



## A Practical Guide to undertaking Equality Impact Assessments

This document is available in other formats upon request

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|------------------|--|
| Document Purpose | To provide a systematic process to ensure that BBSRC and its sponsored institutes do not discriminate against particular groups, and where possible promote equal opportunities. |
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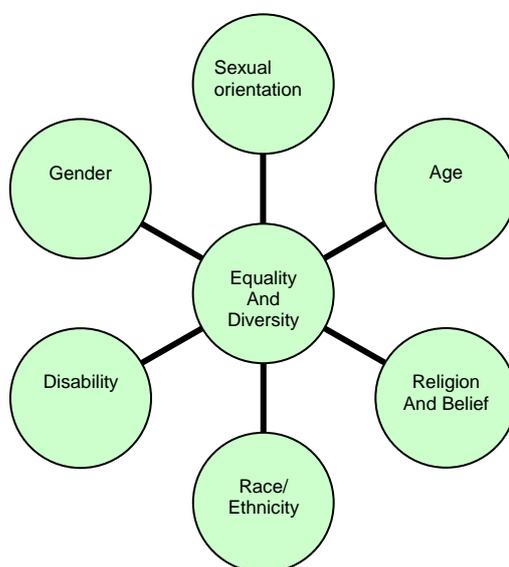
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## 1. What is an Equality Impact Assessment?

The purpose of an Equality Impact Assessment (EIA) is to make sure the organisation's activity and services do not discriminate, and that where possible they promote equal opportunities. An EIA can be undertaken on new or existing services, strategies, policies, working practices and procedures (hereafter referred to as policy or policies).

An EIA is a way to make sure everyone thinks about the likely impact of their work on different groups of people. An EIA involves anticipating the consequences of policies and projects on different groups, making sure that, as far as possible, any negative consequences are eliminated or minimised and opportunities for promoting equality are maximised.

The EIA will cover the six key strands of equality and diversity:-



We are required to carry out equality impact assessments to meet our legal obligations:-

- The Equality Act (2006) states that all publicly funded organisations must impact assess new policies as they are developed, as well as all existing policies.
- Equality Impact Assessments are a specific duty highlighted in the Race, Disability and Gender Equality Schemes which place a general duty on public authorities to:-

- Eliminate unlawful discrimination
- Promote equality of opportunity
- Promote good relations between people from different groups

BBSRC's current equality schemes can be found at:-

[http://www.bbsrc.ac.uk/organisation/policies/employment/race\\_equality\\_scheme.pdf](http://www.bbsrc.ac.uk/organisation/policies/employment/race_equality_scheme.pdf)

[http://www.bbsrc.ac.uk/organisation/policies/employment/disability\\_equality\\_scheme.pdf](http://www.bbsrc.ac.uk/organisation/policies/employment/disability_equality_scheme.pdf)

[http://www.bbsrc.ac.uk/organisation/policies/employment/gender\\_equality\\_scheme.pdf](http://www.bbsrc.ac.uk/organisation/policies/employment/gender_equality_scheme.pdf)

An EIA is a risk assessment of inequality and discrimination, and assists in finding out whether different groups of people are, or could be, disadvantaged by a policy. It involves examining new or existing policies and their impact on the equality groups. The aim is to:-

- Identify any negative impact and ensure that as far as possible these are minimised
- Ensure that opportunities for promoting equal opportunities are maximised
- Identify actions to remove any negative impacts e.g. inequalities in career progression for employees.

The EIA process should form part of the normal policy making process. Everyone involved in policy development and implementation should be aware of the need to undertake impact assessments as a core and ongoing part of their work.

Those approving a policy will be expected to seek assurance that an EIA has been undertaken before authority is given to implement the policy.

## 2. Why do an Equality Impact Assessment?

The Equality Impact Assessment process will help you to:-

- Think carefully about the likely impact of new or existing policies on different equality groups
- Develop policies that focus on positive outcomes and solutions
- Identify what is working well, in addition to what needs improving
- Encourage greater openness and involvement in policy-making
- Develop good practice
- Help to avoid claims of unlawful discrimination.

An EIA should be carried out on new or existing services, strategies, policies or practices. You are required to assess anything (formal or informal) that has an impact on people.

