | Implement your decision**

As a result of your assessment, your findings may lead you to take one of the following courses of action:

- **Continue the policy** – Your assessment demonstrates that the policy shows no potential for discrimination and that you have taken a proportionate approach to advancing equality of opportunity and fostering good relations between people with different protected characteristics. You should document the reasons for this conclusion and the information you used to make this decision.

- **Justify and continue the policy** – Ultimately, there may be other factors (such as other policy aims or financial constraints) which make it reasonable for you to decide to adopt the policy despite its adverse equality impact. You can choose this option where your policy does not unlawfully discriminate, or where any potential discrimination is indirect and can be objectively justified. You need to take into account the possibility that your decision could be challenged, and consider whether you would be able to satisfy a court that you had due regard to the aims of the general equality duty when you reached your decision. It is particularly important that you document the reasons for your decision and the evidence that supported these reasons.
- **Change the policy** – This involves making changes to the policy to ensure it does not adversely affect certain groups of people, or miss opportunities to affect them positively. **This can involve taking steps to mitigate adverse impacts, or to bolster or tailor positive ones.** It is lawful under the Act to treat people differently in some circumstances, such as putting in place single-sex provision where there is a need for it or adopting proportionate positive action measures that benefit people sharing protected characteristics. Document the reasons for the steps you are adopting and the information you used to make this decision.
- **Stop the policy** – If analysis of the policy shows a high probability of unavoidable discrimination which (where the law allows it) cannot be objectively justified, consider developing a new approach in order to avoid legal challenges under the Equality Act 2010. Document the reasons for this decision and the information you used to make it.

When decisions have been made, we recommend that a senior manager/board member signs them off, taking full account of all the equality considerations. When you have decided on your next course of action, consider sharing information about the findings of your assessments when engaging with stakeholders about the policy, and invite their views.

## **f | Document your findings and decisions**

Documenting the impact of your policy on equality and the decisions you take will enable you to show that the general equality duty is being met.

**If you are challenged, it will be difficult to demonstrate compliance without an audit trail of how you made your decisions and what information you took into account.**

*Continued...*

You might like to keep a note of key pieces of information, such as:

- Your assessment of the relevance of the policy to the different aims of the general equality duty.
- Your assessment of the actual or potential impact of the policy, with regard to the aims of the general equality duty.
- What equality information you drew on (including from engagement, where relevant) in developing the policy and assessing its likely impact on equality.
- How this information informed your decision-making, and whether changes were made to your proposals as a result of your assessment of their impact.
- How you will review the actual impact after implementation of the policy.

### g | **Publish your findings and decisions**

Listed authorities – ie those subject to the specific duties – need to publish equality information to demonstrate compliance with the general equality duty. **In practice, documentation about your assessments of impact on equality is likely to be a key component of this information.** You may also wish to publish records of your policy decisions. These records need not have any particular format. However, you may find it easier to have a structured way of publishing both the findings of impact on equality, and the decisions you made, which links with your wider publication of policies and equality information.

We recommend that you publish some records of your equality considerations alongside the relevant policy. It is useful to do this before a policy is finalised so that members of the public can engage with you on your findings. Publication should be proportionate to the matter in hand. For example, information about the equality implications of national policies on people with different protected characteristics is likely to be published at various stages of policy development. However, a school proposing changes to a school uniform policy may find it sufficient simply to include details of the findings of its assessment along with any other information sent out to parents and carers.

### h | **Monitor actual impact and review policies**

**Assessing the impact on equality is an ongoing process that does not end once a policy has been agreed or implemented.** Your assessment will have helped you to anticipate and address the policy's potential impact on different groups. However, the actual impact of the policy will only be known once it has been

introduced. The experience gained through implementation can be used to consider any possible adjustments to the policy.

You may find that you want to consider revising the policy if unexpected negative impacts occur. Other factors that could suggest the need to make adjustments might include a change in the area demographics, the availability of alternative services or the emergence of new ways to reduce adverse impact. You may find it helpful to set out when the policy will be reviewed. Issues that might be considered include:

- How and when you will measure the impact of the policy.
- When the policy will be reviewed and what could trigger an early revision.
- Who will be responsible for monitoring and review.
- What type of information is needed for monitoring and when it will be analysed.
- How to engage stakeholders in implementation, monitoring and review.

## 4 | Summary

The following actions can help public authorities give proper consideration to the aims of the general equality duty:

- **Assessing impact on equality should be an integral part of policy development and decision-making.** Good, timely considerations will lead to better-informed decision-making and ultimately to better policies.
- Without good evidence, assessing impact on equality will be difficult to achieve.
- It is best to focus on identifying and understanding how a policy might affect people with particular protected characteristics differently.
- You should have due regard to the need to make changes that you have identified as necessary to meet different people's different needs, with a view to removing or mitigating negative impacts and enhancing positive ones.
- The time and effort involved should be in proportion to the importance of the policy to advancing equality of opportunity and fostering good relations.
- Engagement with employees, service users, trade unions and others can provide useful evidence for your decision-making.
- **You are strongly advised to document how you considered the impact of your policy, and how that informed your decision-making.**
- It is good practice to evaluate the effectiveness of your approach and amend it, where required.

# Contacts

This publication and related equality and human rights resources are available from the Commission's website: [www.equalityhumanrights.com](http://www.equalityhumanrights.com)

For advice, information or guidance on equality, discrimination or human rights issues, please contact the Equality Advisory and Support Service, a free and independent service.

Website [www.equalityadvisoryservice.com](http://www.equalityadvisoryservice.com)

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