## 3. What types of impact are there?

- a) An impact that will have a **positive** effect on an equality group(s), or improve equal opportunities, and/or relationships between different groups.

**Example one**

An organisation identifies that it has low levels of interest in vacancies among some racial groups. To tackle these findings the organisation decided to:-

- Send information about what it does and the career opportunities to community centres, in various languages and formats.
- Review its recruitment and selection criteria to ensure that there were no barriers to appointment for people from different cultural backgrounds.

**Example two – Positive Action**

A targeted management development programme for women who are under-represented at senior management level. Positive action allows all groups to compete on equal terms with other applicants; selection itself is based on merit.

b) An impact which will have a **negative** effect on one or more equality groups.

**Example one**

A policy that the organisation will only accept external complaints in writing would have a negative impact on some people. This may include people with learning disabilities, people that do not use English as their first language and people for whom written communication is not a strong cultural norm such as British Sign Language users.

**Example two**

An event that was held in a building with no induction loop facilities would have a negative or adverse impact on attendees with a hearing impairment.

c) An impact which is **neutral** and has no impact on particular groups – no one group is advantaged or disadvantaged.

#### 4. Who should be the focus of the Equality Impact Assessment?

The EIA process needs to identify all people who may be at risk of discrimination, less favourable treatment or social exclusion for whatever reason. This will include the six equality groups listed below:-

- **Age** - e.g. consider what issues there are for the employment process, training, and applications for grants, studentships and fellowships.
- **Disability** - e.g. consider what issues there are around access to building and services, careers information and employment opportunities, how we ask for and provide information.
- **Religion and belief** - e.g. consider what issues there are for the employment process and training, how we organise work and take into account religious holidays, cultural issues and customs.

- **Gender** - e.g. consider what issues there are regarding employment and career progression opportunities for women taking and returning from maternity leave, people with caring responsibilities, work-life balance issues.
- **Race/ethnicity** - e.g. consider whether there are barriers to employment and progression, how and where information is provided, cultural issues and customs.
- **Sexual orientation** - e.g. consider what issues there are for the employment process and training.

## 5. The process for conducting an Equality Impact Assessment (EIA)

An EIA should be carried out on all new and existing policies that are of relevance to the promotion of equal opportunities (see glossary).

All new policies should at least undergo an initial assessment for potential relevance to equality.

Given that the principles of relevance and proportionality apply, the time and resources given to impact assessment and consultation will differ according to the relevance of the function and the policy to equality. For example, the level of relevance will inform decisions about the extent of data collection and analysis around a proposed policy and/or how much consultation is undertaken.

### Tips on doing an EIA

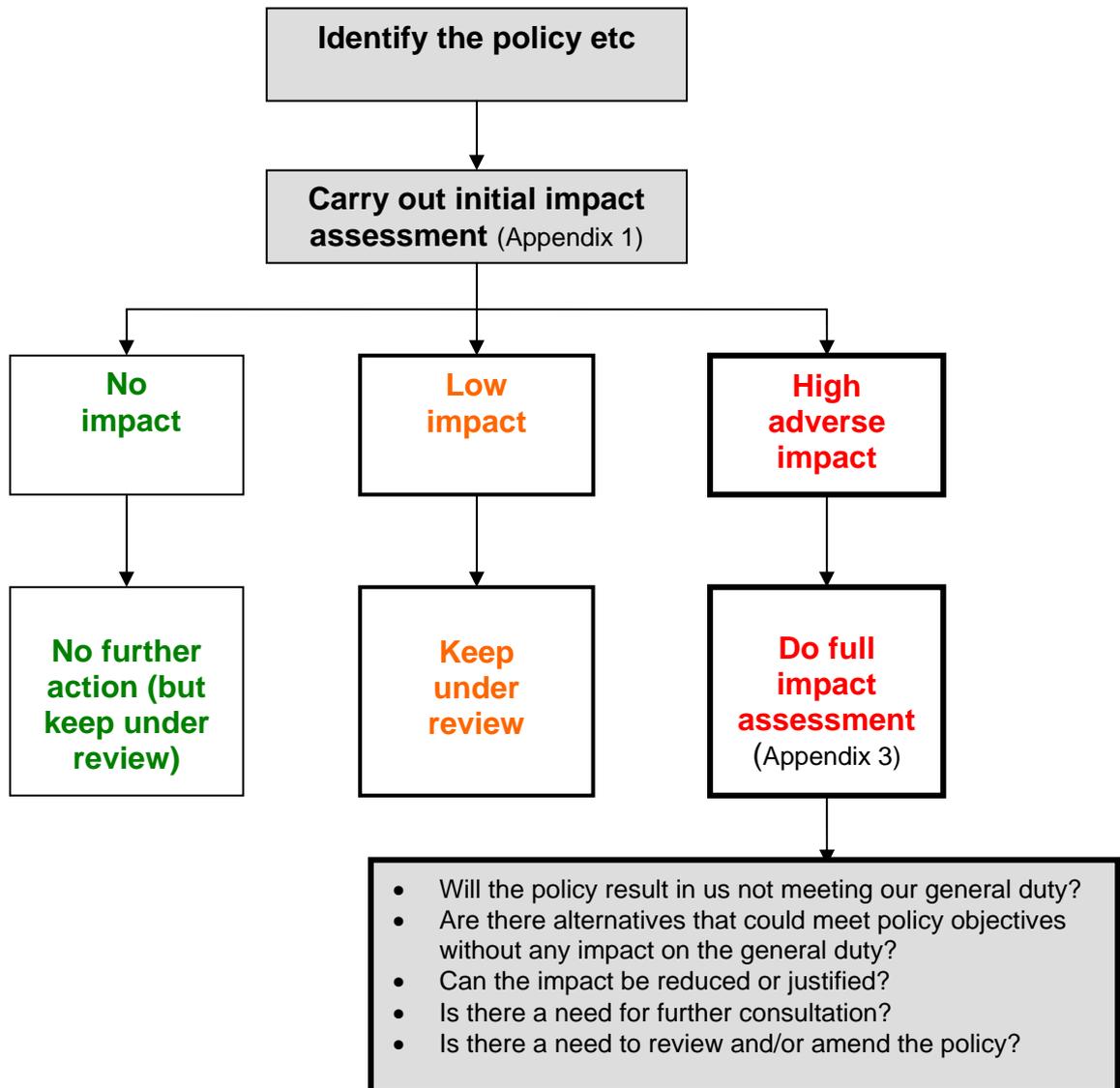
- The EIA is designed to be a positive but challenging process. It is not an exact science and a common-sense approach is required.
- All plans should allow time to make changes to a policy as identified by the EIA; it should not be a last minute check.
- The aim should be to take the perspective of someone in the equality groups when carrying out an EIA.

Completing the EIA is like undertaking a risk assessment. It involves predicting and assessing what the implications of a policy will be on a wide range of people. A good understanding of the principles of direct and indirect discrimination (see glossary) will assist you when completing an EIA. It is best done with the involvement of staff in the area of work, division etc; completing the form with colleagues can provide a different perspective. Advice may also be sought from the Institute HR Manager or HR Group (HRG) at BBSRC Office. Sometimes the best way to find out if a policy or service is likely to impact on equality groups is to directly consult representatives of those groups or relevant specialist organisations.

The EIA is done in two stages:-

1. Initial Impact Assessment (screening)
2. Full Equality Impact Assessment.

Equality Impact Assessment Flow Chart



## 5.1 Prioritising

All existing policies that are of relevance to the promotion of equal opportunities (see glossary) must be impact assessed. However, in liaison with Institute HR managers, we have identified a list of 'priority' functions for which, in the first instance, all existing policies and services will be impact assessed (Appendix 1). In deciding priorities for action, the most urgent attention will be given to BBSRC functions or policies:-

- which are relevant to the general duties to eliminate discrimination and promote equality of opportunity;
- where substantial evidence exists that individuals from minority groups could be affected (adverse impact); and
- there is significant public concern.

## 5.2 Stage 1 - Initial Equality Impact Assessment (Appendix 2)

For each function which has been identified the first stage is to identify all the policies that applies to the function and which help to deliver the key services.

Once you have identified the policies you may find it helpful to prioritise them into high, medium and low risk categories. In so doing, you should consider the aim and purpose of the policy and how it might affect people on a day-to-day basis, i.e. will individuals or groups of people be unable to comply with the policy in any way?

### Example of prioritisation

|        |   |
|--------|---|
| High   | Recruitment and Selection                   |
| Medium | Performance and Personal Development Review |
| Low    | Payroll                                     |

Using the template at Appendix 2 you should screen each policy for potential direct/indirect impact on the equality groups and relevance to the equality duty. As a general guide if the policy has consequences for employees or others (e.g. applicants) it is likely to be relevant and require a full impact assessment. This is because you cannot know whether or not a policy is having a disproportionate effect on some groups unless you compare the outcomes. It is not enough to say that because a policy is applied uniformly to all groups that it is fair and equal. Applying a policy consistently may result in different outcomes for different groups; this should be assessed during the full impact assessment.

You may want to form a small group initially or appoint a couple of people to carry out the screening work. Where you share responsibility for policy development or implementation with another department, it may be useful to undertake joint screening.

Before starting the initial EIA determine the aim, objective(s) and expected outcomes of the policy.

### **Example - Performance and Personal Development Review**

**Aim:** To ensure all staff take part in the annual appraisal process  
**Objective:** All staff use a consistent approach when conducting appraisals  
**Outcome:** 100% staff appraised  
Appraisers have the right skills to conduct appraisals  
All staff understand the purpose of appraisals

1. Is there any evidence that the policy has a different impact on particular groups (e.g. complaints, feedback on the working of the policy)?
2. Is the different impact an adverse (negative) one?
3. Is there evidence that the policy is discriminatory, or perceived to be discriminatory?
4. Is the policy damaging to good relations between different groups (e.g. race relations) or failing to promote good relations?

The following may help you to address the above questions:-

- Using existing monitoring and management information (e.g. on recruitment and selection, complaints of unfair treatment from staff or applicants for grants/studentships)
- Oversight by a project board or other committee
- Review by others, for example, an academic researcher
- Consultations (formal or informal) with those affected (e.g. employees, students).

### **Example of adverse impact**

Analysis of statistics shows that fewer black and minority ethnic (BME) staff and women gain promotion compared to their white male counterparts. A judgement of adverse impact is made, and investigations begin as to the reasons why, along with steps that need to be taken to address it.

If you find that a policy is not equality relevant, or has no or little impact, you do not need to take any further action, although you should keep this under review (see paragraph 6).

If the initial impact assessment shows an adverse impact on one or more of the equality groups a full EIA will be required.

### **5.3 Stage two - Full Equality Impact Assessment (Appendix 3)**

If the initial assessment shows that the policy is likely to have an adverse impact on some groups, a full EIA is required using the template at Appendix 3. This is based on guidance produced by the Commission for Racial Equality but has been amended to allow the impact assessment to cover all the six equality groups. When carrying out the impact assessment you will need to start on those areas which the initial assessment showed as having a potentially high adverse impact. This will allow you to focus effort and resources in order of importance and equality relevance.

The key steps to undertaking a full impact assessment are:-

1. Identify the aims of the policy - what is its purpose, who will benefit from it and how, who will implement it?
2. Consider the evidence - e.g. employment data, satisfaction surveys, complaints/grievances, public surveys, focus groups, demographic data and census findings, local labour force statistics.
3. Assess likely impact - are there any disparities in impact and if so are they adverse or amount to unlawful discrimination.
4. Consider alternatives
  - (i) Will the policy result in BBSRC and/or the institute not meeting its general duty under the Act?
  - (ii) Are there alternatives that could meet the policy objectives without any impact on the general duty?
  - (iii) Can the adverse impact be reduced or justified?
  - (iv) Is there a need for further consultation?
  - (v) Does the policy need to be reviewed and/or re-written?
5. Consult interested parties - e.g. stakeholders, employees, users, applicants (e.g. via satisfaction surveys), networks, Trades Unions etc.
6. Decide whether to adopt the policy.
7. Set up arrangements to monitor and review the policy and its impact.
8. Send the assessment results to HRG, who will arrange for the results to be published.

It is important to remember that it could take a few weeks or months to complete an assessment, depending on the nature of the policy, how much data you need, and the extent of consultation required. It is therefore important to plan each stage of the process in advance.

### **6. Future monitoring**

Equality impact assessments are not a one-off process. All policies, once in operation, should be monitored and regularly reviewed for any evidence of adverse impact on particular groups. You will need to ensure that any existing monitoring arrangements in place are suitable for this purpose or set up new arrangements as required.

You should consider the following questions when planning how to monitor policies:-

1. How will the policy be monitored after implementation?
2. How often will it be reviewed?

3. Who will be responsible for monitoring?
4. Are there systems already in place that can generate the information needed to monitor the policy?
5. Can existing monitoring procedures be adapted to collect the additional information needed in relation to this policy?
6. What performance indicators or targets will be used to monitor the effectiveness of this policy?
7. How will the information obtained from monitoring be fed back into the policy and published more widely?

## **7. Reporting Arrangements**

We are required to publish the results of impact assessments, consultation and monitoring. Send copies of all completed screening forms and full EIAs to the local HR Manager and HRG. HRG will monitor returns for completeness and consistency, and arrange for the assessments to be published on the BBSRC web site.

If you require further explanation about this guidance, please contact the institute HR Manager or a member of HRG.

## PRIORITY FUNCTIONS

| Area of Work  | Institutes or BBSRC Office | Functions Responsible for policy or services       | Priority with regards to equality |
|---|----------------------------|--|-----------------------------------|
| Areas Responsible For Developing and Reviewing Policy | BBSRC Office               | CSG Science Policy (Delivery Plan/ Strategic Plan) | *                                 |
|   |                            | CSG Knowledge Transfer Policy                      | *                                 |
|   |                            | CSG Internal Transfer Policy                       | *                                 |
|   |                            | CSG Information Management Policy                  | *                                 |
|   |                            | CSG Evaluation Policy                              | *                                 |
|   |                            | CSG External Relations Unit – Policy               | *                                 |
|   |                            | STG Science Policy                                 | *                                 |
|   |                            | Finance Policy                                     | *                                 |
|   |                            | HRG Policy   | *                                 |
|   | BBSRC Institutes           | Executive or Centre Management Board               | HIGH                              |
|   |                            | Strategic Development Section                      | HIGH                              |
|   |                            | Contracts & tendering                              | MEDIUM                            |
|   |                            | Institute Secretariat                              | HIGH                              |
| Areas Responsible For Service Design and Delivery     | BBSRC Office               | CSG Delivery of Knowledge Transfer Agenda          | *                                 |
|   |                            | CSG Delivery of International Portfolio            | *                                 |
|   |                            | CSG Delivery of Evaluation Portfolio               | *                                 |
|   |                            | STG Delivery of Science Portfolio                  | *                                 |
|   |                            | STG Funding of grants and awards                   | *                                 |
|   |                            | STG Delivery of Industrial Interface               | *                                 |

|  |                  |   |        |
|--|------------------|---|--------|
|  |                  | Finance Delivery                            | *      |
|  |                  | HRG Delivery of HR Services                 | *      |
|  |                  | HRG Funding of studentships and fellowships | *      |
|  |                  | RCPO Services                               | *      |
|  | BBSRC Institutes | Finance                                     | LOW    |
|  |                  | Computing                                   | LOW    |
|  |                  | HR  | HIGH   |
|  |                  | Library & Information Services              | LOW    |
|  |                  | Building services (access)                  | MEDIUM |
|  |                  | Purchasing                                  | LOW    |

\* *Priority to be determined*



Please show on the table below which groups may be affected by the policy etc:

| Equality Group                     | Positive Impact | Negative Impact |      | No or neutral impact | Reasons/Evidence |
|------------------------------------|-----------------|-----------------|------|----------------------|------------------|
|                                    |                 | High*           | Low# |                      |                  |
|                                    |                 | High*           | Low# |                      |                  |
| Gender (male, female, transgender) |                 |                 |      |                      |                  |
| Sexual Orientation                 |                 |                 |      |                      |                  |
| Minority ethnic groups             |                 |                 |      |                      |                  |
| Age                                |                 |                 |      |                      |                  |
| Disabled people                    |                 |                 |      |                      |                  |
| Religion or belief                 |                 |                 |      |                      |                  |

\* High - there is significant evidence of adverse impact or potential for adverse impact. The policy etc has consequences for or affects significant numbers of people and/or has the potential to make a significant contribution to promoting equality

# Low - there is anecdotal or little evidence to suggest adverse impact. The policy etc operates mainly within a small unit and affects few people.

**If the negative impact of the policy etc is high for any equality group, you must complete a full impact assessment (Appendix 3) as soon as possible.**

**If the negative impact of the policy etc is low please complete the questions below.**

What actions will you take to minimise the impact? Full details of your actions should be shown on the action plan at Appendix 4 and attached to this form

**Please return a copy of this form (and action plan if appropriate) to the institute HR Manager and HRG for quality control and compliance monitoring purposes. HRG will arrange for copy of impact assessments to be published on the BBSRC website.**

**Full Equality Impact Assessment Form**

|  |  |
|--|--|
| Name of policy/strategy/service development/working practice/procedure (name and brief description)? |  |
| Directorate/functional area:   | Is this a new or existing policy etc?                                    |
| Name of individual completing assessment:<br><br>Job title:  | Contact telephone number:  |
| Date assessment completed:   | Summary of Initial Impact Assessment (please attach a copy of the form): |

| Step                      |  | Comments/Evidence |
|---------------------------|--|-------------------|
| 1. Aims of the policy etc | What is the purpose of the policy etc?   |                   |
|                           | Who will implement the policy etc?   |                   |
|                           | Who will benefit?  |                   |
|                           | How will they benefit?   |                   |
|                           | What are the expected outcomes?  |                   |
|                           | How are these measured?  |                   |
| 2. Consider the evidence  | <p>What quantitative and qualitative information is available (e.g. from HR, trade unions, surveys, feedback, complaints/grievances, research reports, demographic data, census findings, local labour force statistics)</p> <p>If there is no or insufficient data available, how will you obtain the information you need (e.g. new survey, focus group)</p> |                   |

|                          |   |  |
|--------------------------|---|--|
| 3. Assess likely impact  | Does the data indicate a possible adverse impact on some groups?  |  |
|                          | Could the disparities between groups be explained by other factors (other than those related to for example race, gender)?  |  |
|                          | Could the policy etc lead to unlawful direct discrimination? (If so the policy etc must be abandoned and you will need to look for different ways of achieving the policy etc aims) |  |
|                          | Could the policy etc lead to unlawful indirect discrimination? If so, is it justifiable?  |  |
|                          | Could the policy etc damage relations between different groups?   |  |
| 4. Consider alternatives | Will the policy etc result in BBSRC and/or the institute not meeting the general duty?  |  |
|                          | Are there alternatives that could meet the policy etc aims/objectives without any impact on the general duty or different groups? If so state what alternative method will be used. |  |
|                          | Can the adverse impact be reduced or justified?   |  |
|                          | Is there a need for further consultation?   |  |
|                          | Does the policy etc need to be reviewed and/or amended/re-written?  |  |

|                               |  |  |
|-------------------------------|--|--|
|                               | What, if any changes have been made to the policy etc?   |  |
| 5. Consult interested parties | Which groups are affected by the policy etc?   |  |
|                               | Which organisations and individuals are likely to have a legitimate interest in the policy etc?                  |  |
|                               | What methods of consultation are most likely to succeed in attracting the people you want to reach?              |  |
|                               | Have other departments held consultations, the results of which you could use?                                   |  |
|                               | Are there representatives of groups you could consult with?  |  |
|                               | Have previous attempts to consult particular groups been unsuccessful? If so why and how could this be overcome? |  |
|                               | If applicable, have you made resources available to reach groups that have previously been hard to reach?        |  |
|                               | What consultation have you undertaken?   |  |
|                               | How will you make the consultation information available?  |  |

|   |   |  |
|---|---|--|
| 6. Decide whether to adopt the policy etc | What does the evidence collected show about the impact of the policy etc on different groups?   |  |
|   | Is the policy etc likely to make it difficult to promote equality and/or good relations between different groups?   |  |
|   | Can the policy etc be amended or additional measures taken so that it achieves its aims without any adverse impact? If so, the action plan at Appendix 4 should be completed and attached |  |
|   | How have you weighed up all the factors?  |  |
|   | What are the reasons for your decision whether or not to adopt the policy etc?  |  |
|   | If this is a new policy etc, how should it be implemented (include any recommendations for a pilot, training and monitoring)?   |  |
| 7. Monitoring arrangements                | How will the policy etc be monitored?   |  |
|   | What data will be collected and how often will it be analysed?  |  |
|   | Who will be responsible for monitoring?   |  |
|   | How often will the policy etc be reviewed and by whom?  |  |

|                               |   |  |
|-------------------------------|---|--|
|                               | How will any concerns be taken into account in any review of the policy etc?  |  |
| 8. Publish assessment results | Send a copy of this impact assessment form to HRG for quality control and compliance monitoring purposes. HRG will also arrange for a copies of the impact assessment results to be published on the BBSRC website. If any areas are unclear or require more detailed information, a member of HRG will contact you before the assessment is published. |  |

**Please return a copy of this form to the institute HR Manager and HRG for quality control and compliance monitoring purposes. HRG will also arrange for copies of impact assessments to be published on the BBSRC website.**

**Equality impact assessment action plan**

Please list below any recommendations for action that you plan to take as a result of an impact assessment.

| <b>Policy etc to be addressed</b> | <b>Action required</b> | <b>Person Responsible</b> | <b>Timescale for completion</b> | <b>Action taken</b> | <b>Comments</b> |
|-----------------------------------|------------------------|---------------------------|---------------------------------|---------------------|-----------------|
|                                   |                        |                           |                                 |                     |                 |
|                                   |                        |                           |                                 |                     |                 |
|                                   |                        |                           |                                 |                     |                 |
|                                   |                        |                           |                                 |                     |                 |

Name: \_\_\_\_\_ Date \_\_\_\_\_

**Please return a copy of this form to the institute HR Manager and HRG for quality control and compliance monitoring purposes. HRG will also arrange for a copies of impact assessments to be published on the BBSRC website.**

# GLOSSARY

## **Equality**

Equality is about creating a fairer society where everyone can participate and has the opportunity to fulfil their potential. It is mostly backed by legislation designed to address unfair discrimination based on membership of a particular group.

## **Diversity**

Diversity is about recognising and valuing difference in its broadest sense. It is about creating a culture and practices that recognise, respect, value and harness difference for the benefit of all.

Equality and diversity are interdependent. There is no equality of opportunity if difference is not recognised and valued.

## **Differential impact**

Suggests that a particular group has been affected differently by a policy, in either a positive, neutral or negative way

## **Direct discrimination**

Is when someone is treated less favourably than others, on the grounds of their age, disability, gender, race, religion or belief, or sexual orientation. There is no justification for direct discrimination – this is unlawful discrimination.

## **Indirect discrimination**

Is when an a provision, criterion or practice is applied equally to everyone but can only be met by a considerably smaller proportion of people from a particular group, and which is to the detriment of a person from that group, and the requirement cannot be justified as a proportionate means of achieving a legitimate aim.

## **Equality Groups**

The six equality groups relate to race, age, disability, gender, religion and belief, and sexual orientation.

## **General Duty**

All public organisations are required, when carrying out their functions, to have regard to the need to:

- eliminate unlawful discrimination and harassment; and
- promote equality of opportunity between different groups (e.g. men and women, different racial groups, disabled and non-disabled people).

In addition there are specific duties on public organisations, which includes the requirement to carry out impact assessments.

## **Monitoring**

A process for collecting, storing and analysing data.

## **Negative impact**

This is where an equality group(s) could be disadvantaged.

## **Policy**

Policies include strategies, service developments, working practices and procedures.

**Objectives**

What the policy is trying to achieve; what the expected outcomes are. E.g. the aim of the recruitment and selection policy is to appoint the best person for the job.

**Outcome**

What the actual results of the policy are.

**Positive impact**

Taking a range of lawful actions to promote the prospects for equality groups who may face, or have faced, inequalities in employment opportunities

**Relevance**

Relevance means 'having implications for' (or affecting) the general duty. A function or a policy etc will be relevant to equality, if it has, or could have, implications for promoting equality. Relevance is about how far a function or policy affects people - as members of the public and as employees of the organisation. As a general guide, a policy, procedure or strategy that has consequences for staff, students, members of the public etc, is likely to be equality relevant. This is because you cannot know whether the policy is having a disproportionate effect on some groups unless you compare the outcomes for different groups. It is not enough to say that because the policy is applied uniformly to all groups that is it fair and equal. Applying a policy consistently may result in different outcomes for different groups. Using monitoring data is really the only way to assess what the outcomes are.